



# **AGENDA**

## **Ordinary Council Meeting Wednesday, 26 March 2025**

**Date: Wednesday, 26 March 2025**

**Time: 10.30 am**

**Location: Maniototo Stadium, 1 Dungannon Street,  
Ranfurly 9332**

(A link to the live stream will be available on the Central Otago District Council's website.)

**Peter Kelly  
Chief Executive Officer**



Notice is hereby given that a Council Meeting will be held in Maniototo Stadium, 1 Dungannon Street, Ranfurly 9332 and live streamed via Microsoft Teams on Wednesday, 26 March 2025 at 10.30 am. The link to the live stream will be available on the Central Otago District Council's website.

## Order Of Business

<b>1</b>	<b>Karakia.....</b>	<b>5</b>
<b>2</b>	<b>Apologies .....</b>	<b>5</b>
<b>3</b>	<b>Public Forum.....</b>	<b>5</b>
<b>4</b>	<b>Confirmation of Minutes .....</b>	<b>5</b>
	Ordinary Council Meeting - 26 February 2025.....	7
<b>5</b>	<b>Declarations of Interest.....</b>	<b>18</b>
	25.4.1 Declarations of Interest Register .....	18
<b>6</b>	<b>Community Board Chair Update .....</b>	<b>22</b>
	25.4.2 Community Board Chair Update .....	22
<b>7</b>	<b>Reports .....</b>	<b>23</b>
	25.4.3 Proposed Wastewater Environmental Performance Standards.....	23
	25.4.4 Local Water Done Well - Admitting Timaru District Council to the Agreement.....	76
	25.4.5 Managing Unreasonable Complainant Conduct .....	82
	25.4.6 Draft Three-Year Internal Audit Programme .....	116
	25.4.7 2024/25 Organisational Business Plan: Second Quarter Results.....	136
	25.4.8 Order of Candidate Names on Voting Papers for the 2025 Triennial Council Elections.....	145
<b>8</b>	<b>Mayor's Report.....</b>	<b>148</b>
	25.4.9 Mayor's Report.....	148
<b>9</b>	<b>Status Reports .....</b>	<b>150</b>
	25.4.10 March 2025 Governance Report.....	150
<b>10</b>	<b>Community Board Minutes .....</b>	<b>211</b>
	25.4.11 Minutes of the Teviot Valley Community Board Meeting held on 5 February 2025 .....	211
<b>11</b>	<b>Committee Minutes.....</b>	<b>217</b>
	25.4.12 Minutes of the Audit and Risk Committee Meeting held on 14 February 2025 .....	217
<b>12</b>	<b>Date of the Next Meeting.....</b>	<b>224</b>
<b>13</b>	<b>Resolution to Exclude the Public.....</b>	<b>225</b>
	25.4.13 Manuherekia Valleys Community Hub Construction Tender Award .....	225
	25.4.14 Fitch Credit Rating .....	225
	25.4.15 Risk Register Update .....	226
	25.4.16 March 2025 Confidential Governance Report.....	226

25.4.17 Confidential Minutes of the Audit and Risk Committee Meeting held on 14  
February 2025 .....226



**Members** Her Worship the Mayor T Alley (Chairperson), Cr N Gillespie, Cr S Browne, Cr L Claridge, Cr I Cooney, Cr S Duncan, Cr S Feinerman, Cr C Laws, Cr N McKinlay, Cr M McPherson, Cr T Paterson

**In Attendance** P Kelly (Chief Executive Officer), L Fleck (General Manager - People and Culture), J Muir (Three Waters Director), S Righarts (Group Manager - Business Support), D Rushbrook (Group Manager - Community Vision), D Scoones (Group Manager - Community Experience), L van der Voort (Group Manager - Planning and Infrastructure), W McEnteer (Governance Manager)

**1 KARAKIA**

Cr McPherson will begin the meeting with a karakia.

**2 APOLOGIES**

**3 PUBLIC FORUM**

**4 CONFIRMATION OF MINUTES**

Ordinary Council Meeting - 26 February 2025



**MINUTES OF A COUNCIL MEETING OF THE CENTRAL OTAGO DISTRICT COUNCIL  
HELD AT NGĀ HAU E WHĀ, WILLIAM FRASER BUILDING, 1 DUNORLING STREET,  
ALEXANDRA  
AND LIVE STREAMED VIA MICROSOFT TEAMS ON WEDNESDAY, 26 FEBRUARY 2025  
COMMENCING AT 10.33 AM**

**PRESENT:** Cr N Gillespie (Chair), Cr S Browne, Cr L Claridge, Cr I Cooney, Cr S Duncan, Cr S Feinerman, Cr C Laws, Cr N McKinlay, Cr M McPherson, Cr T Paterson

**IN ATTENDANCE:** P Kelly (Chief Executive Officer), L Fleck (General Manager - People and Culture), J Muir (Three Waters Director), S Righarts (Group Manager - Business Support), D Rushbrook (Group Manager - Community Vision), D Scoones (Group Manager - Community Experience), P Keenan (Capital Projects Programme Manager), G Robinson (Property and Facilities Manager), P Penno (Community and Engagement Manager), G Bailey (Parks and Recreation Manager), M Burnett (Parks Officer – Strategy/Planning), P Morris (Chief Financial Officer), D McKewen (System and Corporate Accountant), W McEnteer (Governance Manager)

**1 KARAKIA**

Cr Browne gave a karakia to begin the meeting.

**2 APOLOGIES**

**APOLOGY**

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**RESOLUTION**

**Moved:** Claridge  
**Seconded:** Cooney

That the apology received from Her Worship the Mayor and the apologies for early departure from Crs Browne and Feinerman be accepted.

**CARRIED**

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**3 PUBLIC FORUM**

Lynne Stewart – Open Spaces and Recreation Policy

Ms Stewart addressed her submission to the Open Spaces and Recreation Policy consultation. She noted the need for more toilet blocks to be available and noted Manorburn as an example of toilet blocks being built but not open for use. She also noted that shade cloth was needed in open spaces until tree shade could replace them. Finally she mentioned the need for a place to be set aside for natural burials. Ms Stewart then responded to questions.

**4 CONFIRMATION OF MINUTES**

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**RESOLUTION**

**Moved:** Duncan  
**Seconded:** Feinerman

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That the public minutes of the Ordinary Council Meeting held on 29 January 2025 and the Extraordinary Council Meeting held on 14 February 2025 be confirmed as a true and correct record.

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**CARRIED**  
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## **5 DECLARATIONS OF INTEREST**

Members were reminded of their obligations in respect of declaring any interests. Crs Cooney, Gillespie, McPherson and Paterson declared an interest in item 25.3.5. They did not discuss or vote on the item.

## **6 COMMUNITY BOARD CHAIR UPDATE**

Note: Cr Paterson joined the meeting at 10.45 am.

### **25.3.2 COMMUNITY BOARD CHAIR UPDATE**

Norman Dalley, Chair of the Teviot Valley Community Board joined the meeting to discuss matters of interest to the Board.

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Mr Dalley commented that there had been a lot of conversation in the community around the possible transfer of the Roxburgh Pool to Council and the rates implications of that action. He advocated an open meeting with the community to discuss the pool.

He noted the assessment and posting of the Millers Flat Bridge and the disruption to heavy traffic having to detour to Roxburgh to cross the river. He also noted that there did not appear to be any comment about possible work being done on the bridge in the Long-term Plan or any work in general in the Teviot Valley.

Finally he recognised the loss of the entertainment centre to fire on Waitangi Day. He asked for assurance that there would be a like for like replacement for that staff needed to engage directly with the community around next steps.

Mr Dalley then responded to questions.

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## **7 REPORTS**

Note: Cr Laws assumed the Chair as the Three Waters and Waste portfolio lead.

Note: Nichola Williams and Michelle Mehlhopt from Wynn Williams, and Andrew Strahan from GeoCo Consulting joined the meeting for item 25.3.3.

### **25.3.3 LOCAL WATER DONE WELL - OTAGO SOUTHLAND JOINT GROUP OF COUNCILS**

To consider authorising the signing of a Joint CCO Commitment Agreement.

After discussion it was noted that this agreement was a starting point for further discussion and investigation and that details of any proposed CCO would return to Council for consideration at a later meeting.

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**RESOLUTION**

**Moved:** Paterson  
**Seconded:** Feinerman

That the Council

- A. Receives the report and accepts the level of significance.
- B. Agrees to enter into the Otago Southland Joint Group of Councils Commitment Agreement.
- C. Authorises the Chief Executive to sign the Otago Southland Joint Group of Councils Commitment Agreement as set out in Attachment 1 on behalf of Council, including any minor amendments that are required when finalising the document for signing].
- D. Agrees to rely on the alternative requirements for decision-making and consultation set out in sections 61 to 64 of the Local Government (Water Services Preliminary Arrangements) Act 2024 in accordance with section 58(a)(i).

**CARRIED**

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#### **25.3.4 UPDATE ON APPOINTMENT OF THREE WATERS PROFESSIONAL SERVICES PANELS**

To consider an update on the implementation of a Professional Services Panel to support Three Waters capital programme delivery.

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**RESOLUTION**

**Moved:** McKinlay  
**Seconded:** McPherson

That the report be received for information.

**CARRIED**

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Note: Crs Cooney, Gillespie, McPherson and Paterson declared an interest in item 25.3.5. They did not discuss or vote on the item.

Note: With the agreement of the meeting, Cr Feinerman assumed the Chair.

#### **25.3.5 APPOINTMENT OF HEARINGS PANEL COMMISSIONERS**

To consider appointing members of the Hearings Panel as independent commissioners for RMA hearings.

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**RESOLUTION**

**Moved:** Feinerman  
**Seconded:** Claridge

That the Council

- A. Receives the report and accepts the level of significance.
  - B. Appoints Crs Cooney, Gillespie, McPherson and Paterson as independent commissioners to the Hearings Panel.
-

- C. Notes this arrangement will be reviewed at the inaugural Council meeting following the 2025 triennial elections.

**CARRIED**

### 25.3.6 OPEN SPACES AND RECREATION STRATEGY

To adopt the Open Spaces and Recreation Strategy 2024.

After discussion it was noted that this was a high level strategy and that individual spaces often had their own plan that went into greater detail.

#### RESOLUTION

**Moved:** Feinerman

**Seconded:** Browne

That the Council

- A. Receives the report and accepts the level of significance.
- B. Adopts the Open Spaces and Recreation Strategy 2024.
- C. Notes that the Open Spaces and Recreation Strategy 2024 will be reviewed in July 2026.

**CARRIED**

### 25.3.7 REVIEW OF OPEN SPACES NAMING POLICY 2024

To approve the revised Open Spaces Naming Policy 2024.

After discussion it was agreed to leave the item to lie on the table pending a workshop to further understand the section of the policy around the dual naming of spaces, in particular the order of names between Te Reo and English. The workshop would take place at the next Council meeting.

#### RESOLUTION

**Moved:** Feinerman

**Seconded:** Duncan

That the Council

Leave the item to lie on the table to workshop the dual naming portion of the Open Spaces Naming Policy at the next Council meeting.

**CARRIED**

### 25.3.8 UPDATE - PLAY STRATEGY

To consider an update on the play strategy.

Staff presented the latest part of their play strategy campaign and alerted members to the latest initiative regarding the strategy. It was noted that there would be QR codes placed in parks that could be scanned for the play challenge.

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**RESOLUTION**

**Moved:** Paterson  
**Seconded:** Browne

That the report be received.

**CARRIED**

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**Attachments**

- 1 Flyer for the Play Challenge tabled at the meeting
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**25.3.9 PROPOSAL TO EXTEND CENTRAL OTAGO MUSEUM TRUST'S PERFORMANCE AGREEMENT**

To consider extending Central Otago Museum Trust's performance agreement by one year, to align strategic decision-making about the Trust's future with Council's Long-term Plan 2025-34 and museum investment framework development.

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**RESOLUTION**

**Moved:** Paterson  
**Seconded:** Claridge

That the Council

- A. Receives the report and accepts the level of significance.
- B. Agrees to extend the term of the Performance Agreement between Central Otago District Council and Central Otago Museums Trust through to 16 December 2025.
- C. Resolves to allocate \$50,000 to Central Otago Museums Trust from 2024/25 budgets to enable the implementation of the Performance Agreement for a fourth year.
- D. Notes that any funding beyond this period will be considered within the museum investment framework and in line with Council's 2025-34 Long-term Plan budgets.

**CARRIED**

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Note: Cr Gillespie resumed the Chair.

Note: With the permission of the meeting, items 25.3.11 – 25.3.13 were moved forward.

**25.3.11 DEVELOPMENT OF AN INVESTMENT STRATEGY FOR CROMWELL ENDOWMENT LAND**

To consider an update on the development of an investment strategy for Cromwell endowment land.

After discussion it was agreed that further work was needed to understand whether assets brought with endowment money also formed part of the endowment.

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**RESOLUTION**

**Moved:** Laws

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**Seconded: Browne**

That the report be received.

**CARRIED**

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### **25.3.12 CAPEX REPORT ON CROMWELL MEMORIAL HALL**

To provide capex updates on the Cromwell Memorial Hall Project.

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#### **RESOLUTION**

**Moved: Duncan**

**Seconded: Claridge**

That the report be received.

**CARRIED**

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### **25.3.13 FINANCIAL REPORT FOR THE PERIOD ENDING 31 DECEMBER 2024**

To consider the financial performance for the period ending 31 December 2024.

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#### **RESOLUTION**

**Moved: McKinlay**

**Seconded: Browne**

That the report be received.

**CARRIED**

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Note: The meeting adjourned at 12.30 pm and returned at 1.01 pm.

### **25.3.10 REGIONAL DEALS PROPOSAL**

To consider the Regional Deals light touch proposal and support its submission to Central Government alongside Queenstown Lakes District Council and Otago Regional Council.

Staff introduced the regional deals proposal, the parameters that were offered by central government and the various themes that proposals must address.

After discussion it was agreed to proceed to the next stage of the proposal and it was noted that there were multiple off ramps where Councillors could choose whether to continue with the regional deals programme.

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#### **RESOLUTION**

**Moved: McPherson**

**Seconded: Feinerman**

That the Council

A. Receives the report and accepts the level of significance.

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- B. Approves the proposal for submission to Central Government under the Regional Deals framework.
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**CARRIED**

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## **8 MAYOR'S REPORT**

### **25.3.14 MAYOR'S REPORT**

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#### **RESOLUTION**

**Moved:** Gillespie  
**Seconded:** Cooney

That the Council receives the report.

**CARRIED**

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Note: Cr McPherson left the meeting at 1.48 pm and did not return.

## **9 STATUS REPORTS**

### **25.3.15 FEBRUARY 2025 GOVERNANCE REPORT**

To report on items of general interest, receive minutes and updates from key organisations, consider Council's forward work programme, business plan and status report updates.

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#### **RESOLUTION**

**Moved:** Gillespie  
**Seconded:** Browne

That the report be received.

**CARRIED**

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## **10 COMMUNITY BOARD MINUTES**

### **25.3.16 MINUTES OF THE VINCENT COMMUNITY BOARD MEETING HELD ON 4 FEBRUARY 2025**

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#### **RESOLUTION**

**Moved:** Feinerman  
**Seconded:** Browne

That the unconfirmed Minutes of the Vincent Community Board Meeting held on 4 February 2025 be noted.

**CARRIED**

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**25.3.17 MINUTES OF THE CROMWELL COMMUNITY BOARD MEETING HELD ON 10 FEBRUARY 2025**  
-----**RESOLUTION****Moved: Feinerman****Seconded: Browne**

That the unconfirmed Minutes of the Cromwell Community Board Meeting held on 10 February 2025 be noted.

**CARRIED**  
-----**11 COMMITTEE MINUTES****25.3.18 MINUTES OF THE AUDIT AND RISK COMMITTEE MEETING HELD ON 28 JANUARY 2025**  
-----**RESOLUTION****Moved: Feinerman****Seconded: Browne**

That the unconfirmed Minutes of the Audit and Risk Committee Meeting held on 28 January 2025 be noted.

**CARRIED**  
-----**12 DATE OF NEXT MEETING**

The date of the next scheduled meeting is 26 March 2025 and it was noted that the meeting would be held in Ranfurly.

**13 RESOLUTION TO EXCLUDE THE PUBLIC**  
-----**RESOLUTION****Moved: Gillespie****Seconded: Duncan**

That the public be excluded from the following parts of the proceedings of this meeting.

The general subject matter of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48 of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

<b>General subject of each matter to be considered</b>	<b>Reason for passing this resolution in relation to each matter</b>	<b>Plain English Reason</b>
<b>Confidential Minutes of Ordinary Council Meeting</b>	s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural	To protect a person's privacy

	<p>persons, including that of deceased natural persons</p> <p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(f)(ii) - the withholding of the information is necessary to maintain the effective conduct of public affairs through the protection of Council members, officers, employees, and persons from improper pressure or harassment</p> <p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p> <p>s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p> <p>s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage</p>	<p>Commercial sensitivity</p> <p>To protect people from harassment</p> <p>Legal professional privilege</p> <p>To enable commercial activities</p> <p>To enable commercial or industrial negotiations</p> <p>To prevent use of the information for improper gain or advantage</p>
<b>25.3.19 - Award of Three Waters Reticulation Operations Contract</b>	<p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p>	<p>Commercial sensitivity</p> <p>To enable commercial or industrial negotiations</p>

<b>25.3.20 - Award of Three Waters Facilities Operations Contract</b>	<p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p>	<p>Commercial sensitivity</p> <p>To enable commercial or industrial negotiations</p>
<b>25.3.21 - Improving Digital Connectivity in Central Otago</b>	<p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p>	<p>Commercial sensitivity</p> <p>To enable commercial or industrial negotiations</p>
<b>25.3.22 - Risk Register Update</b>	s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage	To prevent use of the information for improper gain or advantage
<b>25.3.23 - February 2025 Confidential Governance Report</b>	<p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p> <p>s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p>	<p>Legal professional privilege</p> <p>To enable commercial activities</p> <p>To enable commercial or industrial negotiations</p>
<b>25.3.24 - Confidential Minutes of the Cromwell Community</b>	s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the	Commercial sensitivity

<b>Board Meeting held on 10 February 2025</b>	information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information	
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**CARRIED**

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The public were excluded at 1.49 pm and the meeting closed at 2.40 pm.

## 5 DECLARATIONS OF INTEREST

### 25.4.1 DECLARATIONS OF INTEREST REGISTER

Doc ID: 2410869

Report Author:	Wayne McEnteer, Governance Manager
Reviewed and authorised by:	Saskia Righarts, Group Manager - Business Support

#### 1. Purpose

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

#### 2. Attachments

**Appendix 1 - Council Declarations of Interest** [↓](#)

<b>Name</b>	<b>Member's Declared Interests</b>	<b>Spouse/Partner's Declared Interests</b>	<b>Council Appointments</b>
Tamah Alley	Manuherikia Irrigation Co-operative (shareholder) Cliff Care Ltd (family connection) Aviation Cherries Ltd (Director) Tenaya New Zealand Ltd (Director and Shareholder) Southern Lakes Trails (Trustee) LGNZ Zone 6 Chair	Manuherikia Irrigation Co-operative Society Ltd (shareholder) Emergency Management Otago Group Controller (employee) Aviation Cherries Ltd (Director)	Alexandra Community House Trust Central Otago Wilding Conifer Control Group Destination Advisory Board Southern Lakes Health Trust (Trustee)
Sarah Browne	Anderson Browne Construction and Development (Director and Shareholder) Infinite Energy Ltd (Shareholder) Central Otago Sports Turf Trust (Trustee) Central Football and Multisport Turf Trust (Trustee) Sutherland Architecture Studio Ltd (Employee)	Anderson Browne Construction and Development (Director and Shareholder) Infinite Energy Ltd (Employee)	Cromwell Youth Trust Tarras Community Plan Group
Lynley Claridge	Affinity Funerals (Funeral Director)		
Ian Cooney			
Stuart Duncan	Penvose Farms - Wedderburn Cottages and Farm at Wedderburn (shareholder) Penvose Investments - Dairy Farm at Patearoa (shareholder) Fire and Emergency New Zealand (member) JD Pat Ltd (Shareholder and Director)	Penvose Farms - Wedderburn Cottages and Farm at Wedderburn (Shareholder) Penvose Investments - Dairy Farm at Patearoa (shareholder)	Otago Regional Transport Committee Maniototo Ice Rink Committee Maniototo Curling International Inc
Sally Feinerman	Feinerman's Ltd, 109 Scotland Street (Owner / Director) Roxburgh Pool Committee (Chair) Sally Feinerman Trust (Trustee) Feinerman Family Trust (Trustee)	Breen Construction (Employee / Builder)	Ida MacDonald Charitable Trust Teviot Prospects Teviot Valley Walkways Committee

	MPI Teviot Valley Community Hubs group		
Neil Gillespie	Southburn Consulting (Consultant) Cromwell Volunteer Fire Brigade (Chief Fire Officer) Cromwell Bowling Club (patron) Otago Local Advisory Committee - Fire Emergency New Zealand Returned Services Association (Member)		Tarras Hall Committee
Cheryl Laws	The Message (Director) Wishart Family Trust (Trustee) Wooing Tree (Assistant Manager - Cellar Door) Daffodil Day Cromwell Coordinator	Otago Regional Council (Councillor) The Message (Director)	Cromwell Resource Centre Trust Old Cromwell Incorporated
Nigel McKinlay	Transition To Work Trust (Board member) Gate 22 Vineyard Ltd (Director) Everyday Gourmet (Director) Central Otago Wine Association (member) Long Gully Irrigation Scheme (member) CODC (employee) (Granddaughter)		Cromwell Hall Reference Group Cromwell Town Centre Reference Group
Martin McPherson	Alexandra Blossom Festival	CODC (employee) CODC (employee) (Daughter)	Alexandra and Districts Youth Trust



Tracy Paterson	Matakanui Station (Director and shareholder) Matakanui Development Co (Director and shareholder) A and T Paterson Family Trust (Trustee) A Paterson Family Trust (Trustee) Central Otago Health Inc (Elected Member) Bob Turnbull Trust (Trustee / Chair) New Zealand Wool Classers Association (Chair) Central Otago A&P Association (Member) Waiora Manuherikia Governance Group (Member) Central Otago Riding for the Disabled (Volunteer)	Matakanui Station (Director and shareholder) Matakanui Development Co (Director and shareholder) A Paterson Family Trust (Trustee) A and T Paterson Family Trust (Trustee) Federated Farmers (On the executive team) Omakau Irrigation Co (Director) Matakanui Combined Rugby Football Club (Committee) Manuherikia Catchment Group (Co-chair) Omakau Domain Board Omakau Hub Committee (Chair) Manuherikia Valley Community Hub Trust (Trustee) Southern Cross Sheep Ltd (Director) Mt Stalker Ltd (Trustee) Mt Stalker Pastoral Ltd DKIL Ltd (Shareholder) Manuherikia River Limited (Director)	Omakau Recreation Reserve Committee Ophir Welfare Association Committee Central Otago Health Incorporated
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## **6 COMMUNITY BOARD CHAIR UPDATE**

### **25.4.2 COMMUNITY BOARD CHAIR UPDATE**

**Doc ID: 2400814**

#### **1. Purpose**

Robert Hazlett, Chair of the Maniototo Community Board will join the meeting to discuss matters of interest to the Board.

#### **2. Attachments**

**Nil**

## 7 REPORTS

### 25.4.3 PROPOSED WASTEWATER ENVIRONMENTAL PERFORMANCE STANDARDS

Doc ID: 2018381

Report Author:	Julie Muir, Group Manager - Three Waters
Reviewed and authorised by:	Peter Kelly, Chief Executive Officer

#### 1. Purpose of Report

To consider the key points to be included in a Central Otago District Council submission on proposed wastewater environmental performance standards.

#### Recommendations

That the Council

- A. Receives the report and accepts the level of significance.
- B. Agrees to a submission being prepared on the proposed wastewater environmental performance standards.
- C. Agrees that that the submission be drafted based on discussion at the 26 March Council meeting and circulated to councillors for feedback prior to submitting on 16 April 2025.

#### 2. Background

Taumata Arowai have released a discussion document on proposed wastewater environment performance standards. Consultation has been invited and closes on 24 April 2025. The standards will drastically change the consent requirements for urban wastewater discharges.

The following table provides an overview of the existing Central Otago District Council wastewater treatment plants, consent expiry date, current normal population, the existing discharge environment, and the potential classification under the new standards.

A high-level assessment of the likelihood of upgrades being required for the sole purpose of meeting the proposed standards has been provided. It must be noted that upgrades of some sites are still required for other reasons, for example Alexandra requires upgrading due to plant renewal and capacity requirements and Omakau for flood resilience.

Scheme	Consent Expiry date	Current serviced population	Category of discharge	Upgrade Required to meet proposed standard
<b>Cromwell/Bannockburn<sup>1</sup></b>	2049	8055	Lakes and natural ponds with dilution ratio >50 or River with dilution ratio >250 (high)	Yes  or Yes
<b>Alexandra/Clyde</b>	2038	6,016	River with dilution ratio >250 (high)	No
<b>Ranfurly</b>	2050	700	River or stream with dilution ratio <10 (very low)	Yes
<b>Roxburgh</b>	2045	665	Infiltration basins or River with dilution ratio >250 (high)	No
<b>Omakau</b>	2027	261	River with dilution ratio >250 (high)	No
<b>Naseby<sup>2</sup></b>	2051	158	Infiltration basins River or stream with dilution ratio <10 (very low)	No
<b>Lake Roxburgh Village</b>	2029	81	Land, assessed against River with high dilution ratio >250	Yes

<sup>1</sup> The extent of upgrade required for Cromwell will depend on if it is classified as a "Lake or natural pond" or "river with high dilution ratio".

<sup>2</sup> Naseby has infiltration basins which are not covered under the proposed standard

<sup>3</sup> Lake Roxburgh Village is a land discharge and is programmed for a package plant. The existing plant would not comply for a discharge to water.

The discussion document provides the parameters that will be covered by the discharge standards. It is likely that some of the settings will change through the submission and drafting processes.

Based on the information currently available:

- This first package of standards will cover discharges to water and land, reuse of biosolids, overflows from networks and bypasses from treatment plants.
- The standards will not apply to discharges to air, recycled treated wastewater for non-potable use, emerging contaminants and heavy metals, arrangements for onsite wastewater treatment systems (such as septic tanks) or community owned and operated schemes, or wastewater treatment plant (WWTP) discharges in close proximity to human drinking water sources. Regional councils will continue to regulate these aspects in the same way they do currently.

For **discharges to water**:

- Acceptable levels of key contaminants in the discharge would be based on the category of 'receiving environment,' with seven prescribed categories from lakes to the open ocean, each defined by their 'dilution ratio'.
- For the 'open ocean' category, the only applicable parameters would be annual 90%ile limits for ammonia and enterococci (bacteria).
- Existing very small wastewater treatment plants would have separate, less stringent, treatment requirements (yet to be developed).

For **discharges to land**, the standards would apply a risk management assessment for specific land types. This assessment would determine a risk class for the land and set treatment requirements and application limits for total phosphorus, total nitrogen, and E. coli loading rates and concentration.

For **biosolids**, the standards would provide a grading system which reflects pathogen content, metal and organic chemical contaminants. Taumata Arowai proposes to establish Permitted, Controlled, and Restricted Discretionary consenting pathways for the reuse of biosolids, depending on their categorisation grade.

For **network overflows and WWTP bypasses**, the standards would:

- Require consent to be obtained for all network overflows and bypasses but prescribe controlled activity status for this (so that consent could not be declined).
- Require operators to prepare Wastewater Network Risk Management Plans and prescribe monitoring and reporting requirements.
- Enable operators to prioritise addressing overflows based on risk, impact and likelihood of overflows occurring. The mitigation measures and requirements for improvement works would be set by consent authorities through consent conditions in the usual way.

### 3. Practical Implications

#### Regional Council Role

There will be a more limited role for Regional Councils:

It is likely that where standards are provided and met, regional councils would not be able to impose more stringent or additional conditions regarding the same parameters. In other areas regional councils would be able to regulate aspects of activities to which the standards do not apply, such as air discharges in the same way they do now.

In developing the final standards, it will be crucial to provide certainty around when, and the extent to which, regional councils can impose additional performance standards through consent conditions. It appears that substantial regional council input will still be required for discharges to land and in setting the targets for overflows and bypasses.

#### A New Approach to Managing Overflows and Bypasses

In many regions overflows are either treated as a prohibited activity (so consent cannot be sought), or as emergency works under section 330 of the Resource Management Act.

The Discussion Document suggests that this just hides the problem, and 'is not a long-term solution'. Implementing a risk-based planning, monitoring and reporting framework for overflows is a more pragmatic approach to mitigating the effects of these unplanned events.

Existing constructed overflows, such as those that exist at pumpstations will need to be consented. Historically these were constructed to manage emergency overflows at pumpstations with a pipe to either the stormwater system or a waterway.

#### RMA Processes – Changes under the Local Government (Water Services) Bill

While Environmental Performance Standards are already recognised under the RMA, the Local Government (Water Services) Bill will further streamline RMA consenting processes

and allow the wastewater standards (and the equivalent stormwater environmental performance standards, once developed) to override existing RMA plans.

In particular, the Bill proposes that:

- Standards can set the activity status for wastewater projects, providing greater certainty of outcome (e.g. controlled activity status through the standards would mean consent cannot be declined, and the regional council must instead focus on conditions)
- Regional councils would have to implement settings from the standards in consent conditions and cannot include any conditions which are any more or less restrictive (meaning Councils would remain free to impose conditions on matters not provided for e.g. discharges to air).
- If an application complies with or meets the requirements of the standards, then:
  - Normal RMA restrictions on granting discharge consents under sections 105 and 107 would not apply (which means less need to consider alternatives, or to avoid certain kinds of effects in the receiving environment); and
  - Consents would have to be granted for a period of 35 years.

Information from a legal review indicates the Bill would amend the RMA so that standards coming into force (or being amended) would trigger a review of existing resource consent conditions regulated by the standards (at the discretion of the consent authority). Depending on an individual consent's current conditions, this may mean either lifting performance or amending consents to match the new lower standard.

Finally, the Bill sets up a transitional process in the RMA so that any 'soon to expire' consents will instead expire two years after the Bill commences as an Act, to give operators time to consider the standards in their future upgrades and applications.

The Discussion Document also proposes that, in the future, the ability to rely on expired consents after a replacement application has been lodged will be capped at 2 years (it is currently unlimited).

#### **4. Discussion**

An assessment of the implications of the proposed standards against each of the schemes is being undertaken by Pattle Delamore Partners (PDP). This information will be presented to Council during the 26 March Council meeting.

Proposed key points for a submission will also be presented for discussion.

#### **5. Financial Considerations**

Potential future financial implications of the proposed standards on the Central Otago District supplies will be outlined in the presentation to Council during the 26 March Council meeting.

## 6. Options

### Option 1 – (Recommended)

Make a submission on the proposed wastewater environmental performance standards.

Advantages:

- A submission can provide information on the likely impacts of this proposal on Central Otago communities in the future.
- Provides opportunity to influence changes to items of concern in the proposal.

Disadvantages:

- Council is likely to be perceived as placing a higher priority on some aspects of the proposal than other aspects.

### Option 2

Do not make a submission on the proposed wastewater environmental performance standards.

Advantages:

- Likely to be differing views in the community regarding the balancing of efficiency and financial implications against the ability of stakeholders and communities to provide input into consenting processes, and on environmental factors.

Disadvantages:

- Implications on communities in Central Otago will not be considered in setting final standards unless they submit independently.
- No ability to influence change to aspects of the proposal that Council does not agree with.

## 7. Compliance

<b>Local Government Act 2002 Purpose Provisions</b>	This decision enables democratic local decision making and action by, and on behalf of communities by providing input into a crown entity consultation process.
<b>Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.</b>	The submission will consider these aspects.
<b>Considerations as to sustainability, the environment and climate change impacts</b>	The submission will consider these aspects.
<b>Risks Analysis</b>	The submission is being prepared to highlight risks to the Central Otago community of the proposed standards.

<b>Significance, Consultation and Engagement (internal and external)</b>	Making a submission to a national standard is not significant.
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## 8. Next Steps

A presentation will be provided to the Council meeting, outlining in more detail the analysis of implications to Central Otago wastewater treatment facilities.

A submission will be prepared based on the key points discussed by Council.

The submission will be circulated to councillors by 4 April, with feedback to be provided by 11 April. The submission will then be finalised and submitted on 16 April prior to the Easter break.

## 9. Attachments

**Appendix 1 - Discussion-document-National-wastewater-environmental-performance-standards.** [↓](#)





Water Services Authority  
Taumata Arowai

# Consultation on proposed wastewater environmental performance standards

## Discussion document

Minor clarifications made on pages 18 and 21 – 11 March 2025 update



## Table of contents

1.	How to make a submission	3
2.	Executive summary	4
3.	What is covered by the proposed wastewater standards?	8
4.	Our wastewater environment?	11
5.	How were the proposals in this discussion document developed?	15
6.	A discharge to water environmental performance standard	18
7.	A discharge to land environmental performance standard	26
8.	A beneficial reuse of biosolids environmental performance standard	31
9.	Management of overflows and bypasses	35
10.	Arrangements for wastewater treatment plants operating on expired consents under Section 124 of the Resource Management Act 1991	40
<b>Appendix One:</b>	Glossary	41
<b>Appendix Two:</b>	Relationship with Local Water Done Well and Local Government (Water Services) Bill	43
<b>Appendix Three:</b>	Consultation questions	45
<b>Appendix Four:</b>	Detail of the proposed approach for discharges to land	46

# 1. How to make a submission

The Water Services Authority – Taumata Arowai (**the Authority**), on behalf of the Minister of Local Government, is consulting on a set of proposed wastewater environmental performance standards (“wastewater standards”) under section 138 of the Water Services Act 2021. We welcome feedback on the proposals to inform the first set of national wastewater standards and how they are implemented.

This discussion paper includes some questions (set out in boxes) you may like to respond to in your submission. **Appendix Three** contains the full list of questions. You are invited to answer any or all the questions included. Where possible, please include evidence to support your views (for example, references to facts and figures, or relevant examples).

## Timeframes

The consultation is open for 2 months from 25 February 2025. It closes at **5.00pm on 24 April 2025**. You can make a submission via:

- our [online survey form](#), or
- sending your responses to [korero@taumataarowai.govt.nz](mailto:korero@taumataarowai.govt.nz) or mailed to Level 2, 10 Brandon Street, PO Box 628, Wellington 6140, New Zealand.

Please include your name, or the name of your organisation and contact details in your submission.

You will find all the information on this consultation at: [korero.taumataarowai.govt.nz/regulatory/wastewater-standards](https://korero.taumataarowai.govt.nz/regulatory/wastewater-standards)

Please direct any questions you may have in relation to the submission process to: [korero@taumataarowai.govt.nz](mailto:korero@taumataarowai.govt.nz).

## Your feedback will inform the final wastewater standards and how they are implemented

The Authority welcomes feedback on the proposals in this document. This consultation document outlines the first set of proposed wastewater standards. Once submissions have been received, a final proposal will be developed for the Minister of Local Government’s consideration. The final wastewater standards will be set in regulations made by the Governor-General by Order in Council, on the advice of the Minister.

The wastewater standards are expected to be set in mid- to late-2025. This will follow enactment of the Local Government (Water Services) Bill.

## 2. Executive summary

New Zealand's publicly-owned wastewater infrastructure is facing a significant challenge. A significant proportion was built around 30-40 years ago, and upgrades or renewals are required for many wastewater treatment plants and networks. Population growth and urban development is driving the need for infrastructure renewals, with larger communities and housing areas requiring treatment plants and networks with significantly greater capacity than they currently have.

In the next decade, 57 percent of public wastewater network plant infrastructure will require re consenting, and of this number, approximately 20 percent of plants are currently operating on expired resource consents. The resource management system can be challenging for network owners and communities. Across the country, resource consents are developed, assessed and monitored largely on a case-by-case basis. This means the consenting process can be lengthy, uncertain and information intensive. Upgrading wastewater infrastructure is resource intensive and a significant investment for councils, particularly with many facing affordability challenges and competing demands on how rates should be spent. This directly affects communities throughout New Zealand in terms of higher rates, increased public health risks and the impact on the environment.

National or state-level wastewater environmental performance standards (**'wastewater standards'**) combined with transparent public reporting, are a common feature in many jurisdictions that New Zealand commonly compares itself to, such as the United Kingdom, the European Union, Australia and Canada.

This discussion document proposes New Zealand's first set of wastewater standards. These standards will set nationally consistent requirements for all wastewater networks and operators through resource consents as these are renewed or issued for new wastewater infrastructure. Wastewater standards will:

- support environmental outcomes,
- drive cost and time efficiencies,
- support owners of networks to better plan for the cost of infrastructure, and
- save time for territorial authorities as owners of the public infrastructure, and regional councils as regulators.

The proposed wastewater standards are expected to deliver significant cost-efficiencies that may include reduced consenting costs of up to 40 percent based on case study examples. This includes reductions in costs associated with the consenting process such as staff time, technical assessments, feasibility assessments, legal costs and consultation and engagement costs.

Reductions to capital upgrade costs and ongoing operating costs such as staff training and maintenance can also be expected. The costs savings on an individual plant will depend on specific circumstances, such as the type or size of the plant, treatment processes, and options for where the plant discharges. However, over time, further costs savings are expected as materials are standardised, and modular plant options are available that comply with wastewater standards.

Wastewater standards will provide increased certainty to territorial authorities as owners of networks so they can better plan for the cost of infrastructure, and leverage cost efficiencies in designing, procuring and operating wastewater treatment plants. This will support territorial authorities in developing long-term plans in future.

The Local Government (Water Services) Bill proposes 'infrastructure design solutions' that will be used as part of the second implementation phase for wastewater standards. These instruments will support network operators to meet wastewater standards and provide design and operating requirements for modular wastewater treatment plants.

Infrastructure design solutions will result in faster consenting processes and potentially significant cost savings, and over time will enable network operators to standardise the design and procurement of infrastructure, and enable modular, off-the-shelf solutions to be installed.

### What does this package of wastewater standards cover?

The initial package of proposed standards covers areas where resource consents are commonly sought for wastewater treatment plants, specifically:

- discharges to water for a range of parameters and receiving environments, alongside a tailored standard for small wastewater treatment plants,
- discharges to land,
- beneficial reuse of biosolids, and
- arrangements for wastewater network overflows and bypasses of wastewater treatment plants.

The proposed standards do not cover the following matters:

- discharges to air from wastewater treatment plants,
- recycled treated wastewater for non-potable use,
- contaminants of emerging concern such as endocrine disruptors, PFAS (per- and polyfluoroalkyl substances) and heavy metals, and

- arrangements for onsite wastewater treatment systems (such as septic tanks) or community owned and operated schemes.

These areas will continue to be regulated through the existing resource consenting process, pending future wastewater standards that address them. To ensure standards remain fit-for-purpose, the Authority will establish an ongoing work programme to evaluate how standards have been implemented and to consider where additional standards may be appropriate or whether amendments are necessary.

### How will wastewater standards be implemented?

Wastewater standards will primarily be implemented through future resource consents for public wastewater treatment plants and networks as they come up for renewal. Wastewater standards must be implemented as part of any new resource consent for existing plants and networks, as well as consents for new wastewater infrastructure. The certainty generated by wastewater standards will streamline these consent processes and decisions. Any matters not covered by wastewater standards will continue to be set through the existing resource consent process as they are now.

Regional councils remain the regulator for catchments, including wastewater treatment plants, networks and their discharges, and will have a critical role in implementing and ensuring compliance with wastewater standards through resource consents. Consistent with this role, regional councils will implement the wastewater standards through consent conditions. The Authority will collect information through regular network environmental performance reporting and summarise it annually in a public-facing report, to provide a further layer of transparency about plant and network environmental performance.

Decisions about wastewater arrangements, such as where plants are located and discharge to, will continue to sit with territorial authorities and their communities. Territorial authorities will, for example, continue to consult with their communities about their preferences under local government legislation, and apply to regional councils for new consents for wastewater treatment plants or networks in a way that reflects community preferences.

### Relationship with Local Water Done Well

Wastewater standards are a core aspect of Local Water Done Well, the Government's approach to address long-standing water infrastructure challenges. Wastewater standards are intended to reduce the regulatory burden relating to consenting, and lead to greater standardisation in plant design, performance and operation, while providing councils with greater certainty of costs for their wastewater network investments.

The Local Government (Water Services) Bill (**the Bill**), which is currently before a Parliamentary select committee, proposes changes that impact how wastewater standards are made and implemented. These amendments are designed to ensure regional councils must implement any requirements imposed as part of a wastewater standard in a new consent, and cannot include any conditions in a consent which are any more or less restrictive. The Bill also proposes that, where the infrastructure proposed in a new consent meets the relevant wastewater standard, a 35-year consent must be issued, to maximise the benefit of public investment in the wastewater treatment infrastructure. The Bill also proposes changes to the consultation that applies when wastewater standards are made.

Many councils have wastewater treatment plants with resource consents that will expire in the first two years following the implementation of wastewater standards. The Bill proposes an automatic extension of these consents, so they expire two years following the commencement of the Bill.

**Appendix Two** outlines the proposals in the Bill that, if enacted, will impact how wastewater standards are created and implemented. The proposals in this discussion document are based on the new arrangements set out in this Bill. The Government proposes to make the first set of wastewater standards once this Bill is enacted later this year.

You can find more information about the Local Government (Water Services) Bill [here](#).



# Proposal on-a-page

**i** The Water Services Authority—Taumata Arowai (the Authority), on behalf of the Minister of Local Government, is consulting on a set of proposed national wastewater environmental performance standards ('wastewater standards') under section 138 of the Water Services Act 2021.

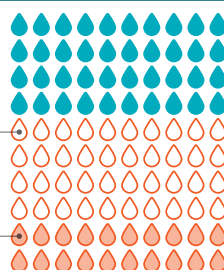
## A What is the rationale for change?

A significant proportion of Council and Crown-owned wastewater infrastructure was built 30-40 years ago. These now require upgrades or renewals.

Population growth and urban development also drive the need for infrastructure renewals, with larger communities and housing areas requiring treatment plants and networks with much greater capacity than they currently have.

Around 60% of public wastewater infrastructure will require consenting in the next decade.

Of this number, 20% of plants are currently operating on expired resource consents.



**KEY:**  
 ● Valid  
 ○ Due to expire  
 ● Expired

**The resource management system can be challenging for network owners and communities across the country.**

Resource consents are developed, assessed, and monitored largely on a case-by-case basis. The current process can be lengthy, uncertain, and information intensive as a result.

## B What does this package of wastewater standards cover?

**The Water Services Act 2021 (the Act) (section 138) enables the Authority to make wastewater standards** following public consultation.

Standards only apply to Council and Crown-owned infrastructure, and may include requirements, limits, conditions, or prohibitions related to activities associated with wastewater treatment plants and networks, including:

- **Discharges to land, air or water**
- **Biosolids** and other **by-products** from wastewater
- **Energy use**
- **Waste** introduced by a third party into a wastewater network (such as trade waste).

The initial package of proposed standards covers areas where resource consents are commonly sought for wastewater treatment plants and networks, specifically:



### Discharges to water

THIS STANDARD PROPOSES:

- Treatment requirements for the main contaminants discharged from a treatment plant, varying by the risk and sensitivity of the receiving environment.



### Discharges to land

THIS STANDARD PROPOSES:

- A framework for identifying suitable land for discharge application, based on a site-specific risk assessment.
- Treatment requirements for nutrients and pathogens discharged to land.



### Beneficial reuse of biosolids

THIS STANDARD PROPOSES:

- A grading system for processing biosolids from wastewater treatment plants, with corresponding activity status for how and when biosolids can be reused based on Water NZ guidelines.



### Wastewater network overflow and bypass arrangements

THIS STANDARD PROPOSES:

- Risk-based planning, monitoring and reporting requirements for overflows from networks and bypasses of plants.
- All existing overflow points must be consented.

➤ Monitoring and reporting requirements will apply across all the standards.

## **i** Small plant standard (SPS)

The discharge to water standard will impose different treatment requirements for wastewater treatment plants that service very small communities. These plants are significantly different to those that service larger towns and cities. They are usually

oxidation ponds that rely on passive treatment arrangements that require little operation, at isolated sites and often without access to electricity. These small plants often have a minimal impact on the receiving environment because of their small size, particularly in

comparison to contaminants like nutrients from surrounding land. Due to this, no nutrient treatment is proposed as part of the small plant standard, and other treatment requirements are tailored to suit infrastructure of this nature.

Version: 21 Feb 2025

### C How will territorial authorities (TAs) and regional councils (RCs) use the standards?

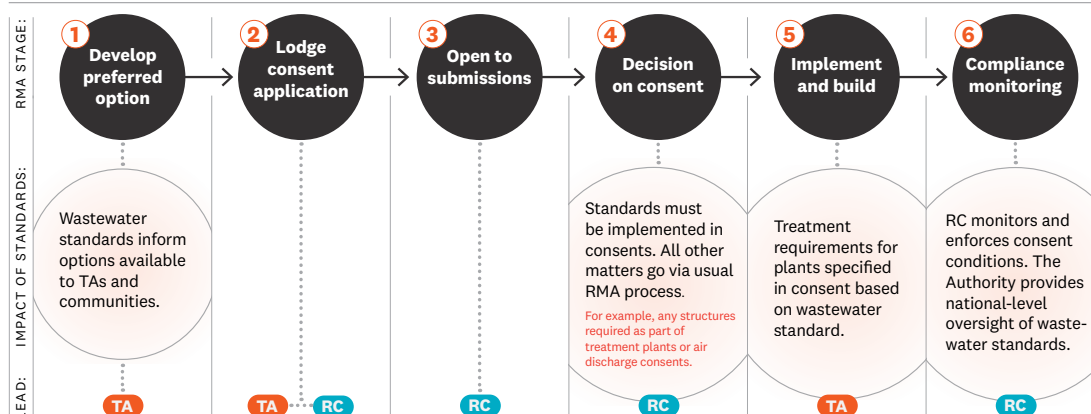
Territorial authorities (TAs) who have wastewater treatment plants due for upgrade or renewal will consult with their communities under the Local Government Act 2002 to determine the best arrangement for their circumstances.

The standards will set treatment requirements based on the type of water body or land the plant discharges to.

These standards will guide councils and communities in making decisions, and in the design, planning, and funding once a decision is made.

#### Examples of what this might look like:

- Communities and TAs may choose to either:
- Decommission and replace an old plant with one that discharges to land in the summer, and water in the winter, or
  - Upgrade an existing plant or combine multiple plants into one centralised arrangement.



### D What are the expected benefits of the proposed standards?

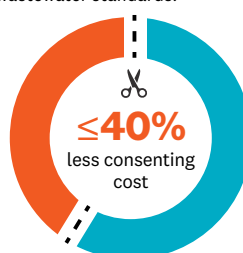
#### Wastewater standards will:

- ✓ Support environmental outcomes.
- ✓ Drive cost and time efficiencies.
- ✓ Support owners of networks to better plan and fund infrastructure.
- ✓ Provide clear expectations about treatment quality to communities.

#### Expected cost efficiencies:

Based on case studies, we expect up to 40% reduction in consenting costs. This includes cost reductions in staff time, technical and feasibility assessments, legal costs, and consultation/engagement expenses. Over time, further savings will come from standardising infrastructure and operations

to comply with the proposed wastewater standards.



#### The standards will provide certainty to TAs, helping them to better:

- Plan
- Design
- Engage with communities
- Fund infrastructure upgrades
- Develop long-term plans

### E What was the process to develop the standards?

The Authority developed these proposals using evidence, technical advice, testing.



**Review of a range of previous work** relating to the area.



**Commissioning technical reports** into potential areas where standards could be made.



**Commissioning case studies** of wastewater arrangements to understand the perspectives of iwi/Māori, TAs, and RCs.



**Commissioning detailed technical advice** into the discharge to water and land standards.



**A Technical Review Group** made up of TAs, RCs, peak industry bodies, and leading industry professionals.

**The goal** is to create credible standards that balance:



#### i The proposed standards do not cover the following matters:

- ✗ Discharges to air from wastewater treatment plants.
- ✗ Recycled treated wastewater for non-potable use.

- ✗ Other contaminants from treatment plants (such as endocrine disruptors, heavy metals, and PFAS).

- ✗ Arrangements for private networks or onsite wastewater treatment systems (such as septic tanks).

Version: 21 Feb 2025

### 3. What is covered by the proposed wastewater standards?

#### Relevant provisions in the Water Services Act 2021

The [Water Services Act 2021](#) (**the Act**) (section 138) enables the Authority to make wastewater standards. The Local Government (Water Services) Bill proposes to change this so that standards are set through regulations made by Order in Council, on the advice of the responsible Minister.

Standards may include (but are not limited to) requirements, limits, conditions, or prohibitions related to activities associated with wastewater networks, including:

- discharges to land, air or water,
- biosolids and any other byproducts from wastewater,
- energy use, and
- waste that is introduced by a third party into a wastewater network (for example, trade waste).

The Local Government (Water Services) Bill also expands and clarifies how standards affect processes and decisions under the Resource Management Act 1991.

The Act enables the Authority to exercise several functions that are relevant to the proposed wastewater environmental standards. These include:

- **Network Environmental Performance Measures:** network operators are required to monitor and report on the environmental performance of their drinking water, wastewater and stormwater networks. Robust data collection and reporting is critical to providing a clear picture about how networks are performing, to minimise potential impacts on the environment and public health over time.
- **Wastewater Network Risk Management Plans:** these plans can be required under section 139 of the Water Services Act (once a timeframe is set by notice in the Gazette) and must meet any relevant wastewater measures, standards or targets.<sup>1</sup> Once made they must be reviewed every 5 years.
- **Wastewater Environmental Performance Targets:** The Authority may also create targets that apply to wastewater network and their operators. These will be introduced at a later date, once there is a clearer picture of how wastewater networks are performing and where targets may be appropriate.

<sup>1</sup> To date, the Water Services Authority hasn't published any requirements or guidance on Wastewater Network Risk Management Plans should cover.

