



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.

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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

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

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

RESOLUTION

Moved: Duncan
Seconded: Feinerman

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.

CARRIED

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.

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.

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.

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

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.

RESOLUTION

Moved: McKinlay
Seconded: McPherson

That the report be received for information.

CARRIED

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.

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.

RESOLUTION

Moved: Paterson
Seconded: Browne

That the report be received.

CARRIED

Attachments

1 Flyer for the Play Challenge tabled at the meeting

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.

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

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.

RESOLUTION

Moved: Laws

Seconded: Browne

That the report be received.

CARRIED

25.3.12 CAPEX REPORT ON CROMWELL MEMORIAL HALL

To provide capex updates on the Cromwell Memorial Hall Project.

RESOLUTION

Moved: Duncan

Seconded: Claridge

That the report be received.

CARRIED

25.3.13 FINANCIAL REPORT FOR THE PERIOD ENDING 31 DECEMBER 2024

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

RESOLUTION

Moved: McKinlay

Seconded: Browne

That the report be received.

CARRIED

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.

RESOLUTION

Moved: McPherson

Seconded: Feinerman

That the Council

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

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

CARRIED

8 MAYOR'S REPORT

25.3.14 MAYOR'S REPORT

RESOLUTION

Moved: Gillespie
Seconded: Cooney

That the Council receives the report.

CARRIED

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.

RESOLUTION

Moved: Gillespie
Seconded: Browne

That the report be received.

CARRIED

10 COMMUNITY BOARD MINUTES

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

RESOLUTION

Moved: Feinerman
Seconded: Browne

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

CARRIED

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:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Plain English Reason
Confidential Minutes of Ordinary Council Meeting	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>
<p>25.3.19 - Award of Three Waters Reticulation Operations Contract</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)(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>

25.3.20 - Award of Three Waters Facilities Operations Contract	<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>
25.3.21 - Improving Digital Connectivity in Central Otago	<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>
25.3.22 - Risk Register Update	<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 prevent use of the information for improper gain or advantage</p>
25.3.23 - February 2025 Confidential Governance Report	<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>
25.3.24 - Confidential Minutes of the Cromwell Community	<p>s7(2)(b)(ii) - the withholding of the information is necessary to protect information where the making available of the</p>	<p>Commercial sensitivity</p>

Board Meeting held on 10 February 2025	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

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 [↓](#)

Name	Member's Declared Interests	Spouse/Partner's Declared Interests	Council Appointments
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) Woing 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	<p>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)</p>	<p