#### Wastewater standards apply to public wastewater networks

The Act provides that wastewater standards may only apply to public networks (i.e., owned by a territorial authority or its service delivery organisation such as Watercare, or certain Central Government organisations), as defined in the Act:

**wastewater network** means the infrastructure and processes that—

- are used to collect, store, transmit through reticulation, treat, or discharge wastewater; and
- are operated by, for, or on behalf of one of the following:
  - a local authority, council-controlled organisation, or subsidiary of a council-controlled organisation;
  - a department;
  - the New Zealand Defence Force

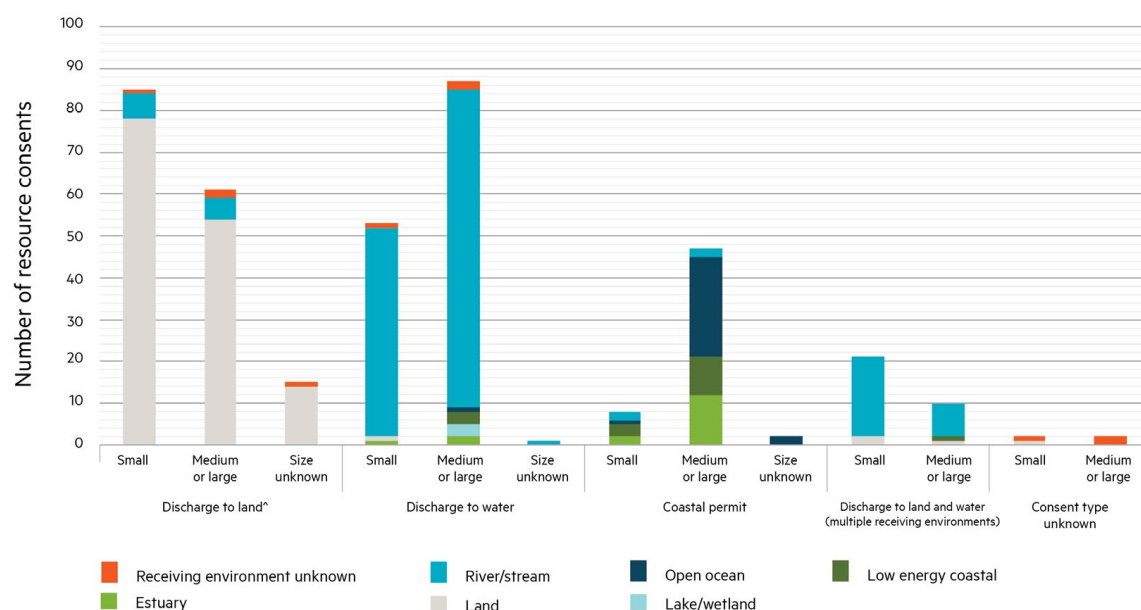
The standards do not apply to privately owned networks, septic tanks or onsite systems for treating wastewater (those captured by AS/NZS 1547:2012). This includes onsite systems with primary, secondary and disinfection wastewater systems – for example, wastewater from campground ablution blocks and amenity public toilets – as well as septic tanks. In these situations, wastewater is generally from one or multiple buildings but within one land area or site. Treatment is typically minimal (compared to a treatment plant with multiple levels of treatment) as is the environmental impact.

#### What are the proposed wastewater standards in this discussion document?

This document proposes an initial set of wastewater standards for discharges to land and water, and arrangements for applying biosolids to land and managing overflows and bypasses. This initial set of standards targets areas where performance improvements will be most effective for this essential infrastructure and cover the majority of consents for wastewater treatment plants as set out in the graph below.



### Wastewater discharge consents by consent type, size and receiving environment\*



\*Based on 353 primary discharge consents from Water Services Authority Wastewater Discharge Consents Database  
^ Includes discharges to land that may enter water

#### Discharge to water standard

The proposed standard for discharges to water includes:

- treatment limits for the main contaminants or 'parameters' that are discharged by wastewater treatment plants, and which commonly are subject to limits or monitoring arrangements in resource consents,
- different classes of receiving environment, in relation to which the treatment limits vary,
- 'end of pipe' monitoring and reporting requirements for the treatment limits, and
- sets separate treatment requirements that are tailored to small wastewater treatment plants that service very small populations and have a minimal impact on the receiving environment.

#### Discharge to land standard

The proposed standard for discharges to land is based on a site-specific risk assessment and includes:

- a framework for identifying areas of land appropriate for land application and classifying its risk,
- treatment requirements for wastewater that is discharged to land, and
- monitoring and reporting requirements, including for soil and water at and around the discharge site.

#### Beneficial reuse of biosolids standard

The proposed standard for beneficial reuse of biosolids includes:

- a grading system for processing biosolids, with corresponding activity status under the Resource Management Act 1991 for how and where biosolids can be reused,
- additional treatment requirements and mitigation measures where biosolids have a lower grade, and
- monitoring and reporting requirements, which correspond with the grade of biosolids.

#### Arrangements for wastewater network overflows and bypasses of wastewater treatment plants

The proposed standard for wastewater network overflows and bypasses includes:

- requirements for network operators to develop wastewater risk management plans, to identify where overflows and bypasses are a risk, and how they should be managed,
- monitoring and reporting requirements for overflows and bypasses from wastewater networks, and
- classification of overflows and bypasses as controlled activities under the Resource Management Act 1991.

**We would like your feedback on the following questions:**

- Do you agree with the areas the first set of standards are proposed to cover?
- What areas should we prioritise to introduce wastewater standards in future?

## How will wastewater standards be implemented?

Regional councils remain the regulator for wastewater and stormwater networks and are responsible for land-use planning, resource consent processes, and monitoring, reporting and compliance and enforcement under the Resource Management Act 1991. The proposed standards will be implemented through new resource consents, which for discharges to water and land will be granted for 35-year timeframes.

We are developing guidance to support network owners and operators, as well as consenting authorities, to implement wastewater standards.

**We would like your feedback on the following questions:**

- What topics should we cover in the guidance material to support implementation of the standards?
- Are there particular groups we should work with to develop guidance and if so, who?
- How should factors such as climate change, population growth, or consumer complaints be addressed when considering a 35-year consent term?

## Discharges to land and water

The proposed wastewater standards will determine some of the conditions imposed on discharge consents under the Resource Management Act 1991. For the specific parameters (and corresponding limits) included in the standard, regional councils will not be able to introduce conditions that require either higher or lower levels of treatment. Monitoring and reporting requirements will also be set through consent conditions.

If a matter is not dealt with in wastewater standards – for example, air or odour discharges – the relevant regional council will continue to set consent conditions. Outside of matters covered in the standards, regional councils (and, where relevant, city or district councils) will still need to consider other consenting aspects of wastewater infrastructure and discharges, such as the location and whether any structures for the plant are required. The proposed standards do not remove the requirement for applicants to engage with communities as part of the infrastructure planning and consenting process.

## Wastewater overflows and bypasses

This discussion document proposes that risk-based monitoring and reporting arrangements be implemented for wastewater overflows, including for both overflows from networks and bypasses of wastewater treatment plants. It also proposes that overflows and bypasses must have an associated consent (that is, they are a 'controlled activity' under the Resource Management Act 1991).

Regional councils will continue to control how adverse effects of overflows and bypasses on the environment are managed. The specific monitoring and reporting requirements in the proposed standard will be included in the wastewater standard and set through consent conditions.

## Beneficial reuse of biosolids

This discussion document proposes a framework for grading biosolids to reflect the level of treatment they have received and the residual levels of contaminants that they contain. The grading framework will also set the consent requirements for different grades of biosolids, with the highest grade not requiring a resource consent to be applied to land (that is, a 'permitted activity' under the Resource Management Act 1991).

This proposal is based on Water New Zealand's draft Beneficial Use of Biosolids and other Organic Materials of Land (Good Practice Guide). This guide has been developed with the sector, and is based on existing guidelines that have been in place since 2002 that have been implemented in some regional plans and consents.

## Second phase of wastewater standards: Infrastructure Design Solutions

The Local Government (Water Services) Bill provides for 'infrastructure design solutions' that will be developed as part of the second implementation phase for wastewater standards, with a new provision inserted into the Water Services Act 2021. These voluntary solutions will set out standardised design and operating requirements for modular wastewater treatment plants or components of wastewater treatment plants that are deemed to meet the wastewater standards. This is intended to support network operators to meet wastewater standards in a cost-effective way.

The infrastructure design solutions are initially likely to focus on treatment plants in smaller communities. They are not in scope for this consultation on proposed wastewater standards. They will be developed and publicly consulted on once enabled through legislation as part of the implementation of the standards.

## 4. Our wastewater environment

### By the numbers: Wastewater treatment plants<sup>2</sup>

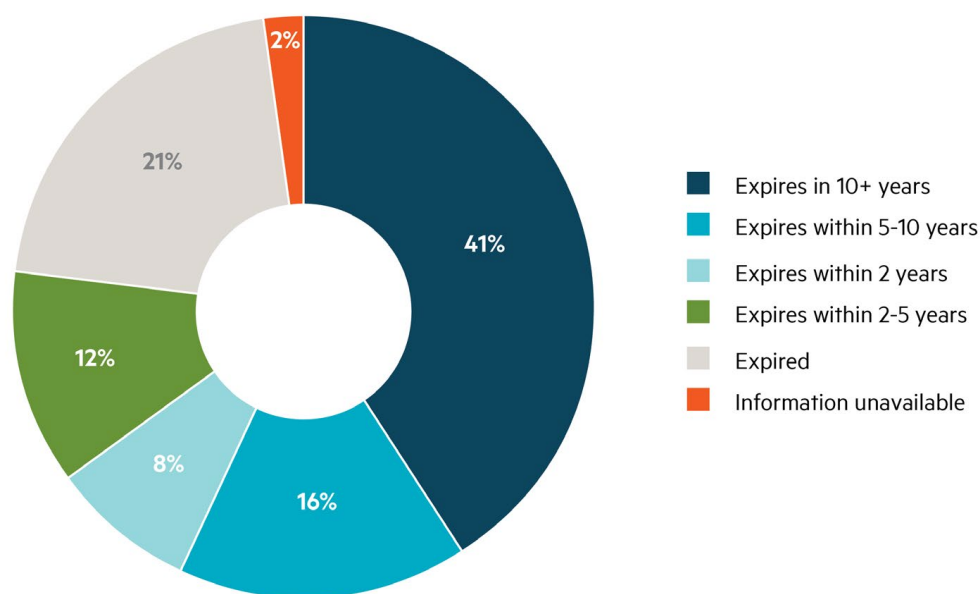
- There are 334 publicly owned wastewater treatment plants across New Zealand, which are owned and/or operated by councils, their council-controlled organisations, or by Crown agencies like the Department of Conservation and the New Zealand Defence Force.
- All 67 local councils operate one or more wastewater treatment plants.
- Approximately 50 percent of wastewater treatment plants serve communities of less than one thousand people.

### What are the main challenges?

**Over the next 10 years, at least 57 percent of consents for wastewater treatment plants will come up for renewal.<sup>3</sup>**

**Already, expired consents make up 21 percent of wastewater treatment plant consents.**

### Wastewater discharge consent expiry timeframes\*



\*Based on 353 primary discharge consents from Water Services Authority Wastewater Discharge Consents Database

<sup>2</sup> These figures are based on the Water Services Authority Database of Wastewater Resource Consents.

<sup>3</sup> The percentage of consents coming up for renewal is based on a Water Services Authority Database of Wastewater Resource Consents. This database was compiled in late-2024 and differs from previously shared numbers of consents coming up for renewal and those that are already expired.

This will place a large consenting burden on councils as well as communities that engage with the consenting process (often on a voluntary basis). There is an opportunity to streamline part of the consenting process, through the introduction of a standardised approach to how wastewater discharges and other wastewater network activities are managed.

The upgrades required to New Zealand's wastewater treatment plants and the associated networks represent a significant infrastructure challenge for councils. A large portion of New Zealand's wastewater plant infrastructure was built around 30-40 years ago, with network infrastructure typically older and in unknown condition. In many cases, significant upgrades are now needed.

Many networks have limited capacity to accommodate population growth, which increases the rate and frequency of overflows and means wastewater treatment plants need to be upgraded to manage increasing demands due to urban development and housing growth. In Auckland, for example, there are current wastewater network constraints limiting development, in areas such as the Hibiscus Coast and Warkworth.

### The realities for smaller plants

Approximately 50 percent of wastewater treatment plants serve communities of fewer than one thousand people. The technology used in these small plants tends to be relatively simple (e.g., mostly oxidation pond-based systems).

Oxidation pond-based systems often cannot perform to the same standard as more technologically sophisticated plants. Affordability challenges are particularly felt in smaller communities, with the cost of consenting and upgrading treatment plants falling on limited or declining ratepayer bases in areas such as Southland. Geographic constraints often mean amalgamating smaller treatment plants is not feasible.

[Source: The Southland Economic Project \(2018\)](#)

### The effects-based consenting process is complex, costly and varies across the country

Under the Resource Management Act 1991, wastewater treatment plants require several resource consents, including for discharges of treated wastewater to water or land, discharges to air (including odour), certain activities associated with beneficial reuse of biosolids, land use for the treatment plant, and in some regions, overflows.

The resource consenting process follows an effects-based approach, which means managing the effects of activities on the environment, rather than the activities themselves. This approach has led to three main issues:

- there are significant costs in investigating and agreeing on the effects of a proposed activity to inform a consent,
- there is significant variation in wastewater treatment requirements (both across the country and within regions), and this impacts the overall system and its performance in multiple ways, and
- there is a lack of transparency about how the wastewater system is performing.

### There is significant variation in wastewater treatment requirements across the country

The existing resource management system is based on the consenting arrangements for wastewater treatment plants and networks being set "at place" based on a particular plant, the associated receiving environment and the specific effects on it, and any community preferences about the arrangements. This approach has led to significant variation in treatment limits, monitoring and reporting requirements from plant to plant, with no consistency based on common areas such as the age of a plant, its treatment processes or infrastructure, or impacts on the receiving environment. The approach has also resulted in significant design, operating and consenting costs for plants, long consent processing times and treatment arrangements determined without any clear baseline or expectations for what "good" treatment should be. The bespoke process limits potential efficiencies and cost savings, for example, from standardising how treatment plants are designed, constructed and operated.

Compliance with consents can be particularly challenging due to the varying treatment limits and inconsistencies in consent conditions. Many contaminants have no limits placed on them, or alternatively are articulated in ways that make compliance and enforcement difficult or impossible. Regional councils may experience challenges in taking timely and consistent enforcement action due to a lack of reliable information.

### There are significant costs in investigating and determining the effects of a proposed activity for a consent

The consenting process for infrastructure such as wastewater is complex, time-consuming and expensive. Costs are often incurred through:

- engaging technical specialists to assess environmental effects and required plant upgrades,
- consultation with communities and other potentially affected parties,
- peer review by the consenting authority, and
- at times, Environment (or High) Court appeals.

Resource consenting for wastewater has also had to occur in parallel with implementing freshwater policy changes, for example, under the National Policy Statement for Freshwater Management. This has required considerable time and effort from councils and their communities.

#### The variable cost of wastewater consents

A 2021 report prepared by the New Zealand Infrastructure Commission – Te Waihanga looked at the cost of consenting infrastructure projects in New Zealand. The report found the cost of consenting to be considerably higher in the waste and water sectors (compared to other infrastructure sectors).

This was largely driven by the amount of expert advice and intensive engagement required. The report also found that the most significant indirect costs are those associated with delay. Funding set aside for infrastructure upgrades may be unable to be used due to significant consenting delays. The cost of construction and availability of resources (labour and materials) may change during the consenting processes.

A national stocktake of wastewater treatment plants, undertaken in 2019, found a range of reasons for why treatment plants are operating on expired consents. These reasons include the capacity and capability of small councils to manage the consenting process, lengthy and/or difficult consultation processes, and affordability constraints to meet community expectations.

[Source: National stocktake of municipal wastewater treatment plants \(2019\)](#)

[Source: The cost of consenting infrastructure projects in New Zealand \(2021\)](#)

### There is a lack of transparency about wastewater system performance

The general age and condition of wastewater infrastructure has implications for communities, including for public health and environment quality. When wastewater systems are not properly managed, including the collection, treatment, and disposal processes, it can lead to various health issues and risks. A badly maintained wastewater system can expose communities to disease-causing pathogens; and in disaster situations, such as floods, the risk of water-borne diseases travelling through a community can increase.

The impacts of deferred maintenance include an increase in overflows from the broader network. In an overflow, untreated wastewater escapes from a network into environments including streams, rivers, harbours and coastlines. This impacts community members using these environments to swim or gather food, as well as the plants and animals living there.

Despite these impacts on communities, public information about the performance of wastewater networks is hard to find. The lack of transparency and consistent public reporting makes it difficult to understand how environmental and public health risks are being managed. There is an opportunity for the Authority to improve national consistency through its monitoring and reporting functions, which will increase transparency about how wastewater networks are performing. Wastewater standards can also support this work.

### Opportunity and benefits of national wastewater standards

To drive cost efficiencies, save time for both those seeking and issuing consents, and make infrastructure design and procurement more efficient, there is an opportunity to put wastewater standards in place ahead of the large number of consents coming up for renewal.

#### Wastewater standards will drive cost efficiencies in plant design, procurement and operations

The proposed wastewater standards are expected to deliver significant cost-efficiencies relating to consenting costs. The interim regulatory impact statement published with this discussion document (which can be found [here](#)) includes case studies that estimate, for example that up to 40 percent of costs on consenting may be saved through application of the proposed standards. This includes reductions in costs associated with the consenting process including staff time, technical assessments, feasibility assessments, legal costs and consultation and engagement costs.

In some cases, there may also be reductions to capital upgrade costs and ongoing operating costs such as staff training and maintenance. The costs savings on an individual plant will depend on specific circumstances, such as the type or size of the plant, treatment processes, and options for where the plant discharges. However, over time, further costs savings are expected as materials are standardised, and modular options that comply with wastewater standards become available.

Wastewater standards will provide certainty to network owners and operators, so they can better plan for the cost of infrastructure – and leverage cost efficiencies in designing, procuring and operating wastewater treatment plants. This will support territorial authorities in developing future long-term plans (including 30-year infrastructure strategies).

### **The consistency created by national wastewater standards will enable benchmarking of performance and incentivise transparent and consistent compliance and enforcement.**

The Authority publishes system-level information about the environmental performance of wastewater networks [annually](#). Nevertheless, public information about individual wastewater network performance can be hard to find. At the same time, community expectations about how wastewater discharges are managed and reported are increasing.

Establishing nationally consistent wastewater standards will help to:

- ensure communities have access to better information, which will enable clearer expectations about the quality and service of wastewater treatment,
- streamline consent processes (design and engagement) to save applicants time and reduce the cost of consultants,
- provide certainty to local councils as network owners, so that they can plan for the cost of upgrading and maintaining wastewater infrastructure,
- provide opportunities for economies of scale in plant design, procurement and operator capability building / training,
- ensure that overflows from networks are better understood by network owners, ensuring that the pipe infrastructure is appropriately managed and maintained, and public health and environmental risks are reported to affected communities,
- make compliance and enforcement for regional councils easier by standardising the main contaminant limits and monitoring and reporting requirements in wastewater discharge consents,
- enable benchmarking of performance, to drive improved efficiencies over time, and
- improve public health and environmental outcomes over time.

## **Learning from international practices**

National or state-level wastewater standards have been in place for decades in many of the jurisdictions that New Zealand commonly compares itself to, including the European Union (EU), United Kingdom, Australia and Canada.

Internationally, the protection of public health is broadly considered the key driver for setting wastewater discharge regulations, closely followed by environmental protection. Phased introduction of standards is a common approach taken overseas to support the manageability, fiscal impacts and prioritisation of certain upgrades: the EU has applied standards to different sizes of treatment plants over different timeframes as an example.

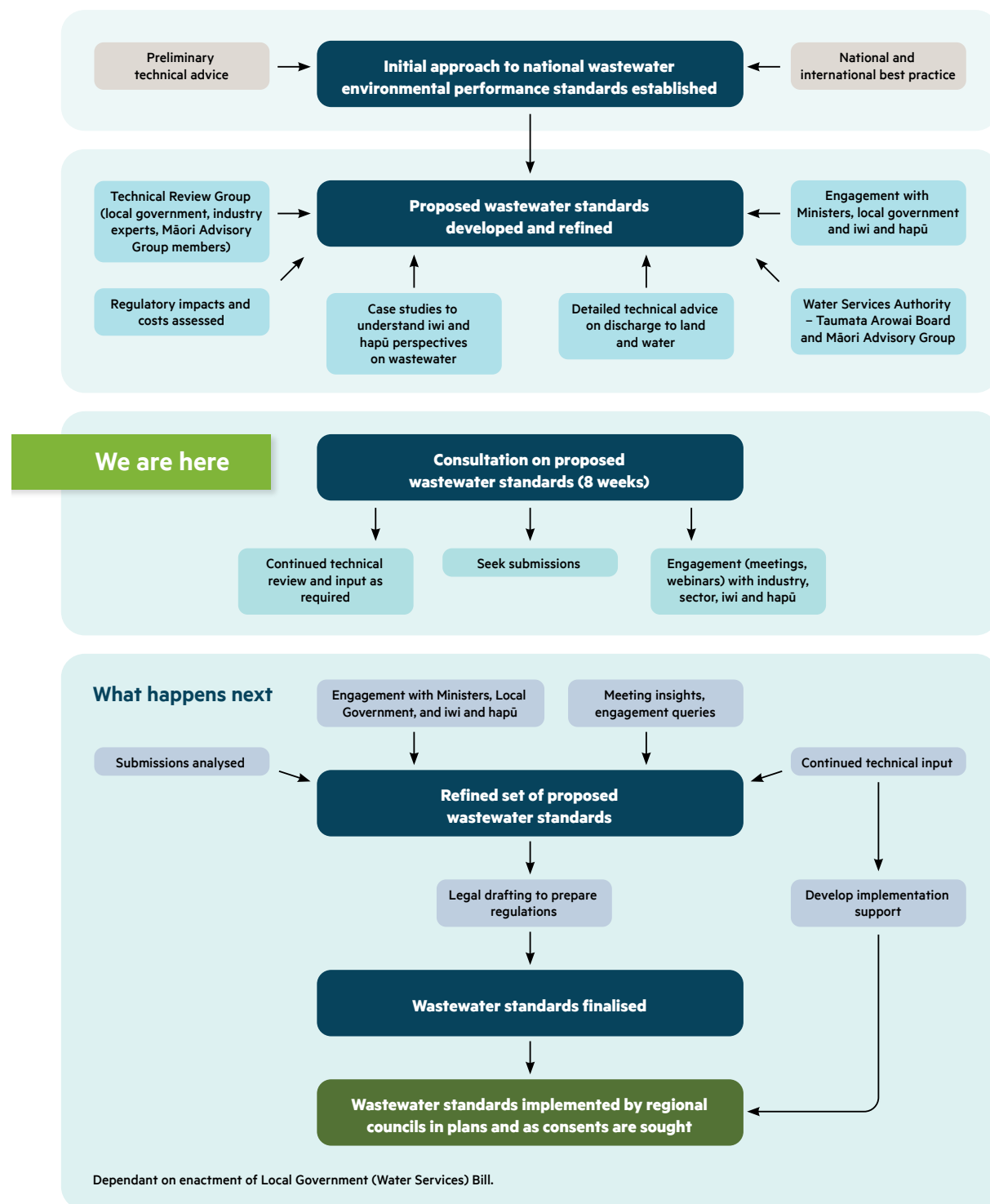
In many jurisdictions there is a population (or population equivalent) or flow (volume) component for setting standards, dependent on discharge type. While there are different approaches to setting, implementing and enforcing standards, there is widespread use of central parameters.

There are well-established monitoring and reporting requirements for overflows in many international jurisdictions that provide detailed information on overflow events – for example, the number, location and volume of overflows. The data collected is used to:

- identify where there are issues (primarily the scale and type of overflows),
- benchmark performance and identify areas for improvement,
- inform the public and community groups,
- prioritise what and where infrastructure improvement is needed,
- develop standards, and
- make investment decisions based on reliable data.

## 5. How were the proposals in this discussion document developed?

### Developing the first set of wastewater standards





The Authority has developed these proposals through a policy process that has drawn on a range of evidence, technical advice and testing with councils and industry experts. This has included:

- reviewing a range of previous work in this area, including the New Zealand Wastewater Sector report (2021), commissioned by the Ministry for the Environment, and a suite of reports commissioned by the Department of Internal Affairs<sup>4</sup>
- commissioning technical reports into potential areas where standards could be made
- commissioning case studies that detail iwi and hapū involvement in wastewater treatment arrangements to better understand Māori values and perspectives, and how existing wastewater treatment arrangements can meet iwi and hapū aspirations
- commissioning detailed technical advice into the discharge to water and land standards

Copies of these documents can be found [here](#).

The Authority convened a Technical Review Group to provide advice on proposals relating to wastewater standards. This group was comprised of individuals with leading expertise across sectors involved with wastewater management, including representatives from regional councils, territorial authorities, industry professionals, and Water New Zealand. Members of the Authority's Board and Māori Advisory Group also participated in the Technical Review Group.

## Regulatory impact statement

An interim regulatory impact statement has been prepared to comply with Cabinet requirements for proposals that will have regulatory impact – this can be found [here](#). This provides a summary of the problem being addressed, the options considered, their associated costs and benefits, the consultation undertaken, and the proposed arrangements for implementation and review. The regulatory impact statement will be updated following consultation and will be considered by the Minister of Local Government and Cabinet as part of the process for the setting of standards.

## Iwi and hapū perspectives on wastewater treatment arrangements

To inform the development of the standards, the Authority engaged with a number of iwi and hapū to understand perspectives on wastewater treatment arrangements. The Authority commissioned a series of case studies to understand how mana whenua views have been incorporated into areas like resource consents, what processes work well, and where there is room for improvement. For each case study, the Authority also engaged with the relevant territorial authority and regional council.

Some of the themes from this engagement include:

- there is a strong preference for ongoing 'at-place' decision-making to ensure that iwi and hapū are involved in decisions affecting them and can actively participate in all phases of wastewater treatment processes. This extends from design arrangements through to monitoring and reporting of the infrastructure once built and its effect on the environment.
- iwi and hapū consider human waste to be tapu (prohibited) due to its impact on the health of people and the environment. This means that human waste must undergo a process of whakanoa (cleansing) before it can be safely integrated back into the environment. There are various ways that wastewater infrastructure has responded to this, including arrangements to allow waste to have contact with land before it is discharged to water.
- the preference is for the highest standard of treatment possible for both water and land-based approaches at the point of discharge. Where wastewater is discharged to water, at minimum it should not have a detrimental impact on the health and quality of the taiao (receiving environment) or the people that use the environment.
- while iwi and hapū strongly prefer discharge to land, there are several examples where this option has not proved feasible. This has primarily been because nearby land is not suitable (e.g., too porous), because the land is highly productive and therefore too expensive, or because the wastewater treatment plant is too large meaning the quantity of land required is not a practical alternative.

<sup>4</sup> This includes the [national stocktake of municipal wastewater treatment plants, and cost estimates for upgrading wastewater treatment plants that discharge to the ocean](#).



- resource consenting processes are often protracted and experiences of working with councils tended to be highly variable, often due to a lack of early engagement and changes in council staff as the key contact point. Iwi and hapū input is often done on a voluntary or in-kind basis and limited (for example, due to competing demands), which makes it difficult to engage consistently. There is therefore a preference for resourcing or funding to enable good engagement in these processes.
- the case studies, together with information from other sources, demonstrated that comprehensive engagement processes involving iwi led to better outcomes from the iwi and hapū perspective.

You can read through the case studies [here](#).

### Treaty settlement obligations and other arrangements between councils, iwi and hapū

There are several legislative and regulatory mechanisms that provide for iwi and hapū engagement and involvement in wastewater management processes. This includes legal obligations between councils and iwi and hapū, as well as the statutory obligations imposed on the Authority to engage early and meaningfully with Māori.

Treaty settlement obligations impose a duty on territorial authorities, regional councils, and decision-makers under the Water Services Act (including the Authority) to have regard to Treaty settlement arrangements that exist and cover the Waikato, Waipā, and Whanganui River catchments.

To inform development of the standards, the Authority is engaging with iwi in these catchments where there are specific settlement obligations to uphold. Broader engagement is also underway with iwi and hapū who have agreements or arrangements with Councils that impact on wastewater arrangements, such as regional participation arrangements under the Resource Management Act 1991, customary marine title holders under the Marine and Coastal Area (Takutai Moana) Act 2011, freshwater obligations under Treaty of Waitangi and parties to joint management arrangement.

This engagement will inform the advice to the Minister of Local Government on how the standards could apply where there are settlement or other relevant obligations.

## 6. A discharge to water environmental performance standard

The **proposed approach** is to establish a discharge to water environmental performance standard that:

- Sets treatment limits for specified contaminants or 'parameters' that will vary depending on different types of receiving environments.
- Imposes monitoring and reporting arrangements for treatment requirements.
- Provides that, where a consent applicant can demonstrate they will meet treatment requirements imposed by the standard, the consent authority must issue a discharge consent with a 35-year timeframe.
- Sets separate treatment requirements that are tailored to small wastewater treatment plants (oxidation ponds) that service very small populations and have a minimal impact on the receiving environment.

### What is a 'discharge to water' from a wastewater treatment plant?

Many wastewater treatment plants discharge treated wastewater to a water body (for example, the ocean or a river). Resource consent conditions set requirements relating to the quality and volume of the discharge, and specify any treatment requirements relating to particular contaminants that are potentially harmful to the environment or create risks to public health.

A resource consent will include monitoring and reporting requirements to track compliance with consent conditions, and require reporting on performance (and any non-compliance) to the relevant regional council.

If the operator of the plant does not comply with these requirements or conditions, they will be in breach of their resource consent. Regional councils are responsible for compliance and enforcement where this occurs – actions can include requiring the operator to remedy the non-compliance, issuing a fine, or commencing court action.

In this context, 'discharge to water' from a wastewater treatment plant does not refer to overflows from the broader pipe network, or where partially treated wastewater bypasses the wastewater treatment plant. These areas are dealt with in the overflows section of this discussion document (covered in [section nine](#) of this document).

Given the impacts of poorly managed pathogens in coastal and freshwater environments (for example, to swimming and shellfish collection), these contaminants are routinely considered for discharge to water consents. For many waterbodies, there are also a range of other activities that impact water quality – for example, recreational boating or activities on nearby farmland. Regional councils manage the cumulative impacts of these activities on water bodies through planning, consenting and enforcement.

### Current arrangements for discharges to water

Based on the Authority's Public Register of Wastewater Networks and a stocktake of resource consents, There are 202 resource consents for wastewater discharges to water.

The management of wastewater discharges to water varies significantly throughout New Zealand and within regions. Variations apply to contaminants and the corresponding limits in consents, as well as their monitoring and reporting requirements.

There are currently 50 wastewater treatment plants discharging to water with expired consents; a situation authorised under section 124 of the Resource Management Act 1991. Of these 50 plants, the average time a plant has been operating on an expired consent is 5 years – the longest is 24 years.

Receiving environments for discharges to water range from large open ocean environments to more static estuarine or lake environments. Generally, due to the significant amount of dilution and dispersion, open ocean environments are less sensitive to discharges than lakes, rivers and streams.

### Relevant documents and processes

Consenting authorities consider a range of documents when managing discharges to water, including:

- The National Policy Statement for Freshwater Management (NPS-FM) and associated National Objectives Framework, which identifies values for freshwater through engagement with mana whenua and communities<sup>5</sup>
- The New Zealand Coastal Policy Statement 2010, which requires consenting authorities to have particular regard to the sensitivity and capacity of receiving environments, nature of contaminants, and avoiding adverse impacts on ecosystems and habitats

<sup>5</sup> The Government has announced that the NPS-FM will be replaced. In preparation for this, the date by which regional councils are required to notify freshwater plan changes has been extended by three years to 31 December 2027. (Footnote updated 11 March 2025)

- Quantitative Microbial Risk Assessments (ORMA), which are increasingly used by consenting authorities to assess the public health risk associated with coastal marine wastewater discharges
- The Australian and New Zealand Guidelines for Fresh and Marine Water Quality (revised in 2018), which provide guidance to assess, manage and monitor the water quality of aquatic systems in Australia and New Zealand.

### How will wastewater standards help to manage discharges to water?

Improving consistency in how discharges to water are managed, and the treatment limits for specific receiving environments will make it easier for network operators to plan, design and operate wastewater infrastructure. It will reduce the complexity of resource consenting and setting conditions.

National standards provide an opportunity to apply consistent limits to a core set of contaminants (such as total nitrogen, total phosphorous, sediment and pathogens) that are discharged from wastewater treatment plants and can impact waterbodies, and the aquatic life and recreational activities in and around these areas. The proposed standards would also set consistent requirements for parameters that indicate there are public health risks, such as *E.coli* or enterococci.

Standards will introduce consistent monitoring and reporting requirements for the core set of contaminants, which will build a clear and comparable picture of how wastewater treatment plants are performing. In future, this information may be used to introduce measures to lift the performance of wastewater networks.

### Proposed approach: discharge to water environmental performance standard for wastewater treatment plants

#### Discharge to water environmental performance standard will specify receiving environment types

It is proposed that treatment requirements will vary depending on the type of receiving environment. This approach is proposed because:

- treatment requirements are generally less stringent where the discharge is to a water body with higher levels of dilution – for example, to the open ocean or a large river;
- conversely, where the discharge is to a water body that has lower levels of dilution or is sensitive in nature, treatment requirements should be higher – for example, a lake or estuary; and
- treatment requirements should differ depending on whether the discharge is to a saline / marine environment or to a freshwater environment.

The proposal is to specify seven categories of receiving environment in the standard, based on dilution and type of receiving environment. A dilution approach is proposed because it is simple, is understood by regulators and operators, and removes the need for more complex (and costly) dispersion modelling. This is reflected in its frequent use in other jurisdictions (including Canada, USA, Switzerland, European Union). It is intended to be a proxy for mixing, as well as the assimilative capacity in the receiving environment and the relative scale of the discharge in relation to the volume of the waterbody.

$$\text{Dilution ratio} = \frac{\text{Volume} + \text{Flow}}{\text{Volume}}$$

**Volume:** the largest predicted annual median for discharge volume, across the duration of a consent (m<sup>3</sup>/day)

**Flow:** the average of the lowest 7 days average flow across a year (m<sup>3</sup>/day)

The following categories of receiving environment are proposed:

Category of receiving environment	Definition
Lakes and natural ponds with dilution ratio >50	Body of standing freshwater, which is entirely or nearly surrounded by land. It includes lakes and natural ponds but excludes any artificial ponds. Typically, low energy depositional environment in which dispersion/dilution is limited by an absence of strong water currents.
River or stream with dilution ratio >10 and <50 (low)	A continually flowing body of fresh water, including streams and modified watercourses, but excludes any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal).
River or stream with dilution ratio >50 and <250 (moderate)	Rivers or streams or streams with very low dilution (dilution ratio <10) are excluded from the standards due to their lower ability to assimilate wastewater discharges.
River or stream with dilution ratio >250 (high)	
Estuaries with dilution ratio >50	A partially enclosed coastal body of water that is either permanently or periodically open to the sea in which the aquatic ecosystem is affected by the physical and chemical characteristics of both runoff from the land and inflow from the sea. It includes features variously named on the NZMS 1:50,000 topographic maps as estuary, creek, firth, inlet, gulf, cove, river mouth, bay, lagoon, harbour, stream, fjord, sound, haven, and basin. <sup>6</sup>
Low energy coastal with dilution ratio >100	Area that is sheltered from large waves and long period waves. Occur in gulfs and behind islands and reefs on the open coast and includes recessed harbours and embayments.
Open ocean with dilution ratio >1000	Water that is remote from estuaries, fiords, inlets, harbours, and embayments, typically >500m from a shoreline and high energy environment.

## Seasonality

Assessing the seasonal implications of wastewater discharges is complex because changes occur both at the treatment plant and in the receiving environment.

Flow varies in the receiving environment and is typically low in summer and higher in winter. Sensitivity of the receiving environment – to nutrients in particular – varies seasonally usually with a greater probability of eutrophication effects in warmer temperatures. In summer months, the discharged nutrient loads pose a greater risk to the receiving environment because the waterbodies are in a low flow state. Over the year, flows in and out of some treatment plants may increase due to significant increased visitor numbers relative to the usual population. Wastewater treatment plants should be designed in a way that accommodates changes in flow.

The risk of seasonal fluctuations in flow is addressed using:

- the 7 Day Median Annual Low Flow to establish the proposed dilution categories.
- the Median Design Flow and proposed numeric limits manage loading to the environment and forms the basis for the discharge volume that will be consented.
- the annual median statistical basis in the proposed standard allows for some flexibility over the course of the year.

These features of the proposed approach provide flexibility to allow for seasonal variation while maintaining an appropriate level of protection for freshwater environments under low flow conditions. This approach will mean that treatment plants are effectively designed to meet the proposed standard across all seasons.

<sup>6</sup> A list of estuaries in New Zealand can be found here: [Assessment of the eutrophication susceptibility of New Zealand's estuaries | Ministry for the Environment](#)

### Parameters and numeric limits for discharges to water

The proposed discharge to water standard sets limits on the contaminants most commonly found in treated wastewater discharges. In the case of *E. coli* and enterococci, they are faecal bacteria indicators that, if present in sufficient quantities, indicate that other harmful pathogens may be present that can cause illness.

Some effects are not covered by the proposed standard as they are influenced by site-specific factors and will therefore continue to be addressed by regional councils during the consenting process. These include:

- The volume of discharge: this relates to site-specific effects such as scour, as well as the scale of the discharge relative to the receiving water body.
- Cumulative effects of contaminants from other sources and their impact on the broader catchment.\*
- Toxicity of metals and other contaminants, such as pesticides, drugs, antibacterial agents and PFAS.
- The presence of artificial chemicals, such as microplastics.
- Bioaccumulation of contaminants in organisms in the receiving water body, such as mercury. (note, the standards address the risk of bioaccumulation on human health after eating affected organisms, particularly filter feeders such as mussels).
- Other effects, such as odour, noise and the location of the discharge structures and bypasses.

\*Bullet point above updated on 10 March 2025 to make it clearer.

### Contaminants and parameters not covered by the proposed discharge to water standard

Where contaminants are not covered by the standard (for example, heavy metals), the usual resource consenting process would apply. This would mean regional councils may set an appropriate limit on these contaminants if this is considered necessary. We anticipate these limits would likely draw on the Australian and New Zealand Guidelines for Fresh and Marine Water Quality, or other factors that a regional council considers appropriate.

Some of the parameters covered by the standard will regulate the levels of other contaminants not covered by the standards. For example, limits proposed for Total Nitrogen will also regulate levels of heavy metals in a treated discharge.

When there are multiple metrics for a parameter the standard is intended to cover all types of that parameter. For example, parameters are proposed for Total Nitrogen and Total Phosphorous and this is intended to cover all forms of nitrogen and phosphorous. This means that a consent may not include different treatment limits for types of nitrogen or phosphorous.

Wastewater standards may be expanded in future to include additional contaminants where there is a clear body of evidence and there would be benefit in having a nationally consistent approach.

### Treatment requirements for discharges to open ocean

Discharges to open ocean are typically subject to a higher rate of mixing and dispersion, subject to stronger tidal and wind currents, and tend to have less frequent public access to the discharge point.

To reflect the assimilative capacity of the open ocean, discharges are only required to treat for enterococci and ammoniacal-nitrogen. This is on the assumption that discharges to ocean and coastal receiving waters will be milli screened to remove solids, as is common in wastewater treatment plants in New Zealand. Trade Waste bylaws also typically control and manage the effects of the discharges of highly coloured waste streams to ocean and coastal receiving waters, as well as known toxic compounds.

### Pathogen limits for discharges to water

As an alternative to the default limits in the standard and to protect shellfish health, we are proposing that a Quantitative Risk Management Assessment (QRMA) could be completed to determine what numeric parameters apply for pathogens (enterococci and *E. coli*) in situations where:

- shellfish is routinely collected, and these areas could be impacted by a new outfall discharge, or
- regular monitoring of an existing discharge has indicated some microbial contamination of shellfish.

The outcome of the QRMA would be used to determine whether the consent holder could meet a higher or lower limit from the proposed standard. We have commissioned additional technical advice about what these limits should be.

#### We would like your feedback on the following question:

- How should we consider checks and balances to protect against situations where the degree of microbial contamination may change throughout the duration of a consent?

### Exceptions to the proposed standard

The proposed standard will not apply in all situations. For discharge to water arrangements that aren't captured by the proposed standard, the wastewater standards would not apply, and any treatment requirements would be set in resource consent conditions by the relevant regional council.

The proposed standard will not apply in the following situations:

- discharges to a waterbody that meets the requirements of Attribute Band A for all attributes contained in Appendix 2A and Appendix 2B of the NPS-FM. This will only be a very small proportion of New Zealand's water bodies that are in a natural, undegraded state.
- discharges to rivers or streams with very low dilution (with a dilution ratio of <10).
- discharges from a wastewater treatment plant directly to an aquifer (commonly known as deep well injection). This is relatively new technology and there are currently no treatment arrangements of this nature in New Zealand.
- discharges to natural wetlands (i.e., those which are not part of the treatment process for the wastewater discharge).

- discharges within the following proximities:
  - » 1,000m upstream or 100m downstream of human drinking water abstraction points in rivers
  - » 500m radius from human drinking water intakes in lakes
    - ~ 1,000m upstream of any tributaries that discharge to lakes within the 500m radius from intakes
- discharges to a waterbody that has naturally high levels of a particular parameter. This is not intended to capture waterbodies that have existing high levels of a particular parameter due to diffuse discharges that occur through land use such as farming.

#### We would like your feedback on the following questions:

- Are the areas for exceptions appropriate to manage the impacts of discharges and do you anticipate implementation challenges?
- How should the exceptions be further defined to ensure there are no unintended consequences?

## Parameters covered by the discharge to water standard (including the rationale, measurement unit and numeric limits)

Parameter, rationale and statistic	Lakes and natural ponds	Rivers and streams (low dilution)	Rivers and streams (moderate dilution)	Rivers and streams (high dilution)	Estuaries	Low energy coastal	Open ocean
<b>Carbonaceous Biochemical Oxygen Demand (cBOD<sub>5</sub>)</b> <b>Rationale:</b> cBOD <sub>5</sub> can indicate the effectiveness of wastewater treatment processes. High levels of cBOD <sub>5</sub> can deplete dissolved oxygen and harm aquatic life. <b>Statistic:</b> Annual median	15 mg/L	10 mg/L	15 mg/L	20 mg/L	20 mg/L	50 mg/L	Not applicable
<b>Total Suspended Solids (TSS)</b> <b>Rationale:</b> Total Suspended Solids an important visible indicator of water quality. Suspended solids absorb light, which can increase water temperature and decrease oxygen levels in waterbodies. <b>Statistic:</b> Annual median	15 mg/L	10 mg/L	15 mg/L	30 mg/L	25 mg/L	50 mg/L	Not applicable
<b>Nutrients (Total Nitrogen and Total Phosphorous)</b> <b>Rationale:</b> Nutrients can affect ecosystem health through eutrophication, increases in plant growth (e.g., algal blooms) and reduced water clarity. The proposed discharge to water standards sets limits on total nitrogen and total phosphorous. For each of the subcategories, limits for nutrients reflect flow and loading.	10 mgN/L	5 mgN/L	10 mgN/L	35 mgN/L	10 mgN/L	10 mgN/L	Not applicable
<b>Total Nitrogen –</b> <b>Statistic:</b> Annual median							
<b>Total Phosphorus –</b> <b>Statistic:</b> Annual median	3 mgP/L	1 mgP/L	3 mgP/L	10 mgP/L	10 mgP/L	10 mgP/L	Not applicable
<b>Ammoniacal-nitrogen (ammonia)</b> <b>Rationale:</b> Ammonia can deplete oxygen levels in water, resulting in reduced biodiversity and declining fish populations. <b>Statistic:</b> Annual 90%ile	3 mgN/L	1 mgN/L	3 mgN/L	25 mgN/L	15 mgN/L	20 mgN/L	50 mgN/L
<b>E. coli</b> <b>Rationale:</b> As with enterococci, <i>E. coli</i> indicates the presence of pathogens and faecal pollution in freshwater. <b>Statistic:</b> Annual 90%ile	6,500 cfu/100mL	1,300 cfu/100mL	6,500 cfu/100mL	32,500 cfu/100mL	Not applicable	Not applicable	Not applicable
<b>Enterococci</b> <b>Rationale:</b> Enterococci and <i>E. Coli</i> indicate the presence of disease-causing bacteria, viruses or protozoa. Enterococci is the most suitable bacteria to test for in marine waters. <b>Statistic:</b> Annual 90%ile	Not applicable	Not applicable	Not applicable	Not applicable	2,000 cfu/100mL	4,000 cfu/100mL	40,000 cfu/100mL



### Compliance, monitoring and reporting requirements

Compliance, monitoring and reporting requirements are proposed as part of the discharge to water standard. These will be included in the consent relating to the wastewater treatment plant, and the consent holder will be required to comply with the monitoring and reporting requirements as a condition of the consent.

Compliance, monitoring and reporting requirements are a standard feature of consent conditions. However the detail of these arrangements varies widely from consent to consent and region to region, and this results in poor outcomes including:

- Some compliance conditions in consents are not articulated in a way that makes breach of a condition or limit enforceable – this compromises enforcement action and can impact on environmental outcomes.
- Differences in monitoring and reporting from plant to plant is, in some cases, an unjustifiable regulatory burden to both operators and regional councils when the plant arrangements are broadly similar.
- There is currently a lack of transparency (and public accountability) for compliance of plants with conditions of a consent.
- It is currently not possible to benchmark performance from plant to plant or operator to operator, which is a standard feature of many other jurisdictions.

Operators will be required to monitor compliance with each of the parameters covered by the standards. The following requirements will apply to all wastewater treatment plants:

- Monitoring the discharge directly from the discharge point ('end of pipe' monitoring) will be required for all contaminants covered in the proposed standard.
- The standard will not require receiving environment monitoring.
- Monitoring requirements are set out in the table of parameters and are based on either the 90th percentile or annual median.

The frequency of monitoring will vary according to the size and complexity of a wastewater treatment plant increases, so does the frequency of the monitoring required:

- Continuous monitoring will be required for wastewater treatment plants serving populations greater than 10,000 – this is already often the case in resource consents for plants of this size.
- Fortnightly monitoring is required for plants serving populations between 1,000 and 10,000 people.
- Monthly reporting is required for small-scale plants serving 1000 people or less.

The following proposed reporting requirements would apply to all parameters:

- Any breach of a parameter must be reported by an operator to the relevant regional council as soon as reasonably possible after the breach is detected.

- An operator must publish compliance against parameters in applicable standards on a monthly basis, on a publicly available website maintained by the operator, and provide the report to the relevant regional council.
- Annual reporting is required of compliance against parameters in applicable standards to regional council and the Water Services Authority.

To provide confidence in how the standards are implemented, network operators will be required to engage a third party, on an annual basis, to audit compliance with matters covered by the standard, including monitoring and reporting requirements. Costs associated with third party auditing will be covered by network operators, rather than consenting authorities.

#### We would like your feedback on the following questions:

- Are the treatment limits, and monitoring and reporting requirements proportionate to the potential impacts of the different discharge scenarios?
- What benefits and challenges do you anticipate in implementing the proposed approach? Are there particular matters that could be addressed through guidance material?

### Periphyton

Periphyton is the slime and algae that grows on primarily hard-bottomed waterbodies such as beds of streams and rivers and requires certain environmental conditions to grow. While it is essential for healthy ecosystems, periphyton can have significant environmental impacts when it proliferates – it can degrade swimming and fishing spots and clog irrigation and water supply intakes. Periphyton is increasingly being used as an indicator of waterbody health, for example, in the Waikato River Authority's River Health and Wellbeing Report.

The Authority proposes that, where a wastewater treatment plant discharges to a hard bottomed or rocky stream or river, the nitrogen and phosphorous limits in the standard would not apply, and the treatment requirements will be set on the basis of a site-specific risk assessment. This represents a best practice approach and is commonly undertaken in existing consents. Based on the outcome of assessment, the infrastructure owner would develop an approach that would be incorporated in the discharge consent.

#### We would like your feedback on the following questions:

- What feedback do you have for managing periphyton in hard bottomed or rocky streams or rivers?
- What detail should be covered in guidance to support implementing this approach for managing periphyton?



## A discharge to water standard for small wastewater treatment plants

The wastewater standard for discharges to water will set different treatment requirements for small plants that service very small communities given how many are in this category and their shared characteristics. These plants are significantly different to those that service larger towns and cities. Most of these plants are oxidation ponds that rely on passive treatment processes that require little operation and less frequent monitoring, at sites that are isolated and often do not have access to electricity.

These plants generally have a low impact on the receiving environment, particularly in relation to nutrients, compared to other sources in the surrounding catchment. Different standards are therefore proposed for small plants that are proportionate to their scale and operating requirements.

The criteria for small plants would be based on the influent cBOD<sub>5</sub> load entering the treatment plant.

- If an existing plant receives a mean annual influent cBOD<sub>5</sub> load of 85kg / day or less, it will qualify for the small plant standard.
- The small plant standard would only apply to existing plants with a mean annual influent load of this volume or less.

We have defined small plants using the average cBOD<sub>5</sub> rather than population served to account for situations where a plant may service only a small population but also receive waste from significant industrial or trade-waste sources.

New treatment plants, including those that meet the definition of small plants, will need to be designed and operated to meet the default standards.

Where the influent cBOD<sub>5</sub> load increased so that it no longer qualified for the small plant standard, it would need to be upgraded to meet the general standard. This would be specified as a condition of the consent.

The discussion document identifies potential specific characteristics for the small plant standard including:

- removal of treatment requirements for total nitrogen (TN) and total phosphorous (TP) – an ammoniacal nitrogen standard would continue to apply because of its toxicity

Feedback is sought on less stringent treatment requirements for other parameters:

- *E. coli* / enterococci could be made less stringent, particularly where limited human contact with receiving waters occurs
- a standard for dissolved cBOD<sub>5</sub> rather than cBOD<sub>5</sub> and TSS limit could be reduced recognising that solids discharged from a well operated wastewater treatment are likely to be algae solids
- operational requirements such as regular desludging of oxidation ponds – these would be included in the consent for the plant.

### We would like your feedback on the following question:

- How should we define small plants and what changes to the default standards should apply to them?

## 7. A discharge to land environmental performance standard

The **proposed approach** is to establish a discharge to land environmental performance standard that:

- Sets out a risk-based framework, to determine what types of land treated wastewater may (or may not) be discharged to.
- Sets out treatment requirements, to reflect each risk category, for wastewater that is discharged to land.
- Imposes monitoring and reporting arrangements.
- Provides that, where a consent applicant is able to demonstrate that they will meet treatment requirements imposed by the standard, the consent authority must issue a discharge consent with a 35-year timeframe.

### What is a 'discharge to land' from a wastewater treatment plant?

In this discussion document, discharges to land refer to discharges of treated wastewater from wastewater treatment plants only, rather than discharges from onsite arrangements such as septic tanks.

While the majority of treated wastewater is discharged to water (freshwater or coastal), approximately 35 percent of wastewater treatment plants discharge treated wastewater to land. Some treatment arrangements are seasonal, with wastewater being discharged to water during conditions when rainfall means wastewater levels are higher and conditions are less suitable for discharge to land. It is more common for small wastewater treatment plants to discharge to land. Discharging treated wastewater to land is often used to provide an additional layer of treatment – for example, through physical filtering.

Treated wastewater can be discharged to land using a variety of methods, to influence how quickly it is released and what method is used. The characteristics of the land will also impact how treated wastewater can be applied. Broadly, land application falls into the following categories:

- **Discharging to rapid infiltration basins:** where treated wastewater is applied to areas that are highly permeable. Compared to other methods, this requires a much smaller area of land but requires deep and highly porous soils, and typically require relatively high-level wastewater treatment beforehand.
- **Slow rate irrigation systems:** where treated wastewater is applied to the surface of a site with plants, crops or pasture.
- **Discharging to sub-soil:** where treated wastewater is applied through buried distribution lines, typically using drainage fields.

- **Discharge to wetlands:** where wetlands are unsealed and unlined, some or all of the discharge will infiltrate through the base of the wetland. This is typically considered a discharge to land. Some wetlands constructed for the purpose of wastewater treatment may collect the discharge at the end of the wetland and pump this to a land application site, this would also be considered a discharge to land.
- **Discharging to land where there is human contact (for example, parks or golf courses):** this is typically done using slow-rate surface irrigation, usually with a much slower flow rate.
- **Mixed wastewater discharge systems:** in some situations, depending on factors such as weather, treated wastewater is only discharged to land for part of the year. Heavy rainfall compromises the ability of the land to absorb discharges.

Discharging to land is technically more complex than discharging to water, for several reasons:

- The topography of the land used will impact the degree of soil erosion and runoff, what plants are suitable and which wastewater disposal system should be used.
- Climate conditions impact how feasible land discharges are.
- Some soils do not have capacity to absorb wastewater or may become oversaturated over time.
- Land-based discharges can lead to potential contamination of water – particularly through nitrogen leaching.
- As the distance between land disposal sites and wastewater treatment plants increases, so do the capital and operating costs.

### Rapid infiltration basins are not covered by the Standard

At this stage, the proposed standard is limited to low-rate infiltration arrangements. This is because there are some fundamental differences in design and operation compared to slow-rate irrigation systems. As a result, it is anticipated that the design and application of limits on nutrients and pathogen loads for rapid infiltration systems will require detailed, site-specific assessments. Given the complex nature of land discharge and the need for further technical work, rapid infiltration systems will be addressed in a subsequent standard.

### Current arrangements for discharges to land

Resource consents set requirements relating to matters such as the quality and volume of the discharge, and include treatment requirements relating to particular contaminants that are potentially harmful. Currently, there are no standardised consent conditions for wastewater discharged to lands. This creates variation in what contaminants are covered in consents and what limits apply. This has impacts on network operators – in their ability to plan, design and operate wastewater infrastructure.

Some regional plans include policies that promote land-based disposal of wastewater, for example:

- The proposed regional plan for Northland states that an application for a consent to discharge to water resource consent will generally not be granted unless discharge to land has been considered and found not to be environmentally, economically or practically viable (D.4.2 of Proposed Regional Plan, 2024).
- The Greater Wellington Regional Council Operative Natural Resources Plan indicates a preference for land-based discharge of wastewater. New discharges of treated wastewater to coastal water are discouraged and new wastewater discharges to freshwater are to be avoided unless discharge to land is not practicable.

The New Zealand Land Treatment Collective has developed the *New Zealand Guidelines for Utilisation of Sewage Effluent (2000)*. These guidelines have been designed to support network operators and consenting authorities to consider relevant factors for planning, design, consenting, management, and monitoring of a land treatment system.

### Relationship with recycling treated wastewater for non-potable reuse

Some jurisdictions have treatment standards for reuse of treated water for non-potable use – for example, to irrigate sports fields, parks, or horticulture, or for dust suppression. There are broader conversations happening in New Zealand about how to reuse treated wastewater for non-potable purposes. While this is out of scope for the first set of wastewater standards, it may be picked up in future – particularly with increasing demand to consider alternative water sources with population growth and pressure from climate change.

### Opportunity

A national environmental standard for discharges to land informs site selection and evaluation, provides certainty for what limits need to be met through consents, and confirms what monitoring and reporting requirements apply.

While the standard doesn't determine how wastewater should be managed, it will support councils to have discussions with communities about where treated wastewater should be discharged and help them evaluate the trade-offs and costs of different options.

### Proposed approach: discharge to land environmental performance standard for wastewater treatment plants

#### Risk management assessment for specific types of land

The proposal is for a risk management assessment of the site and its suitability, which can be applied to specific land scenarios. This approach is a common way to consider whether a potential site is appropriate to discharge to, ahead of incurring significant expense through technical assessments.

The feasibility of potential sites is assessed using a baseline assessment, which will allow a network owner to assess the suitability of land and the treatment requirements early in the process. This assessment also allows risks to be identified, managed and mitigated in a way that will allow land discharge to be a viable alternative to discharge to water, especially for smaller wastewater treatment plants.

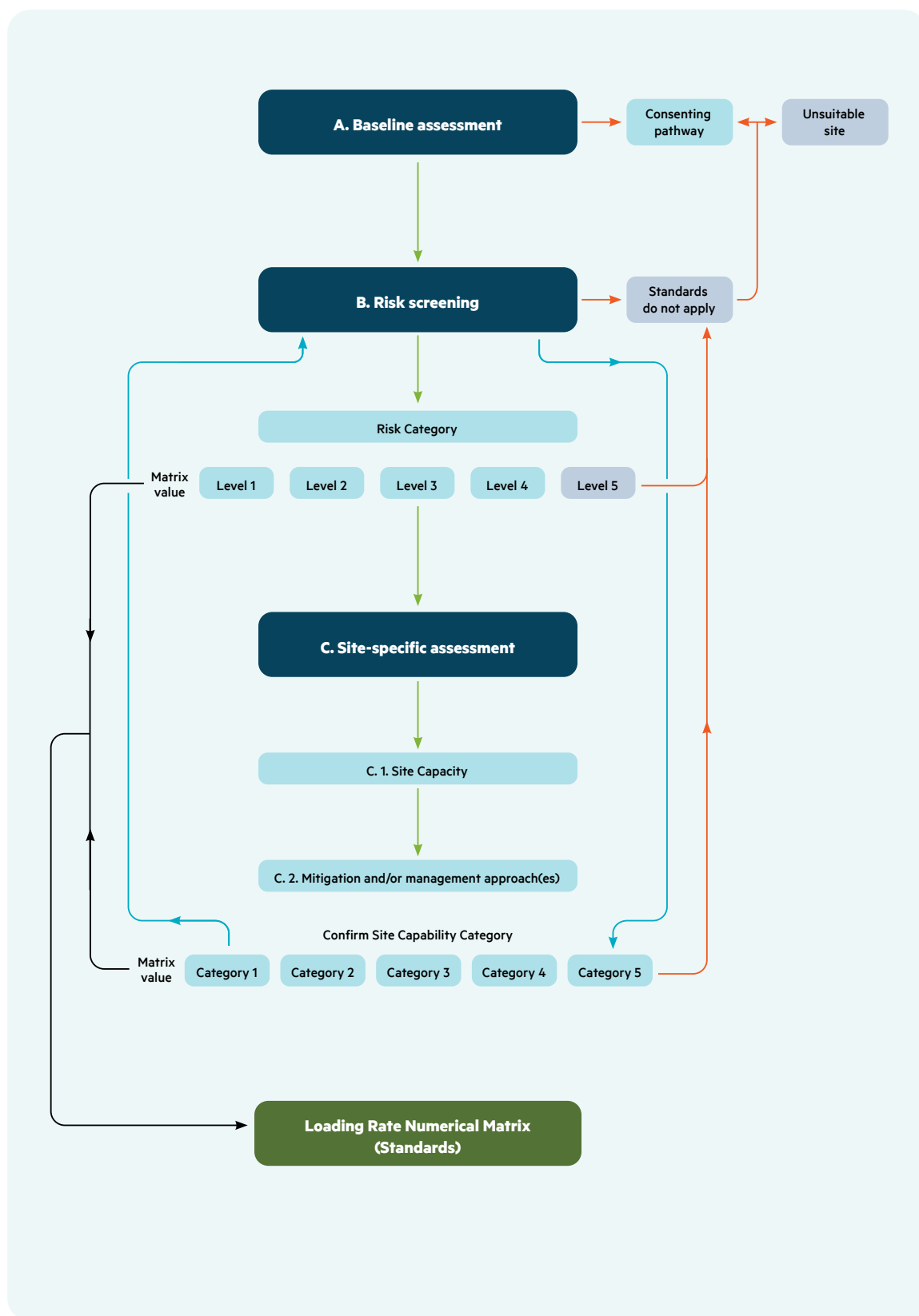
To encourage standardisation, while accounting for variables that influence site suitability, we have developed a risk-based framework that ensures all relevant factors are considered. The risk-based approach will consider a range of variables to determine a risk class for the land which will then set treatment requirements and application limits that apply. Detail about this approach and how it will apply is set out in **Appendix Four**.

The risk-based approach is comprised of three components:

- a desktop feasibility assessment of prospective land (to consider factors such as climate and underlying geology);
- a risk screening assessment which generates a score that to indicate the risk category; and
- a site-specific assessment, which determines the capability of the site and identifies necessary mitigation measures and management approaches.

A diagram outlining the risk assessment process is set out below:

## Preliminary assessment



A baseline assessment will confirm whether a site is suitable to apply to standards to. This assessment will consider items such as underlying geology and groundwater, physical attributes of the site such as topography and size, and current or proposed land uses.

In situations where potential sites are deemed unsuitable for discharging treated wastewater, this is generally intended to prevent risks of:

- adversely impacting public health.
- run-off, erosion and reduced infiltration efficiency (for example, where discharged at surface or above surface irrigation on slopes greater than 10 degrees).
- infrastructure failure, groundwater contamination, surface runoff and environmental degradation (for example, where sites are geologically unstable).
- leaching and groundwater contamination in situations where soils are inappropriate for land application (for example, heavy clay and peat soils).
- compromising cultural heritage, traditional land use practices, and respect the values of local communities. This captures areas which are wāhi tapu, tūpuna, and other sites on Rarangi korero / New Zealand Heritage List.

Sites will also be deemed unsuitable where it is necessary to protect public health, preserve soil health and prevent contamination of crops (for example, irrigation to human food crops). Situations where a customised design approach is needed, for example, for partial land discharge arrangements such as riparian strip wetlands and mix-and-match schemes, are also considered unsuitable.

Suitable sites will move through to more detailed risk screening and site-specific assessments.

Risk screening involves applying a qualitative risk assessment tool, to identify pathways for contaminants (Total nitrogen, Total phosphorous and *E. coli*) to reach a receptor as a result of the discharge. This will consider environmental, public health, and social risks. A risk category between 1 – 4 will be assigned.

A site-specific assessment will involve a detailed check of key factors to understand the capability of the site to receive and manage a discharge. This will consider the proposed application method, detailed groundwater and soil assessments, and possible options for mitigating the effects of a discharge. A site capability category between 1 – 4 will be assigned.

		Site Capability Category				
		Site has decreasing ability to manage discharges →				
		1	2	3	4	
Risk Category	Greater pathways for contamination ↓	1	Class 1	Class 1	Class 2	Class 3
		2	Class 1	Class 2	Class 2	Class 3
		3	Class 2	Class 2	Class 2	Class 3
		4	Class 2	Class 2	Class 3	Standards don't apply (Category 5)

Combining the risk and site capability categories will then determine the overall Class for the site, and the subsequent loading rates and numeric limits that apply for parameters covered by the standard. The table below sets out which parameters are covered by this standard and the rationale for each parameter.

Parameter	Rationale
<b>Total Phosphorus</b>	The proposed discharge to land standard uses total nitrogen and phosphorus as they represent the sum of all forms of these nutrients present in wastewater. Managing these nutrients is important to avoid run-off to waterbodies causing eutrophication.
<b>Total Nitrogen</b>	
<b><i>E. coli</i></b>	The proposed discharge to land standard includes <i>E. coli</i> as it indicates the presence of pathogens and faecal pollution in soil.

The Class determines what numeric limits need to be met for parameters covered by the standard. Where no limit applies for *E. coli*, this assumes the pathway/receptor connection can be adequately removed. The loading rates and concentration with each class account for total load from a site, including from the discharge itself, the land on which it is applied and how it is managed.

Class	Total Nitrogen (kg/ha/year)	Total Phosphorous (kg/ha/year)	<i>E. coli</i> (public health) (cfu/100mL)
1	500	75	No limit
2	250	50	< 2,000
3	150	20	< 1,000

The hydraulic loading rate for discharges to land shall not exceed 5 mm/hour or 15 mm/application event. This application rate reflects the capacity of many soil types and is designed to avoid significant ponding or surface run-off.

### Contaminants and parameters not covered by the proposed discharge to land standard

Some parameters, such as total suspended solids and heavy metals, are not directly covered by the proposed standard. These will need to be considered when designing and maintaining the land discharge system, to avoid operational risks such as blockages and surface run-off. Where contaminants are not covered by the standard, the usual resource consenting process would apply, and regional councils would set an appropriate limit.

We may expand the standards in future to include additional contaminants where there is a clear body of evidence and there would be benefit in having a nationally consistent approach.

#### We would like your feedback on the following questions:

- Are the proposed parameters appropriate to manage the impact of wastewater discharges to land?
- What benefits and challenges do you anticipate in implementing the proposed approach? Are there other particular matters that could be addressed through guidance material?

### Management and Operation Plans

All consents that involve the discharge to wastewater to land will be required to be the subject of a Management and Operation Plan. These plans should include detail about:

- site restrictions
- site inspection requirements (general site operation)
- management requirements and recommendations
- maintenance and contingency requirements, and environmental monitoring
- environmental monitoring and reporting requirements.

Guidance will be developed by the Water Services Authority to support implementation of the standards. This will provide detail about the form and content of Management and Operation Plans, to support network operators.

### Monitoring and reporting requirements

It is proposed that the following requirements will apply to all discharge to land arrangements:

- Groundwater monitoring will be required for all arrangements to assess the potential impact of the discharge.
  - » All arrangements will have to monitor for pH, electrical conductivity, Total ammoniacal nitrogen, Total nitrogen, Nitrate nitrogen, dissolved reactive phosphorous, *E. coli* and Chloride.
  - » Water quality monitoring must be undertaken every 3 months.

- » The number of monitoring wells differs depending on whether the bore is up gradient (minimum 1 well), down gradient (minimum 2 wells) or up gradient of sensitive receptors (site-specific).
- Soil monitoring will be required for all arrangements. While additional monitoring may be required through individual Management and Operation Plans, the following requirements apply as a starting point:
  - » Frequency: soil monitoring must be undertaken as part of the baseline and site-specific assessments, and every 5 years thereafter.
  - » Number of samples: soil samples are to be collected at a per hectare rate, determined by a Suitably Qualified Experienced Practitioner considering the treatment level, plant size and soil capability.
  - » Parameters:
    - ~ Cation exchange capacity
    - ~ Exchangeable Cations (all measured by me/100g and base saturation %): Sodium, Potassium, Calcium, Magnesium.
    - ~ Sodium absorption ratio
    - ~ Soil pH
    - ~ Total phosphorous
    - ~ Olsen phosphorous

The following proposed reporting requirements would apply to all discharge to land arrangements:

- Any breach of a parameter must be reported by an operator to the relevant regional council as soon as reasonably possible after the breach is detected.
- An operator must publish compliance against parameters in applicable standards on a monthly basis, on a publicly available website maintained by the operator, and provide the report to the relevant regional council. Water quality monitoring and groundwater monitoring results should also be published and shared with the relevant regional council.
- Annual reporting is required of compliance against parameters in applicable standards to regional council and the Water Services Authority.

To provide confidence in how the standards are implemented, network operators will be required to engage a third party, on an annual basis, to audit compliance with matters covered by the standard, including monitoring and reporting requirements. Costs associated with third party auditing will be covered by network operators, rather than consenting authorities..

#### We would like your feedback on the following question:

- Are the monitoring and reporting requirements proportionate to the potential impacts of the different discharge scenarios?

## 8. A beneficial reuse of biosolids environmental performance standard

The **proposed approach** will establish an environmental performance standard for beneficial reuse of biosolids, including:

- setting out a grading system for processing biosolids, with corresponding activity status under the Resource Management Act 1991 for how and where biosolids can be reused.
- imposing additional requirements where biosolids have a lower grade.
- imposing monitoring and reporting requirements to reflect the grade of biosolids.

### What are biosolids?

In the 2024 Network Environmental Performance Measures Guide, biosolids are defined as:

*solids or semi-solids (sludge) from the wastewater treatment process, which have been physically and/or chemically treated to produce a semi-solid, nutrient-rich product.*

Biosolids are a nutrient and energy-rich by-product of the wastewater treatment process and are predominantly a mix of water and organic materials. During the treatment process, microorganisms digest wastewater and break down the organic solids. This separates into two streams – a liquid stream (wastewater) and a solids component (sewage sludge). The water content of the solids is further reduced through additional treatment processes (for example, centrifuges or solar drying), to produce biosolids. The quality and composition of biosolids depends on the profile of wastewater entering the treatment plant. Biosolids normally contain between 15 and 95 percent solids, which often contain:

- Macronutrients, including nitrogen, phosphorus, potassium and sulphur.
- Micronutrients, including copper, zinc, calcium, magnesium, iron, boron, molybdenum and manganese.

Biosolids usually contain other substances. These can include synthetic chemical compounds such as pharmaceuticals, microplastics, per- and poly-fluoroalkyl substances (PFAS), or heavy metals.

When managed and treated appropriately, biosolids can be used to improve soil conditions and provide nutrition for plants and forestry, rehabilitate land such as mines or landfills, and improve the microbiology and the water holding capacity of soils. Energy and gases can be extracted from biosolids, to generate heat energy, biogas and biofuel. Internationally, biosolids have also been used in construction (for example, biosolids bricks) and to produce protein- and fat-rich biomass.

The biosolids covered by this standard follow the above definition, and do not include untreated raw sewage sludge, septic tank sludge or sludge from industrial processes.

To realise the beneficial reuse of biosolids, the risks need to be carefully managed to protect environmental, cultural and public health. Typical risks from biosolids involve exposure from concentrated contaminants finding their way into waterbodies, or via uptake into crops, fish, birds, livestock and people. Some contaminants in biosolids can accumulate in the soil they are applied to, which can mean the land becomes contaminated and unsuitable for particular uses.

### Current arrangements for managing biosolids

The Australian and New Zealand Biosolids Partnership has carried out regular surveys of wastewater treatment plants since 2010. Key findings from the 2023 survey indicates that Biosolids production has increased year on year in New Zealand<sup>7</sup> – the increase is not uniform across plants or regions.

Some examples of management of biosolids in New Zealand include:

- **Incineration:** the Tahuna wastewater treatment plant (owned and operated by Dunedin City Council) operates the only biosolids incinerator in Australasia.

<sup>7</sup> [Trends in the New Zealand Biosolids Industry: The Australia and New Zealand Biosolids Partnerships Survey \(2024\)](#), Marcus Richardson (Stantec), Catherine Vero (Ekistica), Rob Tinholt (Australia New Zealand Biosolids Partnership).



- **Land rehabilitation:** this amounts to about 43 percent of biosolids. About 330 tonnes of treated biosolids a day from the Mangere wastewater treatment plant is being used to rehabilitate a retired quarry on neighbouring Puketutu Island.
- **Sludge minimisation facilities:** Wellington City Council is building a facility to reduce the volume of sludge generated by the Karori and Moa Point wastewater treatment plants. The facility will produce a dry, odourless product that can be more easily transported, and used as a soil conditioner and as fuel for industrial heat.
- **Storage:** it's estimated that 15 percent of wastewater treatment plants are storing biosolids. Geo-bags are sometimes used as part of the biosolids production process. Central Hawke's Bay Council used a series of geobags at its Waipawa and Waipukurau wastewater treatment plants to store and stabilise biosolids, prior to removing these from their respective sites.
- **Compost:** The MyNoke worm farm in Taupō produces compost from organic waste (including biosolids), which is purchased by the council and used as fertiliser in parks and reserves.
- **Landfill:** approximately 40 percent of biosolids<sup>8</sup> are disposed of at landfills.

Compared to other jurisdictions, such as Australia and those in the European Union, the rate of reuse of biosolids in New Zealand is low. The relatively high proportion of disposal of biosolids to landfill is an outlier in the international context. Landfills are reaching limits about how much biosolids they receive and the cost of disposing of them is increasing. As not all landfills accept biosolids, some councils truck biosolids for disposal outside their region, often at considerable expense.

Many small-scale wastewater treatment plants with oxidation ponds are not desludged regularly, despite expected operating and maintenance arrangements. This affects the operation of the ponds and increases the concentrations of contaminants, heavy metals and odour. The high number of small oxidation ponds in New Zealand means this is likely to be a significant national problem.

## Planning and consenting arrangements

Regulatory settings for managing biosolids in New Zealand are quite different to other countries. Many other jurisdictions have national frameworks that provide for the beneficial reuse of biosolids, in ways that incentivise options other than disposal at landfill. Some regional plans (for example, the Auckland Unitary Plan) allow application of biosolids to land as a permitted activity, if the biosolids have met processing requirements around pathogens and contaminants such as heavy metals. Most regional plans do not have specific provision for biosolids, which means that application of biosolids to land may require a resource consent. This is likely to be a regulatory disincentive to the reuse of biosolids.

## Guidelines for the Safe Application of Biosolids to Land in New Zealand

The *Guidelines for the Safe Application of Biosolids to Land in New Zealand* (the Guidelines) have been in place since 2003. The Guidelines were reviewed in 2017, and a subsequent comprehensive review of the guidelines is underway, coordinated by Water New Zealand. The draft *Beneficial Use of Biosolids and other Organic Materials on Land (Good Practice Guide)* was tested with the sector in late-2024 and is due to be published in mid-2025.

The guidelines aim to implement best practice arrangements for beneficial reuse of biosolids, including links through to planning controls to allow significantly broader reuse of biosolids in New Zealand than currently occurs. The Guidelines are known and understood by the sector, and have already been implemented in some plans and consents.

## Proposed approach: environmental performance standard for beneficial reuse of biosolids

The Authority proposes a standard for beneficial reuse of biosolids that is based on the Guidelines. The current comprehensive revision of these guidelines has been subject to extensive technical review, together with engagement with sector experts.

<sup>8</sup> As above.



The core elements of the proposed standard are as follows:

- Set out a grading system for processing of biosolids. The grade will reflect the extent to which the pathogen content and vector attraction has been controlled, as well as the level of metals and organic chemical contaminants in the product.
- Application of biosolids that have been processed to the highest grade to land will be treated as a permitted activity. Biosolids that have been processed to lower grades will be a controlled or restricted discretionary activity.
- Exclusion periods will apply where biosolids have a lower pathogen grade depending on the land use – for example, where there is public access, or for permitted types of horticulture or agriculture.
- The nitrogen application rate for biosolids must not exceed, at maximum, an average of 200kg total nitrogen per hectare per year.

### Grading system

The Guidelines contain detailed procedures for the monitoring and sampling of biosolids to ensure that end-products are appropriately categorised, and subsequently managed in their reuse. Biosolid producers will need to develop a detailed process and product monitoring programme in accordance with the Guidelines.

The proposed grading system is designed to differentiate between organic products that are of low risk and those that contain pathogens and/or contaminants that may pose a risk to the receptors. Using this system, biosolids are to be categorised by two grades, as follows:

- **Stabilisation grade, A or B.** This is determined by the pathogen content of the product and whether or not an approved pathogen reduction procedure and an approved vector attraction reduction method have been implemented.
  - » A product is considered Grade A if:
    - ~ It has a documented quality assurance system
    - ~ It has undergone at least one of the listed pathogen reduction processes
    - ~ It has undergone at least one of the listed vector attraction reduction methods
    - ~ It meets all listed product pathogen standards after processing but prior to application
  - » A product is considered Grade B if:
    - ~ It has a documented quality assurance system
    - ~ It has undergone at least one of the accepted vector attraction reduction methods
  - » If a product does not attain Grade B stabilisation, it is not classified

- **Contaminant grade, 1 or 2.** This is determined by the levels of metals and organic contaminants in the product.
  - » Grade 1 is a product that has compliant levels for every contaminant
  - » Grade 2 is not compliant for at least one of the contaminants.

Confirmation of pathogen and contaminant grades will require two sets of sampling:

- » Verification sampling demonstrates whether a treatment process is producing a final product of consistent quality and is typified by a high-frequency sampling regime.
- » Routine sampling is required to demonstrate continued compliance with the product standards.

The following table sets out the proposed approach for grading beneficial reuse of biosolids:

	Contaminant grade 1	Contaminant grade 2
<b>Stabilisation Grade A</b>	Permitted activity (provided all activity standards are met)	Restricted discretionary activity (provided all activity standards are met)
<b>Stabilisation Grade B</b>	Controlled activity (provided all activity standards are met)	

### Consenting approach

The Authority proposes to establish Permitted, Controlled, and Restricted Discretionary consenting pathways for the reuse of biosolids, depending on their categorisation grade. Verified monitoring and sampling of the biosolid products will be a condition of the reuse as either a Permitted, or Restricted Discretionary Activity.

In situations where the proposed reuse of a Grade A1 or B1 biosolid does not meet the applicable activity standards, the proposal would be considered a restricted discretionary activity. Should a biosolid not receive a grade under the framework – for example, where a vector attraction reduction method has not been completed – reusing the biosolids would be assessed by the relevant regional council through the consenting process. When the biosolids standard is made, it will be applied through applications for resource consents.

We are seeking feedback on appropriate Permitted, Controlled, and Restricted Discretionary activity standards and subsequent matters of control and restricted discretion. Common examples of such provisions from rules around the country are provided below.

### Examples of qualifying criteria for the reuse of biosolids

- (1) Biosolid application must be to land only and must avoid groundwater or surface water contamination
- (2) Biosolids may not be applied to certain areas or land types such as:
  - (a) wāhi tapu or sites of cultural significance
  - (b) water supply protection zones
  - (c) sites with geographical, geological or hydrological constraints
- (3) Buffer requirements from:
  - (a) property boundary;
  - (b) surface water body and the coastal marine area;
- (4) Restrictions on supplementary land uses such as land used for food production or residential areas.
- (5) Verification requirements for grades of bio-solids.
- (6) Restrictions on the production of offensive or objectionable odour or dust.
- (7) Specific requirements for record keeping and reporting such as:
  - (a) the nature of the biosolids including dry solids content, application, volume, location and frequency; and
  - (b) the total nitrogen mass-load applied per hectare per annum.
- (8) Baseline soil testing, or testing where biosolids have been applied to land continuously for more than 5 years

### We would like your feedback on the following questions:

- What matters of control or restricted discretion should sit with consenting authorities to manage the reuse of biosolids?
- What should the permitted activity standards include?

### Approach for managing contaminants of emerging concern in biosolids

Global research continues into the significance of contaminants of emerging concern and the implications for beneficial reuse of biosolids. At this stage, some contaminants of emerging concern are not included in the proposed standard (for example, PFAS). Instead, the Authority proposes keeping the matter under active review and may update the standard as new developments occur.

This will mean we are well-positioned to leverage research by other international regulators, as well as agencies such as New Zealand's Environmental Protection Authority (EPA). The profile of biosolids in New Zealand is likely to mean international limits cannot be applied directly, and work would be required, alongside the Ministry of Health and the EPA, to determine what controls are appropriate. Taking a watching brief approach also means we can observe longer-term trends, such as whether and how contaminants of emerging concern accumulate over time.

We would like feedback on two proposed options about how PFAS, as a contaminant of emerging concern, should be addressed in the short-term:

- **Option One:** Provide guidance to support implementation of the standards that could include advice on contaminants of potential concern – such as organic contaminants like microplastics or PFAS. These areas could be brought into the standard over time, as research continues and there is greater capacity in the New Zealand market to test for contaminants of emerging concern.
- **Option Two:** This option would build on guidance issued as part of Option One. Alongside guidance, risk analysis could be undertaken to determine which wastewater treatment plants should test for contaminants of emerging concern. This would provide a local baseline for quantities of these contaminants that might trigger stricter regulation.

### We would like your feedback on the following question:

- How should contaminants of emerging concern in biosolids be addressed in the short-term?

## 9. Management of overflows and bypasses

The **proposed approach** will establish risk-based planning, monitoring and reporting arrangements for wastewater network overflows and bypasses from wastewater treatment plants, including:

- Requiring network operators to use wastewater risk management plans to identify where risks of overflows are, and how they should be managed, controlled, monitored and eliminated.
- Imposing monitoring and reporting requirements for overflows from wastewater networks.
- Making all overflows a controlled activity under the Resource Management Act 1991, consistent with proposed changes through the Local Government (Water Services) Bill.

### What are overflows and bypasses?

Overflows occur where untreated or partially treated wastewater escapes from a wastewater network into the environment. Overflows of untreated wastewater are a public health risk that impacts communities, compromising areas used for swimming, recreational activities and mahinga kai (food collection). Overflows are inevitable. In the 2021/2022 financial year, the Water New Zealand National Performance Review reported a total of 3,121 overflows across New Zealand and this number doesn't include instances where overflows are not reported.

Overflows are caused by a range of factors:

- Constrained capacity to accommodate population growth, which increases the rate and frequency of overflows due to demand on the network.
- Blockages such as build-up of fat and oil, tree roots or incorrectly marketed products (e.g., flushable wipes).
- Plant failures or equipment damage such as broken pipes or pump breakdown.
- Flows that exceed system capacity, either caused by significant inflow or infiltration<sup>9</sup>.

Wastewater networks are particularly vulnerable to impacts of climate change, with increasing severe weather events likely to exacerbate the frequency and impact of overflows.<sup>10</sup>

Almost all wastewater networks are designed to overflow when the amount of water coming into the pipe network exceeds the capacity of the network and/or treatment plant. Some networks are designed so wastewater overflows into the stormwater network when the capacity of the wastewater network is exceeded – for example, during heavy rainfall. Similarly, some older (combined) networks collect both wastewater and stormwater, which means stormwater is also received by the wastewater treatment plant.

Engineered overflow points are used to manage when and where overflows occur. Most networks are designed so wastewater overflows caused by constrained capacity go into the stormwater network through constructed (engineered) overflow points. Even with engineered overflow points, uncontrolled overflows still occur at network points that aren't designed to overflow (such as manholes or gully traps). Uncontrolled overflows are typically caused by blockages or faults in a network, rather than high flows.

### Bypasses occur where partially treated wastewater is diverted to protect a treatment plant

A bypass occurs where partially treated wastewater is diverted past the normal treatment plant route and discharged to the environment. Plants are designed to do this to prevent issues with equipment and systems within the treatment plant, that can occur during periods of high rainfall and inflow.

### Current arrangements for monitoring, reporting and managing network overflows

The approach to managing overflows varies significantly across New Zealand. While wastewater treatment plant discharges are consented, many overflows from wastewater networks remain unconsented or partially consented. Some networks have a comprehensive consent that covers overflows from the entire network, while others have consents for specific overflow points.

<sup>9</sup> Inflow is generally where stormwater gets into the wastewater network from illegal roof connections, low gully traps or cross-connected stormwater systems. Infiltration occurs when water from saturated surrounding soil enters the wastewater network through defects in pipe joints, damaged pipes, private laterals in poor condition and/or offset manhole risers.

<sup>10</sup> ['Impacts and implications of climate change on wastewater systems: A New Zealand Perspective' \(2021\), James Hughes, Katherine Cowper-Heays, Erica Olsson, Rob Bell and Adolf Stroombergen.](#)

From a stocktake of regional plans, around half of regional councils prohibit network overflows, or consider them emergency discharges under section 330 of the Resource Management Act 1991. This approach means that overflows often remain unconsented, and therefore subject to limited or no monitoring or reporting, or requirements for network operators to remove the cause or mitigate any adverse effects from the overflow. As overflows are inevitable, this approach results in the problem being hidden and is not a long-term solution.

Similarly, there is no shared definition or approach to monitoring and reporting of overflows resulting in high variability across New Zealand. Some councils only record overflows that are reported by a member of the public. Others have taken a risk management approach, with telemetric monitoring and public reporting of high-risk overflows. As there isn't a common definition of what constitutes an overflow, councils may have different methods for counting and classifying them. This variability means it is difficult to build a clear picture of what causes overflows, and where and how frequently they occur.

In 2019, the [Regional best practice guide for the management of wastewater overflows](#) was developed<sup>11</sup> to provide a standardised framework and key performance targets for the response, monitoring and reporting of wastewater overflows across the Bay of Plenty region. In 2022, Water New Zealand published a [Good Practice Guide for Addressing Wet Weather Wastewater Network Overflow Performance](#). While the guide provides a common framework for wastewater network service providers to implement, it appears uptake has been minimal.

### What information about overflows is publicly available?

Despite the impact on public health and water-based recreation, it is often difficult for the public to find reliable, real-time information about overflows when they occur. Due to poor information about where and when overflows occur, even network owners can't properly manage their networks to reduce the frequency of overflows to improve public health and environmental outcomes.

Nevertheless, some tools provide publicly available information on water pollution risk and swim safety, including where water quality has been impacted by overflows. These include:

- [Land, Air, Water Aotearoa \(LAWA\)](#) presents national environmental data (collected by regional councils and unitary authorities) and information about river, lake and recreational water quality, alongside a range of other environmental health topics

- The SafeSwim programme in Auckland and Northland provides transparent real-time information about the risk of swimming at specific locations. SafeSwim draws on a range of inputs, including real-time monitoring of wastewater and stormwater networks (and consequently, overflows), alongside predictive models.

### Network Environmental Performance Measures

As part of mandatory requirements set by the Authority, network operators are now required to monitor and report on the environmental performance of wastewater networks. From mid-2024, network operators were required to start recording wastewater overflow information for reporting to the Authority by 30 September 2025. This requires operators to record overflows against consistent definitions and causes. This information will be summarised in an annual network environmental performance report and published on the Authority's website.

### Improving monitoring and reporting arrangements for overflows

Given the public health and environmental impacts and variability in how overflows are monitored, reported and managed, the wastewater standards present an opportunity to set out a risk-based monitoring and reporting regime that:

- Creates greater consistency in how overflows are categorised, managed and reported.
- Supports network operators to prioritise, manage and reduce wastewater overflows.
- Ensures there is greater transparency of public information about overflows affecting areas where people might swim or gather shellfish, and how operators are trying to reduce them.
- Supports regional councils to monitor compliance with wastewater overflow consents and to take proportionate enforcement action where required.

### Proposed approach for managing overflows

The Authority is proposing a risk-based approach, that gives network operators the tools to prioritise addressing overflows based on the risk, impact and likelihood of overflows, within their means. The proposed requirements would apply to all wastewater network overflows, including those from combined wastewater and stormwater networks.

<sup>11</sup> This document was developed by the Bay of Plenty Regional Wastewater Management Group. This group includes representatives from the Bay of Plenty Regional Council, relevant territorial authorities and the Toi Te Ora Public Health Service.

Consistent with the Authority's approach to mandatory network environmental performance reporting, the Authority proposes defining overflows as:

*Instances where untreated or partially treated wastewater (or stormwater contaminated with wastewater) spills, surcharges, discharges or otherwise escapes from a wastewater network to the external environment. This may be due to different causes and may be released via either constructed (engineered) or unconstructed overflow points. Engineered overflow points are designed and intended to act as an emergency relief valve during instances of capacity overload in the network, whereas unconstructed overflow points are not (but inadvertently perform this function).<sup>12</sup>*

The Authority proposes defining bypasses as:

*Bypasses are discharges where the wastewater is not fully treated due to inlet flow rates exceeding the design capacity of a wastewater treatment plant, and then discharged into a receiving environment.*

#### **We would like your feedback on the following questions:**

- Is the current definition of overflow fit-for-purpose, and if not, what changes do you suggest?
- Does the proposed definition of bypasses adequately cover these situations, and if not, what changes do you suggest?

### **Wastewater Network Risk Management Plans**

The Authority proposes that wastewater network risk management plans will be required for all wastewater networks, to ensure network operators identify how risks and hazards from both the network and treatment plants, including overflows, will be managed.

The Authority will issue requirements under section 138 of the Water Services Act 2021 about what should be covered in the overflow section of wastewater network risk management plans. In the first instance, plans should include:

- (a) a map of controlled and uncontrolled overflow points across a network: understanding where these points are in a network is critical to developing approaches to manage overflows. It will also form the basis of monitoring and reporting arrangements.
- (b) a list of all overflow points in the network, that are categorised based on a risk framework: the risk framework looks at the likelihood and potential impact of an overflow and allocates a corresponding level of priority.

- (c) the arrangements relating to any bypass overflows for a wastewater treatment plant, with a risk assessment of these arrangements;

- (d) a summary of approaches taken by the network operator to manage, control, monitor or eliminate risks: approaches for managing overflows are likely to differ depending on the size, scale and complexity of the wastewater network, as well as the resourcing and funding available to the network operator.

In developing wastewater network risk management plans, network operators will be expected to engage with communities, including mana whenua, to understand where risks of overflows are, and how they should be managed, controlled, monitored or eliminated. The plans should demonstrate this engagement has happened and how it has influenced approaches to manage, control, monitor or eliminate risks.

There are existing examples of overflow management plans throughout the country, for example those developed by WaterCare or required by Greater Wellington Regional Council. Once finalised, the plans will need to be shared on a publicly available website and provided to regional councils and other interested parties, such as iwi and hapū.

#### **We would like your feedback on the following questions:**

- How should Wastewater Risk Management Plans relate to existing risk management planning tools, and if the Local Government (Water Services) Bill proceeds, stormwater risk management plans?
- What should be covered in guidance to support developing wastewater risk management plans?
- We understand wastewater risk management plans are already required in some regions – what approaches have worked well and where is there room for improvement?
- How should Wastewater Risk Management Plans interact with the proposed consenting pathways for overflows and bypasses?

### **Making wastewater network overflows and bypasses a controlled activity**

The Local Government (Water Services) Bill proposes to amend the Water Services Act and Resource Management Act to allow the Authority to set resource consent activity status, for activities performance in accordance with the standards. Subject to enactment, the Authority is proposing to make all overflows from wastewater networks, together with bypasses from a wastewater plant, a controlled activity as part of this wastewater standard. Making overflows a controlled activity means that all wastewater overflows and bypasses will need to be consented.

<sup>12</sup> [Network Environmental Performance Measures and Guide 2024](#).



This is a significant change from the current approach to consenting wastewater network overflows for some regions. A consistently applied controlled activity creates a standard consenting pathway to ensure overflows are recorded and reported, which will increase visibility over time and improve our understanding of network performance. Specific approaches to reducing the impact and frequency of overflows can then also be set by consenting authorities through consent conditions.

An example of a controlled activity rule for network overflows from the Auckland Unitary Plan is provided below.

### Example of controlled activity for network overflows from the Auckland Unitary Plan:

The discharge of untreated wastewater overflows onto or into land and/or into water from an existing separated wastewater network servicing existing urban areas (excluding wastewater treatment plants) is a Controlled Activity.

#### Controlled Activity Standards

- (1) A programme must be in place to reduce network overflows to an average of no more than two events per discharge location per annum by 2040.
- (2) Emergency overflow points must be designed and located so that any discharges minimise nuisance, damage, public health risk, and ecological effects and do not cause scouring and erosion at the point of discharge.
- (3) A wastewater network operations plan must be prepared, and implemented, which provides all of the following:
  - (a) a description of the wastewater network;
  - (b) maintenance procedures and levels of service for key elements of the network;
  - (c) operational procedures including response to system failures, incidents and significant overflow events; and
  - (d) monitoring and reporting procedures.
- (4) All pump stations must be continuously monitored by telemetry so that the wastewater network operator is immediately informed of any pump station failure or fault that may result in an overflow.
- (5) The wastewater network must be operated to prevent dry weather overflows during normal operation of the network, and the network operator must have an operational and maintenance programme in place that minimises unforeseen dry weather overflows to the environment.

#### Matters of Control

- (1) for the discharge of untreated wastewater overflows onto or into land and/or into water from an existing separated wastewater network servicing existing urban areas (excluding wastewater treatment plants):
  - (a) the implementation of the overflow reduction programme;
  - (b) the mitigation of any adverse effects associated with the discharges, including effects on potable water supplies and public health;
  - (c) the implementation of the wastewater network operations plan and the operations and maintenance programme;
  - (d) associated monitoring and reporting; and
  - (e) the duration of the consent and the timing and nature of reviews of consent conditions.

#### Assessment Criteria

- (1) for the discharge of untreated wastewater overflows onto or into land and/or into water from an existing separated wastewater network servicing existing urban areas (excluding wastewater treatment plants):
  - (a) the extent to which the overflow reduction programme, the network operations plan and operational and maintenance programme:
    - (i) set out the best practicable option for preventing or minimising adverse effects;
    - (ii) adequately address wastewater discharges generated as a result of potential urban growth, urban redevelopment, and land use intensification within the wastewater catchment, taking into account the growth and intensification provisions of the Plan; and
    - (iii) prevent or minimise adverse effects of wastewater overflows on public health, potable water supplies, freshwater and coastal waters.

#### We would like your feedback on the following questions:

- Do you support setting all wastewater network overflows as controlled activity?
- What matters of control should remain with consenting authorities to reduce the impact and frequency of overflows and bypasses?
- Are there examples of existing approaches to managing overflows that would work well as matters of control?
- What other factors need to be considered when making overflows and bypasses a controlled activity? What matters would be helpful to address through guidance?
- What transition arrangements should apply for scenarios where Regional Councils already have consenting pathways for overflows?

## Monitoring and reporting requirements

The Authority is also proposing to create a wastewater standard, under section 138 of the Water Services Act 2021, that will set out what monitoring and reporting requirements apply for overflows from wastewater networks.

### Monitoring

Monitoring arrangements depend on the type of overflow point. As a minimum, operators would be required to have telemetric monitoring for:

- all engineered overflow points or discharge points that are classified as high risk in wastewater risk management plans;
- all new constructed overflow points and pump stations; and
- all uncontrolled discharge points (using manhole sensors) where there are high frequency overflows.

While installing telemetry at all overflow points is best practice, this may not be immediately feasible from a financial and practical perspective. To reflect this, the Authority proposes staggering the telemetry installation requirements, with high-risk overflows requiring monitoring to be installed sooner.

Reporting requirements are also influenced by the risk assessment of overflows. Public reporting – particularly following overflow events – is critical to improving public transparency through having readily accessible information about overflows and the impacts on recreation and food gathering. Longer-term, after-the-fact reporting supports regional councils, alongside the Authority, to understand where overflows occur and what causes them. In the longer term, this information may be used to set targets, to compel network operators to reduce overflows over time.

### Reporting

Reporting is separated into first response and follow-up reporting.

First response reporting refers to the information that is important for the public health of the community immediately affected by the overflow. This includes information about the time and extent of the overflow, alongside any public health warnings. To ensure the information is available to the affected community at the time they need it, this information should be shared on a publicly accessible website such as the council's website or an online platform such as SafeSwim. This information should be accompanied by public health information (for example, signage) at the site of the overflow, as well as engaging with the local Medical Officer of Health. The following timeframes apply for first response reporting:

- For overflows categorised as high risk: within 2 hours of the event.
- For overflows categorised as medium risk: within 24 hours of the event.
- For overflows categorised as low risk: within 48 hours of the event.

Follow-up reporting is intended to demonstrate how the overflow was managed. This also includes an assessment of the public health and environmental impact of the overflow. As with first response reporting, this should be shared on a publicly accessible website. It should also be provided directly to the relevant regional council, alongside mana whenua and any community groups with a direct interest. This reporting must be completed within two weeks of the overflow event being resolved. If an overflow event lasts more than two weeks, then updates are required to be provided every two weeks following the approach outlined under the first response reporting.

### We would like your feedback on the following questions:

- What matters should be covered in guidance material to support monitoring and reporting requirements?
- Do you support establishing a framework that determines how overflows are managed based on risk?

## 10. Arrangements for wastewater treatment plants operating on expired consents under section 124 of the Resource Management Act 1991

Approximately 20 percent of wastewater treatment plants are operating under expired consents. Treatment plants can do so for an undefined period under section 124 of the Resource Management Act 1991 (RMA), provided an application to renew their consent was lodged within a specified timeframe.

Plants currently operate on an expired consent for an average of five years, with one operating on an expired consent for 24 years.

The Local Government (Water Services) Bill includes changes to the RMA which, if enacted, would allow a time limit to be placed on the period that a wastewater treatment plant may operate on an expired consent under section 124. This is because once wastewater standards are set, the treatment requirements for a plant will be certain and the network operator will be able to engage with its community about the options, plan for, and fund any necessary upgrades.

The Authority proposes that a wastewater treatment plant may only operate on an expired consent under section 124 for a maximum of 2 years. The standards would specify that this arrangement will not commence for 5 years, to give those territorial authorities with plants on expired consents time to plan for and fund the necessary upgrades.

### We would like your feedback on the following questions:

- How long should wastewater treatment plants be able to operate under section 124 of the RMA once wastewater standards have been set?



## Appendix One: Glossary

Term	Definition and Source
<b>Application Method</b>	<p>The specific technique or approach used to apply a substance, treatment, or technology to a wastewater system. This includes the methods, equipment, and procedures employed to achieve the desired treatment or effect, ensuring efficiency, effectiveness, and compliance with relevant Standards. Application methodologies may vary depending on the treatment type, such as chemical addition, filtration, or biological processes, and are designed to optimize the removal or reduction of pollutants.</p> <p>Source: United States Environmental Protection Agency</p>
<b>Assimilative Capacity</b>	<p>The maximum loading rate of a particular pollutant that can be tolerated or processed by the receiving environment without causing significant degradation to the quality of the ecosystem and hence the community values it supports.</p> <p>Source: Australian and New Zealand Guidelines for Fresh and Marine Water Quality</p>
<b>Baseline Assessment</b>	<p>An initial evaluation or desktop exercise conducted to identify and assess potential sites suitable for the application of treated wastewater. This assessment typically involves reviewing high level existing environmental, geological, and land use information to determine the suitability of land parcel for wastewater discharge, without the need for immediate site-specific assessment that would require fieldwork i.e. a first qualitative base for a proposed/potential site.</p> <p>Source: Discharge to Land Technical Report (2025)</p>
<b>Biosolids</b>	<p>Solids or semi-solids (sludge) from the wastewater treatment process, which have been physically and/or chemically treated to produce a semi-solid, nutrient-rich product.</p> <p>Source: Network Environmental Performance Measures and Guide 2024</p>
<b>Bypass</b>	<p><b>Proposed definition</b></p> <p>An intentional diversion of partially treated wastewater from a portion of the treatment facility. A bypass may also occur in a controlled way if operators need to release to shut down equipment for repairs, and there is no way to reroute the wastewater. Consents may provide specific timings, frequencies, circumstances and reporting requirements.</p>
<b>Contaminant</b>	<p>Any substance (including heavy metals, organic compounds and micro-organisms) that, either by itself or in combination with other substances, when discharged onto or into land or water, changes or is likely to change the physical, chemical or biological condition of that land or water.</p> <p>Source: Resource Management Act 1991</p>
<b>Controlled Activity</b>	<p>Activities described by section 87A(2) of the RMA which require a resource consent from the Regional Council.</p> <p>Source: Resource Management Act 1991</p>
<b>Discharge</b>	<p>Volume of treated wastewater that is released from a wastewater treatment plant into the receiving environment.</p> <p>Source: Discharge to Land Technical Report</p>
<b>Dilution Ratio</b>	<p>Ratio of receiving environment flowrate/volume to wastewater discharge flowrate/volume. A measure of extent of dilution that takes place within the receiving environment.</p> <p>Source: Discharge to Water Technical Report</p>

<b>Overflows</b>	<p><b>Proposed definition</b></p> <p>Instances where untreated or partially treated wastewater (or stormwater contaminated with wastewater) spills, surcharges, discharges or otherwise escapes from a wastewater network to the external environment. This may be due to different causes and may be released via either constructed (engineered) or unconstructed overflow points. Engineered overflow points are designed and intended to act as an emergency relief valve during instances of capacity overload in the network, whereas unconstructed overflow points are not (but inadvertently performs this function).</p> <p>Source: Network Environmental Performance Measures and Guide 2024</p>
<b>Pathogens</b>	<p>Disease-causing micro-organisms such as certain bacteria, viruses and parasites.</p> <p>Source: Discharge to Water Technical Report</p>
<b>Periphyton</b>	<p>A group of organisms in aquatic environments specialised to live on and exploit much larger (usually inert) surfaces. Groups of organisms include fungi, bacteria, protozoa, and algae. The most conspicuous group is the algae and this group is usually the focus of most studies of periphyton.</p> <p>Source: New Zealand Periphyton Guideline 2000</p>
<b>Primary treatment</b>	<p>The separation of suspended material from wastewater in septic tanks, primary settling chambers, or other structures, before effluent discharge to either a secondary treatment process, or to a land application system.</p> <p>Source: AS/NZS 1547:2012</p>
<b>Quantitative Microbial Risk Assessment</b>	<p>A quantitative way of estimating the health risk to people who are swimming in and consuming raw shellfish harvested from waters which are near sources of microbial contamination such as river plumes and wastewater outfalls.</p> <p>Source: NIWA Microbial Monitoring factsheet</p>
<b>Receiving Environment</b>	<p>Any waterbody receiving discharge from a wastewater treatment plant.</p> <p>Source: Adapted from the National Policy Statement on Freshwater Management</p>
<b>Secondary treatment</b>	<p>Aerobic biological processing and settling or filtering of effluent received from a primary treatment unit.</p> <p>Source: AS/NZS 1547:2012</p>
<b>Wāhi tapu</b>	<p>Sacred place, sacred site – a place subject to long-term ritual restrictions on access or use, i.e. a burial ground, a battle site or a place where tapu objects were placed</p> <p>Source: Te Aka Māori dictionary</p>

## Appendix Two: Relationship with Local Water Done Well and Local Government (Water Services) Bill

As part of its Local Water Done Well policy programme, the Government has introduced the Local Government (Water Services) Bill (the Bill) into Parliament to propose changes to how water services are delivered in New Zealand. You can find more detail about the Bill [here](#).

This Bill includes proposals to change the legislative arrangements that apply to wastewater standards in both the Water Services Act 2021 and the Resource Management Act 1991. The main proposed areas of change that relate to this discussion document are:

Area of Change	Description
<b>A single national standard to be applied in resource consents (with a limited set of exceptions)</b>	Changes are proposed to the Resource Management Act 1991 providing that, where a wastewater environmental performance standard is made, a consent authority (regional council) may not grant a resource consent contrary to the standard and must include conditions that are <i>no more or less restrictive</i> than is necessary to give effect to the standard unless an "exception" applies. This establishes an absolute standard, for the matters that the standard covers.  Regional councils will continue to be responsible for wastewater discharge consenting but will be required to apply the wastewater standards through consent conditions and be responsible for enforcing consent compliance.
<b>Exceptions regime</b>	While wastewater standards are intended to create certainty and national consistency, there will be cases where a national standard may be inappropriate. Exceptions (for example, the discharge to water standard not applying for discharges to natural wetlands) will be a component of a standard and developed and enacted through the same process as wastewater standards. In situations where an exception applies, the existing resource consent process is reverted to. This means regional councils determine consent conditions, as well as monitoring and reporting requirements, alongside consultation with the community.
<b>Minimum consent duration</b>	Shorter consent timeframes create uncertainty and can compromise the ability to take an affordable long-term investment approach. Where wastewater infrastructure has been renewed or upgraded to meet the new wastewater standards, it is proposed that a 35-year consent duration will apply.
<b>Periodic review of standards</b>	Wastewater standards will require periodic review to enable risks to receiving environments or people to be managed, and to take advantage of new technology. Changes to standards will apply at the start of the new consenting cycle.  The Bill proposes changes to section 128 of the Resource Management Act 1991, so that the making or amendment of a wastewater environmental performance standard is a potential trigger for a review of resource consent conditions.
<b>Standards may include activity status</b>	Wastewater standards will be able to set the consenting status of an activity – for example, that aspects of wastewater management are a discretionary or controlled activity. This is intended to create a consistent approach to how consenting authorities consider certain activities or discharges from wastewater networks.
<b>Standards will take precedence over national directions and plans</b>	Where there is any inconsistency between a wastewater standard and a national direction or plan made under the RMA, the wastewater environmental performance standard will prevail.
<b>Standards will be made by Order in Council</b>	Wastewater standards will be enacted through regulations made by Order in Council on the recommendation of the Minister of Local Government. A Regulatory Impact Statement is prepared and considered alongside proposed wastewater standards, to ensure the costs and benefits are clearly understood.

<b>Change in approach to Te Mana o te Wai</b>	Existing requirements in the Act for decision-makers to give effect to Te Mana o te Wai will be replaced with a requirement to take account of the National Policy Statement for Freshwater Management and other relevant national directions and regional plans that relate to freshwater when exercising their functions.
<b>Infrastructure design solutions</b>	<p>The Authority will be able to set infrastructure and operating requirements for wastewater treatment plants that, if met, will result in faster consenting processes (for example, via controlled activity status).</p> <p>An infrastructure design solution would specify most of the consent requirements for the infrastructure, and function as a design solution. Over time, this will enable network operators to standardise the design and procurement of infrastructure, and enable modular, off-the-shelf solutions to be installed.</p> <p>Proposed law changes will enable the Authority to develop infrastructure design solutions as part of the implementation of wastewater standards. These are initially likely to focus on small treatment plants. Proposals for infrastructure design solutions will be publicly consulted on.</p>

The Bill was introduced in December 2024 to implement the proposed changes and is progressing through the select committee process. On current timing, the Bill is expected to be enacted in mid-2025. Feedback that relates to the proposed changes to legislation governing wastewater standards should be separately directed through the select committee process, which is led by the Department of Internal Affairs.

### Arrangements for resource consents expiring in the short-term

Many territorial authorities will have wastewater treatment plants with resource consents that will expire in the period following enactment of wastewater standards. The Bill includes arrangements to extend existing resource consents, to expire two years following the commencement of the Bill. This will give councils time to plan for how standards will affect reconsenting decisions for wastewater infrastructure, alongside any required upgrades or renewals.

The detail about transition arrangements for wastewater standards is outlined in the Bill and complementary documents.

## Appendix Three: Consultation questions

### We would like your feedback on the following questions:

#### General

- Do you agree with the areas the first set of standards are proposed to cover?
- What areas should we prioritise to introduce wastewater standards in future?
- What topics should we cover in the guidance material to support implementation of the standards?
- Are there particular groups we should work with to develop guidance and if so, who?
- How should factors such as climate change, population growth, or consumer complaints be addressed when considering a 35-year consent term?

#### Discharge to Water

- How should we consider checks and balances to protect against situations where the degree of microbial contamination may change throughout the duration of a consent.
- Are the areas for exceptions appropriate to manage the impacts of discharges and do you anticipate implementation challenges?
- How should the exceptions be further defined to ensure there are no unintended consequences?
- Are the treatment limits, and monitoring and reporting requirements proportionate to the potential impacts of the different discharge scenarios?
- What benefits and challenges do you anticipate in implementing the proposed approach? Are there particular matters that could be addressed through guidance material?
- How should we define small plants and what changes to the default standards should apply to them?
- What feedback do you have for managing periphyton in hard bottomed or rocky streams or rivers?
- What detail should be covered in guidance to support implementing this approach for managing periphyton?

#### Discharge to Land

- Are the proposed parameters appropriate to manage the impact of wastewater discharges to land?
- What benefits and challenges do you anticipate in implementing the proposed approach? Are there other particular matters that could be addressed through guidance material?
- Are the monitoring and reporting requirements proportionate to the potential impacts of the different discharge scenarios?

#### Beneficial Reuse of Biosolids

- What matters of control or restricted discretion should sit with consenting authorities to manage the reuse of biosolids?
- What should the permitted activity standards include?
- How should contaminants of emerging concern in biosolids be addressed in the short-term?

#### Overflows and Bypasses

- Is the current definition of overflow fit-for-purpose, and if not, what changes do you suggest?
- Does the proposed definition of bypasses adequately cover these situations, and if not, what changes do you suggest?
- How should Wastewater Risk Management Plans relate to existing risk management planning tools, and if the Local Government (Water Services) Bill proceeds, stormwater risk management plans?
- What should be covered in guidance to support developing wastewater risk management plans?
- We understand wastewater risk management plans are already required in some regions – what approaches have worked well and where is there room for improvement?
- How should Wastewater Risk Management Plans interact with the proposed consenting pathways for overflows and bypasses?
- Do you support setting all wastewater network overflows as controlled activity?
- What matters of control should remain with consenting authorities to reduce the impact and frequency of overflows and bypasses?
- Are there examples of existing approaches to managing overflows that would work well as matters of control?
- What other factors need to be considered when making overflows and bypasses a controlled activity? What matters would be helpful to address through guidance?
- What transition arrangements should apply for scenarios where Regional Councils already have consenting pathways for overflows?
- What matters should be covered in guidance material to support monitoring and reporting requirements?
- Do you support establishing a framework that determines how overflows are managed based on risk?

#### Arrangements for wastewater treatment plants operating on section 124, Resource Management Act 1991

- How long should wastewater treatment plants be able to operate under section 124 of the RMA once wastewater standards have been set?

## Appendix Four: Detail of the proposed approach for discharges to land

This section sets out detail of the proposed framework for discharging treated wastewater to land, including matters to be considered when determining whether to discharge to a proposed site and the numeric limits for the parameters covered by the proposed standard.

Further detail on how to implement the discharge to land standard will be set out in guidance material, to be released by the Water Services Authority once standards are enacted. Guidance will be tailored to support wastewater treatment plant operators as well as consenting authorities.

To determine whether treated wastewater can be discharged to land and what aspects of the discharge to land standard apply, the following process must be followed:

1. Baseline assessment: specific requirements will be set out in guidance to accompany the standards and are including but not limited to:
  - a. Soil moisture assessment (e.g., to assess field capacity and seasonal variability)
  - b. Existing desktop information:
    - i. Site physical attributes (e.g., topography and whether a sufficient area of land is available)
    - ii. Existing groundwater data and models (to understand depth, quality, flow direction, seasonal variation and sensitivity)
    - iii. Available soil data (to understand soil type and drainage capacity)
    - iv. Underlying geology
    - v. Site contamination history
    - vi. Current and proposed land use with the application area
    - vii. Potential receptors, proximity and sensitivity (including environmental, social, cultural and to the built environment)
  - c. Where insufficient information is available via desktop research, conduct a field-based investigation.
2. Risk screening, to assign a corresponding risk category: this involves applying a qualitative risk assessment tool, to identify pathways for contaminants (Total nitrogen, Total phosphorous and *E. coli*) to reach a receptor as a result of the discharge. Guidance accompanying the standards (to be published once the standards are enacted) will include a list of pathways for contamination to ensure the quality of risk assessments is consistent. This includes considering:
  - a. Environmental risk: groundwater depth and its proximity from the site boundary, and the nature of receptors within 100m of a site boundary.
  - b. Public health risk: whether the site is near –
    - i. a primary contact recreation within immediate receiving water (surface water)
    - ii. an area people can walk past an application area with sub-surface drip irrigation
    - iii. a drinking water protection zone
    - iv. a location of domestic private bores.
  - c. Social risk: primarily, amenity values and cultural considerations.

3. **Site-specific assessment:** this involves a site-specific check of key factors, to understand the capability of the site and what mitigation measures are appropriate. This includes considering:
- the application method (for example, whether a sub-surface drip irrigator or low-pressure spray)
  - the degree and type of vegetation cover
  - a groundwater assessment: to confirm the flow direction, quality and depth of groundwater, and to install groundwater monitoring wells
  - a soil assessment: undertaken by a suitably qualified and experienced person, to address the following –
    - hydraulic conductivity
    - water holding capacity
    - high risk soils, or soils classified as Category 5 and 6 in AS/NZS1547:2012
    - Existing nutrient concentrations and potential cumulative effects including but not limited to: Total Phosphorus, Olsen P, Total nitrogen, TKN, ammonium-N, Nitrate-N, Exchangeable cations, pH.

The site-specific assessment should also involve considering what mitigation or management approaches are necessary to reduce risk, for example:

- buffer zones and planting
- monitoring discharge volumes and quality
- irrigation scheduling
- management of spray draft/odour
- vegetation management and monitoring
- public access requirements
- irrigation system maintenance
- contingency plans
- receiving environment monitoring
- periodic Operation and Maintenance Plan reviews
- alternate potable well supply.

The table below outlines how factors are considered in the site-specific assessment and what risk category corresponds with. Where between categories, it is recommended the most conservative (highest) category is applied to the loading rate matrix.

#### Factors considered in the site-specific assessment for potential discharges to land:

	Category 1	Category 2	Category 3	Category 4	Category 5
<b>Hydraulic conductivity</b>	Moderate	Moderate to rapid	Slow draining	Rapid draining	Poorly drained, saturated soil
<b>Soil type and suitability</b>	Sandy loam, loam, silt loam	Sand, loamy sand	Fine grained – clay loam, silty clay loam	Course granular soil	High risk soils, i.e., heavy clays, peat, soils classified as Category 5 and 6 in AS/NZS 1547:2012
<b>Land use</b>	Suitable for nutrient removal by cropping	Suitable for nutrient removal by cropping	Permanent ground cover	Permanent ground cover	Permanent ground cover
<b>Topography</b>	Low relief <10-degree slopes	Low relief <10-degree slopes	Slopes up to 17 degrees	Slopes up to 17 degrees	Slopes > 17 degrees
<b>Depth to groundwater</b>	>10m	>10m	Between 5 and 10 m below ground level	Between 1 and 5m below ground level at times	Shallow /at ground level, <1m below ground level
<b>Natural hazards (e.g., flooding, land instability)</b>	Negligible risk	Low risk	Medium risk	High risk	Very high

## **25.4.4 LOCAL WATER DONE WELL - ADMITTING TIMARU DISTRICT COUNCIL TO THE AGREEMENT**

**Doc ID: 2417654**

Report Author:	Peter Kelly, Chief Executive Officer
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### **1. Purpose of Report**

To consider a request for Timaru District Council to join the Otago Southland Joint Group of Councils Commitment Agreement

### **Recommendations**

That the Council

- A. Receives the report and accepts the level of significance.
- B. Approves a variation to the Otago Southland Joint Group of Councils Commitment Agreement to allow Timaru District Council to become a party to the Agreement.
- C. Authorises the Chief Executive to sign a deed of accession and variation to the Otago Southland Joint Group of Councils Commitment Agreement to allow Timaru District Council to become a party to the Agreement on behalf of the Council and make minor changes to the agreement to accommodate a new Council joining the group.

### **2. Background**

Central Otago, Clutha, Gore and Waitaki District Councils have joined together to explore a joint delivery model for three waters. This group of Councils is working together to define how a Joint CCO could be setup and operated in a way that will benefit each member of the group.

The Councils have entered into a Commitment Agreement which reflects their mutual interest to investigate the option and sets out how they will work together through the process.

The Agreement provides for individual Councils to withdraw its' participation from the Agreement at any time as the options are further defined, and the views of communities and stakeholders are sought through public consultation. It also makes provision for the agreement to be varied which would facilitate new Council's joining the group with a view to becoming a part of the joint delivery model for three waters.

### **3. Discussion**

The Central Otago, Clutha, Gore and Waitaki District Councils (Group of Councils) are working to assess the merits of forming a Joint Council Controlled Organisation to deliver water services across their regions. Work is underway to define what a Joint CCO would look like and how it compares against [Council Name] continuing to deliver water services in house or setup of a [Council Name] Council Controlled Organisation.



Timaru District Council (TDC) has confirmed a request to join Central Otago, Clutha Gore and Waitaki Districts in exploring the option to develop a Joint Council Controlled Organisation and become a party to the Commitment Agreement previously signed by the Group of Councils. For this to occur all four Councils need to record their approval for the Commitment Agreement to be varied to include TDC as a party to the Agreement. This paper seeks Council consideration and decision on this matter.

The paper also provides a summary of the next key activities and milestones for public and stakeholder consultation on the proposal and subsequent Council Decision Making.

### **Inclusion of Timaru District Council to the Group of Councils**

Discussions took place between mayors, chief executives and elected members of the original four councils (Central Otago District Council, Clutha District Council, Gore District Council, and Waitaki District Council) and Timaru District Council in late February/early March 2025. These conversations led to the subsequent consideration of expanding the Southern Joint CCO work to incorporate Timaru District Council.

Initial high-level modelling was completed by Morrison Low to demonstrate the financial impact on the “original four councils” and Timaru District Council, of the expanded model. The results of that modelling highlighted that:

- Inclusion of Timaru District Council was beneficial for the “original four”.
- Inclusion of Timaru District Council would also provide an opportunity for water consumers in the Timaru District to pay less than they would otherwise pay under an in-house delivery model.

The analysis was presented to Timaru District Council on 4 March 2025 and the Council approved entering into the existing Commitment Agreement.

This report details both the financial and wider non-financial benefits of Timaru District Council joining the group. Approval from all four existing Councils is sought to provide for Timaru District Council's inclusion and approve a variation to the Commitment Agreement, to reflect this.

### **Legal Implications**

If the variation is approved, the effect of this will be that TDC will become a party to the Agreement and will be bound by it as if it had been a party to the original Agreement and signed it. TDC will have all the same rights and obligations as the original parties to the agreement.

The variation will make amendments that are necessary to include TDC as a party to the Agreement, including expanding the service area to include Timaru, including a Timaru Council member as a member of the Councils Executive Group, Project Steering Group and Project Team and adjusting each Council's proportionate share of costs from 25% to 20%. It will also remove reference to the “Initial Contribution” which has become redundant.

The Local Government (Water Services Preliminary Arrangements) Act places statutory requirements on the Councils that are required to be complied with. If a territorial authority struggles to comply with the requirements for a compliant WSDP, the Act provides for the Minister to appoint either of two new roles, costs of which are borne by Council:

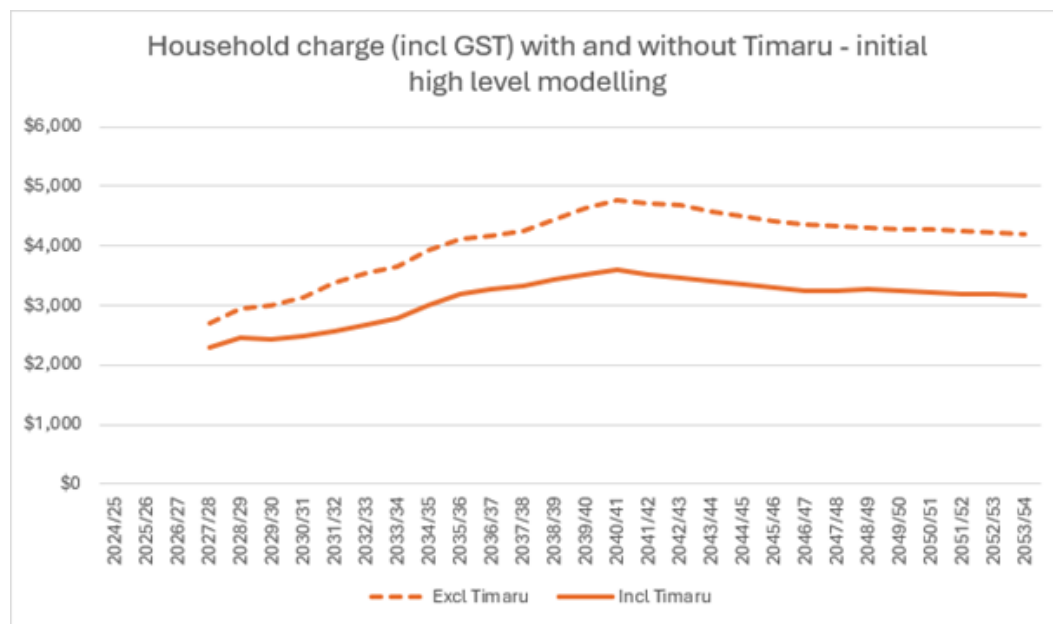
- Crown facilitators, who may work with Councils to assist, advise, or amend draft WSDPs and;
- Crown water services specialists, who may prepare, direct, or adopt a WSDP in accordance with their notice of appointment.

In addition, the Act provides that a person who contravenes an obligation to disclose information can be fined up to \$500,000 or, in the case of an entity, \$5 million.

#### 4. Financial Considerations

Inclusion of Timaru District Council to the Group of Councils

- Initial financial modelling provided in Figure One presents a harmonised price view to illustrate the available benefits of Timaru District Council joining the group of councils.
- The costs associated with investigating a Joint CCO, as reflected in the Commitment Agreement would be divided equally between the five Councils, reflecting an estimated saving for each Council of approximately \$35k.



#### 5. Options

##### Option 1 – (Recommended)

Agree to enter a deed of accession and variation to the Commitment Agreement that would enable Timaru District Council (TDC) to join the Joint CCO Group of Councils.

Advantages:

- Addition of TDC adds to the economies of scale and overall viability of a Joint CCO.
- The outcomes of community consultation will inform Council decision making and the composition of a Joint CCO.
- Through consultation and Council decision making, should Council(s) exit the group - more likely that the remaining group will remain viable.
- May present future options to further expand the group, to the benefit of all members, with other councils joining at a later date.

Disadvantages:

- Larger group may be less agile in decision making and reaching consensus.
- Greater geographical spread of the group – presents operational considerations.

- May be some resistance to the multi-CCO as Timaru isn't 'south of the Waitaki', which is a commonly accepted boundary for a southern community of interest.

### Option 2

Do not agree to enter a deed of accession and variation to the Commitment Agreement that would enable Timaru District Council to join the Joint CCO Group

Advantages:

- Potentially more efficient collaboration and decision making with a smaller group.
- May be less resistance to the multi-CCO as all members would be 'south of the Waitaki', which is a commonly accepted boundary for a southern community of interest.

Disadvantages:

- Viability of the group may be compromised if one or more councils exit the group.
- Lost opportunity to improve the economies of scale of the group and potential to add further Councils.

### Option 3

Defer the decision to enter a deed of accession and variation to the Commitment Agreement that would enable Timaru District Council to join the Joint CCO Group

Advantages:

- Potentially more efficient collaboration and decision making with a smaller group.

Disadvantages:

- Benefits of the expanded group not realised.
- May cease to be an option to add TDC in the future.
- Involving TDC now enables earlier information sharing as part of options evaluation. Consultation in the absence of this information would be incomplete.

## 6. Compliance

<b>Local Government Act 2002 Purpose Provisions</b>	This decision enables democratic local decision making and action by, and on behalf of communities by allowing Council to decide Timaru should be admitted to an existing agreement.
<b>Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.</b>	<p>The requirements of LWDW requires the Group of Councils to revisit their respective Long-Term Plans and associated supporting strategies (including Financial &amp; Asset Management Strategies), to ensure that water service delivery complies with the Local Water Done Well legislation requirements.</p> <p>The options analysis completed to date includes consideration of impacts on the current LTPs.</p>

	Impacts of the selected options will be further defined and put forward for community feedback through the planned consultation in May 2025.								
<b>Considerations as to sustainability, the environment and climate change impacts</b>	Changes are administrative in nature. Climate Change impacts would be assessed as part of any change to service provision								
<b>Risks Analysis</b>	<table border="1"> <thead> <tr> <th>Risk</th><th>Impacts</th></tr> </thead> <tbody> <tr> <td>Individual Councils do not approve or progressing with a Joint CCO approach.</td><td> <ul style="list-style-type: none"> <li>• Group may become unviable</li> <li>• Individual Councils may not be able to complete a compliant WSDP</li> <li>• Risk of DIA intervention with associated loss of decision-making control</li> </ul> </td></tr> <tr> <td>The Group of Councils is not fully compliant with new legislative requirements – within the required timeframes</td><td> <ul style="list-style-type: none"> <li>• Reputation risk for Councils</li> <li>• Cost and time to rectify</li> <li>• Potential DIA or Regulator Intervention</li> </ul> </td></tr> <tr> <td>One or more Councils may not approve new entrants to the Group.</td><td> <ul style="list-style-type: none"> <li>• Consensus view may not be recognized.</li> </ul> </td></tr> </tbody> </table>	Risk	Impacts	Individual Councils do not approve or progressing with a Joint CCO approach.	<ul style="list-style-type: none"> <li>• Group may become unviable</li> <li>• Individual Councils may not be able to complete a compliant WSDP</li> <li>• Risk of DIA intervention with associated loss of decision-making control</li> </ul>	The Group of Councils is not fully compliant with new legislative requirements – within the required timeframes	<ul style="list-style-type: none"> <li>• Reputation risk for Councils</li> <li>• Cost and time to rectify</li> <li>• Potential DIA or Regulator Intervention</li> </ul>	One or more Councils may not approve new entrants to the Group.	<ul style="list-style-type: none"> <li>• Consensus view may not be recognized.</li> </ul>
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One or more Councils may not approve new entrants to the Group.	<ul style="list-style-type: none"> <li>• Consensus view may not be recognized.</li> </ul>								
<b>Significance, Consultation and Engagement (internal and external)</b>	<p>Significance of this decision is considered to be low for the four existing Councils. Each Council has already considered the significance of the decision to sign the commitment agreement. While adding a new Council will have some significance on the grounds of community interest, impact on Councils' capability and capacity, cost to council and impact on ratepayers and potential changes to the control of Strategic Assets, these matters have largely already been considered and will not change greatly with the addition of a new Council.</p> <p>The Significance and Engagement Policies of the Group of Councils and the requirements of the Local Government (Water Services Preliminary Arrangements) Act 2024 and Bill 3, set out the requirements by which water services delivery model options are to be presented for community consultation.</p> <p>Consultation will occur on three service delivery options available to each Council in accordance with the above legislation. Each Council will need to decide, following consultation, whether it wants to proceed with the Joint water service delivery model. The Councils are not proposing to consult on the decision to enter the deed of accession and variation to the Commitment Agreement.</p>								

**7. Next Steps**

- Secure agreement from, Clutha, Gore and Waitaki District Councils for Timaru District Council to join the Joint CCO Commitment Agreement.
- Present for Council Decision an assessment of the available water service delivery model options – 1 April
- Present Consultation Document and secure Council approval to consult – 8 May
- Community & key stakeholder consultation planned from 9 May to 6 June 25
- Schedule Council hearings, deliberations and decision-making during June 25
- Council Decision Making & WSDP Content Approval - July 25
- Contingency to secure WSDP approvals - August 25
- WSDP Submission Deadline – 3 Sept 25

**8. Attachments**

**Nil**

## 25.4.5 MANAGING UNREASONABLE COMPLAINANT CONDUCT

**Doc ID: 2387282**

Report Author:	Alix Crosbie, Senior Strategy Advisor
Reviewed and authorised by:	Dylan Rushbrook, Group Manager - Community Vision

### 1. Purpose of Report

To consider adopting the Managing Unreasonable Complainant Conduct Policy.

### Recommendations

That the Council

- A. Receives the report and accepts the level of significance.
- B. Adopts the Managing Unreasonable Complainant Conduct Policy.

### 2. Background

Council staff have had an increase in incidents of poor or unreasonable behaviour through the conduct of business. This aligns with a national trend, where councils across New Zealand report an increase in incidents and issues.

The proposed 'Managing Unreasonable Complainant Conduct Policy' seeks to address this issue. There have been three elements to this work:

- Addressing the causes of complaints and continuing to improve our systems, processes, and information to provide the highest possible level of customer service;
- Implementing a Complaints Policy and processes to clarify and track how complaints are managed;
- The 'Managing Unreasonable Complainant Conduct Policy' itself.

This report is primarily focused on the third item, Managing Unreasonable Complainant Conduct, with the first two underpinning this approach and helping to minimise the number of applicable incidents.

Staff sought feedback from all four community boards in November and December 2024. All four boards were supportive of the approach within the Policy, emphasising the following:

- The Policy must not be used punitively, the Boards appreciated the emphasis in keeping available channels of communication open, even with customers exhibiting unreasonable conduct or behaviours.
- The Boards emphasised the importance of continual improvement of Council's customer services channels and approach – including the Complaints Policy – in ensuring Council is not causing issues or frustration that may in turn later lead to unreasonable behaviours.

### 3. Discussion

The Managing Unreasonable Complainant Policy is derived from the sample policy provided via the New Zealand Ombudsman.

The Ombudsman handles complaints about the administrative conduct of public sector agencies. All individuals or groups who interact with Council are able to ask the Ombudsman to review the outcome. The Ombudsman also provides guidance to assist Council in dealing with complaints, including in situations where the conduct or behaviour from a complainant could be considered 'unreasonable.'

The vast majority of complaints received by Council are able to be managed immediately by officers. A small number are escalated to a manager, and a smaller number again to a General Manager or the Chief Executive. Unreasonable Complainant Conduct applies to a minority of complaints where, due to the behaviour of the complainant, a bespoke approach is required.

### 1. Discussion

Council staff have had an increase in incidents of poor or unreasonable behaviour through the conduct of business. This aligns with a national trend, where councils across New Zealand report an increase in incidents and issues.

As part of the response, Council staff will seek to adopt a 'Managing Unreasonable Complainant Conduct' Policy in the first quarter of 2025. There are three elements to this workstream:

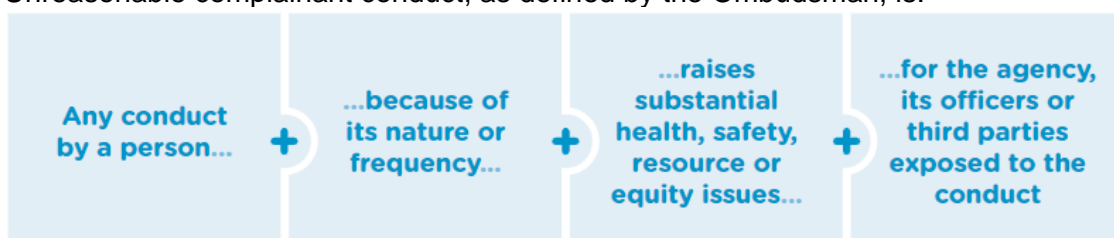
- Addressing the causes of complaints and continuing to improve our systems, processes, and information to provide the highest possible level of customer service;
- Implementing a Complaints Policy and processes to clarify and track how complaints are managed;
- 'Managing Unreasonable Complainant Conduct'.

This report is primarily focused on the third item, Managing Unreasonable Complainant Conduct, with the first two underpinning this approach and helping to minimise the number of applicable incidents.

The Ombudsman handles complaints about the administrative conduct of public sector agencies. All individuals or groups who interact with Council are able to ask the Ombudsman to review the outcome. The Ombudsman also provides guidance to assist Council in dealing with complaints, including in situations where the conduct or behaviour from a complainant could be considered 'unreasonable.'

The vast majority of complaints received by Council are able to be managed immediately by officers. A small number are escalated to a manager, and a smaller number again to a General Manager or the Chief Executive. Unreasonable Complainant Conduct applies to a minority of complaints where, due to the behaviour of the complainant, a bespoke approach is required.

Unreasonable complainant conduct, as defined by the Ombudsman, is:



*Figure: Queensland Ombudsman 'Managing unreasonable complainant conduct.'*

Unreasonable conduct has negative impacts for the organisation, staff, external review bodies and agencies, the complainants themselves, the subjects of the complaint, and other people requiring Council services. These negative impacts have been documented by the New Zealand Ombudsman and include:

- Reducing Council's ability to effectively and fairly allocate resources
- Unnecessary time and resources responding; or inequitable allocation of resources
- Increased staff turnover and significant wellbeing impacts
- Reduced productivity
- And, for the relevant complainants, stress, inability to achieve outcomes, loss of perspective, and an impact on wellbeing.

The Ombudsman has provided extensive guidance. As the Policy is lengthy, a short two-page version will be developed as guidance for all staff and elected members; with the longer policy helping to step through the application in the various possible situations that may call for it in the future.

There are a series of objectives and principles that underpin the Policy, aimed to simplify what is a complex area to manage in practice.

The core objectives are:

- To ensure equity and fairness
- To improve efficiency
- Ensure health and safety.

The prevention principles are to:

- Manage complainant expectations at the outset
- Insist on respect and cooperation
- Implement policies and procedures.

And the management principles aim to:

- Exercise ownership and control over complaints
- Focus on specific, observable conduct – not the person as a problem
- Respond appropriately and with consistency to individual complainants and complaints
- Effectively communicate.

The Policy defines types of unreasonable behaviour, outlines how Council respond to those behaviours, and provides the ability to restrict contact when unreasonable behaviour is having an impact on either our staff and their wellbeing, or our resourcing and ability to serve the rest of the community. It cannot be used punitively as a punishment for poor behaviour – it is intended to manage the impact of the behaviour whilst keeping channels of communication open.

It does not replace the Trespass Procedure or other legal instruments or disputes resolution strategies.

The five categories of unreasonable conduct are:

Unreasonable persistence	Unreasonable persistence is continued, incessant and unrelenting conduct by a complainant that has a disproportionate and unreasonable impact on our organisation, staff, services, time, or resources.
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Unreasonable demands	Unreasonable demands are any demands expressly made by a complainant that have a disproportionate and unreasonable impact on our organisation, staff, services, time, or resources.
Unreasonable lack of cooperation	Unreasonable lack of cooperation is when a complainant is unwilling or unable to cooperate with us, our staff, or our complaints process – resulting in a disproportionate and unreasonable use of our services, time, or resources.
Unreasonable arguments	Unreasonable arguments include any arguments that are not based on any reason or logic, that are incomprehensible, false, or inflammatory, trivial, or delirious, and that disproportionately and unreasonably impact upon our organisation, staff, services, time, or resources.
Unreasonable behaviours	Unreasonable behaviour is conduct that is unreasonable in all circumstances (regardless of how stressed, angry, or frustrated a complainant is) because it unreasonably compromises the health, safety and security of our staff, other service users or the complainant themselves.

Examples of conduct are given on pages 3-5 of the draft Policy.

UCC incidents will generally be managed by limiting or adapting the ways we interact with or deliver services to complainants by restricting:

Who they have contact with	limiting a complainant to a sole contact person or staff member in our organisation.
What they can raise with us	restricting the subject matter of communications that we will consider and respond to.
When they can have contact	limiting a complainant's contact with our organisation to a particular time, day, or length of time, or curbing the frequency of their contact with us.
Where they can make contact	limiting the locations where we will conduct face-to-face interviews to secured facilities or areas of the office.
How they can make contact	limiting or modifying the forms of contact that the complainant can have with us. This can include modifying or limiting face-to-face contact, telephone, and written communications, prohibiting access to our premises, contact through a representative only, taking no further action or terminating provision of services altogether.

Further detail on these restrictions are outlined on pages 7-11 of the Policy.

Specific detail is also provided on the procedures to be followed before any restriction takes place – including ensuring a written warning is provided to give the complainant an opportunity to change their approach; and the review process to ensure that the restrictions are removed should a complainants behaviour improve. This is outlined on pages 12-14 and in the attachments.

Additional clauses address the impact on staff, including the support for officers dealing with unreasonable conduct, and how stress is managed.

All record keeping in relation to the approach is managed with Council's Privacy Officer to ensure only relevant details are shared with staff.

#### 4. Financial Considerations

No financial considerations.

#### 5. Options

##### Option 1 – (Recommended)

Adopt the Managing Unreasonable Complainant Conduct Policy.

Advantages:

- Addresses known issue with wellbeing and resourcing implications
- Emphasis on reducing incidents of unreasonable conduct through other initiatives
- Compliant with the Ombudsman's preferred approach
- Focus on maintaining access as far as possible
- Allows Council to take a bespoke approach, rather than the blunt tool of Trespass

Disadvantages:

- No disadvantages identified.

##### Option 2

Do not adopt the Managing Unreasonable Complainant Conduct Policy

Advantages:

- No advantages identified.

Disadvantages:

- Reduced tools for staff managing unreasonable behaviour
- Trespass tool requires blanket banning, removing access to all Council facilities – including democratic processes
- Known issue with wellbeing and resourcing implications remains unaddressed

#### 6. Compliance

<b>Local Government Act 2002 Purpose Provisions</b>	This decision enables democratic local decision making and action by, and on behalf of communities by enabling Council to respond to unreasonable complainant conduct in a way that preserves their access to democratic processes.
<b>Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.</b>	Consistent with other Council plans and policies. Complemented by the Complaints Policy and our Customer Experience workstreams.
<b>Considerations as to sustainability, the environment and climate change impacts</b>	No environmental implications.
<b>Risks Analysis</b>	

	Policy deals with an area of known risk.
<b>Significance, Consultation and Engagement (internal and external)</b>	Consultation is not required under either the Local Government Act 2002 or the Significance and Engagement Policy.

## 7. Next Steps

If approved, the Policy will be in place for a three-year period.

## 8. Attachments

**Appendix 1 - Complaints Policy** [↓](#)

**Appendix 2 - Managing Unreasonable Complainant Conduct Policy** [↓](#)

**Appendix 3 - Two-page version of UCC Policy** [↓](#)



# Complaints Policy

<b>Department:</b>	Customer Experience
<b>Document ID:</b>	614499
<b>Approved by:</b>	CEO
<b>Effective date:</b>	2025
<b>Next review:</b>	2028

## Purpose:

To provide a fair and transparent process for the resolution of formal complaints.

## Principles and objectives:

Central Otago District Council commits to act fairly, timely, openly, and with integrity in the management of formal complaints.

## Scope:

This policy applies to complaints against Central Otago District Council, including any employees or contractors. Some complaints about building inspectors are referred to the Building Consent Complaints Process.

This policy manages complaints raised by members of the public or other groups or individuals for further action or consideration through formal channels. It is not intended to manage requests for service and complaints that can be resolved through business as usual.

## Definitions:

<b>Complaint</b>	For the purposes of this policy, a complaint is defined as a statement expressing dissatisfaction with a particular situation <b>and</b> requiring consideration through formal channels.
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## Policy:

Council operates a three step complaints process, aiming to resolve complaints as quickly as possible.



Step	Action
<b>Step One</b>	A complaint can be received by any member of staff.
Initial formal complaint	<p>When identifying the correspondence as a formal complaint, it is raised and referred to the appropriate business unit for a response.</p> <p>All complaints are acknowledged within 2 working days. This acknowledgement will contain the timeframe for any further correspondence.</p>
<b>Step two</b>	Where this initial response is unable to satisfy or resolve the issue, an escalation is made to a third-tier manager or member of the executive team for consideration.
Escalation	
<b>Step three</b>	If the customer is not satisfied with the response by the business unit, they can request a review be carried out.
Executive review	This review will be carried out by either the relevant executive manager, a different executive manager, or the Chief Executive.
<b>Specialist</b>	<p>An alternate process may be required when the issues remain unresolved after following each step, or if the issues raised are highly sensitive or complex.</p> <p>In these circumstances, an alternative approach is developed and communicated to the customer, along with any related timeframes.</p>

If Council is unable to reach a resolution with the complainant, the complainant will be made aware of their right to contact the Ombudsman.

Complainant privacy and record keeping are maintained in line with the relevant policies and procedures.

### Investigation

Council follows internal processes to undertake investigations of complaints, related to the detail of the complaint itself. For instance, if a complaint relates to the behaviour of a member of staff the relevant People and Culture process will be followed.



Due to staff privacy, in some circumstances a complainant may not be provided the detail of the outcome of a resolution; however, they will receive an update when the matter is closed.

### **Complaints about the Chief Executive**

Complaints about the Chief Executive or Executive Management can be made through this standard complaints process.

If preferred, these complaints can also be addressed through an independent process.

Independent complaints can be received by either the Mayor or the Independent Chair of the Audit and Risk Committee. They are managed independently with the Governance Manager.

All independent complaints are considered 'specialised' complaints. The process and any timeframes will be set and communicated directly to the customer by the Governance Manager, Mayor, or Independent Chair of the Audit and Risk Committee.

### **Unreasonable complainant conduct**

Most customers who contact Council act reasonably and responsibly, even if they are experiencing distress, frustration or anger about their complaint or concern. In rare circumstances customer behaviour may be considered unreasonable conduct. The Managing Unreasonable Complainant Conduct Policy applies in these circumstances.

## **Relevant legislation:**

- Health and Safety at Work Act 2015
- Local Government Information and Meetings Act 1987
- Ombudsman [Complaints about Public Sector Agencies Process](#)
- Privacy Act 2021

## **Related documents:**

- [Building Consent Complaints Process](#)
- Privacy Policy
- Unreasonable Complainant Conduct Policy



# Managing Unreasonable Complainant Conduct Policy

<b>Department:</b>	<b>Customer Experience</b>
<b>Document ID:</b>	660583
<b>Approved by:</b>	CEO
<b>Effective date:</b>	2025
<b>Next review:</b>	2028

## Purpose:

Central Otago District Council is committed to being accessible and responsive to all complainants who approach our office. At the same time, the success of our office depends on:

- Our ability to do our work in the most effective and efficient ways possible
- The health, safety, and security of our staff
- Our ability to allocate our resources fairly across all the complaints we receive.

When complainants behave unreasonably, their conduct can significantly affect the successful conduct of our work. CODC act proactively and decisively to manage any complainant conduct that negatively and unreasonably affects us and support our staff to do the same in accordance with this policy.

## Principles and objectives:

The policy was developed to better manage unreasonable conduct by complainants and keep channels of communication open as far as possible.

It aims to help staff:

- Feel confident and supported in taking action to manage Unreasonable Complainant Conduct [UCC].
- Act fairly, consistently, honestly, and appropriately when responding to UCC
- Understand their roles and responsibilities in relation to the management of UCC, and how this policy will be used
- Understand the types of circumstances where it may be appropriate to manage UCC, using one or more of the following mechanisms:
  - The strategies for managing unreasonable conduct either as contained in this policy or in New Zealand Ombudsman guidance for UCC
  - Alternate dispute resolution strategies to deal with conflicts
  - Legal instruments such as trespass laws or other legislation



- Understand the criteria we will consider before we decide to change or restrict a complainant's access to our services
- Be aware of the processes that will be followed to record and report UCC incidents, and the procedures for consulting and notifying complainants about any proposed action or decision to change or restrict their access to our services
- Understand the procedures for reviewing decisions made under this policy, including specific timeframes for review.

## Scope:

This policy applies to all interactions with CODC staff, or third-party contractors acting on behalf of CODC.

## Definitions:

The following acronyms are used throughout this policy:

Acronym	Meaning
CODC	Central Otago District Council
UCC	Unreasonable complainant conduct, as defined below

### Unreasonable complainant conduct

Most complainants act reasonably and responsibly in their interactions with us, even when they are experiencing high levels of distress, frustration, and anger about their complaint. However, despite our best efforts to help them, in a very small number of cases complainants display inappropriate and unacceptable behaviour. They can be aggressive and verbally abusive towards our staff, threaten harm and violence or bombard our offices with unnecessary and excessive phone calls and emails. They may make inappropriate demands on our time and resources or refuse to accept our decisions and recommendations in relation to their complaints. When complainants behave in these ways (and where there are no cultural factors that could reasonably explain their behaviour) we consider their conduct to be 'unreasonable'.

In short, unreasonable conduct by a complainant is any behaviour by a current or former complainant which, because of its nature or frequency raises substantial health, safety, resource or equity issues for our organisation, our staff, other service users and complainants or the complainant themselves.

UCC can be divided into 5 categories of conduct:

- unreasonable persistence





- unreasonable demands
- unreasonable lack of cooperation
- unreasonable arguments
- unreasonable behaviours.

Conduct	Explanation
<b>Unreasonable persistence</b>	<p>Unreasonable persistence is continued, incessant and unrelenting conduct by a complainant that has a disproportionate and unreasonable impact on our organisation, staff, services, time, or resources.</p> <p>Some examples of unreasonably persistent behaviour include:</p> <ul style="list-style-type: none"> <li>• An unwillingness or inability to accept reasonable and logical explanations, including final decisions that have been comprehensively considered and dealt with (even when it is evident the complainant does understand the information provided).</li> <li>• Persistently demanding a review simply because it is available, and without arguing or presenting a case for one.</li> <li>• Pursuing and exhausting all available review options, even after we have explained that a review is not warranted – and refusing to accept that we cannot or will not take further action on their complaint.</li> <li>• Reframing a complaint in an effort to get it taken up again.</li> <li>• Multiple and repeated phone calls, visits, letters, emails (including cc'd correspondence) after we have repeatedly asked them not to.</li> <li>• Contacting different people within or outside our organisation to get a different outcome or a more sympathetic response to their complaint – this is known as internal and external 'forum shopping'.</li> </ul>
<b>Unreasonable demands</b>	<p>Unreasonable demands are any demands expressly made by a complainant that have a disproportionate and unreasonable impact on our organisation, staff, services, time, or resources.</p> <p>Some examples of unreasonable demands include:</p>



	<ul style="list-style-type: none"> <li>• Issuing instructions and making demands about how to handle their complaint, the priority it should be given, or the outcome to be achieved.</li> <li>• Insisting on talking to a senior manager or the Chief Executive personally when the reasons that this is not appropriate or warranted have been carefully explained to the complainant.</li> <li>• Emotional blackmail and manipulation resulting in intimidation, harassment, shaming, seduction or portraying themselves as being victimised when this is not the case.</li> <li>• Insisting on outcomes that are not possible or appropriate in the circumstances, for example asking for someone to be fired or prosecuted, or for an apology or compensation when there is no reasonable basis for this.</li> <li>• Demanding services of a nature or scale that we cannot provide, even after we have explained this to them repeatedly.</li> </ul>
<b>Unreasonable lack of cooperation</b>	<p>Unreasonable lack of cooperation is when a complainant is unwilling or unable to cooperate with us, our staff, or our complaints process – resulting in a disproportionate and unreasonable use of our services, time, or resources.</p> <p>Some examples of unreasonable lack of cooperation include:</p> <ul style="list-style-type: none"> <li>• Sending us a constant stream of complex or disorganised information without clearly defining the issue at hand or explaining how the material provided relates to their complaint (where the complainant is clearly capable of doing this).</li> <li>• Providing little or no detail around their complaint or providing information in 'drips and drabs'.</li> <li>• Refusing to follow or accept our instructions, suggestions, or advice without a clear or justifiable reason for doing so.</li> <li>• Arguing that a particular solution is the correct one in the face of valid contrary arguments and explanations.</li> <li>• Unhelpful behaviour such as withholding information, acting dishonestly and misquoting others.</li> </ul>



<b>Unreasonable arguments</b>	<p>Unreasonable arguments include any arguments that are not based on any reason or logic, that are incomprehensible, false, or inflammatory, trivial, or delirious, and that disproportionately and unreasonably impact upon our organisation, staff, services, time, or resources.</p> <p>Arguments are unreasonable when they:</p> <ul style="list-style-type: none"> <li>• fail to follow a logical sequence that the complainant is able to explain to staff</li> <li>• are not supported by any evidence or are based on conspiracy theories.</li> <li>• lead a complainant to reject all other valid and contrary arguments</li> <li>• are trivial when compared to the amount of time, resources, and attention that the complainant demands</li> <li>• are false, inflammatory, or defamatory.</li> </ul>
<b>Unreasonable behaviour</b>	<p>Unreasonable behaviour is conduct that is unreasonable in all circumstances (regardless of how stressed, angry, or frustrated a complainant is) because it unreasonably compromises the health, safety and security of our staff, other service users or the complainant themselves.</p> <p>Some examples of unreasonable behaviours include:</p> <ul style="list-style-type: none"> <li>• acts of aggression, verbal abuse, derogatory, racist, or grossly defamatory remarks</li> <li>• harassment, intimidation, or physical violence</li> <li>• rude, confronting, or threatening correspondence</li> <li>• threats of harm to self or third parties, threats with a weapon or threats to damage property, including bomb threats</li> <li>• stalking in person or online</li> <li>• emotional manipulation.</li> </ul> <p>Central Otago District Council has a zero-tolerance policy towards any harm, abuse or threats directed towards staff. Any conduct of this kind will be dealt with under this policy, the trespass procedure, any other relevant policy, and in accordance with our duty of care and work health and safety responsibilities.</p>



## Roles and responsibilities:

Role	Responsibility
<b>All staff</b>	<p>All staff are responsible for familiarising themselves with this policy as well as the <i>Individual Rights and Mutual Responsibilities of the Parties to a Complaint</i> document at <b>Appendix B</b>. Staff are also encouraged to explain the contents of this document to all complainants, particularly those who engage in UCC or exhibit the early warning signs of UCC.</p> <p>Staff are encouraged and authorised to use the strategies and scripts provided in the <i>Managing unreasonable conduct by a complainant staff manual</i>.</p> <p>Any strategies that change or restrict a complainant's access to our services must be considered by a General Manager or Chief Executive.</p> <p>Staff are also responsible for recording and reporting all UCC incidents they experience or witness (as appropriate) to the UCC incident form. A file note of the incident should also be copied into MAGIQ Documents.</p>
<b>General Manager Community Experience, General Manager People and Culture, Chief Executive</b> or a General Manager as delegated by the Chief Executive	<p>The General Manager Community Experience, General Manager People &amp; Culture, and Chief Executive, in consultation with relevant staff, have the responsibility and authority to restrict a complainant's access to our services in the circumstances identified in this policy. When doing so they consider the criteria in this policy and aim to impose any service changes or restrictions in the least restrictive ways possible. Their aim when taking such actions is not be to punish the complainant, but rather to manage the impacts of their conduct.</p> <p>When applying this policy, the General Manager will also aim to keep at least one open line of communication with a complainant. However, we do recognise that in extreme situations all forms of contact may need to be restricted for some time to ensure the health, safety, and security of our staff or third parties.</p>



<b>Senior Manager</b>	<p>All senior managers are responsible for supporting staff to apply the strategies in this policy, as well as those in the manual. Senior managers are also responsible for ensuring compliance with the procedures outlined in this policy, and that all staff members are trained to deal with UCC – including on induction.</p> <p>After a stressful interaction with a complainant, senior managers should provide affected staff members with the opportunity to debrief their concerns either formally or informally. Senior managers will also ensure that staff are provided with proper support and assistance including medical or police assistance, and if necessary, support programmes.</p> <p>Senior managers may also be responsible for arranging other forms of support for staff, such as appropriate communication or intercultural training.</p>
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## Policy:

### Responding to and managing UCC

#### Changing or restricting a complainants access to our services

UCC incidents will generally be managed by limiting or adapting the ways we interact with or deliver services to complainants by restricting:

- **Who they have contact with** – limiting a complainant to a sole contact person or staff member in our organisation.
- **What they can raise with us** – restricting the subject matter of communications that we will consider and respond to.
- **When they can have contact** – limiting a complainant's contact with our organisation to a particular time, day, or length of time, or curbing the frequency of their contact with us.
- **Where they can make contact** – limiting the locations where we will conduct face-to-face interviews to secured facilities or areas of the office.
- **How they can make contact** – limiting or modifying the forms of contact that the complainant can have with us. This can include modifying or limiting face-to-face contact, telephone, and written communications, prohibiting access to our premises, contact through a representative only, taking no further action or terminating provision of services altogether.



When using the restrictions provided in this section, we recognise that discretion will need to be used to adapt them to suit a complainant's personal circumstances such as level of competency, literacy skills, and cultural background. In this regard, we also recognise that more than one strategy may be needed in individual cases to ensure their appropriateness and efficacy.

#### **Who: limiting the complainant to a sole contact point**

Where a complainant tries to forum-shop within our organisation, changes their issues of complaint repeatedly, constantly reframes their complaint, or raises an excessive number of complaints, it may be appropriate to restrict their access to a single staff member (a sole contact point) who will manage their complaint(s) and interaction with our office. This may help ensure they are dealt with consistently and may minimise the incidence of misunderstandings, contradictions, and manipulation.

To avoid staff 'burnout', the sole contact officer's supervisor will provide them with regular support and guidance as needed. The General Manager Customer Experience and General Manager People and Culture will also review the arrangement every 6 months, or earlier if required, to ensure that the officer is managing/coping with the arrangement. Complainants who are restricted to a sole contact person will, however, be given the contact details of one additional staff member who they can contact if their primary contact is unavailable – for example if they go on leave or are otherwise unavailable for an extended period of time.

#### **What: restricting the subject matter of communications that we will consider**

Where complainants repeatedly send letters, emails, or online forms that raise trivial or insignificant issues, contain inappropriate or abusive content, or relate to an issue that has already been comprehensively considered or reviewed (at least once) by our office, we may restrict the issues the complainant can raise with us.

For example, we may:

- Refuse to respond to correspondence that raises an issue that has already been dealt with, that raises a trivial issue, or is not supported by evidence. The complainant will be advised that future correspondence of this kind will be read and filed without acknowledgement unless we decide that we need to pursue it further – in which case, we may do so on our 'own motion'.
- Restrict the complainant to one complaint or issue per month. Any attempts to circumvent this restriction (for example by raising multiple complaints or issues in the one letter) may result in modifications or further restrictions being placed on their access.



- Return the correspondence to the complainant and require them to remove any inappropriate content before we agree to consider its contents. We will also keep a copy of the inappropriate correspondence for our records to help identify repeat UCC incidents.

### **When and how: limiting when and how a complainant can contact us**

If a complainant's contact with our organisation places an unreasonable demand on our time or resources, or affects the health, safety, and security of our staff because it involves behaviour that is persistently rude, threatening, abusive or aggressive, we may limit when or how the complainant can interact with us.

This may include:

- Limiting their telephone calls or face-to-face interviews to a particular time of the day or days of the week.
- Limiting the length or duration of telephone calls, written correspondence, or face-to-face interviews. For example:
  - Telephone calls may be limited to [10] minutes at a time and will be politely terminated at the end of that time period.
  - Lengthy written communications may be restricted to a maximum of [15] typed or written pages, single sided, font size 12 or it will be sent back to the complainant to be organised and summarised. This option is only appropriate in cases where the complainant is capable of summarising the information and refuses to do so.
  - Limiting face-to-face interviews to a maximum of [45] minutes.
- Limiting the frequency of their telephone calls, written correspondence, or face-to-face interviews. Depending on the nature(s) of the service(s) provided we may limit:
  - Telephone calls to [1] every 2 weeks/month.
  - Written communications to [1] every 2 weeks/month.
  - Face-to-face interviews to [1] every 2 weeks/month.

For irrelevant, overly lengthy, disorganised or very frequent written correspondence we may also:

- Require the complainant to clearly identify how the information or supporting materials they have sent to us relate to the central issues that we have identified in their complaint.
- Restrict the frequency with which complainants can send emails or other written communications to our office.



- Restrict a complainant to sending emails to a particular email account (e.g., the organisation's main email account) or block their email access altogether and require that any further correspondence be sent through New Zealand Post only.

#### *'Writing only' restrictions*

When a complainant is restricted to 'writing only' they may be restricted to written communications through:

- Email only to a specific staff email or our general office email account
- New Zealand Post only
- Some other relevant form of written contact, where applicable.

If a complainant's contact is restricted to writing only, the General Manager or nominated officer will clearly identify the specific means that the complainant can use to contact our office. If it is not appropriate for a complainant to enter our premises to hand deliver their written communication this must be communicated to them as well.

Any communications received by our office in a manner that contravenes a 'writing only' restriction will either be returned to the complainant or read and filed without acknowledgement.

#### **Where: limiting face-to-face interviews to secure areas**

If a complainant is violent or overtly aggressive, unreasonably disruptive, threatening or demanding or makes frequent unannounced visits to our premises, we may consider restricting our face-to-face contact with them.

These restrictions can include:

- Restricting access to particular secured premises or areas of the office such as the reception area or a secured room or facility.
- Restricting their ability to attend our premises to specified times of the day or days of the week only – for example, when additional security is available or to times or days that are less busy.
- Allowing them to attend our office on an 'appointment only' basis, and only with specified staff (for these meetings, staff should enlist the support and assistance of a colleague for added safety and security.)
- Banning the complainant from attending our premises altogether and allowing some other form of contact, e.g., 'writing only' or 'telephone only' contact.

#### *Contact through a representative only*





In cases where we cannot completely restrict our contact with a complainant and their conduct is particularly difficult to manage, we may require them to contact us through a support person or representative only. The support person may be someone nominated by the complainant, but they must be approved by the General Manager.

When assessing a representative or support person's suitability, the General Manager should consider factors such as their level of competency and literacy skills, demeanour and behaviour, and relationship with the complainant. If the General Manager determines that the representative or support person may exacerbate the situation with the complainant, the complainant will be asked to nominate another person and we may assist them in this regard.

### **Completely terminating a complainant's access to our services**

In rare cases, and as a last resort when all other strategies have been considered, the General Manager may decide that it is necessary for our organisation to completely restrict a complainant's contact or access to our services.

A decision to have no further contact with a complainant will only be made if it appears that the complainant is unlikely to modify their conduct, or their conduct poses a significant risk for our staff or other parties because it involves one or more of the following:

- Acts of aggression, verbal or physical abuse, threats of harm, harassment, intimidation, stalking, assault.
- Damage to property while on our premises.
- Threats with a weapon or common office items that can be used to harm another person or themselves.
- Physically preventing a staff member from moving around freely either within their office or during an off-site visit – e.g., entrapping them in their home.
- Conduct that is otherwise unlawful.

In these cases, the complainant will be sent a letter notifying them that their access has been restricted as outlined in the procedure. A complainant's access to our services and our premises may also be restricted (directly or indirectly) using legal mechanisms like trespass laws and other legislation or legal orders to protect members of our staff from personal violence, intimidation or stalking by a complainant.

### **Alternative dispute resolution**

If the General Manager and the Chief Executive determine that we cannot terminate our services to a complainant in a particular case or that we or our staff bear some responsibility



for causing or exacerbating their conduct, they may consider using alternative dispute resolution strategies such as mediation and conciliation to resolve the conflict with the complainant and attempt to rebuild our relationship with them.

If an alternative dispute resolution strategy is considered to be an appropriate option in a particular case, it will be conducted by an independent third party to ensure transparency and impartiality. However, we recognise that in UCC situations an alternative dispute resolution strategy may not be an appropriate or effective strategy – particularly if the complainant is uncooperative or resistant to compromise. Therefore, each case will be assessed on its own facts to determine the appropriateness of this approach.

### Procedure to be followed when changing or restricting a complainant's access to our services

The procedure attached in **Appendix A** formulates part of this policy.

Unless a complainant's conduct poses a substantial risk to the health and safety of staff or other third parties, a written warning about their conduct will be provided in the first instance.

If a complainant's conduct continues after they have been given a written warning, or in extreme cases of over aggression, violence, assault, and or other lawful/unacceptable conduct, the General Manager Community Experience, or another nominated General Manager, have the discretion to send a notification letter immediately restricting the complainant's access to our services (without prior or further written warning). If the complainant is unable to read the letter (due to literacy issues, non-English speaking, etc) the letter will be followed or accompanied by a telephone call, using an interpreter if necessary.

### Appealing a decision to change or restrict access to our services

People who have their access changed or restricted are entitled to one appeal of a decision to change or restrict their access to our services. This review will be undertaken by a senior staff member who was not involved in the original decision to change or restrict the complainant's access. This staff member will consider the complainant's arguments and personal circumstances, including cultural background, along with all relevant records regarding the complainant's past conduct. They will advise the complainant of the outcome of their appeal by letter, which must be signed off by the Chief Executive. The staff member will then refer any materials or records relating to the appeal to the Chief Executive to be kept in the appropriate file.



If a complainant is still dissatisfied after the appeal process, they may seek an external review from an oversight agency such as the Ombudsman. The Ombudsman may accept the review (in accordance with its administrative jurisdiction) to ensure that we have acted fairly, reasonably, and consistently and have observed the principles of good administrative practice, including procedural fairness.

### **Non-compliance with a change or restriction on access to our services**

All staff members are responsible for recording and reporting incidents of non-compliance by complainants. This should be recorded in a file note in the case management system and a copy forwarded to the General Manager who will decide whether any action needs to be taken to modify or further restrict the complainant's access to our services.

### **Periodic reviews of all cases where this policy is applied**

#### **Period for review**

All cases where this policy is used will be reviewed at a period dependent on the nature of the service provided. This will be at 3, 6, or 12 month intervals. No review period may extend by more than 12 months after the service change or restriction was initially imposed or upheld.

#### **Notifying the complainant of an upcoming review**

The General Manager will ask complainants if they would like to participate in the review process unless they determine this invitation will provoke a negative response from the complainant (i.e. further UCC). The invitation will be given, and the review will be conducted in accordance with the complainant's access restrictions.

#### **Criteria to be considered during a review**

When conducting a review, the General Manager will consider:

- Whether the complainant has had any contact with the organisation during the restriction period
- The complainant's conduct during the restriction period.
- Any information or arguments put forward by the complainant for review.
- Any other information that may be relevant in the circumstances.



The General Manager may also consult any staff members who have had contact with the complainant during the restriction period.

Sometimes a complainant may not have a reason to contact our office during their restriction period. As a result, a review decision that is based primarily on the fact that the complainant has not contacted our organisation during their restriction period may not be an accurate representation of their level of compliance/reformed behaviour. This should be taken into consideration, in relevant situations.

### **Notifying a complainant of the outcome of a review**

The General Manager will tell the complainant the outcome of their review using an appropriate method of communication, as well as a written letter explaining the outcome.

The review letter will:

- Briefly explain the review process.
- Identify the factors that have been considered during the review.
- Explain the decision or outcome of the review and the reasons for it.

If the outcome of the review is to maintain or modify the restriction, the review letter will also:

- Indicate the nature of the new or continued restriction.
- State the duration of the new restriction period.
- Provide the name and contact details of the nominated senior manager or relevant officer who the complainant can contact to discuss the letter.
- Be signed by the General Manager Community Experience, a nominated General Manager, or Chief Executive.

### **Recording the outcome of a review**

The General Manager is responsible for keeping a record of the outcome of the review, updating the case management records, and notifying all relevant staff of the outcome of the review including if the restriction has been withdrawn.

## **Managing staff stress**

### **Staff reactions to stressful situations**



Dealing with demanding, abusive, aggressive, or violent complainants can be extremely stressful, distressing and even frightening for our staff. It is perfectly normal to get upset or stressed when dealing with difficult situations.

As an organisation, we have a responsibility to support staff members who experience stress as a result of situations arising at work and we will do our best to provide staff with debriefing and counselling opportunities, when needed. However, to do this we also need the help of all CODC staff to identify stressful incidents and situations. All staff have a responsibility to tell relevant supervisors and senior managers about UCC incidents, and any other stressful incidents that they believe require management to be involved.

### **Debriefing**

Debriefing means talking things through following a difficult or stressful incident. It is an important way of dealing with stress. Many staff do this naturally with colleagues after a difficult telephone call, but staff can also debrief with a supervisor or senior manager (or as a team) following a significant incident. We encourage all staff to engage in an appropriate level of debriefing, when necessary.

Staff may also access support through the employee assistance programme.

### **Training and awareness**

CODC is committed to ensuring all staff are aware of and know how to use this policy. All staff who deal with complainants in the course of their work will also receive appropriate training and information on using this policy and on managing UCC on a regular basis and on induction. This includes training to support culturally appropriate communication.

### **Relevant legislation:**

[Link to Ombudsman guidance](#)

### **Related documents:**

[To be listed when complete.](#)



## Appendix A: Procedure to be followed when changing or restricting a complainant's access to our services

A six-step procedure is generally followed when changing or restricting a complainant's access to CODC services.

A General Manager or the Chief Executive may modify the procedure if circumstances warrant it, for example if UCC places a severe or immediate risk to staff. At all times, CODC take the complainant's personal circumstances into account and restrictions applied in ways that are appropriate and necessary to manage a complainant's conduct.

The six-steps are:





### **Consulting with relevant staff**

When the General Manager receives a UCC incident form from a staff member, they contact the staff member to discuss the incident.

They discuss:

- The circumstances that gave rise to the UCC incident, including the complainant's situation, personal and cultural background, and perspective.
- The impact of the complainant's conduct on our organisation, relevant staff, our time, resources etc.
- The complainant's response to the staff member's warnings or requests to stop the unreasonable behaviour.
- What the staff member has done to manage the complainant's conduct (if applicable).
- Any suggestions made by relevant staff on ways that the situation could be managed.

### **Criteria to be considered**

Following a consultation with relevant staff the General Manager will search the case management system for information about the complainant's prior conduct and history with our organisation. They will also consider the following criteria:

- Whether the conduct in question involved overt anger, aggression, violence, or assault (which is unacceptable in all circumstances).
- Whether the complainant's case has merit.
- The likelihood that the complainant will modify their unreasonable conduct if they are given a formal warning about their conduct.
- Whether changing or restricting access to our services will be effective in managing the complainant's behaviour.
- Whether changing or restricting access to our services will affect the complainant's ability to meet their obligations, such as reporting obligations.
- Whether changing or restricting access to our services will have an undue impact on the complainant's welfare, livelihood, or dependents etc.
- Whether the complainant's personal circumstances have contributed to the behaviour – For example, the complainant's cultural background may mean their communication patterns differ from those of our staff or our organisation's standards, or the complainant is a vulnerable person who is under significant stress as a result of one or more of the following:
  - homelessness
  - physical disability
  - illiteracy or other language or communication barrier
  - mental or other illness



- personal crises
  - substance or alcohol abuse.
- Whether the complainant's response or conduct was moderately disproportionate, grossly disproportionate, or not at all disproportionate in the circumstances.
- Whether there are any statutory provisions that would limit the types of limitations that can be applied to the complainant's contact with, or access to our services.

Once the General Manager has considered these criteria, they will decide on the appropriate course of action. They may suggest formal or informal options for dealing with the complainant's conduct which may include one or more of the strategies provided in the manual and this policy.

### **Providing a warning letter**

Unless a complainant's conduct poses a substantial risk to the health and safety of staff or other third parties, the General Manager will provide them with a written warning about their conduct in the first instance. If the complainant is unable to read the letter, it will be followed/accompanied by a telephone call, using an interpreter if necessary.

The warning letter will:

- Specify the date, time, and location of the UCC incident(s).
- Explain why the complainant's conduct/UCC incident is problematic.
- List the types of access changes and/or restrictions that may be imposed if the behaviour continues. (Note: not every possible restriction should be listed but only those that are most relevant).
- Provide clear and full reasons for the warning being given
- Include an attachment of the organisation's ground rules and/or briefly state the standard of behaviour that is expected of the complainant. See **Appendix B** - Individual rights and mutual responsibilities of parties to a complaint.
- Provide the name and contact details of the staff member who they can contact about the letter.
- Be signed by the General Manager or the Chief Executive.

### **Providing a notification letter**

If a complainant's conduct continues after they have been given a written warning or in extreme cases of overt aggression, violence, assault, or other unlawful/unacceptable conduct, the General Manager has the discretion to send a notification letter immediately restricting the complainant's access to our services (without prior or further written warning). If the complainant is unable to read the letter (due to literacy issues, non-English speaking, etc.) the letter will be followed or accompanied by a telephone call, using an interpreter if necessary.

This notification letter will:

- Specify the date, time, and location of the UCC incident(s).
- Explain why the complainant's conduct is problematic.
- Identify the change and/or restriction that will be imposed and what it means for the complainant.





- Provide clear and full reasons for this restriction.
- Specify the duration of the change or restriction imposed, which will not exceed 12 months.
- Indicate a time period for review.
- Provide the name and contact details of the senior officer who they can contact about the letter and/or request a review of the decision.
- Be signed by the General Manager or the Chief Executive.

#### **Notifying relevant staff about access changes/restrictions**

The General Manager will notify relevant staff about any decisions to change or restrict a complainant's access to our services, in particular reception and security staff in cases where a complainant is prohibited from entering our premises.

The General Manager will also update case management system and/or other centralised register/list with a record outlining the nature of the restriction imposed and its duration.

#### **Continued monitoring/oversight responsibilities**

Once a complainant has been issued with a warning letter or notification letter the General Manager will review the complainant's record/restriction at regular intervals [every 3, 6, or 12 months dependent on the type of UCC], on request by a staff member, or following any further incidents of UCC that involve the particular complainant to ensure that they are complying with the restrictions/the arrangement is working.

If the General Manager determines that the restrictions have been ineffective in managing the complainant's conduct or are otherwise inappropriate they may decide to either modify the restrictions, impose further restrictions, or terminate the complainant's access to our services altogether.



## Appendix B: Individual rights and mutual responsibilities of the parties to a complaint

*Note: These rights have been developed using guidance provided by the New Zealand Ombudsman and, at the direction of the Ombudsman, the model policies developed by the New South Wales Ombudsman. The term 'rights' is used to demonstrate a guarantee of the standard of service and behaviour that all parties should meet is a complaints process is to be effective. It is not used to depict a legally enforceable entitlement – although some are.*

### Individual rights

#### **Complainants have the right:**

- to make a complaint and to express their opinions in ways that are reasonable, lawful, and appropriate, regardless of cultural background, national origin, sex, sexual orientation, gender expression, disability or other cultural or personal characteristics
- to a reasonable explanation in a wide range of languages of the organisation's complaints procedure, including details of the confidentiality, secrecy or privacy rights or obligations that may apply
- to a fair and impartial assessment and, where appropriate, investigation of their complaint based on the merits of the case
- to a fair hearing
- to a timely response
- to be informed in at least general terms about the actions taken and outcome of their complaint
- to have decisions that affect them explained to them
- to at least 1 review of the decision on the complaint
- to be treated with courtesy and respect
- to communicate valid concerns and views without fear of reprisal or other unreasonable response.

#### **Staff have the right:**

- to determine whether, and if so how, a complaint will be dealt with
- to finalise matters on the basis of outcomes they consider to be satisfactory in the circumstances
- to expect honesty, cooperation, and reasonable assistance from complainants
- to expect honesty, cooperation and reasonable assistance from organisations and people within jurisdiction who are the subject of a complaint



- to be treated with courtesy and respect
- to a safe and healthy working environment
- to modify, curtail or decline service (if appropriate) in response to unacceptable behaviour by a complainant.

#### **Subjects of a complaint have the right:**

- to a fair and impartial assessment and, where appropriate, investigation of the allegations made against them
- to be treated with courtesy and respect by staff of CODC
- to be informed (at an appropriate time) about the substance of the allegations made against them that are being investigated
- to be informed about the substance of any proposed adverse comment or decision
- to be given a reasonable opportunity to put their case during the course of any investigation and before any final decision is made
- to be told the outcome of any investigation into allegations about their conduct, including the reasons for any decision or recommendation that may be detrimental to them
- to be protected from harassment by disgruntled complainants acting unreasonably.

### **Mutual responsibilities**

#### **Complainants are responsible for:**

- treating staff of CODC with dignity and respect
- clearly identifying to the best of their ability the issues of complaint, or asking for help from the staff of CODC to assist them in doing so
- providing CODC, to the best of their ability, with all the relevant information available to them at the time of making the complaint
- being honest in all communications with CODC
- informing CODC of any other action they have taken in relation to their complaint
- cooperating to the best of their ability with the staff who are assigned to assess/investigate/resolve/determine or otherwise deal with their complaint.

If complainants do not meet their responsibilities, CODC may consider placing limitations or conditions on their ability to communicate with staff or access certain services.

CODC has a zero-tolerance policy in relation to any harm, abuse or threats directed towards its staff. Any conduct of this kind may result in a refusal to take any further action on a complaint or to have further dealings with the complainant. Any conduct of a criminal nature will be reported to police, and in certain cases legal action may also be considered.

**Staff are responsible for:**

- providing reasonable assistance, including cultural and linguistic assistance, to complainants who need help to make a complaint and, where appropriate, during the complaint process
- dealing with all complaints, complainants and people or organisations the subject of complaint professionally, fairly, and impartially
- giving complainants or their advocates a reasonable opportunity to explain their complaint, subject to the circumstances of the case and the conduct of the complainant
- giving people or organisations the subject of complaint a reasonable opportunity to put their case during the course of any investigation and before any final decision is made
- informing people or organisations the subject of investigation, at an appropriate time, about the substance of the allegations made against them and the substance of any proposed adverse comment or decision that they may need to answer or address
- keeping complainants informed of the actions taken and the outcome of their complaints
- giving complainants explanations that are clear and appropriate to their circumstances, and adequately explaining the basis of any decisions that affect them
- treating complainants (and people who are the subject of complaints) with courtesy and respect at all times and in all circumstances
- taking all reasonable and practical steps to ensure that complainants are not subjected to any detrimental action in reprisal for making their complaint
- giving adequate warning of the consequences of unacceptable behaviour.

If CODC or its staff fail to comply with these responsibilities, complainants may complain to the Chief Executive, the independent chair of the Audit and Risk Committee, or to the New Zealand Ombudsman.

**Subjects of a complaint are responsible for:**

- cooperating with the staff of CODC who are assigned to handle the complaint, particularly where they are exercising a lawful power in relation to a person or body within their jurisdiction
- providing all relevant information in their possession to CODC or its authorised staff when required to do so by a properly authorised direction or notice
- being honest in all communications with CODC and its staff
- treating the staff of CODC with courtesy and respect at all times and in all circumstances



- refraining from taking any detrimental action against the complainant in reprisal for them making the complaint.

If subjects of a complaint fail to comply with these responsibilities, action may be taken under relevant laws or codes of conduct.

**CODC is responsible for:**

- maintaining an appropriate and effective complaint handling system in place for receiving, assessing, handling, recording, and reviewing complaints
- making decisions about how all complaints will be dealt with
- ensuring that all complaints are dealt with professionally, fairly, and impartially
- ensuring that staff treat all parties to a complaint with courtesy and respect
- ensuring that the assessment and any inquiry into the investigation of a complaint is based on sound reasoning and logically probative information and evidence
- finalising complaints on the basis of outcomes that the organisation, or its responsible staff, consider to be satisfactory in the circumstances
- implementing reasonable and appropriate policies, procedures, and practices to ensure that complainants are not subjected to any detrimental action in reprisal for making a complaint, including maintaining separate complaint files and other operational files relating to the issues raised by individuals who make complaints
- adequately considering any confidentiality, secrecy or privacy obligations or responsibilities that may arise in the handling of complaints and the conduct of investigations.

If CODC fails to comply with these responsibilities, complainants may complain to the independent chair of the Audit and Risk Committee or the New Zealand Ombudsman.



## Unreasonable Complainant Conduct Policy Summary

Most engagement between customers and staff at Central Otago District Council is productive. The vast majority of interactions are short and resolved to mutual satisfaction. We have a goal of becoming leaders in customer service

There are, however, occasions where communication breaks down or things otherwise go as well as they could. Council have a Complaints Policy that is designed to capture these instances – including commitments to respond to all complainants in a timely manner.

This recognises that there are times where our systems may cause people become frustrated. We endeavour to identify these ahead of time, and work to resolve them quickly when brought to our attention.

There are, however, a small number of cases where unreasonable complainant conduct becomes a barrier in delivering our services. It's important that we maintain the ability to share time and resources fairly to provide a service for all residents and visitors to CODC; and look after the wellbeing of our staff.

Unreasonable conduct could include any of the following behaviours, when they have a disproportionate and unreasonable impact on the organisation, staff, services, time, or resources:

- **unreasonable persistence** – continued, incessant and unrelenting conduct
- **unreasonable demands** – that are disproportionate or otherwise unreasonable
- **unreasonable lack of cooperation** – an unwillingness to engage or cooperate with us, our staff, or our complaints process
- **unreasonable arguments** – that are not based on any reason or logic, or that are incomprehensible, false or inflammatory, trivial or delirious.
- **unreasonable behaviours** – that compromise the health, safety, and security of staff, other service users, or the customer themselves.

Changing or restricting a complainants access to our services is not ever used as a punishment. It is to ensure the health, safety and wellbeing of our community and our staff; and the appropriate use of our time and resources. When repeated unreasonable behaviour is encountered, we may choose to limit customers contact in the following ways:

- **Who they have contact with** – limiting a complainant to a sole contact person or staff member in our organisation.
- **What they can raise with us** – restricting the subject matter of communications that we will consider and respond to.
- **When they can have contact** – limiting a complainant's contact with our organisation to a particular time, day, or length of time, or curbing the frequency of their contact.
- **Where they can make contact** – limiting the locations where we will conduct face-to-face interviews to secured facilities or areas of the office.



- **How they can make contact** – limiting or modifying the forms of contact that the complainant can have with us. This can include modifying or limiting face-to-face contact, telephone, and written communications, prohibiting access to our premises, contact through a representative only, taking no further action or terminating provision of services altogether.

If you encounter unreasonable behaviour:

- Note the incident against the customer's name in MAGIQ and notify Erin Blaikie
- It may be appropriate to also log a health and safety incident in BWare.
- The Managed Customer Process should not be used as a threat. There is a clear process we must follow, including notifying a customer of their rights and responsibilities, a warning letter, and formal notification.

If you are approached by a managed customer:

- Managed customer details will be tagged to their MAGIQ customer ID and appear in our internal GIS system.
- Details will also be communicated to customer-facing staff. To protect customer privacy, this will include only the name, types of restriction/s in place, and any instructions how to proceed.
- These locations will contain detail on the type of restriction and whether they're applicable to your interaction. For instance, a customer may be restricted on discussion on one topic – but otherwise be able to interact with all of our services.
- This is a new process and it will take some time to iron out. Please keep in touch with Erin, David, or Alix on any challenges with the process and we will continue to improve.

How does someone become a managed customer?

- The Managed Customer Process is responsive and depends on the type of behaviour. An aggressive customer may be warned after the first incident; whereas unreasonable arguments or persistence often require ongoing incidents of behaviour from the same individual – to the extent it becomes a strain on resources.
- The GM of Community Experience has responsibility for decision making, with input from our Customer Services Manager; Health Safety and Wellbeing Advisor; General Manager People and Culture, and relevant members of the leadership team.
- A six-step process is followed when changing or restricting access to our services: Consult with relevant staff; consider behaviour against the criteria; provide a warning letter; provide a notification letter; notify relevant staff; continued monitoring and review.

How does someone stop being a managed customer?

- All managed customers are reviewed at a period dependent on the nature of the service provided. This will be at 3-, 6-, or 12-month intervals. The contact and conduct during the restriction period is assessed, and any relevant staff are consulted.

## 25.4.6 DRAFT THREE-YEAR INTERNAL AUDIT PROGRAMME

**Doc ID: 2410654**

Report Author:	Saskia Righarts, Group Manager - Business Support
Reviewed and authorised by:	Peter Kelly, Chief Executive Officer

### 1. Purpose of Report

To consider the draft three-year internal audit programme.

### Recommendations

That the Council

- A. Receives the report and accepts the level of significance.
- B. Note that the Audit and Risk Committee resolved to recommend the proposed three-year internal audit programme to Council.
- C. Approves the draft three-year internal audit programme.

### 2. Background

As part of good risk oversight and management it is prudent to have an internal audit programme. This programme should focus on areas of the business that are typically covered by the external audit programme, bearing in mind the organisation's key areas of risk.

In 2024 a draft programme was developed, but at that time the risk register was undergoing a significant revision, and key changes were happening in leadership (such as the appointment of a new chief executive officer and an independent chair of the Audit and Risk Committee). After review by the executive leadership team, it was felt the proposed programme was not reflective of where the organisation was at, and given key leadership changes it was agreed to delay this piece of work until late 2024.

### 3. Discussion

In late 2024, Deloitte were re-engaged and in January 2025 conducted a series of interviews with key personnel. In conjunction with these interviews and a review of key documents (e.g., the risk register) a refreshed programme has been developed. This has been reviewed and endorsed by the executive leadership team. The proposed programme was presented the Audit and Risk Committee at their meeting on 14 February 2025. The Committee was supportive of the proposed programme and resolved that the programme be recommended to Council.

The attached report details the approach to developing the proposed programme and the key areas of focus. The proposed programme is:



**2025/26 financial year**

- Operational finance review
- Capital expenditure review

**2026/27 financial year**

- Fraud
  - Part A: Fraud and corruption gap analysis
  - Part B: Fraud and corruption awareness training
- Contract management review

**2027/28 financial year**

- Talent management review
- Business continuity and resilience review
- Procurement processes review (budget dependent)

**4. Financial Considerations**

The cost of the internal audit programme is included in the draft budgets for the 2025-34 Long-term Plan.

**5. Options**Option 1 – (Recommended)

Approve the proposed three-year internal audit programme.

Advantages:

- Enables areas of potential business risk/improvement to be independently reviewed and actions identified for enhance organisation performance.
- Enables governance oversight of identified areas for improvement.

Disadvantages:

- None identified.

Option 2

Approve the proposed three-year internal audit programme with amendments.

Advantages:

- Enables areas of potential business risk/improvement to be independently reviewed and actions identified for enhance organisation performance.
- Enables governance oversight of identified areas for improvement.

Disadvantages:

- None identified.

Option 3

Do not approve the proposed three-year internal audit programme.

## Advantages

- Would result in minor savings of \$51,000 per year.

## Disadvantages

- May miss the opportunity for areas of business risk/improvement to be identified and actions undertaken to enhance organisation performance
- May increase Council's risk in certain areas over time if appropriate mitigations and actions are not undertaken.

**6. Compliance**

<b>Local Government Act 2002 Purpose Provisions</b>	This decision enables democratic local decision making and action by, and on behalf of communities by identifying improvements to internal processes that should increase the efficiency, accuracy, and effectiveness of Council's outputs.
<b>Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.</b>	Yes.
<b>Considerations as to sustainability, the environment and climate change impacts</b>	There are no impacts upon sustainability, the environment, or climate change as a result of this decision.
<b>Risks Analysis</b>	While the preferred option included in this report seeks to reduce risk through the audit of key activities throughout Council, should Council not approve the programme there is a chance that our risk exposure could increase over the next three years. Regular audits of internal activities and processes aim to reduce risk exposure through identification of improvement actions and monitoring of the implementation of these actions.
<b>Significance, Consultation and Engagement (internal and external)</b>	This decision is not classed as significant.

**7. Next Steps**

Pending approval by Council the internal audit programme will commence following adoption of the 2045/34 Long-term Plan.

**8. Attachments**

**Appendix 1 - Draft three-year internal audit programme** [↓](#)



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## Draft three-year Internal Audit Programme

January 2024



Draft

# Contents

-  Overview ..... 3
-  Approach ..... 4
-  Key themes ..... 6
-  Summary of draft three-year internal audit programme ..... 7
-  Our response and rationale ..... 8
-  Appendix 1: List of interviewees ..... 12
- Appendix 2: Scope and approach (per engagement letter) ..... 13
- Appendix 3: Deloitte’s FORRESTT categorisation of risks ..... 14
- Appendix 4: Other areas for consideration ..... 15

# Overview

## Background

Central Otago District Council ('CODC' or 'you') has requested Deloitte to assist with the refresh and development of its internal audit programme. We worked with leadership (in this case, seven members of the Executive team, and one operational manager) and Chair of the Audit and Risk Committee ('ARC') to identify areas that should be considered and included in CODC's three-year internal audit programme.

Whilst we prepared an internal audit plan in September 2023, several factors highlighted the need for a refresh of the programme. For example, the repeal of Affordable Water Reform (Three Waters), ongoing reform of the Resource Management Act, and significant rates rises at territorial authorities across the country. You also have a new CEO and a new ARC Chair. It is important that their views are reflected in any internal audit programme of work.

This document presents the results of our work, which aims to provide CODC with a balanced approach to gaining assurance over its risk management activities and internal control environment. The programme has been designed to provide a mix of engagements that both protect and create value for CODC.

## Acknowledgement

We would like to take this opportunity to thank all interviewees at CODC for their time and input during the course of this engagement.

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# Approach

Our refreshed internal audit programme was led foremost by our discussions with interviewees. We used CODC's risk management policy, framework and documentation to further inform areas for inclusion. We combined this with our knowledge of the local government sector, and internal audit experience from several other Councils to guide our risk-based refresh of the programme.



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## Approach (continued)

The three-year refreshed internal audit programme has been developed based on:

1. Our interviews held with your key stakeholders. Following the interviews, we:
  - Grouped the key risks and concerns discussed into common themes, which have been mapped into specific risk domains using CODC's risk domains (per CODC's Risk Management Policy) and supplemented with Deloitte's FORRETT categorisation of risks (Appendix 3);
  - Sorted and ranked insights into three common themes and refreshed the internal audit programme to target these themes. We considered the timing and order of reviews based on when they will deliver the most value to CODC and when they are most appropriate; and
  - Provided our response and rationale for the areas proposed for inclusion in the three-year internal audit programme, and justification for the order of them.
2. To support our risk categorisation and prioritisation, we used our knowledge of the local government sector, and internal audit experience from several other Councils. We also conducted a review of the relevant risks and context specific to CODC using key documentation, including:
  - CODC's Risk Management policy, draft Risk Appetite statements and Strategic Risk Register;
  - 17 Functional business plans; and
  - Annual and External Audit reports.



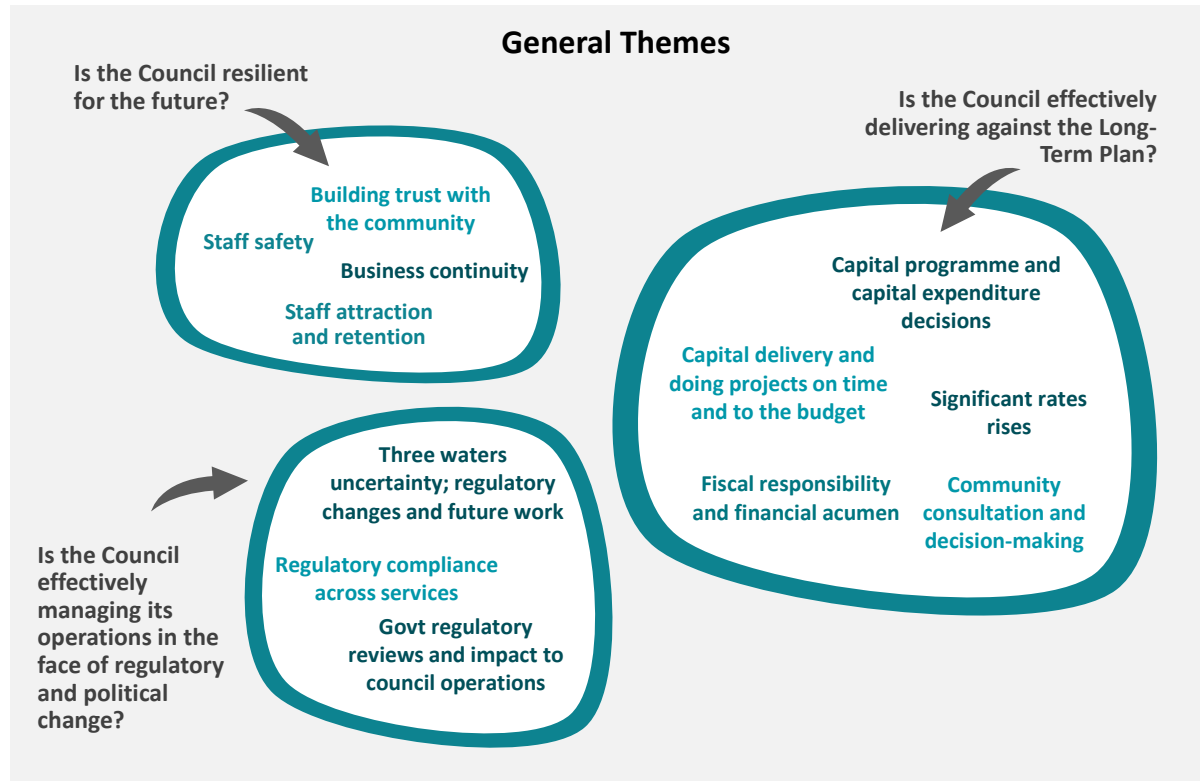
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# Key themes identified from interviews with key stakeholders

Our interviews with key stakeholders revealed common themes and areas of risk across the Council and its operations. Some areas of risk reflected those from our internal audit planning in 2023 – which shows continuity. Other themes came out stronger, or new themes arose, reflecting the shifting risk environment for CODC.



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# Summary of draft three-year internal audit programme



## Assumptions

We have applied the following assumptions when drafting your three-year internal audit programme:

- Between two to three engagements will be carried out each year, the engagement size will depend on the nature of the work and the breadth of control objectives covered; and
- The order of engagements within each year is indicative only.

We understand that risk profiles may change over time and therefore it is important that flexibility is maintained and that engagements are prioritised in the right manner. It is essential that the three-year internal audit programme is reviewed twice a year to account for the continuously changing risk environment and to ensure that it continues to meet CODC's needs.

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# Our response and rationale

We understand that it is important that we listen to your requirements for every review. Accordingly, upfront discussions will be held to refine and agree on the scope of work with you. These will be developed and tailored to your needs at that point in time. Each terms of reference will be agreed and signed off with you prior to any work commencing.

CODC Risk Category	Our response and rationale	Proposed area for review	Fee range
Financial Operations; Financial Sustainability	<p>The primary theme arising from discussions with stakeholders was how effective CODC is in delivering its LTP, and how it can be improved. Our core focus for Year One of the internal audit programme is to evaluate and provide recommendations on the Council’s financial operations and financial sustainability practices.</p> <p>We understand that a review of financial planning and budgeting across the organisation is a timely piece of work which will support teams embed good practice as the Council starts its next LTP process in early 2026.</p> <p><b>Review objective:</b> A top-down independent and objective review to help CODC understand the current state of operational financial processes and controls across teams. This will identify what is in place to support teams to make financial decisions including: if financial decisions are made based on the organisation’s objectives, financial and market data, and if cost accounting is conducted appropriately to support financial decision-making. The review will provide recommendations on how operational finance across the organisation can be improved.</p>	Operational Finance Review	\$20,000 - \$24,000
Financial Operations; Financial Sustainability; Service Delivery and Assets; Reputation and Relationships	<p>We noted in discussions with key stakeholders that the Council’s programme of capital delivery has faced significant challenges in the past resulting in project delays and overruns. In aggregate, this has led to the organisation delivering on approximately 50% of planned activity in 2024.</p> <p>Capital expenditure is where a significant proportion of ratepayer money goes, and the capital programme represents significant value to the community. Capital decisions are also made in a nuanced manner and delegated authority is dispersed across community boards. The Council’s financial and operational strategies are linked closely to capital expenditure and a review in this area will also provide line of sight on if capex decisions are made in a sustainable manner.</p> <p><b>Review objective:</b> A review of key controls and processes on budgeting, capital expenditure financial reporting, capital project decision-making and business cases and alignment with CODC’s financial strategy.</p>	Capital Expenditure Review	\$23,000 - \$26,000
Estimated total fees for Year 1 (2025/2026)			\$43,000 to \$50,000

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## Our response and rationale (continued)

CODC Risk Category	Our response and rationale	Proposed area for review	Fee range
All	<p>Our proposed areas for Year Two of the internal audit programme are focussed specifically on controls and processes that support ongoing risk management efforts and promote a culture of accountability and ethical behaviour. Fraud controls are key processes that protect CODC from fraud, waste and abuse. Fraud risk management is a hot topic area across our local government clients, and a hot topic for internal audit globally.</p> <p><b>Review objective:</b> An advisory review which provides a holistic view of CODC's existing approach to fraud and corruption risk planning, prevention, detection and response by benchmarking current and planned efforts against the elements of 'leading' practice.</p>	Fraud and Corruption Gap Analysis	\$8,000 - \$10,000
All	<p>An organisation's people are the best fraud and corruption detection tool. Promoting a zero-tolerance culture is key part of maintaining the Council's reputation and social license to operate. It is important that CODC is actively looking to adopt a proactive approach to identifying and addressing fraud and corruption risks. Fraud and corruption awareness training increase awareness and understanding around fraud and corruption risks. Training also helps to highlight the prevention and detection processes that CODC currently has in place and provide clarity and guidance on its ethical principles (e.g., when and how to declare a conflict of interest) to employees.</p> <p><b>Review objective:</b> Built upon findings from gap analysis, deliver a series of awareness training sessions which gauge the level of awareness across CODC – and provide training on – fraud and corruption related risks.</p>	Fraud and Corruption Awareness Training	\$6,000 - \$8,000
Financial Operations; Legislative and Regulatory Compliance; Service Delivery and Assets; Reputation and Relationships	<p>After reviewing CODC's capital expenditure and operational finance activities, it is also timely to consider efficiencies in the Council's ongoing contracts with suppliers and contractors. Fairness, transparency, due diligence and good contract management practices are important to ensure management and elected members have line of sight over contracts and significant areas of ongoing expenditure. Managing relationships and agreements with third parties well supports CODC's social license to operate.</p> <p><b>Review objective:</b> A review of key controls that support contract management, including contract reviews, regular and appropriate reporting to key stakeholders, contract storage, and contracts allowing for appropriate monitoring of supplier performance and service delivery.</p>	Contract Management Review	\$22,000 - \$25,000
Estimated total fees for Year 2 (2026/2027)			\$36,000 to \$43,000

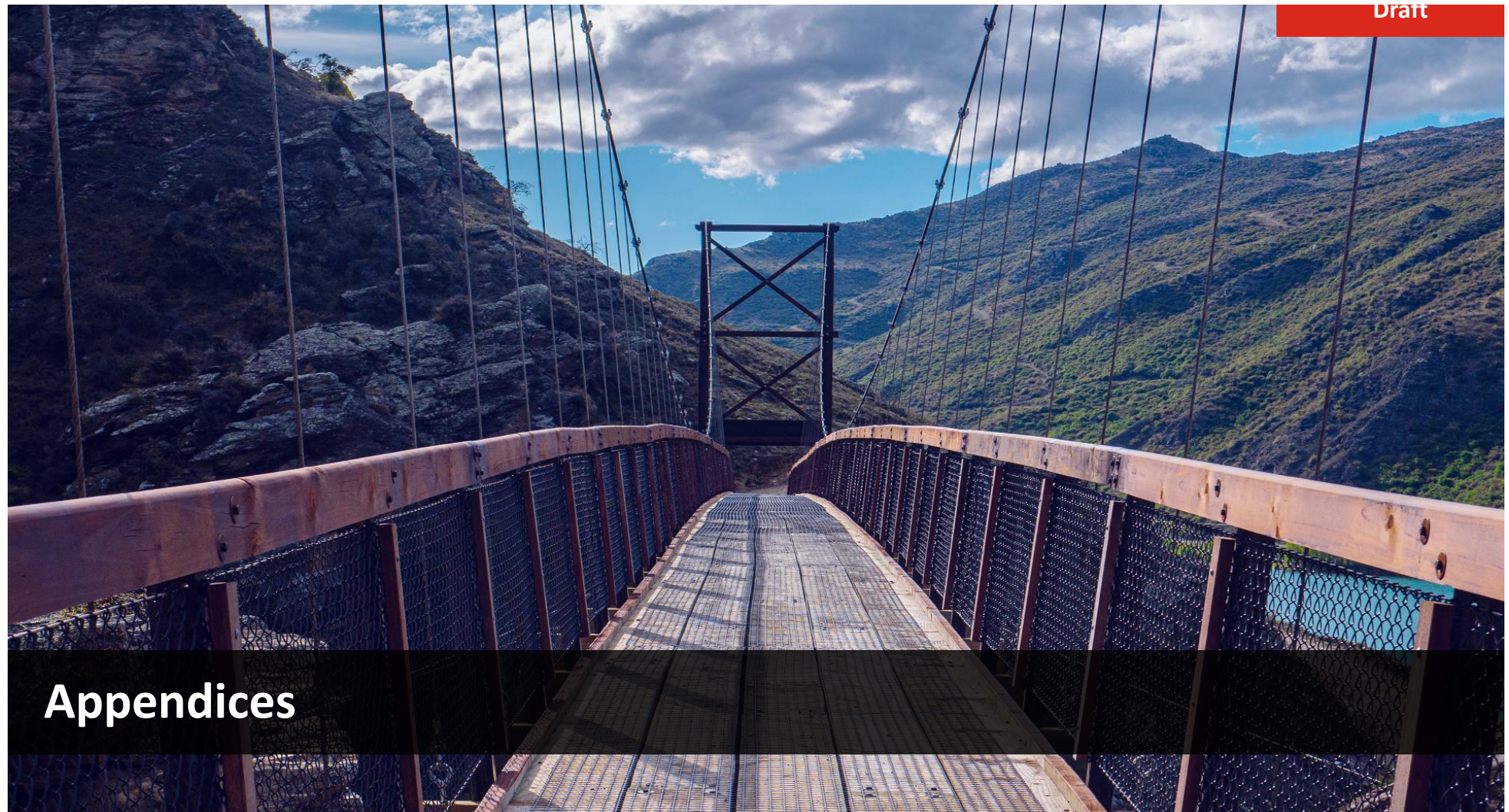
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## Our response and rationale (continued)

CODC Risk Category	Our response and rationale	Proposed area for review	Fee range
People and Health & Safety	<p>Our proposed areas for Year Three focus on future capabilities and resilience. Attracting and retaining good talent is a key enabler for CODC's future success, and 'People' was one of the top common keywords mentioned by interviewees. A clearly articulated strategy, people policies, processes and controls are all important in ensuring that the Council has effective workforce and succession planning in place. In addition, the council's future resilience depends on making sure it has the required future capabilities.</p> <p><b>Review objective:</b> A hybrid advisory / internal audit review which inspects key controls and processes to determine the effectiveness of the current state of talent management, including succession and workforce planning, learning and development and other areas.</p>	Talent Management Review	\$25,000 - \$30,000
Financial Operations; Service Delivery and Assets; Reputation and Relationships; Environment; Systems, data and information	<p>Participants are mindful of the significant risks and opportunities the Council faces in the future, and in ensuring an acceptable level of service delivery is maintained. Business continuity is an important piece in proactively identifying risks to CODC and preparing recovery strategies or risk management strategies (reduce, avoid, share, pursue, control). In some areas, continuity is a matter of regulatory and legislative compliance, and it is important that the Council has comfort that management have identified continuity risks holistically and planned for them.</p> <p><b>Review objective:</b> A review of current state business continuity plans, processes and mitigating controls to address business continuity in service delivery across CODC, including: Recovery strategies, impact analyses, communication and community engagement planning.</p>	Business Continuity and Resilience Review	\$16,000 - \$20,000
Financial Operations; Service Delivery and Assets; Reputation and Relationships	<p>Good procurement practices are key for identifying efficiency in the Council's capital programme delivery. A strong procurement function will mean CODC engages with the best suppliers and contractors and mitigate the risk of mis-scoping work, poor quality work, project overruns and financial losses. There is a significant level of procurement risk management and process uplift in CODC currently, and a review is timely for later in the programme to provide an independent and objective assessment on this activity.</p> <p><b>Review objective:</b> A review of key controls around procurement decisions, including financial due diligence, supplier and contractor selection and evaluation, disclosure and management of conflicts of interest.</p>	Procurement Processes Review*	\$20,000 - \$25,000*
Estimated total fees for Year 3 (2027/2028)			\$41,000 to \$75,000

\*This review may be a part of Year 3 or a future piece of assurance depending on timing and capacity to deliver.







# Appendix 1: List of interviewees

No.	Name	Role	Interview Date
1	Saskia Righarts	Group Manager – Business Support	13 January 2025
2	Paul Morris	Chief Financial Officer	14 January 2025
3	Julie Muir	Group Manager – Three Waters	14 January 2025
4	Amelia Lines	Risk and Procurement Manager	14 January 2025
5	Lee Webster	Group Manager – Planning and Infrastructure (Acting)	14 January 2025
6	Louise Fleck	General Manager – People and Culture	20 January 2025
7	David Scoones	Group Manager – Community Experience	21 January 2025
8	Bruce Robertson	Audit and Risk Committee Chair	23 January 2025
9	Peter Kelly	Chief Executive Officer	24 January 2025

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## Appendix 2: Scope and approach (per engagement letter)

### Scope

The scope of services provided includes the following:

- Develop a three-year internal audit programme for proposed activity, priorities by risk. The programme will be developed with input from CODC's management, the ARC and other employees, as necessary.

### Approach

We understand that CODC wants an internal audit programme that covers the risks and issues that matter most whilst ensuring that time is not wasted in reviewing areas that are not of material interest to your risk profile. Our planned approach is comprised of two activities:

#### Step 1 – Discovery

Understand the risk landscape of CODC in 2024: Review relevant documentation, including the Annual Plan 2024-2025 consultation document, organisational business plan, risk management policy, strategic risk register, audit and annual reports etc.

#### Step 2 – Engagement

- a. Conduct eight 30-45 minute interviews with personnel to understand their perspectives on the key opportunities and challenges for CODC, specific risks to the Council, and sources of assurance/reliance. This will include the following personnel:\*
- Chair of the ARC
  - Chief Executive Officer
  - Chief Financial Officer
  - Group Manager – Business Support
  - Group Manager – Community Experience
  - Group Manager – Planning and Infrastructure
  - Three Waters Director
  - Risk and Procurement Manager

- b. We will then present the draft internal audit programme to the Group Manager – Business Support and the Chief Financial Officer to discuss, gather feedback and refine. We will finalise the draft programme after one round of feedback.

#### Step 3 – Presentation

We will present the final draft of internal audit programme to your ARC for a further opportunity for challenge and validation.







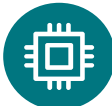

*\* During the course of fieldwork, we conducted an additional interview with the General Manager – People and Culture.*



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## Appendix 3: Deloitte's FORRESTT categorisation of risks

This table below sets out the risk categories that we have used to execute this engagement and ensure sufficient coverage across all risk domains or sources. We have also used this framework to assist in the development of our interview agenda and profiling questions.

FORRESTT MODEL* – A RISK CATEGORY FRAMEWORK							
Financial	Operational	Reputational	Regulatory	Extended Enterprise	Strategic	Technological	Talent
							
Risk Domains		Definition					
Financial		Risk of potential <b>financial loss resulting from breach of key risk indicators</b> , ineffective or inefficient processes, and controls					
Operational		Risk of potential <b>breakdowns/deficiencies</b> in process effectiveness or efficiency resulting <b>from people, controls, and/or process design</b> weakness which may cause material exposure					
Reputational		Risk of potential <b>tarnished reputation, reduced confidence</b> from community and stakeholders as a result of breach in risk management requirements, operational breakdown, legal/regulatory breach or other reputational-impacting event					
Regulatory		Risk of potential <b>finances or enforcement actions from regulators</b> resulting from legal/regulatory issues, and potential <b>breaches of compliance</b> and/or risk management requirements					
Extended Enterprise		Risk of potential disruption caused by a <b>failure to identify, measure and mitigate risks at key third-party organisations</b> (e.g., contractors, suppliers, etc.) or a failure to manage such relationships					
Strategic		Risk of potential situations that could <b>impede the organisation's ability to achieve its mission and disrupt the assumptions at the core of its strategy</b> - including risks to strategic positioning, strategic execution and strategic choices and consequences					
Technological		Risk of potential <b>system defects, inadequate decision-making supporting IT infrastructure</b> , or illegal or unauthorised use of computer systems					
Talent		Risk of potential situations that could <b>impact ability to attract, develop, and retain the human capital</b> required to execute the strategy/business					

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## Appendix 4: Other areas for consideration

This table below sets out a number of other engagements that we considered in developing this draft three-year internal audit programme for CODC. This was included so that readers have visibility over the breadth of engagements that could be considered, and we are happy to discuss whether any of these should be prioritised and included in CODC's three-year internal audit programme.

No.	Risk domains (CODC)	Risk domains (Deloitte)	Areas of review
1	Financial Operations* Financial Sustainability*	Financial	<ul style="list-style-type: none"> <li>• Rates</li> <li>• Operational spend</li> <li>• Accounts payable &amp; related parties</li> <li>• Accounts receivable</li> </ul>
2	Performance & Capability* Asset & Infrastructure* Environmental	Operational	<ul style="list-style-type: none"> <li>• Building and resource consent monitoring</li> <li>• Sustainability</li> <li>• Project management</li> <li>• Operational reporting management and integrity</li> </ul>
3	Reputation & Stakeholder Relationship	Reputational	<ul style="list-style-type: none"> <li>• Complaints management</li> </ul>
4	Compliance & Legal/Statutory	Regulatory	<ul style="list-style-type: none"> <li>• Legislative compliance</li> <li>• Contract compliance</li> </ul>
5	Performance & Capability* Asset & Infrastructure*	Extended Enterprise	<ul style="list-style-type: none"> <li>• Third party risk management</li> <li>• Contractor management</li> </ul>
6	N/A	Strategic	<ul style="list-style-type: none"> <li>• Risk maturity assessment</li> </ul>
7	IS Systems & Data	Technological	<ul style="list-style-type: none"> <li>• Information security and privacy</li> <li>• IT strategy and governance</li> </ul>
8	People & Health and Safety	Talent	<ul style="list-style-type: none"> <li>• Employee attraction and retention</li> </ul>

*\* In accordance with Deloitte's FORREST model, this is a combination that extends across the two risk domains.*

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## 25.4.7 2024/25 ORGANISATIONAL BUSINESS PLAN: SECOND QUARTER RESULTS

**Doc ID: 2397885**

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Reviewed and authorised by:	Saskia Righarts, Group Manager - Business Support

### 1. Purpose

To receive the second quarter results of the 2024/25 Organisational Business Plan.

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### Recommendations

That the report be received.

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### 2. Discussion

The Council's organisational business plan provides the framework for the council's leadership team to take a strategic look at the financial year ahead, review the organisational strategic objectives, and provides a written road map for achievement.

New to the 2024/25 Organisational Business Plan is the inclusion of both performance results (internal facing results) and performance measure (external facing measures which are set in long-term plans and reported in annual reports).

The report attached provides comments on how the Council is working towards the 2024/25 Organisational Business Plan during the second quarter period of 1 October – 31 December 2024.

### 3. Attachments

**Appendix 1 - Organisational Business Plan Quarterly Review Oct - Dec 2024** [↓](#)

## Organisational 2024/25 Business Plan Quarterly Report

Period: October – December 2024

Our aspirations for this year	How we plan to get there	Comments
To drive good decision-making through <b>sound strategic practices</b> .	Districtisation Project	The decision from the September meeting to fund all activities, bar some grants, district wide has been implemented through the budgeting input through the 2025-34 Long-term Plan. Work on updating the Reserve Accounts has begun.
	District Vision Project	Community Outcomes have been updated to reflect the results from the Shaping Tomorrow Together project. These have been included in the draft Long-term Plan for community consultation. There is a hui scheduled with Aukaha in February to discuss the alignment of mana whenua values with this, and other Central Otago District Council work.
	2025-34 Long-term Plan	Council agreed all the key consultation items and all draft budgets have been entered.
	Regional Three Waters Delivery Collaboration	Council continues to be involved regional collaboration discussions which will be considered as part of our Water Service Delivery Plan and Long-term Plan processes.
To <b>improve organisational practices</b> to build culture and resilience, meet expectations, achieve efficiencies, focus on training and collaboration, and make CODC a great workplace.	Organisation Vision Project	The CODC vision, mission, values update and goals for the organisation were presented to staff at the staff function held in December. Council have been informed of the outcome of this piece of work.
	Business Continuity Plans	Three Activity Business Continuity Plan's remain a work in progress. Once finalised, these will then be worked up into an organisational wide Business Continuity Plan.
	Organisational Project Improvement	Following working with Integral Group Ltd late 2024, we are starting the new year with a reset to ensure we can incorporate the Integral framework into CODC and the goals of the project.  Once this reset has occurred, we will be testing the new framework before implementation, including organisation rollout and staff training to encourage adoption. This will be supported by the continual improvement group.
	Finance relationship managers	The Long-term Plan is now at the audit stage. Improving organisational practice will now shift to the delivery of the 2024/25 Annual report. The finance team will be working closely with business units to ensure delivery of critical components such as valuations to enable the process to run smoothly given this year is an election year. The dashboard for the 6 months to 31 December is being prepared for discussion at ELT on 25 February. A new round of training for budget holders will occur soon to reinforce what has been learnt in preparation for the 2025/26 Annual Plan.
	Digital and Information Strategy Implementation	Following MAGIQ Cloud, the major project for 2024 that went live September 2024, Information Services is resetting to focus on optimisation – automation and data visualisation, which is being enable through MAGIQ Cloud.  Records digitisation of property files has reached 71%.  Password Improvement project, which included Keeper Vault for all users has been deployed including user training, linked to cybersecurity awareness training, while strengthening password quality.  Converged Security/Network Improvement (CSNI) project following procurement, implementation is being planned with the various suppliers.  Microsoft 365 Security project partner has been selected and scheduled to start February 2025. This will further implement Council Authentication Policy.
	Health, Safety and Wellbeing Strategy	All staff and leaders were trained on a new module – HR Performance. This digitises our current performance tools of monthly coaching conversations/1:1, Individual Development Plans and Annual Performance Appraisals. This module aims to increase performance in our team and create accountabilities for both employees and their managers.  Four monthly engagement survey was completed in November with a focus on Leadership. We were excited to see some great results across the organisation.
To <b>build trust with our community</b> through great interactions/experiences, delivery on commitments and provide greater	Customer Enhancement Project	Following the leadership meeting the project team is reviewing processes through various departments to understand consistencies or different experiences in each.
	Increased community engagement	Four engagement process were underway through the Let's Talk – Kōrero Mai platform during this timeframe. <ul style="list-style-type: none"> <li><b>Open Spaces</b> (24 submissions). This was the third and final time to consult with the community on this topic. Those who had submitted</li> </ul>

Our aspirations for this year	How we plan to get there	Comments
transparency.		<p>in the past were invited to participate, as well as all those who registered with Let’s Talk and expressed an interest in being informed of all community engagement opportunities. Council “closed the loop” with all participants at the conclusion of each engagement with the survey results and next steps.</p> <ul style="list-style-type: none"><li>• <b>Lodge Lane in Clyde</b> (141 responses). Routine project updates provided on Let’s Talk and CODC website.</li><li>• <b>Manorburn Dam Recreation Reserve Management Plan pre-consultation</b> (68 responses). This was the first of two consultations on this topic. Those who registered with Let’s Talk and expressed an interest in parks were invited to participate. We “closed the loop” with all participants at the conclusion with the survey results and next steps. Targeted engagement with stakeholder groups and Vincent Ward schools.</li><li>• <b>Kāmoanahaehae - Riverside Park</b>. Ongoing, informal engagement with the Alexandra community, including providing routine project updates to those who have subscribed.</li></ul> <p>Ongoing efforts to make our engagement a two-way discussion by inviting Let’s Talk registered users to participate, in addition to other more widespread engagement with community groups and “closing the loop” by providing participants of Council engagements with survey results and other reports and/or Council decisions.</p>
	Procurement Policy Adherence Reviews	Procurement Policy adherence reviews are scheduled to be undertaken in March 2025.
	Delivery on all 2024/25 Annual Plan projects	As of 31 December the year-to- date against revised budget (including carry forwards and Council resolutions) 33% of the total capital spend against the full year’s revised capital budget has been expensed.
	Reporting on organisational performance	This is the second quarterly report on the Council’s performance.
	2023/24 Annual Report	Completed.
To grow our commitment to Te Tiriti o Waitangi	Upskilling staff on te Ao Māori.	A four-part online learning Te Ao Māori through Tāko Maori. This is promoted and available to all council employees. New employees are provided information on this course at their induction. An additional two staff signed up for learning this quarter taking total staff now studying to 51.
	Aukaha Partnership Agreement (year 3)	The second hui was held in November with updates on key projects provided. The relationship continues to advance.

Performance measures

Public facing: Long-term plan - Annual Plan - Annual Report

Community outcome	Our objective level of service	How we measure success	Our Aim2024/25	DIA Measure	Results 2024/25	Q1 Results	Q2 Results	Comments
ROADING								
Thriving Economy	Provide an efficient roading network	Average length of time to issue a consent for access to a road	≤ 2 days		0.7 days	0.7 days	0.6 days	Meeting target.
		The average quality of ride on the sealed road network, measured by smooth travel exposure	Smooth Travel Exposure ≥ 90%	P	97%	N/A	N/A	Annual measure.
		Percentage of sealed local road network that is resurfaced	> 3.9% of sealed road length resurfaced per annum	P	2.40%	N/A	N/A	Annual measure.
		Number of service requests from customers responded to within 10 days	≥ 90%	P	91%	N/A	N/A	Quarterly reporting not yet available. Expected to be available for Q3.
Connected Community	Provide a safe roading network	Change from previous year in number of fatalities and serious injury crashes on local roading network	Stable or decreasing trend	P	Number of fatal and serious crashes = 4	1	3 YTD = 4	Meeting target. 2021/22 = 9 2022/23 = 4 2023/24 =4

Sustainable Environment	Provide a fully accessible roading network	The percentage of footpaths that fall within the Council's level of service standard for the condition of footpaths	> 70%	P	79%	N/A	N/A	Annual measure.
		Customer satisfaction with the condition of unsealed roads	To maintain customer satisfaction at or above 70%	P	70%	N/A	N/A	Awaiting Residents Opinion Survey 2025
ENVIRONMENTAL SERVICES								
Sustainable environment	Improving the Efficiency of Resource Use	Total amount of waste to landfill per rateable property	Incremental year-on-year reduction (measured as rubbish + recycling)		509 kg	111 kg	140kg	Target not achieved. Quarter 2 in 2023/24 = 124 kg. An increase of 29kg per rateable property from 2023/24 to 2024/25 for the second quarter.
		Customer satisfaction with waste services measured through customer survey	Incremental increase		81%	N/A	N/A	Awaiting Residents Opinion Survey 2025
	Carbon Footprint reduction	Annual carbon footprint measurement using CEMARS process	Incremental reduction or set annual reduction target.		0.32 tCO2e per rateable property	N/A	N/A	Annual measure.
Connected community	Provide compliant waste systems and facilities	Compliance with resource consents for transfer stations, closed and operational landfills	Incremental percentage improvements.		94%	N/A	N/A	Annual measure.
Thriving economy Sustainable environment	To enable people to develop their land in an appropriate way through a streamlined and cost-effective consent process	Customer satisfaction with resource consent process in customer survey	Maintain customer satisfaction ≥ 75%		51%	N/A	N/A	Awaiting Residents Opinion Survey 2025
		Resource consents processed within statutory timeframes	Resource consents processed within statutory timeframe ≥ 95%		63%	75%	66%	Target not achieved.
PLANNING AND REGULATORY								
Thriving economy Connected Community	To maintain the ability to issue building consents	Through maintaining the Building Consent Authority accreditation	To maintain Building Consent Authority accreditation		Pass	Pass	Pass	Accreditation in place. Annual Measure.
	To enable customers to build in an appropriate way through a timely consent process	Percentage of building consents issued within the statutory timeframe	To achieve ≥ 98% of building consents issued within the statutory timeframes		96%	94.87%	90.34%	Target not achieved. Resourcing challenges through the year with a fluctuating workload.
	To provide customers with LIM reports and a timely service	Percentage of LIMs issued within the statutory timeframe	To achieve ≥ 99% of LIMs issued within the statutory timeframes		100%	100%	100%	Target achieved.
ENVIRONMENTAL HEALTH								
Thriving economy Connected community	To assist food business operators to meet their obligation of selling safe and suitable food. This will be achieved through education and verifying and enforcing the requirements of the Food Act 2014	Percentage of applications for the registration of food businesses completed within 10 working days	≥ 95% of applications for the registration of food businesses are completed within 10 working days		100%	100%	100%	Target achieved.
		Percentage of food business verifications carried out within the required Food Act 2014 performance-based verification frequency	To achieve ≥ 95% of food business verifications being carried out within the required Food Act 2014 performance based verification frequency		84%	84%	94%	Target not achieved.  New EHO started 24/2/25 Expect to catch up by mid-year 2025.
		Percentage of corrective action requests and improvement	To achieve ≥ 95% of corrective action requests		100%	100%	100%	Target achieved.



		notices resulting from non-conformances / compliances are completed within the specified period	and improvement notices resulting from non-conformances/compliances being completed within the specified period					
<b>PARKS AND RECREATION</b>								
Thriving Economy Sustainable Environment	Parks and reserves are maintained and operated so that they look good and meet the needs of users	Percentage of customer survey respondents satisfied with parks and reserves	Maintain satisfaction with parks and reserves at above 90%		88%	N/A	N/A	Awaiting Residents Opinion Survey 2025
		Percentage of customer survey respondents satisfied with cemeteries and the burial process	Maintain satisfaction with cemeteries and the burial process at above 90%		82%	N/A	N/A	Awaiting Residents Opinion Survey 2025
Connected Community	Playgrounds in the district have equipment that is fun and educational	Percentage of customer survey respondents satisfied with playgrounds	Maintain satisfaction with playgrounds at above 90%		87%	N/A	N/A	Awaiting Residents Opinion Survey 2025
	Central Otago playgrounds are maintained to meet the NZ Playground Safety Standards	Annual "Playground Safety Standards" audit	To pass		Did not meet target	N/A	Pass	Target achieved. The playground audit was completed. The level of compliance to the playground safety standards is sitting at 63.5% which is a pass.
<b>POOLS</b>								
Thriving Economy Connected Community	To provide aquatic facilities including a range of programmes that meet the needs of the majority of the community	Percentage of customer survey respondents satisfied with pools and the programmes offered	Maintain user satisfaction ≥ 90%		80%	N/A	N/A	Awaiting Residents Opinion Survey 2025
	Aquatic facilities are managed to NZ Water Safety Council "Pool Safe" Standards	Annual "Pool Safe" audit	To pass		Pass	Pass	Pass	Yearly audit is in progress.
<b>PROPERTY AND COMMUNITY FACILITIES</b>								
Thriving economy Sustainable environment Connected community	Community buildings are accessible and affordable to communities based on existing provision	Percentage of customer survey respondents satisfied with community buildings	> 90% satisfied		71%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
		A charging policy is in place that demonstrates fees that reflect the level of benefit provided	Fees and charges charging policy in place.		Fees and charges charging policy in place.	Fees and charges charging policy in place.	Fees and charges charging policy in place.	Target achieved.
Thriving economy Connected community	Free public toilets are available for the local community and visitors throughout the district at locations set out in the Public Toilet Strategy	Percentage of customer survey respondents satisfied with public toilets	> 90% satisfied		86%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
	Each building will be assessed at a frequency required to	Compliance with building Warrant of Fitness requirements	Full compliance		Full compliance	Full compliance	Full compliance	Target achieved.



	meet all Building Act and Code of Compliance requirements							
	Housing suitable for elderly is provided in the main townships until such time as the need can be met by other agencies	Percentage of EPH tenancy survey respondents satisfied with their unit	> 90% satisfied		96%	N/A	N/A	Awaiting Tenants Survey April 2025.
	To meet all Civil Aviation Authority (CAA) requirements for uncertified airports	No complaints from Airport users or notifications from CAA of noncompliance	Full compliance		Full compliance	Full compliance	Full compliance	Target achieved.
LIBRARIES								
Thriving economy Connected community Sustainable environment	To provide a quality library service through friendly, helpful and knowledgeable staff that enables residents and visitors to have valued library experiences	Percentage of library users satisfied with the quality of library services	> 90%		94%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
SERVICE CENTRE								
Connected community	Satisfaction with contact regarding service requests	Customer survey – the service was fast and efficient	> 85%		76%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
		Customer survey – the service was friendly and courteous	> 90%		89%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
		Customer survey – issues dealt with effectively	> 80%		76%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
	Satisfaction with the initial contact with Council	Customer survey – the service was fast and efficient	> 90%		84%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
		Customer survey – the service was friendly and courteous	> 90%		94%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
		Customer survey – issues dealt with effectively	> 80%		73%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
COMMUNICATIONS AND ENGAGEMENT								
Connected community	Community feel they are informed about Council activities	Percentage of respondents to customer survey who feel they are informed about Council activities	> 80%		61%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
	Community believe they have adequate opportunities to have their say in Council activities	Percentage of respondents to customer survey who believe they have adequate opportunities to have their say in Council activities	> 80%		69%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
COMMUNITY DEVELOPMENT								
Connected community	Connect and support people involved in community-led development	Council to facilitate a hui for local people involved in community-led development	Two hui held each year		Five hui achieved	1	1 YTD = 2	Target achieved. Total number of hui held this year to date is 2. Cromwell Strategic Doing Hui was held in October.

	initiatives							
<b>ECONOMIC DEVELOPMENT</b>								
Thriving economy Connected community Sustainable environment	Council's economic development projects and activities are adding value relevant for Central Otago communities	Percentage of respondents to customer survey who are satisfied with the type of economic development activity that Council is involved in	75%		59%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
<b>TOURISM</b>								
Thriving economy Connected community Sustainable environment	Council's tourism activity enhances the quality of life for Central Otago residents	Percentage of respondents to customer survey who are satisfied that visitors to the district enrich the quality of life for residents	75%		75%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
<b>POLICY AND STRATEGY</b>								
Thriving economy Connected community Sustainable environment	Council administered documents in the policy and strategy register are current and have been reviewed within specified timeframes	Percentage of Council administered documents in the policy and strategy register are current and have been reviewed within specified timeframe.	> 90%		90%	86.54%	92.59%	Meeting target.
<b>GOVERNANCE</b>								
Thriving Economy Sustainable Environment Connected Community	A community that is satisfied with the leadership, representation and decision making by its elected members	Percentage of customer survey respondents satisfied that elected members are making a positive difference	> 75%		40%	N/A	N/A	Awaiting Residents Opinion Survey 2025.
	Central Otago District Council democratic processes enable participation in Council's decision-making processes	The number of complaints regarding Council democratic processes upheld by the Ombudsman or Privacy Commissioner	Nil		Nil	Nil	Nil	Meeting target.
<b>BUSINESS SUPPORT</b>								
Thriving Economy Connected Community	Adoption of annual plans, long-term plans and amendments, and annual reports by Council within statutory timeframes	Percentage of annual reports and long-term and annual plans are adopted by Council within the specified legislative timeframes 100%	100%		100%	0%	0%	Did not meet statutory deadline of 30 October 2024 for the Annual Report. 2025-34 Long-term Plan is on target to meet statutory deadline of 30 June 2025.
<b>INFORMATION SERVICES</b>								
Connected Community	To protect the privacy of individuals dealing with Council	Number of upheld complaints relating to breaches of privacy	Nil		Nil	Nil	Nil	Target achieved.
<b>WATER SUPPLY</b>								
Thriving Economy	Provide a fully accessible and reliable water network	The percentage of real water loss from the network reticulation system (leaks, metering inaccuracies)	Target current annual real losses from the networked reticulation system ≤ 30% of water produced	P	27%	N/A	N/A	Quarterly reporting not yet available.

Sustainable Environment	Provide an efficient water network	Fault response time to urgent callouts Attendance: Resolution:	Target median time to get to site ≤ 1 hour	P	2 hrs 3 mins	N/A	N/A	Quarterly reporting not yet available.
			Target median time to resolve ≤ 4 hours	P	12 hrs 57 mins	N/A	N/A	Quarterly reporting not yet available.
		Fault response time to non-urgent callouts Attendance: Resolution:	Target median time to get to site ≤ 8 hours	P	23 hrs 19 mins	N/A	N/A	Quarterly reporting not yet available.
			Target median time to resolve ≤ 24 hours	P	31 hrs 07 mins	N/A	N/A	Quarterly reporting not yet available.
		The average consumption of water per day per resident	To maintain water demand at < 600 L/person/day	P	519.88 L/person/day	N/A	N/A	Quarterly reporting not yet available.
		Total number of customer complaints for: clarity, taste, odour, pressure and flow, continuity of water supply, responses to water service requests	13 per 1,000 connections	P	9.5 per 1,000 connections	N/A	N/A	Quarterly reporting not yet available.
Connected Community	Provide a safe and healthy water network	Compliance with the Drinking Water Quality Assurance rules* Bacterial compliance	All schemes to comply	P	Compliance not met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance not met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance not met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance not met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance not met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance met	N/A	N/A	Quarterly reporting not yet available.
				P	Compliance met	N/A	N/A	Quarterly reporting not yet available.
		Protozoal	All schemes to comply	P	Compliance not met	N/A	N/A	Quarterly reporting not yet available.
WASTEWATER								
Thriving Economy	Provide an efficient, accessible and reliable wastewater network	Total number of complaints for: odour, faults, blockages, responses to wastewater	Total number of complaints ≤ 10 per 1,000 connections.	P	10.6 per 1,000 connections	N/A	N/A	Quarterly reporting not yet available.
Sustainable Environment	Provide a safe and compliant wastewater network	Compliance with discharge consents	Abatement notices: 0	P	Abatement notices: 5	N/A	N/A	Quarterly reporting not yet available.
			Infringement notices: 0	P	Infringement notices: 0	N/A	N/A	Quarterly reporting not yet available.
			Enforcement orders: 0	P	Enforcement orders: 0	N/A	N/A	Quarterly reporting not yet available.
			Convictions: 0	P	Convictions: 0	N/A	N/A	Quarterly reporting not yet available.
		Fault response time Attendance: Resolution:	Target median time to get to site ≤ 1 hour	P	52 mins	N/A	N/A	Quarterly reporting not yet available.
			Target median time to resolve the problem ≤ 4	P	2 hrs 11 mins	N/A	N/A	Quarterly reporting not yet available.

			hours					
Connected Community	Provide a safe and compliant wastewater network	Number of dry weather sewerage overflows from sewerage scheme	Number of dry weather sewerage overflows ≤ 1 per 1,000 connections	P	2.73 per 1,000 connections	N/A	N/A	Quarterly reporting not yet available.
STORMWATER								
Sustainable Environment	Provide an efficient, full accessible and reliable stormwater network	Compliance with discharge consents	Abatement notices: 0	P	Abatement notices: 0	N/A	N/A	Quarterly reporting not yet available.
			Infringement notices: 0	P	Infringement notices: 0	N/A	N/A	Quarterly reporting not yet available.
			Enforcement orders: 0	P	Enforcement orders: 0	N/A	N/A	Quarterly reporting not yet available.
			Convictions: 0	P	Convictions: 0	N/A	N/A	Quarterly reporting not yet available.
Connected Community	Provide a safe and compliant stormwater network	Number of flooding events that occurred	Nil	P	Nil	N/A	N/A	Quarterly reporting not yet available.
		Number of habitable floors affected in flooding events	Target number of habitable floors affected ≤ 1 per 1,000 properties per flood event	P	Nil	N/A	N/A	Quarterly reporting not yet available.
		Response time to attend flood events	Target median time to get to site ≤ 1 hour	P	Nil	N/A	N/A	Quarterly reporting not yet available.
		Number of complaints received about stormwater performance	Total number of customer complaints ≤ 2 per 1,000 properties	P	0.3 per 1,000 properties	N/A	N/A	Quarterly reporting not yet available.

## 25.4.8 ORDER OF CANDIDATE NAMES ON VOTING PAPERS FOR THE 2025 TRIENNIAL COUNCIL ELECTIONS

**Doc ID: 2018956**

Report Author:	Wayne McEnteer, Governance Manager
Reviewed and authorised by:	Saskia Righarts, Group Manager - Business Support

### 1. Purpose of Report

To consider the order of candidate names on voting papers for local authority elections in October 2025.

### Recommendations

That the Council

- A. Receives the report and accepts the level of significance.
- B. Agrees that the candidate names on voting papers for the Central Otago District Council 2025 triennial elections and any subsequent by-elections within the triennium appear in random order.

### 2. Background

Under section 31 of the Local Electoral Regulations 2001, Council can decide by resolution the order in which the names of candidates will appear on the voting paper, whether it be in alphabetical order of surname, pseudo random order or random order.

### 3. Discussion

The last Central Otago District Council elections candidates' names were presented in random order. The different options are described below.

*Random order* - the randomisation of candidate names is applied at the time the voting papers are printed, which results in the candidate names being listed in a different order on each voting paper (within the limits of available combinations).

*Alphabetical order by surname* - the candidate names appear on the voting paper in alphabetical order of the surname. This is the default option if no preference is indicated.

*Pseudo random order* - Under this arrangement, the candidate names would be placed in a receptacle, mixed together and then drawn out, with the candidate names then being listed on all voting documents in the order in which they are drawn.

The regulations provide that if a local authority has determined that pseudo-random order is to be used, the Electoral Officer must state in the public notice required to be given, the date, time and place at which the order of the candidate's names will be arranged. Any person is then entitled to attend while the arrangement is in progress.

#### **4. Financial Considerations**

There is no impact on the allocated budget for the local body elections as a result of this decision.

#### **5. Options**

##### Option 1 – Random Order (recommended)

That candidate names appear in random order on the voting papers (within the limits of available combinations).

Advantages:

- No candidate is given an advantage by being listed first for that election on every voting paper.
- Software used by council contractor's means there is no additional expense for this option.

Disadvantages:

- Voters may find it more difficult to find their preferred candidate.

##### Option 2 – Alphabetical Order of Surname

That candidate names appear in alphabetical order of surname on the voting papers.

Advantages:

- Sorting in alphabetical order of surname is the simplest method for the voter and the most familiar, being the system used in central government elections.

Disadvantages:

- Research suggests that there is a degree of advantage for candidates whose names are listed first on the voting paper.

##### Option 3 – Pseudo-Random Order

That candidate names appear in the same random order on the voting papers.

Advantages:

- All candidates have an equal chance in having a degree of advantage for candidates whose names are listed first on the voting papers.

**Disadvantages:**

- Research suggests that there is a degree of advantage for candidates whose names are listed first on the voting paper.
- Voters may find it more difficult to find their preferred candidate.
- There are minor additional public notice costs because the draw to select the order of candidate names on the voting paper must be advertised as being open to the public.
- The additional time needed to complete the draw means that there is time pressure to prepare the public notice of day of election and candidate names.

**6. Compliance**

<b>Local Government Act 2002 Purpose Provisions</b>	This decision enables democratic local decision making and action by, and on behalf of communities by choosing how electoral papers will be presented to voters.
<b>Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.</b>	Council has previously used random order as the method by which names are placed on voting papers.
<b>Considerations as to sustainability, the environment and climate change impacts</b>	There are no considerations to be made as a result of this decision.
<b>Risks Analysis</b>	There are no risks associated with this decision.
<b>Significance, Consultation and Engagement (internal and external)</b>	This decision does not trigger consultation under the Significance and Engagement Policy.

**7. Next Steps**

Once nominations have closed voting papers will be prepared in accordance with the decision made.

**8. Attachments**

**Nil**

## 8 MAYOR'S REPORT

### 25.4.9 MAYOR'S REPORT

Doc ID: 2416215

#### 1. Purpose

To consider an update from Her Worship the Mayor.

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#### Recommendations

That the Council receives the report.

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The past month has been devastating for our community with the loss of six lives on our local roads, as well of dozens of people directly impacted. While this council are very pro road safety, not every aspect can be accounted for when you are dealing with human error. My thoughts are with the families and friends of those lost, and with our outstanding first responders.

Thank you all for the decision making undertaken at the last meeting. Some of the potential opportunities in front of us are generational in nature and may result in council operating in a different way to what it was set up for in 1989. There is a cost of opportunity, and a cost to not take an opportunity, so I am pleased to see us keep a conversation alive to better work out where the benefits could lie for our district.

I have continued open dialogue with Sustainable Tarras, the Environmental Defence Society and Santana Minerals in relation to their Fast Track Act application for a mine at Bendigo. We are working hard to have our council in the best position to respond to the application when it is lodged with the fast track process. This will be no small piece of work, conducted under an extremely tight timeframe.

The monthly Business South Central Otago meeting was well attended this month, followed by a catch up at Olivers in Clyde. It is promising to see a bit of positivity in the retail and hospitality sector, though this is dampened slightly in some downturn in other industries.

I welcomed 20 new kiwis to receive their citizenship certificates, which is always a great day. Though I don't know if the woman who has already been here for 65 years would be classed as a "new" kiwi. It is always a very special day for the citizens, as well as their friends and family and I love reading the stories even though some of them come from extremely hard to pronounce towns.

Together with VCB chair Jayden I participated in a fundraiser for the Child Cancer Foundation. Donated sausages were snapped up for \$3 a piece, and some extremely generous locals popping their change (and more than change) in the buckets was gratefully received for a very worthy cause. I am awaiting the end of the month to find out how I went in the inaugural mayoral challenge to raise the most money.

I was lucky enough to be invited as a guest speaker at BLAST in Alexandra. BLAST stands for Blue Light Adventure, Skills and Training and I was thrilled to bring this to Alex 10 years ago with Ben Sanders who was then part of the Defence Force. It was particularly special to see BLAST is now run by Nathan and Lia, who participated in the first BLAST as year 9's, and are now working in



our local community and giving back to this awesome programme. The overwhelming feedback was that the breakfast was the best part, and I was stoked to see a great turnout even though the kids didn't have school on that day. Kudos for them still getting out of bed. (I think they may have been scared of the punishment Nathan would dream up for them if they were no shows – skills I'm pretty sure he learned from Ben.)

I opened the Innovations in Health Psychology conference in Clyde, which welcomes 70 international psychiatrists, psychologists and others to Clyde for the week. The calibre of these people was awe-inspiring, and amazing to be hosting guests from America, the UK, Belgium, Denmark, Germany and a token Aussie to name a few. I have no doubt they will have a wonderful time here and perhaps we can retain a couple of them to bolster our mental health offerings locally – the suggestion was enthusiastically received.

Finally, I know a number of you have seen a lot of pretty awful comments going around on social media lately about this council, our capabilities, our decision making, and our pedigree. I say to all of you – thank you. Thank you for putting your hand up to turn up continually for your community. Thank you for the countless hours, which often go without thanks. Thank you for the missed family events because you are representing our area, and the lower pay check at your actual job because you had to take three days off to attend council meetings. Our community will have the opportunity to change this Council come October – I hope all the potential candidates haven't been put off by what they see online.

Finally – LTP is coming up fast and this is a huge piece of work for both elected members and the staff. So I leave you with some words from Mayor Wayne Brown: "If you don't like where the money's going, tell us. If you do like it, tell us, if you just wanna complain, at least make it official." Roll on the submission period!

## **2. Attachments**

**Nil**

## 9 STATUS REPORTS

### 25.4.10 MARCH 2025 GOVERNANCE REPORT

Doc ID: 2400848

Report Author:	Wayne McEnteer, Governance Manager
Reviewed and authorised by:	Nathan McLeod, Acting Group Manager - Business Support

#### 1. Purpose

To report on items of general interest, receive minutes and updates from key organisations, consider Council's forward work programme, business plan and status report updates.

#### Recommendations

That the report be received.

#### 2. Discussion

##### Status Reports

The status reports have been updated with any actions since the previous meeting (see Appendix 1).

##### Tūhura Otago Museum report to contributing local authorities - February 2025

Attached is a report from Tūhura Otago Museum that was previously sent to Councillors (see Appendix 2).

##### Update on Abatement Notices

There were no changes to the status of abatement notices, so there is no report this month. It will be brought before Council again in two months' time.

#### 3. Attachments

Appendix 1 - Council Status Updates [↓](#)

Appendix 2 - Tūhura Otago Museum report to contributing local authorities - February 2025 [↓](#)

Status Updates		Committee: Council			
Meeting	Report Title	Resolution No	Resolution	Officer	Status
25/10/2017	Council Owned Land, Pines Plantation Area North of Molyneux Park Netball Courts, Alexandra – Consider Sale/Development by Joint Venture of Residential Land (PRO 61-2079-00)	17.9.9	<p><b>Recommendations</b></p> <p>A. <u>RESOLVED</u> that the report be received and the level of significance accepted.</p> <p>B. <u>AGREED</u> to the sale of part of Lot 25 DP 3194 and part of Lot 6 DP 300663, located south of the Transpower corridor at the north end of Alexandra and adjacent to the Central Otago Rail trail.</p> <p>C. <u>APPROVED</u> the Vincent Community Board's recommendation for sale of the land by way of a joint venture development and sale of Lots, the minimum terms and conditions including:</p> <ul style="list-style-type: none"> <li>The joint venture partner funding development with no security registered over the land.</li> <li>Council receiving block value.</li> <li>Council receiving 50% of the net profit, with a minimum guaranteed of \$500,000.</li> <li>Priority order of call on sales income:</li> </ul> <p><b>First:</b> Payment of GST on the relevant sale.</p> <p><b>Second:</b> Payment of any commission and selling costs on the relevant sale.</p> <p><b>Third:</b> Payment to the Developer of a fixed portion of the estimated Project Development Costs per lot as specified in the Initial Budget Estimate and as updated by the Development Costs Estimate breakdown.</p> <p><b>Fourth:</b> Payment of all of the balance settlement monies to Council until it has received a sum equivalent to the agreed block value.</p>	Property and Facilities Manager	<p><b>12 Mar 2025</b> Sealing is complete, site tidy up and grass seed areas. Stage 4 walk over by the end of March.</p> <p><b>17 Feb 2025</b> Sealing to occur week of 17th February. Site cleanup to follow, to be completed and off site by March.</p> <p><b>16 Jan 2025</b> Sealing in the next 3 weeks after the engineers inspection.</p> <p><b>05 Dec 2024</b> Still aiming for work to be completed by the end of the year.</p> <p><b>15 Nov 2024</b> Footpaths have been sealed and curbing completed. Final work preparing the road for sealing is underway, team aiming to have work done by Christmas.</p> <p><b>16 Oct 2024</b> Due to staff constraints sealing work will happen before the end of the year, working with the developer to find solutions to complete this work.</p> <p><b>16 Sept 2024</b> Sealing is now due end of October, beginning of November due to weather conditions and excessive rain.</p> <p><b>15 Aug 2024</b> All pre work have been completed and waiting for sealing season, which opens in September subject to weather conditions.</p> <p><b>19 Jul 2024</b> Curbing complete, filling subgrade under way. Road seal will commence once sealing season begins.</p> <p><b>12 Jun 2024</b></p>

			<p><b>Fifth:</b> Payment of all of the balance settlement monies to Council until it has received an amount equivalent to the agreed minimum profit share to Council.</p> <p><b>Sixth:</b> Payment of all of the balance to the Developer for actual Project Costs incurred in accordance with this Agreement.</p> <p><b>Seventh:</b> Payment of all of the balance amounts (being the Profit Share) to be divided 50 / 50 (after allowance for payment of the Minimum Profit to Council.</p> <p>D. <u>AGREED</u> to delegate to the Chief Executive the authority to select the preferred joint venture offer and negotiate "without prejudice" a joint venture agreement.</p> <p>E. <u>AGREED</u> that the Chief Executive be authorised to do all necessary to achieve a joint venture agreement.</p>		<p>The kerb preparation is complete, and the kerb pouring will start today, continuing for the next few days to finish all remaining kerbs for this stage. From Monday, the plan is to raise the remainder of the road to subgrade level, currently 0.1 to 0.2 meters below. After reaching subgrade, testing will be done, followed by applying AP65 and AP40 over the next few months, preparing for sealing., Simultaneously, work on footpaths, driveways, and berms will begin, involving shaping existing berms and forming footpaths and driveways for sealing. , The project aims for completion by September/October, contingent on favourable weather and possibly utilizing more resources to meet the September deadline.</p> <p><b>14 May 2024</b> Stage 4 all in ground infrastructure is installed. The base course will be finished off before winter and sealing will take place in September which will mean stage 4 complete.</p> <p><b>09 Apr 2024</b> Stage 4 all in ground infrastructure is installed. The base course will be finished off before winter and sealing will take place in September which will mean stage 4 complete.</p> <p><b>06 Mar 2024</b> Stage 4 all in ground infrastructure is installed. The base course will be finished off before winter and sealing will take place in September which will mean stage 4 complete.</p> <p><b>13 Feb 2024</b> Working with the developer to get a start date for the last part of the project which is surfacing end roads.</p> <p><b>18 Jan 2024</b> Roading to start first quarter 2024. No further change.</p>
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					<p><b>30 Oct 2023</b> Stage 4 in-ground infrastructure complete. Road surfacing and kerbing to follow.</p> <p><b>09 Oct 2023</b> No Change.</p> <p><b>15 Sept 2023</b> No change</p> <p><b>17 Aug 2023</b> No change.</p> <p><b>27 Jun 2023</b> No change.</p> <p><b>15 Jun 2023</b> No update.</p> <p><b>02 May 2023</b> Stage 3 settled, Stage 4 still under construction.</p> <p><b>06 Apr 2023</b> Stage 3 titles issued, moving into Stage 4 development.</p> <p><b>14 Feb 2023</b> Still awaiting title. 224 issued for Stage 3</p> <p><b>10 Jan 2023</b> No change.</p> <p><b>30 Nov 2022</b> No change.</p> <p><b>15 Sept 2022</b> No Change.</p> <p><b>12 Aug 2022</b> Stage 3 Title are due March next year and Stage 4 are due for title June next year.</p> <p><b>23 Jun 2022</b> No further update available.</p> <p><b>May 2022</b> Stage 2 Titles received and settled. Work is on track for Stage 3.</p> <p><b>April 2022</b> No update. Awaiting approval.</p> <p><b>March 2022</b> Stage two 223c and 224c applications submitted. Awaiting approval.</p> <p><b>February 2022</b></p>
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					<p>All 16 sections sold and settled in January 2022 in Stage 1, 15 out of 16 sections sold in Stage 2 and 12 sections sold, three under offer and four unsold in Stage 3.</p> <p><b>January 2022</b> Titles have now issued for the 16 sections in Stage 1 with settlement for all sections on 20 January. Stage 2 224C Application has been applied for and titles are expected late January 2022. Stage 3 progress is on track. Current sales are as follows: Stage 1 - 16/16 lots under contract (settlement 20 January) Stage 2 - 15/16 lots under contract Stage 3 - 11/19 lots under contract.</p> <p><b>November 2021</b> 224c has been issued for stage 1. Awaiting LINZ to issue Title. Stage 2 roading will be sealed week of 22nd November.</p> <p><b>October 2021</b> Development work programme generally on track. Stage 1 is approximately 2 weeks behind schedule due to COVID-19, although Stage 2 is ahead and Stage 3 is on schedule. As of September 2021, sales figures were Stage 1 – 16 sold; Stage 2 – 13 sold, 3 unsold; Stage 3 – 10 sold, 9 unsold or under offer.</p> <p><b>September 2021</b> Construction work progressing, although slightly behind due to COVID-19 alert level restrictions.</p> <p><b>March–July 2021</b> Work progressing according to contract.</p> <p><b>February 2021</b> 3910 contract executed. Detailed update was emailed to the board separate to this Status Report.</p> <p><b>January 2021</b> Construction has commenced. Work programme to be fully finalised in coming weeks.</p> <p><b>December 2020</b></p>
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				<p>Lawyer is drafting variation to agreement for discussion with developer.</p> <p><b>November 2020</b> Due to one of the shareholders passing away in late June the developer AC/JV Holdings has been working on a succession plan which should be finalised in early November. The need to agree succession has meant recent delays to the development but Staff are in regular contact with the contractor to ensure that works begin as soon as possible. Once succession arrangements are confirmed it will enable construction to progress and sections to be put on market as soon as possible. To further ensure this outcome a variation to the development agreement will be prepared which will confirm stages and tighten progress requirements.</p> <p><b>September 2020</b> Work expected to start on site in October for Stage 1 and some sections will be marketed. Stage 1 completion scheduled for April 2021.</p> <p><b>May – August 2020</b> Due to Covid 19, engineering design and construction start date delayed. As of May, engineering design mostly complete and work on site expected to start soon with a staged approach. Also awaiting outcome of Shovel Ready Projects application which may affect how this development progresses.</p> <p><b>February 2020</b> The developer is working on engineering design for subdivision to be approved by Council. Work expected to start on site for subdivision in approximately 6 weeks.</p> <p><b>January 2020</b> Subdivision consent granted 18 December 2019.</p> <p><b>November 2019</b> Subdivision consent was lodged on 22 November 2019.</p>
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					<p><b>September – October 2019</b> The affected party consultation process with NZTA, Transpower and DOC for the application to connect Dunstan Road to the State Highway is almost complete. The developer is also close to finalising the subdivision plan to allow for the resource consent to be lodged.</p> <p><b>July 2019</b> Subdivision consent expected to be lodged in August.</p> <p><b>June 2019</b> Tree felling complete. Subdivision consent expected to be lodged in July or August.</p> <p><b>May 2019</b> Tree felling commenced 20 May and is expected to take up to 6 weeks to complete. Subdivision scheme plan close to being finalised before resource consent application.</p> <p><b>April 2019</b> Security fencing has been completed. Felling of trees expected to commence in the next month. Concept plan is in final draft. Next step is for the surveyor to apply for resource consent.</p> <p><b>March 2019</b> Concept plan is in final draft. Next step is for the surveyor to convert to a scheme plan and apply for resource consent. The fencer is booked in for March.</p> <p><b>January 2019</b> Development agreement was signed by AC &amp; JV Holdings before Christmas. Subdivision plan now being developed for resource consent application and removal of trees expected to start mid to late January.</p> <p><b>October 2018</b> The development agreement is with the developer's accountant for information. Execution imminent.</p> <p><b>September 2018</b></p>
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					<p>The development agreement is under final review.</p> <p><b>August 2018</b> Risk and Procurement Manager finalising development agreement to allow development to proceed.</p> <p><b>June 2018</b> Preferred developer approved. All interested parties being advised week of 11 June. Agreement still being finalised to enable negotiation to proceed.</p> <p><b>March – April 2018</b> Staff finalising the preferred terms of agreement.</p> <p><b>February 2018</b> Requests received. Council staff have been finalising the preferred terms of agreement to get the best outcome prior to selecting a party, including understanding tax implications.</p> <p><b>December 2017</b> Request for Proposals was advertised in major New Zealand newspapers at the end of November 2017 with proposals due by 22 December. Three complying proposals received.</p> <p><b>November 2017</b> Council solicitor has provided first draft of RFI document for staff review.</p> <p><b>November 2017</b> Action Memo sent to the Property Officer</p>
25/09/2019	Consideration of New Zealand Standard (NZS) 4404:2020 (Doc ID 422658)	19.8.10	<p><b>Recommendations</b></p> <p>A. <u>RESOLVED</u> that the report be received, and the level of significance accepted.</p> <p>B. <u>AGREED</u> to adopt NZS 4404:2010 as Council's subdivision standard subject to the development of an updated addendum for local conditions.</p>	Infrastructure Manager	<p><b>17 Mar 2025</b> Drafting of all sections underway.</p> <p><b>12 Feb 2025</b> Drafting of roading and landscaping sections underway.</p> <p><b>15 Jan 2025</b> Project scoping finalised - being reviewed by project team.</p> <p><b>05 Dec 2024</b> Project scoping underway with relevant teams.</p> <p><b>13 Nov 2024</b></p>

					<p>Land Development Engineer started 18/11/24 on a fixed term contract for the update of 4404 addendum. Project scoping with relevant teams underway.</p> <p><b>16 Oct 2024</b> Fixed term offer made for land development engineer. The role is project specific for the NZS4404 update and fixed term through to 30 June 2025.</p> <p><b>14 Aug 2024</b> Project still contingent on availability of resource</p> <p><b>18 Jul 2024</b> The project's start date will be contingent on available resources, and we have approached a potential candidate to support our Engineering team, who will also assist in updating the standards.</p> <p><b>13 Jun 2024</b> Project commencement will depend on resourcing and we are currently recruiting for a new staff member in the Engineering team who will take this on as their responsibility.</p> <p><b>07 May 2024</b> Funding has been included in the 2024/25 Annual Plan to review and update Council's addendum to NZS4404. The project is currently being scoped and work is set to begin from 1 July.</p> <p><b>08 Feb 2024</b> Funding to progress development of updated standards has been included in 2024/25 AP. Awaiting funding to progress.</p> <p><b>08 Jan 2024</b> No change.</p> <p><b>14 Nov 2023</b> Applying for funding as part of Council's LTP process to progress this piece of work.</p> <p><b>06 Oct 2023</b> No Change.</p> <p><b>15 Sept 2023</b></p>
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					<p>No Change</p> <p><b>04 Jul 2023</b> No change.</p> <p><b>14 Jun 2023</b> No change.</p> <p><b>18 May 2023</b> No change.</p> <p><b>11 Apr 2023</b> No change.</p> <p><b>17 Feb 2023</b> No Change</p> <p><b>10 Jan 2023</b> No change</p> <p><b>01 Dec 2022</b> No change</p> <p><b>28 Oct 2022</b> No change.</p> <p><b>19 Sept 2022</b> No change.</p> <p><b>08 Aug 2022</b> No change.</p> <p><b>23 Jun 2022</b> No change.</p> <p><b>19 May 2022</b> No change.</p> <p><b>March 2022</b> Due to work programme commitments this item has been deferred. Looking to potentially add to the 2023 work schedule.</p> <p><b>January 2021 – February 2022</b> No change.</p> <p><b>December 2020</b> The status of this work will be reviewed in February 2021 and a further update provided then.</p> <p><b>January 2020 - November 2020</b> No change.</p> <p><b>December 2019</b></p>
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					<p>Workshops continuing for updating engineering standards. The Environmental Engineering team will be working with planning to ensure the design standards from the Cromwell masterplan are developed alongside the updated engineering standards.</p> <p><b>November 2019</b> Drafting of an updated addendum is underway and expected to be included in report to Council in early 2020.</p> <p><b>October 2019</b> Action memo sent to the Environmental Engineering Manager.</p>
15/07/2020	Lease of Kyeburn Reserve - Ratification	20.5.4	<p><b>Recommendations</b></p> <p>That the Council:</p> <p>A. <b>Receives</b> the report and accepts the level of significance.</p> <p>B. <b>Agrees</b> to grant the Kyeburn Committee a lease pursuant to Section 61(2A) of the Reserves Act 1977, on the following terms:</p> <ol style="list-style-type: none"> <li>1. Permitted use: Community Hall</li> <li>2. Term: 33 years</li> <li>3. Rights of Renewal: None</li> <li>4. Land Description    Sec    20    Blk    V11 Maniototo SD</li> <li>5. Area: 0.4837 hectares</li> <li>6. Rent: \$1.00 per annum if requested</li> </ol> <p>Subject to the Kyeburn Hall Committee</p>	Asset Management Team Leader - Property	<p><b>18 Dec 2024</b> Issue will be passed to property statutory staff. ON HOLD.</p> <p><b>15 Jan 2024</b> Have not received a response from Kyeburn Hall Committee. ON HOLD.</p> <p><b>13 Nov 2023</b> 6/11/2023 – Requested that the Kyeburn Hall Committee table at their AGM and General meeting the outstanding issue of picking up the ground lease. The Kyeburn Hall Committee reported back that it is under discussion with the Kyeburn Library Committee Inc. for the lease to be picked up given the Kyeburn Library Committee are already incorporated.</p> <p><b>11 Oct 2023</b> No change. On hold.</p> <p><b>14 Sept 2023</b> No change, on hold</p> <p><b>17 Aug 2023</b> No change, on hold.</p> <p><b>23 Jun 2023</b> No change, on hold.</p> <p><b>12 Jun 2023</b> No change. On hold.</p> <p><b>02 May 2023</b> No change. On hold.</p>

			<ol style="list-style-type: none"> <li>1. Becoming an Incorporated Society</li> <li>2. Being responsible for all outgoings, including utilities, electricity, telephone, rubbish collection, rates, insurance and ground maintenance</li> </ol>	<p><b>27 Apr 2023</b> No change. On hold.</p> <p><b>27 Mar 2023</b> No change. On hold.</p> <p><b>21 Feb 2023</b> No change. On hold</p> <p><b>06 Jan 2023</b> No change, on hold.</p> <p><b>25 Nov 2022</b> The Kyeburn Hall Committee have now advised they don't want to become an Incorporated Society, they are looking to an existing Incorporated Society in the area to see if the ground lease could be picked up by them. Awaiting for further information from the Kyeburn Hall Committee in the new year.</p> <p><b>28 Oct 2022</b> No change. On Hold.</p> <p><b>14 Sept 2022</b> No Change. On Hold</p> <p><b>09 Aug 2022</b> No change on hold</p> <p><b>18 May 2022</b> No change to the status of this item. Still on hold.</p> <p><b>August 2021</b> ON HOLD until meeting able to take place.</p> <p><b>July 2021</b> Meeting request to the Committee for July 2021 was declined by the Committee citing workloads and health issues of committee members. The Committee will make contact when their schedule allows.</p> <p><b>June 2021</b> May meeting was postponed until July 2021.</p> <p><b>February – April 2021</b> Property and Facilities Officer - Ranfurly to meet Committee in May 2021 and discuss next steps.</p>
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					<p><b>January 2021</b> Waiting for confirmation of their status as an Incorporated Society before issuing the lease.</p> <p><b>September – December 2020</b> Kyebrun Hall Committee to follow up progress on getting their status as an Incorporated Society, in response to email sent to them September 2020.</p> <p><b>August 2020</b> Advised Kyebrun Hall Committee of Council's resolution and waiting for confirmation of their status as an Incorporated Society before issuing the lease.</p> <p><b>July 2020</b> Action memo sent to Property and Facilities Officer – Maniototo.</p>
26/01/2022	Alexandra Airport Masterplan	22.1.3	<p>That the Council</p> <p>B. Adopts the proposed Alexandra Airport Masterplan.</p> <p>C. That a business and financial strategy be developed to support the implementation of the Airport Masterplan.</p>	Property Officer	<p><b>17 Mar 2025</b> Update delayed until April meeting due to further information required for water supply.</p> <p><b>12 Feb 2025</b> An update including information on the runway reseal and water supply is planned for the March 2025 meeting.</p> <p><b>16 Jan 2025</b> An update is planned for the March 2025 meeting.</p> <p><b>15 Nov 2024</b> Report will come to Council in the New Year with more information on Airport. ON HOLD</p> <p><b>15 Oct 2024</b> Council have applied for a water connection and this should go live before the end of the year.</p> <p><b>13 Sept 2024</b> Discussions still ongoing regarding town water supply connection.</p> <p><b>14 Aug 2024</b></p>

					<p>Report expected to go to September meeting if details on connecting to town water supply can be finalised.</p> <p><b>17 Jul 2024</b> A report will go to Council meeting in August or September.</p> <p><b>12 Jun 2024</b> Information still being collated and staff waiting on key updates on water connection and reseal procurement. Once this information is finalised a report will go to the next available Council meeting.</p> <p><b>09 May 2024</b> Property staff reviewing and collating information for 26 June report.</p> <p><b>09 Apr 2024</b> Still waiting on further information regarding connection to Alexandra Town water supply in order to provide full overview to Council of progress with development.</p> <p><b>06 Mar 2024</b> Report to Council delayed as further information required.</p> <p><b>12 Feb 2024</b> An information only report regarding the Alexandra Airport will be presented to Council at March meeting which will provide a financial update.</p> <p><b>09 Jan 2024</b> Finance are working on reconciliation of Airport budgets, capital expenditure and required rates contributions to be updated in Long Term Plan 2024-34.</p> <p><b>09 Nov 2023</b> No further update.</p> <p><b>11 Oct 2023</b> No further update. Financial strategy will be reviewed as part of the LTP process.</p> <p><b>15 Sept 2023</b> Updated cost estimate for the new hangar development have been included for new LTP</p>
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					<p><b>17 Aug 2023</b> Updated cost estimates being prepared for new hangar development to be included in the LTP financials.</p> <p><b>04 Jul 2023</b> No further update.</p> <p><b>13 Jun 2023</b> No further update. Financial strategy will be reviewed as part of the LTP process.</p> <p><b>19 May 2023</b> No further update.</p> <p><b>06 Apr 2023</b> Due to drop off in interested parties more clarity required on demand for new hangar sites. Financial strategy will be reviewed as part of the LTP 2024-34 process.</p> <p><b>20 Feb 2023</b> Investigations still in progress for infrastructure.</p> <p><b>20 Dec 2022</b> Investigations in progress for options for infrastructure required for new hangar site development.</p> <p><b>25 Nov 2022</b> Draft concept plan prepared. Meeting planned in New Year to update stakeholders and seek feedback.</p> <p><b>28 Oct 2022</b> No change. Plans still in progress.</p> <p><b>15 Sept 2022</b> Business plan and concept plans for new hangar precinct are in progress</p> <p><b>12 Aug 2022</b> No change</p> <p><b>20 Jun 2022</b> Business plan and concept plans for new hangar precinct are in progress</p> <p><b>19 May 2022</b></p>
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					<p>Masterplan included in Vincent Spatial Plan press release to inform public it has been adopted and is available on CODC website. Work progresses on planning for next stage of development and business plan.</p> <p><b>05 Apr 2022</b> The Masterplan has been added to the CODC website.</p> <p><b>22 Feb 2022</b> Copy of adopted Masterplan will be uploaded to Council's website. Business and financial strategy planning has begun for the new hangar precinct budgeted in Year 2 of the LTP 2021-31.</p> <p><b>03 Feb 2022</b> Information still being collated and waiting on some key outcomes concerning water connection and update on resealing procurement. Once this information is available a report will be presented to Council at next meeting.</p>
14/12/2022	Private Plan Change 21 - Fulton Hogan, Parkburn	22.10.2	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Agrees to accept and process the request as a private plan change and proceed to notify the request, under clause 26 of the First Schedule to the Resource Management Act 1991.</p>	Principal Policy Planner	<p><b>17 Mar 2025</b> Mediation is ongoing.</p> <p><b>17 Feb 2025</b> Plan change is subject to appeal.</p> <p><b>15 Jan 2025</b> No change</p> <p><b>12 Dec 2024</b> One Appeal received</p> <p><b>15 Nov 2024</b> No Change - Appeals close 18 November</p> <p><b>17 Oct 2024</b> Decision Notified - Appeals close 18 November</p> <p><b>13 Sept 2024</b> Decision going to September Council Meeting for ratification and approval to notify</p> <p><b>15 Aug 2024</b></p>

					<p>Decision is being reviewed and will go to September Council meeting for recommendation, will then be notified with 30 day appeal period.</p> <p><b>19 Jul 2024</b> Hearing held, decision being drafted by hearings commissioners.</p> <p><b>13 Jun 2024</b> PC 19 decision notified and the independant Panel for PC 21 are working through the implications of the decision and recent Environment Court Decision on NPS-HPL</p> <p><b>15 May 2024</b> Waiting until Plan Change 19 is confirmed.</p> <p><b>15 Apr 2024</b> Decision is pending the outcome of Plan Change 19.</p> <p><b>11 Mar 2024</b> Hearing Held - panel drafting decision</p> <p><b>13 Feb 2024</b> Hearing Held 12/13th February</p> <p><b>15 Jan 2024</b> Section 42A released and hearing scheduled.</p> <p><b>17 Nov 2023</b> Section 42A being drafted. Hearing scheduled for 12 &amp; 13 February.</p> <p><b>13 Oct 2023</b> Proponent has asked for the hearing to be deferred to early 2024 to enable them to speak with submitters.</p> <p><b>18 Sept 2023</b> No change</p> <p><b>18 Aug 2023</b> Further submissions have closed. Independent commissioner chair has been appointed.</p> <p><b>04 Jul 2023</b> No change.</p> <p><b>14 Jun 2023</b> No update.</p>
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					<p><b>18 May 2023</b> Submissions closed. Summary is completed for the submissions to be notified.</p> <p><b>11 Apr 2023</b> Plan Change notified and submission closed</p> <p><b>22 Feb 2023</b> Notification 2nd March</p> <p><b>11 Jan 2023</b> Plan Change documents are being prepared for public notification.</p> <p><b>16 Dec 2022</b> Action memo sent to staff.</p>
29/11/2023	Business Case Omakau Wastewater	23.11.2	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Agrees that the preferred way forward is the option to construct a new wastewater treatment site at Omakau in a more resilient location, with disposal to land.</p> <p>C. Agrees to include funding for investigation and preliminary design to progress the next stage of the business case for the Omakau Wastewater Treatment Project in the Draft 2024 Long-term Plan.</p> <p>D. Agrees that the treatment plant design will accommodate the potential future treatment of wastewater from Ophir, but reticulation of Ophir is not included within the scope of this project.</p> <p>E. Directs staff to provide an updated business case which provides refined costs and a delivery strategy for Council approval following preliminary design, and prior to procurement of detailed design and construction.</p>	Capital Projects Programme Manager	<p><b>01 Dec 2023</b> The business cases will be further progress once funding is confirmed in the LTP. Likely to commence from July 2024. ON HOLD.</p> <p><b>30 Nov 2023</b> Action memo sent to staff.</p>
29/11/2023	Business Case Alexandra Wastewater	23.11.3	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p>	Capital Projects Programme Manager	<p><b>01 Dec 2023</b> The business cases will be further progress once funding is confirmed in the LTP. Likely to commence from July 2024. ON HOLD.</p>

			<p>B. Agrees that preferred way forward is the option to construct a new wastewater treatment site on Council land adjacent to the Alexandra Airport, with disposal to land.</p> <p>C. Agrees to include funding for investigation and preliminary design to progress the next stage of the business case for the Alexandra wastewater treatment plant project in the Draft 2024 Long-term Plan.</p> <p>D. Directs staff to undertake more detailed investigation into the capability of the existing site to meet long term requirements if discharge to water was to continue.</p> <p>E. Directs staff to provide an updated business case which provides refined costs and a delivery strategy for Council approval following further investigation of both the existing and preferred option of a new site.</p>		<p><b>30 Nov 2023</b> Action memo sent to staff.</p>
31/05/2023	Alexandra Airport Runway Resurfacing	23.5.8	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Approves an additional \$445,000 to complete the resurfacing of Alexandra Airport. The additional budget is to be funded from existing budgets for new hangar site development which will be delayed until a new financial strategy for the Airport has been developed through the Long-term Plan 2024-34 process.</p> <p>C. Authorise the Chief Executive to do all that is necessary to give effect to the resolutions.</p>	Property Officer	<p><b>04 Mar 2025</b> Contract for resurfacing has been awarded to HEB Construction and resealing is scheduled to start on 18 March and be completed by 23 March. The sealed runway will be closed during this time.</p> <p><b>12 Feb 2025</b> Tenders closed on 7 February. Report with update will come to Council in March.</p> <p><b>14 Jan 2025</b> Tender delayed. Will be released in January.</p> <p><b>10 Dec 2024</b> Closed tender to be released by 20 December 2024 and closing in January 2025.</p> <p><b>15 Nov 2024</b> Closed tender to be released before Christmas.</p> <p><b>15 Oct 2024</b></p>

					<p>Closed tender due to be released by the end of October.</p> <p><b>13 Sept 2024</b> Tender documents being prepared and expected to be released at the end of September.</p> <p><b>14 Aug 2024</b> Pricing for runway reseal will be tendered due to cost estimates being overbudget. Tender expected to be released in September and contractor appointed by November 2024.</p> <p><b>17 Jul 2024</b> Pricing options to reseal the runway are still in progress.</p> <p><b>12 Jun 2024</b> Due to high prices from original quote alternate price options for reseal being sought. We are still working with the contractors to finalise if testing is necessary.</p> <p><b>09 May 2024</b> Runway base and paving surface testing price being obtained and testing scheduled.</p> <p><b>09 Apr 2024</b> Further pavement testing on the runway will be carried out in the near future. The results of this testing will help to inform options for further design and procurement for resealing of the runway. Once updated costings are available a report will be brought back to Council if further funding is required.</p> <p><b>06 Mar 2024</b></p>
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					<p>Fulton Hogan have advised there issue with existing base of runway which will mean risk of cracking once resurfaced. Remediation will be required at significant additional cost. More investigation needed into cost and requirements. As a result resurfacing will have to be delayed until next spring/summer season. A report will come back to Council for consideration of funding for additional costs.</p> <p><b>12 Feb 2024</b> Meeting with Fulton Hogan delayed until February 15th to confirm resurfacing details.</p> <p><b>09 Jan 2024</b> Lichen spraying completed in December. Meeting with Fulton Hogan in January to confirm surface required and schedule reseal.</p> <p><b>09 Nov 2023</b> Lichen spraying is required prior to resurfacing which is being scheduled in next few weeks. Resurfacing is likely to be scheduled early in the New Year.</p> <p><b>11 Oct 2023</b> Fulton Hogan carried out site testing with no issues arising. Waiting for scheduling to be confirmed.</p> <p><b>15 Sept 2023</b> No Change.</p> <p><b>17 Aug 2023</b> Awaiting timing and finalised costs from Fulton Hogan.</p> <p><b>04 Jul 2023</b> Met with Fulton Hogan on site on 29 June. For runway inspection Fulton Hogan to confirm pricing and scheduling as soon as possible.</p> <p><b>13 Jun 2023</b> Meeting with Fulton Hogan and site investigation to confirm pricing and scheduling on 20 June.</p>
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					<b>01 Jun 2023</b> Tender documents being prepared to be released at the end of September.
24/09/2024	Visitor Levy and Short Term accommodation	24.11.12	That the Council A. Receives the report and accepts the level of significance. B. Adopts a formal supportive position of Queenstown Lakes District Council's proposal to introduce a localised visitor levy. C. Adopts a supportive position on the investigation of a localised visitor levy within Central Otago in the absence of a national visitor levy. D. Instructs staff to provide a cost/benefit analysis on the introduction of a commercial or targeted rate on short-term rental properties within Central Otago.	Group Manager - Community Vision	<b>12 Mar 2025</b> No further updates. <b>12 Feb 2025</b> This is now part of the Regional Deals conversations. <b>13 Jan 2025</b> No further updates. <b>18 Nov 2024</b> Staff working to develop a budget for 2025/26 financial year LTP input. Update to come in March 2025. <b>18 Oct 2024</b> Work has begun on this. <b>04 Oct 2024</b> Action memo was sent to staff.
24/09/2024	Psychoactive Substances Policy Renewal	24.11.7	That the Council A. Receives the report and accepts the level of significance. B. Approves the draft Psychoactive Substances Policy for consultation.	Senior Strategy Advisor	<b>12 Mar 2025</b> Consultation closed 7 March. Staff are processing the submissions and will contact those who indicated they would like to make an oral submission. Tentative hearing dates have been set for April. The Psychoactive Substances Policy Renewal is expected to return to the May Council meeting <b>13 Jan 2025</b> Consultation programmed. <b>18 Oct 2024</b> Programmed for consultation at the same time as the alcohol bylaw. <b>04 Oct 2024</b> Action memo was sent to staff.
30/10/2024	Private Plan Change 23 (Hartley Road Partnership) - Decision on Acceptance	24.12.10	That the Council A. Receives the report and accepts the level of significance. B. Resolves that Plan Change 23 be accepted under Schedule 1, Clause 25 (2) (b) of the Resource	Principal Policy Planner	<b>17 Mar 2025</b> Summary submission is in. Currently looking to schedule the hearing. <b>17 Feb 2025</b> Summary of submissions notified. <b>15 Jan 2025</b>

			Management Act 1991 and notified as a private plan change under Schedule 1, Clause 26.		<p>submissions close 17th January</p> <p><b>12 Dec 2024</b> No Change</p> <p><b>15 Nov 2024</b> Plan Change 23 Notified 16th November - Submissions close 17th January</p> <p><b>06 Nov 2024</b> Action memo sent to staff.</p>
30/10/2024	Draft Open Spaces and Recreation Strategy	24.12.6	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Approves the draft Open Spaces and Recreation Strategy 2024 for consultation.</p>	Parks Officer - Planning and Strategy	<p><b>13 Mar 2025</b> Document uploaded. No more updates will be needed on this now until Feb 2026 when we will be due for a soft review. MATTER CLOSED</p> <p><b>27 Feb 2025</b> Will update Strategy and upload online this week</p> <p><b>14 Jan 2025</b> Strategy is being updated following public consultation. Going to bring the final strategy in front of Council for approval in March 2025.</p> <p><b>14 Nov 2024</b> The Open Spaces and Recreation Strategy was updated (to fix typographical errors) and went out for public consultation on 7 November.</p> <p><b>06 Nov 2024</b> Action memo sent to staff.</p>
30/10/2024	Gambling and Board Venue Policy	24.12.9	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Directs staff to engage with the community on a proposal to introduce a sinking lid approach to class 4 gambling.</p> <p>C. Approve the draft statement of proposal for consultation.</p> <p>D. Appoints Crs McPherson and Paterson to hear submissions if required.</p>	Senior Strategy Advisor	<p><b>12 Mar 2025</b> Consultation closed 7 March. Staff are processing the submissions and will contact those who indicated they would like to make an oral submission. Tentative hearing dates have been set for April. The Gambling and Board Venue Policy is expected to return to the May Council meeting</p> <p><b>13 Jan 2025</b> Consultation programmed.</p> <p><b>07 Nov 2024</b></p>



					<p>Programmed for consultation at the same time as the alcohol bylaw and psychoactive substances policy.</p> <p><b>06 Nov 2024</b> Action memo sent to staff.</p>
27/11/2024	Local Water Done Well - CODC Options for Development of Water Services Delivery Plans	24.13.10	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Notes that CODC must draft a Water Services Delivery Plan and include as a minimum two options with one being the status quo.</p> <p>C. Directs the CEO to develop a Water Services Delivery Plan that includes the following options:</p> <p>(a) Status quo,</p> <p>(b) Single Council – Council Controlled Organisation, and</p> <p>(c) Multi Council – Council Controlled Organisation.</p> <p>D. Authorises the CEO in partnership with other participating Otago - Southland Councils to further develop the detail required to support a multi council CCO Water Services Delivery Plan.</p>	Chief Executive Officer	<p><b>17 Mar 2025</b> The various options are currently being worked through.</p> <p><b>18 Feb 2025</b> Report coming to the February Council meeting to look at a multi-council CCO approach.</p> <p><b>16 Jan 2025</b> Work has begun on this plan.</p> <p><b>10 Dec 2024</b> Action memo sent to staff.</p>
18/12/2024	Extension of Temporary Alcohol Restriction Zone	24.14.9	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Directs staff to consult on renewing the Alcohol Restrictions in Public Places Bylaw, with the inclusion of the Teviot Valley in the Blossom Festival Temporary Alcohol Restriction Zone; and a new Temporary Alcohol Restriction Zone for the Merino Shears weekend.</p> <p>C. Appoints Cr Browne and Cr Laws as members to hear submissions if required.</p> <p>D. Accepts that a bylaw is the most appropriate mechanism for addressing the issue.</p>	Senior Strategy Advisor	<p><b>12 Mar 2025</b> Consultation closed 7 March. Staff are processing the submissions and will contact those who indicated they would like to make an oral submission. Tentative hearing dates have been set for April. The Extension of Temporary Alcohol Restriction Zone is expected to return to the May Council meeting.</p> <p><b>13 Jan 2025</b> Consultation programmed.</p> <p><b>20 Dec 2024</b> Action memo sent to staff.</p>

29/05/2024	Plan Change 19 - Recommended Decision of the Hearings Panel	24.6.12	That the Council  A. Receives the report and accepts the level of significance.  B. Adopts the decision on Plan Change 19.  C. Approves the notification of the decision in accordance with clause 11 of the First Schedule to the Resource Management Act 1991.	Principal Policy Planner	<p><b>17 Mar 2025</b> There have been informal discussions with all parties and two appeals have been resolved. Formal mediation has been set for May / June 2025.</p> <p><b>17 Feb 2025</b> Informal discussions have been held with appellants. Now waiting for mediation dates from the Environment Court.</p> <p><b>15 Jan 2025</b> Informal discussions continuing.</p> <p><b>12 Dec 2024</b> Informal Discussions progressing</p> <p><b>15 Nov 2024</b> Informal discussions commenced</p> <p><b>17 Oct 2024</b> Mediation not available through Environment Court until March/, April - Council requested approval to engage in informal discussions with appellants prior to that which has been approved.</p> <p><b>13 Sept 2024</b> Submissions grouped along with section 274 parties. Leave sought from Court to undertake informal discussions with submitters.</p> <p><b>15 Aug 2024</b> 14 appeals received, all submitters have been notified on our website. No decision has been made on what parts of PC19 can become operative.</p> <p><b>19 Jul 2024</b> Appeal period closes on 9 August.</p> <p><b>13 Jun 2024</b> Decision notified 8th June - 30 day appeal period</p> <p><b>06 Jun 2024</b> Action memo sent to staff.</p>
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31/07/2024	Economic Development Strategy	24.9.5	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Notes the update on the development of a new Economic Development Strategy.</p> <p>C. Appoints Crs Alley and Paterson to act as liaisons to the steering group.</p> <p>D. Extends duration of existing 2019-2024 Economic Development strategy until the new strategy is adopted.</p>	Economic Development Manager	<p><b>17 Mar 2025</b> Draft plan to come to the April Council meeting.</p> <p><b>12 Feb 2025</b> No further updates.</p> <p><b>15 Jan 2025</b> Meeting held with Runaka representatives, draft document being prepared.</p> <p><b>08 Nov 2024</b> No further updates at this stage.</p> <p><b>18 Oct 2024</b> Community workshops have been completed and currently compiling information to liaise with Runaka.</p> <p><b>02 Sept 2024</b> Community consultation taking place over September.</p> <p><b>16 Aug 2024</b> Work on the new strategy has begun.</p> <p><b>06 Aug 2024</b> Action memo sent to staff.</p>
29/01/2025	Assigning Role of Controller	25.1.12	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Recommends to the Otago Civil Defence Emergency Group Manager that Patrick Keenan, a Central Otago District Council employee be appointed as a Local Civil Defence Controller (statutory position).</p>	Group Manager - Community Vision	<p><b>17 Mar 2025</b> Appointment yet to be ratified by Joint Committee.</p> <p><b>12 Feb 2025</b> Awaiting joint committee approval.</p> <p><b>31 Jan 2025</b> Action memo sent to staff.</p>
29/01/2025	Draft Consultation Document and Supporting Material for the 2025-34 Long-term Plan for Audit New Zealand	25.1.24	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Approves that the draft Consultation Document be provided to Audit New Zealand for audit as required under the Local Government Act 2002, subject to the changes identified.</p>	Group Manager - Business Support	<p><b>17 Mar 2025</b> The Consultation Document will be presented to the March 2025 meeting. MATTER CLOSED</p> <p><b>31 Jan 2025</b></p>

			<p>C. Approves the following supporting information to the Consultation Document be provided to Audit New Zealand to facilitate the audit:</p> <ul style="list-style-type: none"> <li>(a) Infrastructure Strategy</li> <li>(b) Financial Strategy</li> <li>(c) Development and Financial Contributions Policy</li> <li>(d) Fees and Charges</li> <li>(e) Significance and Engagement Policy</li> <li>(f) Revenue and Financing Policy</li> <li>(g) Rates Remission and Postponement Policy</li> <li>(h) Liability Management Policy</li> <li>(i) Investment Policy</li> <li>(j) Prospective Financial Statements and Prospective Funding Impact Statements</li> <li>(k) Community Outcomes Development</li> <li>(l) Significant Forecasting Assumptions and Risks</li> <li>(m) Capital Expenditure for Activity Groups</li> </ul> <p>D. Agrees that the consultation item for the Supercars grant that the preferred option is to support the grant of \$250,000 with funding from the tourism reserves.</p> <p>E. Agrees that the Chief Executive Officer is authorised, in consultation with the Mayor, to make any necessary formatting or editorial changes, or other such changes required by Audit New Zealand, to finalise the material ahead of presentation back to Council in March 2025.</p>		<p>The Consultation Document and supporting material have been provided to Audit New Zealand. Amendments have been made and will be presented back to Council on 17 March 2025 for approval to adopt these documents for formal consultation.</p> <p><b>31 Jan 2025</b> Action memo sent to staff.</p>
29/01/2025	Alexandra Water Renewals procurement	25.1.6	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p>	Capital Projects Programme Manager	<p><b>18 Feb 2025</b> Advertising tender on 4 March 2025</p> <p><b>31 Jan 2025</b> Action memo sent to staff.</p>

			<p>B. Notes that the priority water pipe renewal sites are Bridge Hill Rising Main, Enterprise Street (Alexandra) and Northland Street (Ranfurly).</p> <p>C. Approves the procurement plan for tendering of water pipe renewals on Bridge Hill and Enterprise Street, Alexandra, including the following</p> <p>(a) Tenders to be evaluated using the Weighted Attribute Method with a 40% price weighting.</p> <p>D. Authorises the Chief Executive Officer to award the work to the preferred contractor following the procurement process, provided that the tendered amounts are within the approved budget and subject to the revised Procurement Policy being adopted (25.1.14).</p>		
29/01/2025	Cromwell Water Treatment Plant and Borefield Upgrade Procurement	25.1.7	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Approves procurement of a new treatment plant at the reservoir site near McNab Road and an upgrade of the borefield between Lake Dunstan and the Alpha Street recreation reserve, with tenders evaluated using the weighted attribute method with a 40% price weighting.</p> <p>C. Authorises the Chief Executive Officer to award the work to the preferred contractor following the procurement process provided that the tendered amounts are within the approved budget and subject to the revised Procurement Policy being adopted (25.1.14).</p> <p>D. Notes that consideration of the future use of the existing treatment buildings will occur within the next 12 months.</p>	Capital Projects Programme Manager	<p><b>18 Feb 2025</b> Advertised tender on 31 January 2025.</p> <p><b>31 Jan 2025</b> Action memo sent to staff.</p>
29/01/2025	Ranfurly Water Treatment Plant - Protozoa Barrier	25.1.8	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p>	Capital Projects Programme Manager	<p><b>18 Feb 2025</b> Tender advertisement is currently programmed for 10 March 2025</p> <p><b>31 Jan 2025</b></p>

			<p>B. Approves installation of a cartridge and ultraviolet (UV) treatment solution as an affordable option to meet the New Zealand Drinking Water Quality Assurance Rules</p> <p>C. Notes that a cartridge and ultraviolet (UV) treatment solution:</p> <p>(a) will have a treatment capacity limit is likely to require water conservation measures when source water experiences high turbidity</p> <p>(b) operational costs will rise to meet increased electricity and plant operations associated with additional treatment processes</p> <p>D. Approves the procurement plan for protozoa barrier treatment at the Ranfurly Water Treatment Plant using a Weighted Attribute Method with a price weighting of 40%.</p> <p>E. Authorises the Chief Executive Officer to award the contract to the preferred contractor following the procurement process provided that the tendered amounts are within the approved budget and subject to the revised Procurement Policy being adopted (25.1.14).</p>		Action memo sent to staff.
29/01/2025	Patearoa Water Treatment Plant - Protozoa Barrier	25.1.9	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Approves installation of a cartridge and ultraviolet (UV) treatment solution as an affordable option to meet the New Zealand Drinking Water Quality Assurance Rules</p> <p>C. Notes that a cartridge and ultraviolet (UV) treatment solution:</p> <p>(a) Will have a treatment capacity limit that is likely to require water conservation measures when source water experiences high turbidity</p>	Capital Projects Programme Manager	<p><b>18 Feb 2025</b> Tender advertisement is currently programmed for 10 March 2025.</p> <p><b>31 Jan 2025</b> Action memo sent to staff.</p>

			<p>(b) Operational costs will rise to meet increased electricity and plant operations associated with additional treatment processes</p> <p>D. Approves procurement of protozoa barrier treatment for the Patearoa Water Treatment Plant.</p> <p>(a) Tenders to be evaluated on a Weighted Attribute Method with a price weighting of 40%.</p> <p>E. Authorises the Chief Executive Officer to award the contract to the preferred contractor following the procurement process provided that that the tendered amounts are within the approved budget and subject to the revised Procurement Policy being adopted (25.1.14).</p>		
26/02/2025	Regional Deals Proposal	25.3.10	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Approves the proposal for submission to Central Government under the Regional Deals framework.</p>	Group Manager - Community Vision	<p><b>12 Mar 2025</b> Regional Deals proposition has been submitted awaiting decision from DIA.</p> <p><b>04 Mar 2025</b> Action memo sent to staff.</p>
26/02/2025	Local Water Done Well - Otago Southland Joint Group of Councils	25.3.3	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Agrees to enter into the Otago Southland Joint Group of Councils Commitment Agreement.</p> <p>C. Authorises the Chief Executive to sign the Otago Southland Joint Group of Councils Commitment Agreement as set out in Attachment 1 on behalf of Council, including any minor amendments that are required when finalising the document for signing].</p> <p>D. Agrees to rely on the alternative requirements for decision-making and consultation set out in sections 61 to 64 of the Local Government (Water Services Preliminary Arrangements) Act 2024 in accordance with section 58(a)(i).</p>	Chief Executive Officer	<p><b>04 Mar 2025</b> Agreement signed on 3 March 2025 and sent to Wynn Williams for collating and promulgation.</p> <p><b>04 Mar 2025</b> Action memo sent to staff.</p>

26/02/2025	Appointment of Hearings Panel Commissioners	25.3.5	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Appoints Crs Cooney, Gillespie, McPherson and Paterson as independent commissioners to the Hearings Panel.</p> <p>C. Notes this arrangement will be reviewed at the inaugural Council meeting following the 2025 triennial elections.</p>	Regulatory Services Manager	<p><b>17 Mar 2025</b> Panel members are now independent and will be chosen for each hearing by the CEO or his representative. MATTER CLOSED</p> <p><b>04 Mar 2025</b> Action memo sent to staff.</p>
26/02/2025	Open Spaces and Recreation Strategy	25.3.6	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Adopts the Open Spaces and Recreation Strategy 2024.</p> <p>C. Notes that the Open Spaces and Recreation Strategy 2024 will be reviewed in July 2026.</p>	Parks and Recreation Manager	<p><b>12 Mar 2025</b> The Strategy has been approved by Council and it is now on Council's website. MATTER CLOSED.</p> <p><b>04 Mar 2025</b> Action memo sent to staff.</p>
26/02/2025	Proposal to extend Central Otago Museum Trust's Performance Agreement	25.3.9	<p>That the Council</p> <p>A. Receives the report and accepts the level of significance.</p> <p>B. Agrees to extend the term of the Performance Agreement between Central Otago District Council and Central Otago Museums Trust through to 16 December 2025.</p> <p>C. Resolves to allocate \$50,000 to Central Otago Museums Trust from 2024/25 budgets to enable the implementation of the Performance Agreement for a fourth year.</p> <p>D. Notes that any funding beyond this period will be considered within the museum investment</p>	Community and Engagement Manager	<p><b>17 Mar 2025</b> The performance agreement has been signed by the CEO and sent to the Trust. An invoice for the \$50k has been received. MATTER CLOSED</p> <p><b>04 Mar 2025</b> Action memo sent to staff.</p>



			framework and in line with Council's 2025-34 Long-term Plan budgets.		
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## **TŪHURA OTAGO MUSEUM**

### **Report to Contributing Local Authorities**

### **February 2025**

**For the period 1 December 2024 to 31 January 2025**

#### **DIRECTORS REPORT**

Reflecting on the first months of 2025 it is evident that Tūhura Otago Museum is navigating an evolving landscape with resilience and ambition. Our visitor numbers reached 244,601, which is approximately 3% lower than the previous year. This decline likely reflects the impact of the current economic climate and a reduced number of cruise ship arrivals in Dunedin. Nevertheless, the *RELICS* LEGO exhibition has attracted strong attendance, demonstrating the lasting appeal of high-quality and engaging programming.

While summer is typically a period of intense focus on serving our visitors, this season has also been marked by significant changes. In a major step towards reimagining our Pacific Cultures Gallery, we have closed the Polynesia section to begin a renewal process. A key part of this effort was a dedicated Pasifika Community Day, where we invited members of our Pacific communities to share their perspectives and aspirations for the future of the space. Their insights will play a crucial role in shaping what comes next.

Beyond our walls, our outreach work remains a cornerstone of our mission. The team recently returned from a successful visit to the Cook Islands, generously supported by the U.S. Embassy, which helped strengthen relationships and share knowledge across the Pacific. Closer to home, our Science Showcases continue their North Island tour, and partnerships with Te Whai Ao (Dodd-Walls Centre) and Solar Tsunamis are delivering exciting science engagement nationwide. However, it is disappointing that funding for public engagement from MBIE and the Ministry of Education has disappeared. This loss presents a significant challenge to sustaining our outreach efforts.

Finally, I am pleased to welcome Dr. Georgia Ciaran as our new Head of Philanthropy and Development. I look forward to the expertise and energy she will bring to this vital role. At the same time, we bid farewell to Paige McPherson and Shannah Rhynard-Geil, whose contributions to the Museum have been deeply valued. As always, I extend my gratitude to the dedicated team at Tūhura Otago Museum, our supporters, and our wider community for their commitment to our work. The year ahead promises both challenges and opportunities, and I am confident that together, we will continue to inspire curiosity, connection, and discovery.

Director's media activity:

<https://www.rnz.co.nz/news/national/539024/six-planets-to-line-up-in-night-sky>

<https://www.rnz.co.nz/news/national/536495/how-to-see-the-geminids-meteor-shower-from-new-zealand>

<https://www.rnz.co.nz/national/programmes/summer-days/audio/2018970734/road-trip-ian-griffin>

I continue to write my weekly “Skywatch” column in the Otago Daily Times.

[https://www.odt.co.nz/search/results/skywatcher?sortby=published\\_at%20DESC](https://www.odt.co.nz/search/results/skywatcher?sortby=published_at%20DESC)

## COLLECTIONS AND RESEARCH

### Access requests completed

	Image/data	Item/physical
Humanities		4
Taoka Māori		
Natural Science	1	2
Other		

#### Details:

- Classics student Rose Wallington, visited to examine a group of objects related to the Trojan War, as part of her University of Otago Summer Research Scholarship.
- Dr Allison Miller visited to examine specimens of sea cucumbers collected from Kermedecs.
- Members of the group of volunteers helping to scan the archived correspondence were given a tour of the storage areas with a particular focus on pieces with a link to HD Skinner.
- Michael Zellmann-Rohrer visited to examine our small collection of papyrus fragments.
- Alison Glendining visited to see her mother’s wedding gown, which Mrs Glendining also wore when she got married.
- Joseph Robinson requested images of Kākā and Kea with colour morph feathers to use for his Aotearoa gothic folk music album project.
- Dr Daphne Lee and Dianne Nyhoff from the Geology Department at University of Otago visited the Museum’s geology collection and discussed potential research on diatoms.



*Bowl from Mesa Verde, New Mexico, purchased by H.D. Skinner during the time of his Rockefeller Fellowship. E28.131. Tūhura Otago Museum Collection*



*Lekythos painted with scene showing Ulysses' crew escaping Polyphemus. E48.249. Willi Fels Memorial Gift; Tūhura Otago Museum Collection*

#### Loans

Outward loans sent:

- None

Inward loans received:

- None

Other loan activity:

- 1x toki (L69.7) on loan returned to owner.
- Kerr (IL89-1) loan collection (majority) transferred to Strath Taieri Historical Society. The remaining 4 taoka to be gifted to Tūhura Otago Museum.
- Meteorite returned from outward loan.
- Background work on outstanding undocumented loans from the 1970s and 1980s from the old DSIR which now forms the New Zealand Arthropod Collection with Manaaki Whenua – Landcare Research.

#### Collections item records

	This period	Financial year to date
New/digitised:	2,458	5,756
Revised:	49,728	65,161
Imaged:	2,500	3,464

Details/Highlights:

Tūhura Otago Museum  
Report to Contributing Local Authorities  
February 2025

Page 3 of 29

- Data of Lycaenid butterflies in our main pinned insect collection, that were accessioned ahead of a visiting researcher in November/December, are being added to Vernon CMS.
- Inventories are ongoing.

#### Acquisitions and Deaccessions

	Acquisitions	Deaccessions
Humanities	6	
Taoka Māori		
Natural Science	2	

#### Details/Highlights:

- 19th century French clock garniture.
- Fijian salusalu lavalava presented during Fijian Language Week 2024.
- Small model of a Palestinian flag.
- 'Fish at Limu Pools' by Cora-Allen.
- Set of mid-20th century travel bags for accessories.
- Overstayer label cap.
- Eight empty egg cases and fragments from elephant fish (*Callorhinchus milii*).
- 30 Pieces of *Dactylanthus taylorii*, collected by Douglas Amooore from Turangi area in 1970s.

#### Enquiries:

	Public Enquiries	Item Receipts
Humanities	14	6
Taoka Māori	11	2
Natural Science	8	8
Conservation	7	

- Enquiries include: Beech Timber Yard; coin identification; information about a Chinese vase; Japanese wedding kimono; Aynsley cup and saucer; wedding dress; Minié ball bullet; mystery object from Blueskin Bay; mystery object bought from an antiques shop; offer of antique tools; historic newspapers, bottle and bone dug up near Highgate; Asian ivory carvings; Goldfields police; fossil identification (x2); spider identification; slug identification; museum specimen species confirmation; plant disease identification; moa bone identification, snail mating behaviour; Milburn quarry fossil fish specimen information
- Kaupapa Māori enquiries include: information on pūngāwerewere pattern on waka; information on Ngāti Kere pare (D34.627); information on pounamu hei tiki and pendants from personal collection; information on Kerr collection; received Tiwai Point archaeological assemblage for research from Te Kupeka Tiaki Taoka (formally Southland Museum and Art Gallery Trust); information on Dr. Riley and his collection at the Museum; update spelling for 'Marama-a-Whetū'; advice and recommendation on pounamu pendant from private

collection; taonga Māori from The Neck Rakiura; information on weaving donated by Edwina Regan; information on tiki figure; information on Sonny Hovell collection in museum; query into identifying Māori taonga from private collection from Churchill Auction;

- Conservation enquiries include: Eden Logan regarding an archaeological conservation internship; Viveca Orsted Johansen regarding a conservation internship; Jaz Mathisen regarding private painting conservation work; Jenny Sherman regarding freezing woollen materials; Steve Kerr regarding DNA destructive sampling; Jane Lancaster regarding an introductory meeting as a new employee of Central Otago Museums Trust; Debbie Jarvis regarding a science talk at Oamaru Library on the 11<sup>th</sup> of February 2025.

### Protected Objects Act

The following taoka have been notified to the Ministry of Culture and Heritage under the Protected Objects Act (1975): there were none this period.

### Publications & Social Media: On the collection

	Internal researcher	External researchers
Research publications/papers	1	1
Blogs		
Other	5	

The following is a reference list of recent publications on the collection by internal researchers:

- Harris, Anthony. Latest loss should be a wake-up call. *Otago Daily Times*, Nature File, Weekend Mix, 7 December 2024, p.9
- Harris, Anthony. Dance flies swarm in act of courtship. *Otago Daily Times*, Nature File, Weekend Mix, 14 December 2024, p.9
- Harris, Anthony. A sting in the tail. *Otago Daily Times*, Nature File, Weekend Mix, 21 December 2024, p.9
- Ueki, T., Summerhayes, G. and Hiscock, P. eds., 2024. In the Footsteps of Our Ancestors: Following Homo sapiens into Asia and Oceania. Taylor & Francis.
- Harris, Anthony. Thrips abound after humid holiday period. *Otago Daily Times*, Nature File, Weekend Mix, 11 January 2025, p.9
- Harris, Anthony. Tiny device pest control aid. *Otago Daily Times*, Nature File, Weekend Mix, 18 January 2025, p.9

Publications by external researchers:

- Février, Gabin. "Langage corporel antique : Jeux de doigts dans la céramique attique des Vie et Ve siècles av. n. è." (Mémoire de M2, Master HACM, Nantes Université, supervised by Ludi Chazalon, MCF en Histoire de l'Art à Nantes Université), defended on October 9, 2024.

### Collection team contributions to projects, exhibitions and programmes

Collection based projects:

- Work has resumed on the catalogue of Mesopotamian seal stones in the collection.
- Onumia spade toothed whale progresses in the tanks in Invermay with our contractor.

#### In-house exhibitions, programmes and gallery projects:

- Much planning and preparation in readiness for the Community Consultation Day that marked the beginning of the refresh of the Hall of Polynesia.
- Input and advice on the information and images used by the HIDDEN team for their Tūhura Otago Museum game.
- We are in conversation with the Classics Programme staff at University of Otago about adding a screen in People of the World that could be loaded with presentations based on some of the projects undertaken by Classics interns.

#### External projects (e.g.: Industry networks, partnerships, community work and events)

- 3D scanning of taonga for Nelson Provincial Museum.
- Working with the Middlemarch Museum on the Kerr collection.
- Working with Central Stories, Alexandra, who have sought advice on a collection of taoka Māori.
- Reviewing full submissions for IFFTl 2025 (Moirā).
- Tiwai Point archaeological assemblage transfer from Te Kupeka Tiaki Taoka (formerly Southland Museum and Art Gallery Trust).
- Kane Fleury has been working with Auckland Museum on finalising the manuscript and ichnotaxonomy of the Kaipara Footprints.
- Onumia Spade-toothed whale dissection was project-managed and led by Kane Fleury at Invermay campus. All the Natural Science team was involved in this.

#### Archives

- Final reports for the Lotteries Commission and Ngāi Tahu Archives were completed and sent to each of the organisations in December.
- Appraisal and cataloguing work was completed on a new medium sized series: ARCH 0026 Mixed Governance and Redevelopment Records (seven boxes, 44 files). This series contains a variety of records from the 1960's through to the late 1990's, the main uniting factor being that the records were retired from use after the introduction of the alpha-numeric classification system introduced in the early 2000's.

##### The series includes:

- Otago Museum Trust Board minutes and director's reports from the 1960's-1970's.
- Corporate and strategic plans from 1989-1993.
- A large collection of records related to the stage 1 redevelopment, with particular focus on planning and the early stages of development as well as a complete set of minutes of the redevelopment planning group (1994-2003)
- Tender documents for the major components of the project.
- A small collection of correspondence from the office of Richard Cassels (1992-1994)
- Early Stage 2 Redevelopment planning documents
- Around a decade's worth of correspondence between Raymond Forster and the A.G.M.A.N.Z Art Galleries and Museums Association New Zealand from the 1960's.

- Invertebrate hall development draft materials, concepts.

#### Honorary curators, volunteer and internship activity

- Dr Jane Malthus and Shannah Rhynard-Geil undertook a textiles storage workshop with the Taieri Historical Society on 13 December

#### Presentations, talks and interviews

Title	Date	External Audience	Delivered by
The Kingdom – animals in the jewellery of Jane Dodd	10 January 2025	The Otago Institute Podcast	Jane Dodd and Dr Barbara Anderson
Spade-toothed whales	4 December	Public talk	Kane Fleury, Anton van Heldon, Tumai Cassidy, Micheal Denk, Joy Reidenburg, Alex Worth.
<a href="https://www.rnz.co.nz/news/national/535473/dissection-of-rare-whale-begins-this-is-an-extraordinary-thing">https://www.rnz.co.nz/news/national/535473/dissection-of-rare-whale-begins-this-is-an-extraordinary-thing</a>	2 December	RNZ- National	Kane Fleury
<a href="https://edition.cnn.com/2024/12/10/science/spade-toothed-whale-new-zealand-intl-hnk/index.html">https://edition.cnn.com/2024/12/10/science/spade-toothed-whale-new-zealand-intl-hnk/index.html</a>	10 December	CNN- International	Kane Fleury
<a href="https://www.doc.govt.nz/news/media-releases/2024-media-releases/rarest-whale-in-the-world-to-undergo-dissection/">https://www.doc.govt.nz/news/media-releases/2024-media-releases/rarest-whale-in-the-world-to-undergo-dissection/</a>	2 December 2024	DOC- National	Kane Fleury
<a href="https://www.odt.co.nz/news/dunedin/dissection-rare-whale-huge-opportunity">https://www.odt.co.nz/news/dunedin/dissection-rare-whale-huge-opportunity</a>	2 December 2024	ODT- Regional	Kane Fleury
<a href="#">‘Extraordinary’ dissection begins on rare whale found on NZ beach   Stuff</a>	2 December 2024	STUFF NZ- National	Kane Fleury
<a href="https://www.rnz.co.nz/news/national/535473/dissection-of-rare-whale-begins-this-is-an-extraordinary-thing">https://www.rnz.co.nz/news/national/535473/dissection-of-rare-whale-begins-this-is-an-extraordinary-thing</a>	2 December 2024	RNZ- National	Kane Fleury



<a href="#">Rarest whale in the world undergoes dissection in Dunedin</a>	2 December 2024	1NEWS-National	Kane Fleury
<a href="https://www.odt.co.nz/news/dunedin/world-interest-dissection-rare-little-known-whale">https://www.odt.co.nz/news/dunedin/world-interest-dissection-rare-little-known-whale</a>	3 December 2024	ODT- Regional	Kane Fleury
<a href="#">Scientists undertake world-first dissection of rare spade-toothed whale in Dunedin - NZ Herald</a>	3 December 2024	NZ Herald-National	Kane Fleury
<a href="https://www.theguardian.com/world/2024/dec/03/spade-tooth-rare-whale-new-zealand-scientists-dissect">https://www.theguardian.com/world/2024/dec/03/spade-tooth-rare-whale-new-zealand-scientists-dissect</a>	3 December 2024	The Guardian-International	Kane Fleury
<a href="https://www.foxweather.com/earth-space/spade-toothed-whale-new-zealand-study">https://www.foxweather.com/earth-space/spade-toothed-whale-new-zealand-study</a>	3 December 2024	Fox Weather-International	Kane Fleury
<a href="#">World's rarest whale to undergo study for first time in New Zealand</a>	4 December 2024	Yahoo-International	Kane Fleury
<a href="#">World's rarest beaked whale undergoes dissection in scientific first - Oceanographic</a>	4 December 2024	Oceano Graphic-International	Kane Fleury
<a href="https://nit.com.au/04-12-2024/15219/worlds-rarest-whale-examined-in-maori-scientist-partnership">https://nit.com.au/04-12-2024/15219/worlds-rarest-whale-examined-in-maori-scientist-partnership</a>	4 December 2024	National Indigenous Times-International	Kane Fleury

## Conservation

### Preventive

- Condition reports for new accessions, treatments, and loan objects.
- IPM management including quarantine, freezing, blunder trap monitoring and ID, pest checks for events, etc.
- Pest Gone quarterly rodent check and cockroach spray of the Tropical Forest.
- Deep clean of Animal Attic and Maritime gallery.
- Assisting with packing and storage.
- Assistance with the delivery and return of the plesiosaur head fossil from the Otago University's Geology Department for filming and imaging.

#### Projects

- Continuation of the top up of ethanol in the wet store.
- Health and Safety risk assessments.
- Checking objects for the Tuvalu and Tokelau community viewings.
- Discussion and planning of the Pasifika Gallery changes.

#### Outreach

- Consultation of mouldy diatom slides at Otago University.
- Discussion of conservation science talk at the Oamaru Library for the International Girl and Women in Science Day.

#### Regional Museums

- IPM textile cleaning workshop at Taieri Historical Society on 13 December 2024
- Conservator joined the Curator Māori on outreach to museums in Central Otago.

#### Remedial

- Silk sample frame glass conserved.
- Preparation of specimens for destructive sampling for both natural sciences and humanities.
- Continuation of wet whale bone treatment.

### EDUCATION AND OUTREACH

#### Holiday Club

The holiday club did not run over the summer school holiday period due to Basecamp being closed for remedial building works. The April holiday club will run for just seven days due to the Easter and Anzac Day public holidays falling within that school holiday period.

#### Sleepovers

Our pre-visit information has been updated, along with evening programmes. Bookings for this year so far are:

**Term 1:** 12 sleepovers from 10 schools

**Term 2:** 7 sleepovers from 4 schools

#### Education Outside the Classroom (EOTC)

The school holidays ran from 16<sup>th</sup> December 2024 to 27<sup>th</sup> January 2025. All recent programmes have continued to receive positive feedback. We received a higher number of Homeschooling groups during December and have several bookings for the rest of the year.

Programme workshop updates are currently underway including creating 3D printed models of collection items so that these can be handled by students, or inspected using virtual reality or the planetarium.

**Student visits by District**

December Total: 420	2 weeks	January	0 weeks School holidays
DCC	334	DCC	0
Canterbury	18	Canterbury	0
Waitaki	40	Waitaki	0
Auckland	28	West Coast	0

A table recording student number participation follows. Please note, these numbers include multiple programmes by the same class on the same visit, excluded from the Ministry's criteria for student counting, to be reported in Milestone Reports. This table does not include numbers from non-applicable institutions or adults.

Please note that Planetarium numbers for Education programmes are replicated in the Planetarium report.

Dec 24 & Jan 25	Y 0-3	Y 4-6	Y 7-8	Y 9-10	Y 11+	TOTAL
Total	65	56	138	166	11	436
Annual Target	1350	1650	1500	1050	450	6000
% of Annual Target	5%	3.4%	9.2%	16%	2.4%	7.3%
Adult Total	96					

**Pacific Engagement*****US Embassy grant – Cook Islands Science Expo 'Te Rangi Ātea'.***

Senior Science Engagement Coordinator Dr Marijn Kouwenhoven, Pasifika Engagement Co-ordinator Jonika Edgecombe and Front of House team member Emma Morris took the Tūhura Tuarangi – Aotearoa in Space showcase (created through an MBIE grant) to the Cook Islands for their science expo. The showcase fostered massive interaction and the portable planetarium drew a lot of intrigue across all ages.





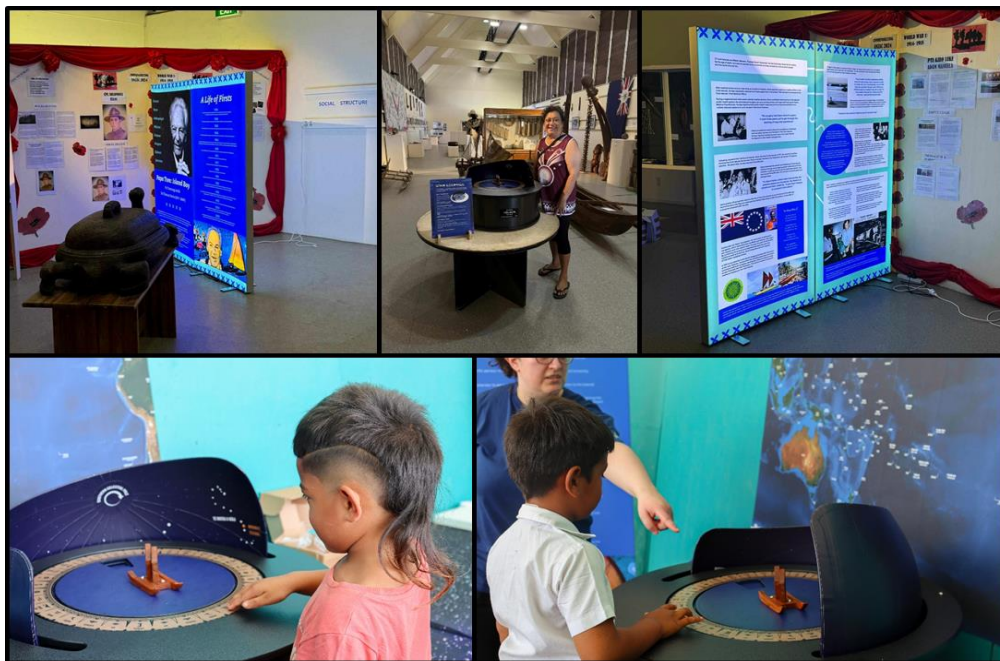
The project has been successful in engaging almost the entire island of Mangaia during the science expo (population: 450). 100 community members attended the screening of 'Good Night Oppy' and the NASA Astronaut, Kjell Lindgrens' video message, as well as about 300 children in Rarotonga who engaged with our Papa Tom display and viewed Kjells' Video too.



This project strengthened our relationship with the Cook Islands' Climate Change Office, and led to an invitation to return. It has also built trust between contributing organisations and the communities



involved, with positive feedback from those attending. The indigenous Innovation and Inspiration aspect was particularly impactful, directly inspiring youth and showcasing the attainability of STEM careers. Te ARA – Cook Islands Museum gratefully received donations of the Sir Thomas Davis and Celestial Navigation Interactives, which will allow continued inspiration long after our departure from the Island! These events and associated projects have increased STEM accessibility to these somewhat isolated island nations and have inspired communities to engage with STEM content and career aspirations. We hope to continue to foster these connections and impacts moving forward.



The US Embassy funding for this project also includes a trip to Niue in mid-2025, again to deliver Tūhura Tuarangi.

### ***Other Pacific Engagement***

The Pacific Engagement Outreach Team has been involved in planning for a major project at Tūhura Otago Museum, the Pacific Cultures Gallery refresh. They have also been integral to networking with the Pasifika community members to encourage participation in the Pasifika gallery community consultation day on 1<sup>st</sup> of February.

Other activities that the Pasifika team have been involved in include:

- Pacific Trust Otago in collaboration with University of Otago. The Pacific Division of Sciences have asked us to host 3 days of their holiday programme. They will be at Tūhura on the 21<sup>st</sup>, 22<sup>nd</sup> and 23<sup>rd</sup> of January (estimated numbers = 60).
- FAIVA O SU'A — Tatau Otago 2025. The live tattooing of traditional Samoan tattoos event planning is well underway. Recipients of the Malu and Pe'a are meeting in the HD Skinner Annex on 1<sup>st</sup> of March.

- The Kickstart programme at Otago is attending a collections/gallery tour on the 22<sup>nd</sup> Jan. Kickstart is a bridging course for Pacific students interested in Health Sciences.
- The Samoa Far from Frozen and Science of Medicines tour funded by MFAT is booked and will take place at the end of March.
- Meeting scheduled to explore hosting the Tāmanu programme. Tāmanu is a biomedical research programme for undergrad Pacific students that Cameron Young (a Pacific PhD and Medical student) developed in 2023 to expose more Pacific people to lab-based biomedical research. It has two main arms: (1) a four-week midwinter intensive programme held over the mid-year break, and (2) a summer scholars programme held over the summer. This year, Tāmanu has ten summer scholars who have developed science communication outputs (e.g., posters, videos, dance, workshops) and want to share this with the community. They are looking at hosting this at Tūhura!

#### Outreach carried out this period

Date	Region	Event	Direct Engagement
Monday, December 2, 2024	Otago	Silver Science - Alexandra	16
Thursday, December 5, 2024	Region	TKKM-O (Kura Visit)	15
Friday, December 6, 2024	Otago	Silver Science - Miller's Flat	28
Saturday, December 7, 2024	Otago	Science Show: Green Island Market Day	60
Thursday, December 12, 2024	Otago	Otago Civil Defence: Solar Tsunamis - Science of Space Weather presentation	20
Saturday, December 14, 2024	Region	Tokomairiro A&P Show, Milton	250
Sunday, January 19, 2025	Otago	Pop-up: Brighton Gala	400
Monday, January 20, 2025	Otago	Silver Science – Balclutha	9
Tuesday, January 21, 2025	Otago	Pacific Trust Holiday Programme	67
Wednesday, January 22, 2025	Otago	Pacific Trust Holiday Programme: Science round robin + Show	67
Thursday, January 23, 2025	Otago	Pacific Trust Holiday Programme: Tropical Rainforest, PGP & Science Centre	67
Saturday, January 25, 2025	Otago	Pop up - Taieri A&P Show	250
Monday, January 27, 2025	Clutha	Silver Science - Balclutha	20
		<b>TOTAL</b>	<b>1254</b>

### ***Brighton Gala Day***

On Sunday 19<sup>th</sup> January, Katie Nichols, Ashley Stewart, and Steve Ting delivered a host of science demonstrations and activities for Brighton's Gala Day. Both adults and children particularly enjoyed interacting with the wave tank display and seeing our demonstration on the thermal capacity of water.

### ***Tokomairiro A&P Show — Milton.***

This was another successful A&P show in Milton which felt like our best engagement of this season so far. We are continuing to involve the Front of House team in these opportunities where possible and this time Daniela Tapper accompanied Helen Gregory to this event. The Dragon's Breath demo with liquid nitrogen was a particularly big hit!

### **Externally Contracted Outreach:**

#### ***MBIE's Silver Science: Hands-On Science for the Young at Heart***

Katie Nichols led the delivery of four *Silver Science* workshops during this period:

- Alexandra 2<sup>nd</sup> December — Cryptography
- Miller's Flat 5<sup>th</sup> December — Solar Tsunamis
- Balclutha 20<sup>th</sup> January — DIY Hydrogen Fuel cells
- Balclutha 27<sup>th</sup> January — Solar Tsunamis

One of the highlights of this period was the workshops in Alexandra as this was the first opportunity to deliver a newly developed workshop on cryptography. The participants were very enthusiastic and greatly appreciated the opportunity to understand how ciphers and codes have been used in the past and how encryption protects our personal data. The workshops were well-received, including by one former lecturer in cryptography. Some of the comments from the group included:

"Didn't want it to finish. Could have been longer".

"Presentation very well delivered and explained in a conversational way. Rather impressive".



*Alexandra attendees learning about the Enigma Machine*



### ***MBIE's Tūhura Tuarangi — Completing the Mission***

During this period the team submitted the final report for the Tūhura Tuarangi showcase. Across 2024, the showcase toured 11 destinations throughout Aotearoa (from Invercargill to Kaikōura, and Wellington to Auckland) and exceeded participation targets by engaging 29,382 people. The core target audience for the showcase — school students (total: 1,270) — were specifically engaged across 59 class sessions.

MBIE's *Completing the Mission* funding extended the original Tūhura Tuarangi — *Aotearoa in Space* showcase's reach into many communities around Aotearoa and into the Pacific. In total, the showcase engaged over 130,000 people, including tens of thousands of school-aged rangatahi and their whānau.



*Day 1 of the Tūhura Tuarangi showcase, September 2022: Students from George Street Normal School are the first to explore the showcase*



*Day 800 of the Tūhura Tuarangi showcase: Students from Mangaia School are the final group to explore the showcase (December 2024)*

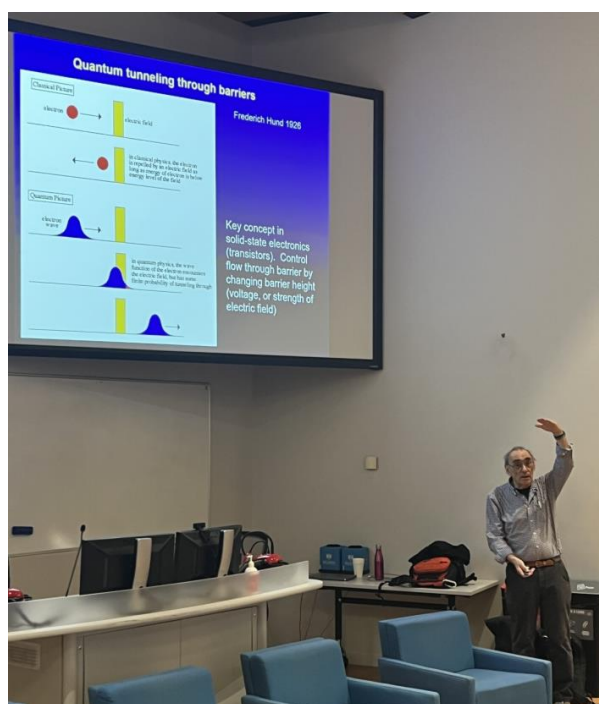
## Other Engagement & Outreach Activities

### *Te Whai Ao – Dodd-Walls Centre Partnership*

This period was distinguished by the successful application to UNESCO to host one of the seven funded global colloquia for the International Year of Quantum Science and Technology. This event will be hosted by the Dodd-Walls Centre partnership and will bring high profile international artists, whose work sits at the intersection between art and quantum science and technology, to Dunedin to craft a vision document for the next 5-10 years. The timing is also such that we hope to leverage their presence in New Zealand for other engagements that are currently being explored.

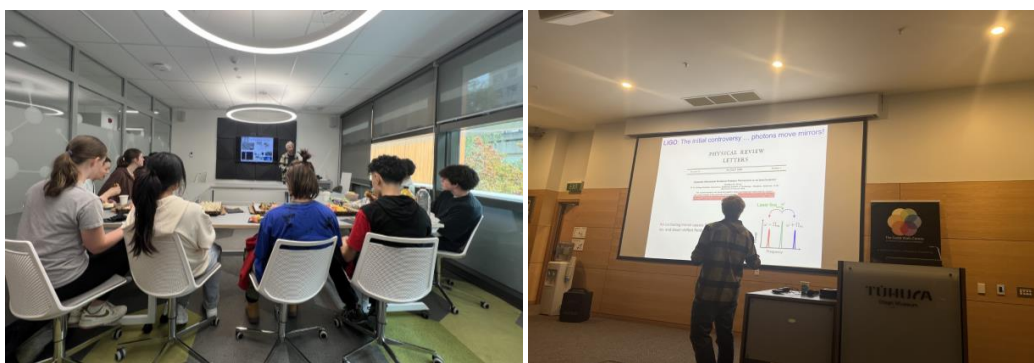
In addition to adapting the previous school-aged workshop on quantum cryptography from 2021 for the *Silver Science* programme (as described above) some other small engagements were undertaken.

For the Institute for Complex Adaptive Matter conference in Wellington, our Senior Science Engagement Coordinator was asked to help organize and chair a panel of national and international quantum physicists for a public event. This event was very well received both by the public and by other members of the conference who were very interested to learn more about Tūhura's involvement in public engagement with quantum physics.



*Professor Gordon Baym's talk, prior to the panel.*

The week following the conference offered an opportunity for the Dodd Walls Centre partnership to organize a lunchtime presentation to the 11 students attending MacDiarmid's Nanocamp from visiting professor Alejandro Fainstein, from the Balseiro Institute of Bariloche, Argentina, followed by a public talk at Tūhura that evening.



*Professor Fainstein's double-header – first to students (left), then to the public (right). The talk was incredibly well-received by both.*

In between this, plans are underway across the year for a number of new initiatives for the International Year of Quantum Science and Technology, as well as planning for our annual collaborations at ASB Polyfest, MOTAT STEM Fair, and the like. Sadly, LUMA, which in past years has been a highlight of the year with large engagement numbers, has been cancelled for this year. However, the Dodd Walls Centre partnership is in talks with the Christchurch City Council to attend Tīrama Mai, their Matariki Festival.

## EVENTS

### Public Events

December was a festive month for Tūhura, with nearly 3,000 visitors participating in a variety of public events and Christmas activities. Among the highlights were our *RELICS* LEGO -themed Christmas Makerspace and a series of sold-out LEGO Christmas decoration workshops, both of which were met with overwhelming enthusiasm from attendees. We also hosted free LEGO illustration workshops, and a talented group of LEGO builders showcased their impressive LEGO robotics in the Atrium.

For the fourth consecutive year, Tūhura proudly hosted the Heritage Christmas Light Bus Tours, which have now become a beloved tradition in the community. With visitors enquiring about the tours as early as October, over 1,000 people enjoyed the experience, and many of the buses reached full capacity across the four nights.

In addition, in the lead-up to Christmas we welcomed six of Dunedin's local choirs to perform on the weekends creating a festive and heartwarming atmosphere within the Museum.

Sadly, the events team had to say farewell to Event Coordinator Emily Kerr-Bell whose contributions over the past 12 months were invaluable. Her positive energy and dedication made a lasting impact, and she will be greatly missed.

In early January the team took some well-deserved leave as this is a traditionally quiet period for events. However, we still hosted the first of our LEGO Sensory Days. During these events the lighting and sound in the gallery were adjusted to create a more inclusive experience for neurodiverse visitors allowing everyone to enjoy the exhibition at their own pace. The *RELICS* LEGO Makerspace also remained popular, especially on rainy days, attracting many cruise ship visitors.

Looking ahead, Tūhura continues to plan exciting events and activities to engage and inspire the community in 2025.

<b>DECEMBER EVENTS 2024</b>			
<b>DATE</b>	<b>TITLE</b>	<b>ATTENDANCE</b>	<b>ENTRY</b>
18 - 22 December	Heritage Christmas Lights Tours	1054	PAID
13-23 December	Makerspace	1043	FREE
14-Dec	LEGO Xmas Decorations	55	PAID
18-Dec	It's A Wonderful Life	10	PAID
21-Dec	LEGO Xmas Decoration Workshop	55	PAID
22-Dec	LEGO Drawing Workshop	19	FREE
7-Dec	Christmas Choirs - Dunedin Rock Choir	60	FREE
8-Dec	Christmas Choirs - Star Singers	84	FREE
14-Dec	Christmas Choirs - Rhythmix	53	FREE
15-Dec	Christmas Choirs - Waitati Warblers	137	FREE
22-Dec	Christmas Choirs - Dunedin Harmony and Highland Harmony	132	FREE
14-Dec	How the Grinch Stole Christmas	10	PAID
21-Dec	The Santa Claus	14	PAID
22-Dec	Elf	23	PAID
15-Dec	The Polar Express	34	PAID
20-Dec	Cocktails and Chemistry	20	PAID
20-Dec	LEGO Robotics Workshops	120	FREE
	<b>TOTAL</b>	<b>2923</b>	
<b>JANUARY EVENTS 2025</b>			
<b>DATE</b>	<b>TITLE</b>	<b>ATTENDANCE</b>	<b>ENTRY</b>
21-Jan	Alex Feinstein – Dodds Wall Talk	14	FREE
17-26 Jan	RELICS LEGO Makerspace	365	FREE
16-Jan	LEGO Movie 2	70	PAID
7-Jan	LEGO Sensory Sessions	16	PAID
	<b>TOTAL</b>	<b>465</b>	

#### Private Events

After a busy series of conference events in November, the number of bookings for events in December was lower than expected. Only one Christmas function was held, likely reflecting the financial challenges faced by many businesses. Several regular clients informed us that they were opting for more intimate, in-house celebrations instead. The largest event in December was a five-day scientific conference early in the month. Our biggest Christmas event hosted 140 guests across the Atrium, Science Centre, and Tropical Forest, with strong attendance.

Due to most businesses being closed over the Christmas period, private events were limited in January. However, a notable highlight was a wedding reception held in the Atrium. We've seen a marked increase in inquiries and bookings for weddings and engagement functions at Tūhura.

Over December and January, 482 visitors attended private functions at Tūhura.

### Events Feedback

*"On behalf of the (... organization), I would like to extend a big thank you for everything during our conference. Your team were amazing to work with and this made the event run very smooth.*

*"We're very grateful and wanted to extend our thank you to you both!"*

*"Just a quick email to say thank you for everything you and the rest of the staff did for us at (our) conference a couple of weeks ago. .... you were just so helpful with giving us the space, resources and time to bring together a successful weekend."*

*"Thank you for your email and for making the process so easy. I really appreciate all your help in organising this—thank you for your hard work!"*



*Tūhura Team after decorating the Christmas Tree in the Atrium – ready for events!*





*Visitors enjoying Cocktails and Chemistry in December*

## VISITOR EXPERIENCE

### Retail:

- **Sales Performance:** December sales were on par with last year, while January showed a slight increase compared to the same period. Cruise ship visitors contributed to higher shop traffic in January.
- **Stock Update:** LEGO stock sold out, with remaining LEGO merchandise continuing to perform well.

### Science and Tropical Forest Department:

- **New Experiences:** A new 'Bug Hunt' trail was created for Bug Day in collaboration with the Otago Entomology Society. It runs from February 15th to early March to celebrate the 'Bug of the Year' competition.
- **Animal Updates:** We welcomed new fish into the tropical forest pond: 7 jewelled cichlids and 1 tropical oscar fish named Brutus, donated by local enthusiasts.
- **Exhibit Development:** A coral reef tank has been approved to replace the brine shrimp tank in the biozone space. It aims to educate visitors on climate change effects on marine ecosystems, with plans to introduce clownfish once the tank stabilizes.

- **Animal Highlights:**

- Our Goliath stick insects are nearing adulthood, with 2 females and 4 males now on display.
- Spyro, our young bearded dragon, has become a visitor favourite with his playful behaviour. He has grown to 30cm at just six months old.

**Visitor Experience Department:**

- **Show Attendance:** The First Flight Butterfly Release show welcomed 1,049 adults and 693 children during the December/January holiday period.
- **Tour Performance:** Tour numbers for December and January remained steady. Online and prepaid bookings increased, driven by summer tourism.
  - Treasures of the Museum Tour: 33 adults attended.
  - Spotlight Tour: 16 adults and 3 children attended.
  - Pre-booked Cruise Ship Tours: 813 visitors so far this season.
- **Trails:** 450 LEGO Gallery Quests were distributed for the *RELICS* LEGO exhibition. Additionally, 250 Tūhura Science Centre trails, 400 Forest trails, and 400 LEGO I-Spy trails were distributed during December and January.
- **Group Bookings:**
  - Hosted two pre-booked group tours from the Otago University Manaaki Scholarship students and the English Language Centre, marking their third consecutive year booking with us.
  - Hosted Hands-On Otago groups in the planetarium, science centre, and *RELICS* LEGO exhibition.
  - Delivered science communication sessions for Otago University's Advance School of Sciences Academy.

## EXHIBITIONS AND CREATIVE SERVICES

**Exhibitions and displays currently open:**

- *Director's Choice* Stairwell exhibition to commemorate 10 years of Ian Griffin's directorship, open until mid-September 2025.
- *Absolutely Agnes – A Hallenstein Family Legacy* is ongoing in People of the World.
- *The Kingdom – Animals in the Jewellery of Jane Dodd* opened 11 October 2024 and runs until 28 July 2025.
- *The Six Yard Sisterhood – Deconstructing the Sari in Aotearoa* by Rekha Shailaj runs from 1 November – 23 February 2025 in the Beautiful Science Gallery.
- *RELICS: A New World Rises* opened 30 November 2024 in Special Exhibitions Gallery and runs until 27 April 2025. Over 16,000 paid admissions so far which is tracking well.

**In Development:**

- *Kiingi Tuheitia Portraiture Awards* exhibition opens 20 March within Tāngata Whenua Gallery.
- *Heavenly Pop Hits: The Legacy of Martin Phillipps* display on Atrium 1 opens 28 February 2025.
- Assisting with the Pacific Cultures Gallery refresh.

- *2025 iD Emerging Designer Awards* Finalist Showcase opens in Beautiful Science Gallery 25 February.
- *Ad Parnassum — Purapurawhetū* an Arts Festival collaboration which also utilises the Planetarium, opening 4 April 2025.
- *26<sup>th</sup> Tūhura Photography Awards* will again be in Special Exhibitions Gallery in 2025, opening 29 June. Competition will launch 11 April.
- *Arca Arcade* 18 July – 28 September in Beautiful Science Gallery. This exhibition blends nostalgic technology with contemporary art under designer Preston McNeil's guidance. Wall-mounted, playable arcade machines are transformed into artistic installations adorned with te ao Māori influences and styles from prominent Aotearoa New Zealand artists. This collection honours the cultural significance of arcade gaming while offering a modern twist on arcade cabinet design.
- Stairwell display changeover – Natural Science team led project.
- *iNDx* art exhibition in Beautiful Science gallery, 4 October – 14 December.
- Planning summer exhibition for 2025/2026.
- Planning for exhibition early-mid 2026.
- *Tohu Whēnua, Tohu Ora*, the Rock Art collaboration with Canterbury Museum ongoing.

#### Creative Services:

- Designed the Annual Plan and Strategic Overview document.
- Design services for upcoming programmes and events, including collateral, marketing and supporting materials.
- Updated design of Education supporting documents.
- Contracting design work with the ORC on information sheets for Lizards, fungi, and a water quality report.
- Design work for Bug of the Year competition.
- Met with Singapore Science Centre about a potential exhibition.
- Updating signage in Tropical Forest.
- *XYZZY* has been nominated in the Best of Earth fulldome film competition. Winners announced 25 March. It is now signed up with two distribution companies, one in the US and one in Europe. And a number of enquiries for screenings have been received.

## MARKETING

The end of 2024 and the start of 2025 were busy and productive for the Marketing team. This period saw the highest number of international visitors for the year due to the increase in cruise ship visitors. Our major highlight was the launch of the *RELICS* LEGO exhibition, which has been a great success and a key driver of engagement.

#### Exhibitions

##### ***RELICS: A New World Rises Exhibition***

A tremendous effort went into promoting *RELICS*, our largest exhibition in years, with the aim of generating widespread buzz. The marketing approach was multifaceted, blending traditional advertising with creative strategies to capture attention:

- **Advertising:** We utilised digital marketing across Dunedin, from the Dunedin Airport to local malls, creating a city-wide presence. The Museum Shop was rebranded, and we collaborated with Precinct Café on LEGO-themed cupcakes, table talkers, and vinyl advertisements.



- **Outdoor & Public Space Promotions:** Key promotional items included a giant LEGO figure at the Museum entrance, reskinned Dunedin Welcome signs on State Highway One (both north and south), bus backs, corflutes, and pop-up exhibitions in Meridian, Wall Street, and Golden Centre malls.
- **Wayfinding & Internal Design:** We revamped Museum signage, including the lift displays and giant atrium banners, and updated the visitor experience to make navigation clearer and more engaging.
- **Collaborations & Media:** We teamed up with The Breeze Radio for a LEGO Christmas float at the Santa Parade, and our LEGO Build Competition gained national attention. We also worked with local artists to secure LEGO builds for the galleries, further engaging with the local LEGO community.
- **Press Coverage:** Media outreach was extensive, with coverage from local and national press, radio, and television. Stories ranged from the Dunedin Welcome signs to the exhibition builders' visit and our creative promotional strategies.

The exhibition's opening day was a huge success, and visitor awareness in the region is strong. The community is deeply engaged with the exhibition, with ongoing media presence keeping it top of mind.

### January School Campaign

In January, we targeted school groups with tailored promotions and class deals, tapping into the back-to-school momentum and encouraging school visits to the Museum.

### Christmas Events

#### *Holiday Campaigns*

December was packed with festive events, from Christmas light displays to the popular Cocktails and Chemistry sessions. The Marketing team worked diligently to sell tickets and fill event spaces.

#### *Online & In-Store Shop Campaigns:*

Social media, local papers, and radio were used to push pre-Christmas shopping both online and in-store. This included promoting unique items in the shop as well as seasonal specials to drive sales.

### Media & Public Relations

Thirty six media stories over this two-month period. Highlights were:

- **Spade-Toothed Whale Collaboration:** In collaboration with DOC and local iwi, we gained significant media coverage for the spade-toothed whale dissection, which resulted in local, national, and international press.
- **Bug of the Year Campaign:** Marketing heavily supported the velvet worm for the Bug of the Year campaign, which garnered local media attention.
- **XYZZY Nominations:** The XYZZY planetarium show was nominated for a major award, and we leveraged this achievement in our media efforts.

Date	Spread	Media	Subject	Link
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2 December 2024	Regional	ODT	Jane Dodd	<a href="https://www.odt.co.nz/lifestyle/magazine/baboons-blowflies-and-bubbles">https://www.odt.co.nz/lifestyle/magazine/baboons-blowflies-and-bubbles</a>
2 December 2024	National	DOC	Spade-toothed whale	<a href="https://www.doc.govt.nz/news/media-releases/2024-media-releases/rarest-whale-in-the-world-to-undergo-dissection/">https://www.doc.govt.nz/news/media-releases/2024-media-releases/rarest-whale-in-the-world-to-undergo-dissection/</a>
2 December 2024	Regional	ODT	Spade-toothed whale	<a href="https://www.odt.co.nz/news/dunedin/dissection-rare-whale-huge-opportunity">https://www.odt.co.nz/news/dunedin/dissection-rare-whale-huge-opportunity</a>
2 December 2024	National	STUFF NZ	Spade-toothed whale	<a href="#">‘Extraordinary’ dissection begins on rare whale found on NZ beach   Stuff</a>
2 December 2024	National	RNZ	Spade-toothed whale	<a href="https://www.rnz.co.nz/news/national/535473/dissection-of-rare-whale-begins-this-is-an-extraordinary-thing">https://www.rnz.co.nz/news/national/535473/dissection-of-rare-whale-begins-this-is-an-extraordinary-thing</a>
2 December 2024	National	1NEWS	Spade-toothed whale	<a href="#">Rarest whale in the world undergoes dissection in Dunedin</a>
2 December 2024	Regional	The Hits	Otago Museum Shop	<a href="#">WIN a Family pass to Otago Museum</a>
3 December 2024	Regional	ODT	Spade-toothed whale	<a href="https://www.odt.co.nz/news/dunedin/world-interest-dissection-rare-little-known-whale">https://www.odt.co.nz/news/dunedin/world-interest-dissection-rare-little-known-whale</a>
3 December 2024	National	NZ Herald	Spade-toothed whale	<a href="#">Scientists undertake world-first dissection of rare spade-toothed whale in Dunedin - NZ Herald</a>
3 December 2024	International	The Guardian	Spade-toothed whale	<a href="https://www.theguardian.com/world/2024/dec/03/spade-tooth-rare-whale-new-zealand-scientists-dissect">https://www.theguardian.com/world/2024/dec/03/spade-tooth-rare-whale-new-zealand-scientists-dissect</a>
3 December 2024	International	Fox Weather	Spade-toothed whale	<a href="https://www.foxweather.com/earth-space/spade-toothed-whale-new-zealand-study">https://www.foxweather.com/earth-space/spade-toothed-whale-new-zealand-study</a>
4 December 2024	International	Yahoo	Spade-toothed whale	<a href="#">World’s rarest whale to undergo study for first time in New Zealand</a>
4 December 2024	International	Oceanographic Magazine	Spade-toothed whale	<a href="#">World's rarest beaked whale undergoes dissection in scientific first - Oceanographic</a>
4 December 2024	International	National Indigenous Times	Spade-toothed whale	<a href="https://nit.com.au/04-12-2024/15219/worlds-rarest-whale-examined-in-maori-scientist-partnership">https://nit.com.au/04-12-2024/15219/worlds-rarest-whale-examined-in-maori-scientist-partnership</a>
7 December 2024	National	Scoop Culture	LEGO Comp	<a href="https://www.scoop.co.nz/stories/CU2412/S00066/tuhura-otago-museum-announces-winners-of-national-lego-build-competition.htm">https://www.scoop.co.nz/stories/CU2412/S00066/tuhura-otago-museum-announces-winners-of-national-lego-build-competition.htm</a>

8 December 2024	National	RNZ	Jane Dodd	<a href="#">Our uneasy place in the animal kingdom with Jane Dodd   RNZ</a>
10 December 2024	International	CNN	Spade-toothed whale	'A really stocky, powerful-looking little animal:' Scientists are gaining precious clues about the world's rarest whale   CNN
12 December 2024	Local	The Star	LEGO Comp	<a href="https://www.odt.co.nz/the-star/plastic-peaks">https://www.odt.co.nz/the-star/plastic-peaks</a>
13 December 2024	National	DOC	Spade-toothed whale	<a href="https://www.doc.govt.nz/news/media-releases/2024-media-releases/spade-toothed-whale-reveals-new-discoveries/">https://www.doc.govt.nz/news/media-releases/2024-media-releases/spade-toothed-whale-reveals-new-discoveries/</a>
13 December 2024	Regional	ODT	Spade-toothed whale	<a href="https://www.odt.co.nz/news/dunedin/what-dissection-rarest-whale-world-found">https://www.odt.co.nz/news/dunedin/what-dissection-rarest-whale-world-found</a>
13 December 2024	National	RNZ	Spade-toothed whale	<a href="#">Dissection of 'rarest whale in the world' leads to new discoveries about the species   RNZ News</a>
13 December 2024	National	1News	Spade-toothed whale	<a href="#">What scientists discovered when dissecting a rare spade-toothed whale</a>
13 December 2024	International	MSN	Spade-toothed whale	<a href="#">Dissection of 'rarest whale in the world' leads to new discoveries about the species</a>
13 December 2024	National	STUFF NZ	Meteor Shower	<a href="https://www.stuff.co.nz/nz-news/360520501/spectacular-geminids-meteor-shower-light-new-zealands-skies">https://www.stuff.co.nz/nz-news/360520501/spectacular-geminids-meteor-shower-light-new-zealands-skies</a>
17 December 2024	National	MSN	Spade-toothed whale	<a href="#">Rare spade-toothed whale autopsy unveils prehistoric hints</a>
17 December 2024	International	Oceanographic Magazine	Spade-toothed whale	<a href="#">Rare spade-toothed whale has nine stomachs and 'wisdom' teeth - Oceanographic</a>
10 January 2025	Regional	ODT	Bug of the Year	<a href="#">Museum campaigns for 'charming' velvet worm vote   Otago Daily Times Online News</a>
10 January 2025	National	RNZ	Road Trip	<a href="https://www.rnz.co.nz/national/programmes/summer-days/audio/2018970734/road-trip-ian-griffin">https://www.rnz.co.nz/national/programmes/summer-days/audio/2018970734/road-trip-ian-griffin</a>
13 January 2025	Regional	ODT	Magic Moments	<a href="#">Magic Moments: January 13   Otago Daily Times Online News</a>
14 January 2025	Regional	OAR	Bug Day	<a href="https://ondemand.accessmedia.nz/StationFolder/otago/NZOA64k-2025-01-13%20-%20OMS%20%20-%20Bug%20of%20the%20Year%20-%20Connal%20McLean.mp3">https://ondemand.accessmedia.nz/StationFolder/otago/NZOA64k-2025-01-13%20-%20OMS%20%20-%20Bug%20of%20the%20Year%20-%20Connal%20McLean.mp3</a>
16 January 2025	Regional	ODT	The Kingdom	<a href="#">Art seen: January 16   Otago Daily Times Online News</a>
16 January 2025	Regional	ODT	The Six Yards Sisterhood	<a href="#">Art seen: January 16   Otago Daily Times Online News</a>

20 January 2025	National	Scoop	XYZZY	<a href="https://www.scoop.co.nz/stories/CU2501/S00156/dunedins-tuhura-otago-museums-xyzzzy-nominated-for-prestigious-best-of-earth-awards.htm">https://www.scoop.co.nz/stories/CU2501/S00156/dunedins-tuhura-otago-museums-xyzzzy-nominated-for-prestigious-best-of-earth-awards.htm</a>
22 January 2025	Regional	ODT	XYZZY	<a href="https://www.odt.co.nz/news/dunedin/full-dome-film-getting-global-recognition">https://www.odt.co.nz/news/dunedin/full-dome-film-getting-global-recognition</a>
28 January 2025	National	RNZ	XYZZY	<a href="https://www.rnz.co.nz/national/programmes/afternoons/audio/2018972445/immersive-fulldome-show-xyzzzy-nominated-for-global-awards">https://www.rnz.co.nz/national/programmes/afternoons/audio/2018972445/immersive-fulldome-show-xyzzzy-nominated-for-global-awards</a>
31 January 2025	Regional	ODT	Pacific Cultures Gallery	<a href="https://www.odt.co.nz/news/dunedin/pacific-cultures-gallery-be-closed-refresh">https://www.odt.co.nz/news/dunedin/pacific-cultures-gallery-be-closed-refresh</a>

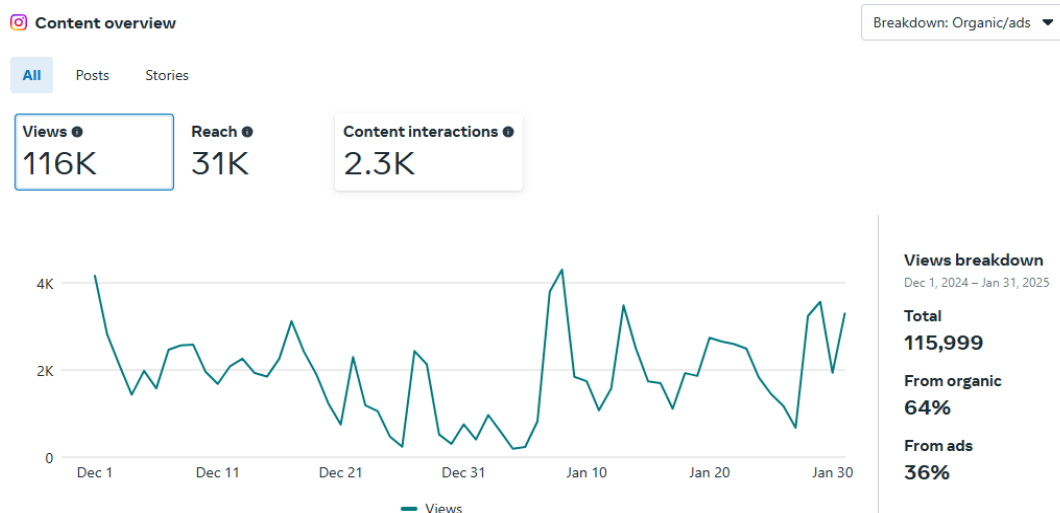
## Social Media Growth

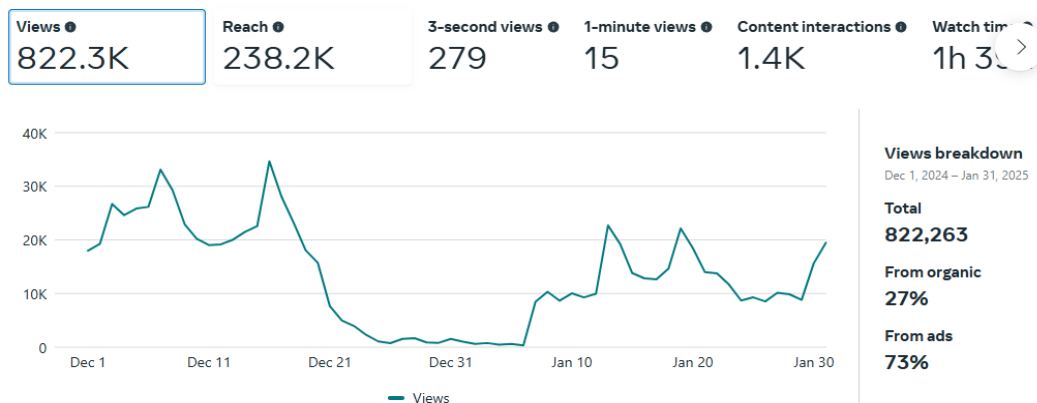
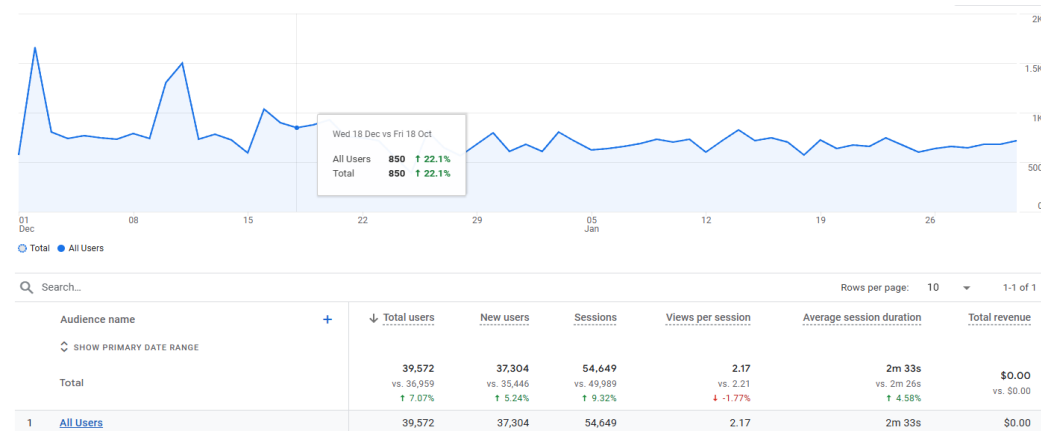
### Instagram Milestone

Tūhura's Instagram account reached 6,000 followers in December, making it Dunedin's most followed cultural institution. This growth reflects our increasing digital engagement and the popularity of our events and exhibitions.

Overall, the social media and website statistics for this period have been strong, driven by the summer break and the *RELICS* LEGO exhibition. The combination of high-profile events, strategic campaigns, and engaging content helped boost our online presence, ensuring a broader reach and higher interaction from both local and international audiences.

### Instagram:



**Facebook:****Website:****Internal Signage & Visitor Experience**

We focused on enhancing the internal visitor experience by:

- **Updating the Museum's Information Desk** to be more welcoming, with improved customer service features and better upselling opportunities.
- **Updating wayfinding signage** to make the Museum easier to navigate, making the overall experience here more user-friendly and aesthetically appealing.

**Conclusion**

The final months of 2024 and the beginning of 2025 were exceptionally successful for the Museum's marketing efforts. From the *RELICS* LEGO exhibition to various public events and media initiatives, the team delivered impactful results. The Museum's visibility and engagement across multiple channels have significantly increased, setting a strong foundation for the year ahead.

**FACILITIES, ASSETS AND TECHNOLOGY**

The Facilities team are working on or have completed the following projects:

- Asbestos removal from Dpad completed

- Replace second HVAC unit in storeroom
- Service boiler
- Yearly serving of HVAC
- Yearly serving of BMS
- Final plan for targeted seismic assessment of Ross and Fels building. Work to start week 17<sup>th</sup> Feb
- Start Pacific gallery upgrade.
- Clear spouting's on museum
- Replace lights at main door of museum inside and outside. (LED)

END OF REPORT

## **10 COMMUNITY BOARD MINUTES**

### **25.4.11 MINUTES OF THE TEVIOT VALLEY COMMUNITY BOARD MEETING HELD ON 5 FEBRUARY 2025**

**Doc ID: 2403109**

Report Author:	Sarah Reynolds, Governance Support Officer
Reviewed and authorised by:	Saskia Righarts, Group Manager - Business Support

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#### **Recommendations**

That the unconfirmed Minutes of the Teviot Valley Community Board Meeting held on 5 February 2025 be noted.

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#### **1. Attachments**

**Appendix 1 - Minutes of the Teviot Valley Community Board Meeting held on 5 February 2025**

**MINUTES OF A MEETING OF THE  
TEVIOT VALLEY COMMUNITY BOARD  
HELD IN THE ROXBURGH SERVICE CENTRE, 120 SCOTLAND STREET, ROXBURGH  
AND LIVE STREAMED VIA MICROSOFT TEAMS ON WEDNESDAY, 5 FEBRUARY 2025  
COMMENCING AT 10.02 AM**

**PRESENT:** Mr N Dalley (Chairperson), Mr M Jessop, Ms G Booth, Cr S Feinerman,  
Mr C Pannett

**IN ATTENDANCE:** D Rushbrook (Group Manager - Community Vision), D Scoones (Group  
Manager - Community Experience), G Bailey (Parks and Recreation  
Manager), P Fleet (Roading Manager), C Webster (Communications Officer),  
S Reynolds (Governance Support Officer)

**1 APOLOGIES**

There were no apologies.

**2 PUBLIC FORUM**

Graeme Rae – Mowing of Berms

Mr Rae reminded the board that he had asked for feedback following the December meeting with regards to the berms issue. He requested that the board put a regular column in the Teviot Bulletin to communicate matters that the board are discussing. He noted that there is a meeting of the ratepayers group on 12<sup>th</sup> February at the Ettrick Hall.

Mr Rae then responded to questions.

**3 CONFIRMATION OF MINUTES**

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**COMMITTEE RESOLUTION**

**Moved:** Dalley  
**Seconded:** Jessop

That the public minutes of the Teviot Valley Community Board Meeting held on 5 December 2024 be confirmed as a true and correct record.

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**CARRIED**

**4 DECLARATIONS OF INTEREST**

Members were reminded of their obligations in respect of declaring any interests. There were no further declarations of interest.

**5 REPORTS**

**25.1.2 MOWING OF INDIVIDUAL GRASS VERGE ROXBURGH**

To consider mowing the verge on the corner of Smith and Scotland Street Roxburgh.

It was noted that the original report presented to the December 2024 meeting, item 24.8.3 was left to lie on the table. However following the Council adoption of the Grass Verges Policy the process

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for residents to apply to have their verges mown is now outlined in the policy. Applications would be considered on a case-by-case basis according to criteria.

It was noted that the application would apply for the ratepayer for the property at the time and should there be a sale of the property, the agreement would cease.

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### COMMITTEE RESOLUTION

**Moved:** Dalley  
**Seconded:** Pannett

That the Teviot Valley Community Board

- A. Receives the report and accepts the level of significance.
- B. Declines mowing of the grass verge on the corner of Smith and Scotland Streets, Roxburgh.

**CARRIED** with Ms booth recording her vote against.

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### 25.1.3 REPRESENTATION ON EXTERNAL COMMITTEES

To consider replacing Russell Read on two external committees.

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### COMMITTEE RESOLUTION

**Moved:** Dalley  
**Seconded:** Feinerman

That the Teviot Valley Community Board

- A. Receives the report and accepts the level of significance.
- B. Appoints a Mr Pannett as a representative to the I and H McPhail Charitable Trust and the Tuapeka County Bursary Fund Committee.

**CARRIED**

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## 6 MAYOR'S REPORT

### 25.1.4 MAYOR'S REPORT

Her Worship the Mayor was not present at the meeting.

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## 7 CHAIR'S REPORT

### 25.1.5 CHAIR'S REPORT

The Chair gave an update on activities and issues since the last meeting.

- Had attended and chaired an informal workshop in the Roxburgh Hall on 17 December, with good attendance.
  - Attended the Council meeting in Cromwell and gave an update on the recent board matters.
-

- Had responded to more enquiries on berm mowing and on the potential divestment of Roxburgh pool Punawai Ora, along with many requests about what the rate increase percentage would be for Teviot ratepayers.

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## COMMITTEE RESOLUTION

**Moved:** Dalley  
**Seconded:** Jessop

That the report be received.

**CARRIED**

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## 8 MEMBERS' REPORTS

### 25.1.6 MEMBERS' REPORTS

Members gave an update on activities and issues since the last meeting.

Mr Pannett reported on the following:

- Attended Teviot Irrigation AGM.
- Attended the public workshop held in December, that served to enhance public understanding around the reasoning for the potential divestment of the pool but also noted widespread concern around the cost of this process.
- Attended the Millers Flat coffee club, noted the unrest in the community about the Millers Flat hall being considered for divestment, and discussion around the proposed green waste facility.
- Noted that the public perception of the Long-term Plan consultation is that internal council decisions had been made rather than it being a topic for discussion and consultation.

Cr Feinerman reported on the following:

- Met with Cath Kelly at Grovers Hill cycle tracks, to discuss the creation of some biking ramps and jumps. Had been liaising with Ben from Sports Central to help start off this work. Parents and children are now involved and Sports Central are keen to set up a junior committee to help continue the formation of tracks in this area.
- Attended a Teviot Prospects meeting.
- Gave an update on December and January Council meetings and workshops, noted the inclusion of the Teviot Valley in the Alcohol Ban that is currently up for consultation.
- Attended a workshop with DIA representatives to discuss the Regional Deals concept and gave an update on this process.
- Will be attending the all of government Rural & Provincial sector conference.

Ms Booth reported on the following:

- Noted that she was an apology to the recent rest home and Medical Services meeting.

Mr Jessop reported on the following:

- Attended a Teviot Water Company AGM.
  - Attended the public workshop held in the Roxburgh Hall in December.
  - Teviot Prospects meetings, work has been completed on the living wall, and they are in planning looking at the seats and planter boxes and some murals on the wall need refreshing.
-

- Attended a Millers Flat coffee morning.
- Attended the Millers Flat committee meeting regarding the potential divestment of the hall, and the main issue is the liability around earthquake strengthening. And noted the issues with land ownership on the reserve.
- Noted similar discussions with the Millers Flat bowling club.
- Had received communication from ratepayers on the potential rates increase.
- Had been working on the Millers Flat Sports and Recreation Hub project, noting they had received letters of support from members of the community, and had already received some external funding. It was noted that there would be no cost to the council, as they have indication from external funders they will support the project. The committee would maintain much of the area so that would reduce council maintenance costs. The total budget of \$600,000 was all hoped to be received from external funders and local support. There would be another community meeting and it had been advertised in the Teviot Bulletin and once the final design plans are finalised they will go back to the community to seek feedback.

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#### COMMITTEE RESOLUTION

**Moved:** Dalley

**Seconded:** Booth

That the report be received.

**CARRIED**

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### 9 STATUS REPORTS

#### 25.1.7 FEBRUARY 2025 GOVERNANCE REPORT

To report on items of general interest, receive minutes and updates from key organisations and consider the status report updates.

An update was given on the new Millers Flat Bridge Posting. The impact on local businesses and the increased volume of traffic on the Roxburgh East road was discussed, with this posting adding 40-minutes to journey time for trucks.

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#### COMMITTEE RESOLUTION

**Moved:** Dalley

**Seconded:** Jessop

That the report be received.

**CARRIED**

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Note: Mr Dalley left the meeting at 11.26 am and did not return. Mr Jessop assumed the Chair.

#### 25.1.8 UPDATE - PLAY STRATEGY

An update was given via video presentation.

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**10          DATE OF THE NEXT MEETING**

The date of the next scheduled meeting is 20 March 2025. It was noted that the venue was to be confirmed.

**The meeting closed at 11.47 am**

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CHAIR     /     /

## 11 COMMITTEE MINUTES

### 25.4.12 MINUTES OF THE AUDIT AND RISK COMMITTEE MEETING HELD ON 14 FEBRUARY 2025

**Doc ID: 2407696**

Report Author:	Wayne McEnteer, Governance Manager
Reviewed and authorised by:	Saskia Righarts, Group Manager - Business Support

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#### Recommendations

That the unconfirmed Minutes of the Audit and Risk Committee Meeting held on 14 February 2025 be noted.

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#### 1. Attachments

**Appendix 1 - Minutes of the Audit and Risk Committee Meeting held on 14 February 2025**

**MINUTES OF CENTRAL OTAGO DISTRICT COUNCIL  
AUDIT AND RISK COMMITTEE  
HELD IN NGĀ HAU E WHĀ, WILLIAM FRASER BUILDING, 1 DUNORLING STREET,  
ALEXANDRA  
AND LIVE STREAMED VIA MICROSOFT TEAMS ON FRIDAY, 14 FEBRUARY 2025 AT 9.35  
AM**

**PRESENT:** Mr B Robertson (Chair), Her Worship the Mayor T Alley, Cr S Browne,  
Cr S Feinerman, Cr T Paterson

**IN ATTENDANCE:** P Kelly (Chief Executive Officer), L Fleck (General Manager - People and Culture), J Muir (Group Manager - Three Waters), S Righarts (Group Manager - Business Support), D Rushbrook (Group Manager - Community Vision), D Scoones (Group Manager - Community Experience), A Crosbie (Senior Strategy Advisor), A Lines (Risk and Procurement Manager), A Jansen (Health, Safety and Wellbeing Advisor), W McEnteer (Governance Manager)

**1 APOLOGIES**

There were no apologies.

**2 PUBLIC FORUM**

There was no public forum.

**3 CONFIRMATION OF MINUTES**

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**COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Alley

That the public minutes of the Audit and Risk Committee Meeting held on 28 January 2025 be confirmed as a true and correct record.

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**CARRIED**

**4 DECLARATIONS OF INTEREST**

Members were reminded of their obligations in respect of declaring any interests. There were no further declarations of interest.

**5 REPORTS**

**25.2.2 POLICY AND STRATEGY REGISTER**

To consider the updated Policy and Strategy Register.

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**COMMITTEE RESOLUTION**

**Moved:** Browne  
**Seconded:** Alley

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That the report be received.

**CARRIED**  
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### **25.2.3 MANDATORY DOCUMENTS REGISTER**

To consider the Mandatory Documents Register.

After discussion it was agreed that staff would return to the next meeting to discuss Section 17a reports.

#### **COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Paterson

That the report be received.

**CARRIED**  
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### **25.2.4 HEALTH, SAFETY AND WELLBEING REPORT**

To provide the Audit & Risk Committee with an update on the health, safety and wellbeing performance of the organisation.

After discussion it was agreed that staff would confirm that the council was compliant under Section 44 of the Health and Safety at Work Act at the next Audit and Risk meeting.

#### **COMMITTEE RESOLUTION**

**Moved:** Browne  
**Seconded:** Alley

That the report be received.

**CARRIED**  
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Note: Her Worship the Mayor left the meeting at 10.21 am and returned at 10.22 am.

### **25.2.5 TREASURY REPORT**

To consider the quarterly treasury report..

#### **COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Paterson

That the report be received.

**CARRIED**  
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**25.2.6 AUDIT NZ AND INTERNAL AUDIT UPDATE**

To consider an update on the status of the external and internal audit programme and any outstanding actions for completed external audits.

It was noted that council had not received the management letter from last year from Audit New Zealand.

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**COMMITTEE RESOLUTION**

**Moved:** Alley  
**Seconded:** Paterson

That the report be received.

**CARRIED**

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Note: With the permission of meeting, items 25.2.8 and 25.2.9 were moved forward.

**6 CHAIR'S REPORT****25.2.8 CHAIR'S REPORT**

To consider the Chair's report.

The Chair noted the pressure and expectations of the community to keep rates down and the pressure of rates in the future.

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**COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Alley

That the report be received.

**CARRIED**

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**7 MEMBERS' REPORTS****25.2.9 MEMBERS' REPORTS**

To consider the members' reports.

Her Worship the Mayor noted that the Risk Register was now coming to Council meetings as a standalone report for Councillors consideration.

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**COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Alley

That the reports be received.

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**CARRIED**

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Note: David Seath and Sarah Pass from Deloitte joined the meeting for item 25.2.7

## **25.2.7 DRAFT THREE-YEAR INTERNAL AUDIT PROGRAMME**

To consider the draft three-year internal audit programme.

Mr Seath and Ms Pass gave an overview of the audit programme before responding to questions.

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### **COMMITTEE RESOLUTION**

**Moved:** Paterson  
**Seconded:** Feinerman

That the Audit and Risk Committee

- A. Receives the report and accepts the level of significance.
- B. Note the proposed draft three-year internal audit programme.
- C. Recommends to Council to approve the draft three-year internal audit programme.

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**CARRIED**

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## **8 STATUS REPORTS**

### **25.2.10 FEBRUARY 2025 GOVERNANCE REPORT**

To report on items of general interest and the current status report updates.

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### **COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Alley

That the report be received.

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**CARRIED**

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## **9 DATE OF THE NEXT MEETING**

The date of the next scheduled meeting is 6 June 2025.

## **10 RESOLUTION TO EXCLUDE THE PUBLIC**

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### **COMMITTEE RESOLUTION**

**Moved:** Robertson  
**Seconded:** Alley

That the public be excluded from the following parts of the proceedings of this meeting.

The general subject matter of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48 of

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the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Plain English Reason
<b>Confidential Minutes of Ordinary Committee Meeting</b>	<p>s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of deceased natural persons</p> <p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(f)(ii) - the withholding of the information is necessary to maintain the effective conduct of public affairs through the protection of Council members, officers, employees, and persons from improper pressure or harassment</p> <p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p> <p>s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage</p>	<p>To protect a person's privacy</p> <p>Commercial sensitivity</p> <p>To protect people from harassment</p> <p>Legal professional privilege</p> <p>To prevent use of the information for improper gain or advantage</p>
<b>25.2.11 - Bad Debts and Abandoned Land</b>	<p>s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of deceased natural persons</p> <p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(f)(ii) - the withholding of the information is necessary to maintain the effective conduct of public affairs through the protection of Council members, officers, employees, and persons</p>	<p>To protect a person's privacy</p> <p>Commercial sensitivity</p> <p>To protect people from harassment</p>

	from improper pressure or harassment  s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage	To prevent use of the information for improper gain or advantage
<b>25.2.12 - Cybersecurity, Information and Records Management and Privacy Plans for 2022-2025 Implementation Update</b>	s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage	To prevent use of the information for improper gain or advantage
<b>25.2.13 - Risk Management Update</b>	s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage	To prevent use of the information for improper gain or advantage
<b>25.2.14 - Litigation Register</b>	s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege	Legal professional privilege

**CARRIED**

The public were excluded at 10.52 am and the meeting closed at 12.01 pm.

**12            DATE OF THE NEXT MEETING**

The date of the next scheduled meeting is 1 April 2025.

### 13 RESOLUTION TO EXCLUDE THE PUBLIC

#### Recommendations

That the public be excluded from the following parts of the proceedings of this meeting.

The general subject matter of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under section 48 of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Plain English Reason
<b>Confidential Minutes of Ordinary Council Meeting</b>	<p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p> <p>s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p> <p>s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage</p>	<p>Commercial sensitivity</p> <p>Legal professional privilege</p> <p>To enable commercial activities</p> <p>To enable commercial or industrial negotiations</p> <p>To prevent use of the information for improper gain or advantage</p>
<b>25.4.13 - Manuherekia Valleys Community Hub Construction Tender Award</b>	s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities	To enable commercial activities
<b>25.4.14 - Fitch Credit Rating</b>	s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the	Commercial sensitivity

	commercial position of the person who supplied or who is the subject of the information	
<b>25.4.15 - Risk Register Update</b>	s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage	To prevent use of the information for improper gain or advantage
<b>25.4.16 - March 2025 Confidential Governance Report</b>	<p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p> <p>s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities</p> <p>s7(2)(i) - the withholding of the information is necessary to enable Council to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)</p>	<p>Legal professional privilege</p> <p>To enable commercial activities</p> <p>To enable commercial or industrial negotiations</p>
<b>25.4.17 - Confidential Minutes of the Audit and Risk Committee Meeting held on 14 February 2025</b>	<p>s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of deceased natural persons</p> <p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information</p> <p>s7(2)(f)(ii) - the withholding of the information is necessary to maintain the effective conduct of public affairs through the protection of Council members, officers, employees, and persons from improper pressure or harassment</p> <p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p> <p>s7(2)(j) - the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage</p>	<p>To protect a person's privacy</p> <p>Commercial sensitivity</p> <p>To protect people from harassment</p> <p>Legal professional privilege</p> <p>To prevent use of the information for improper gain or advantage</p>

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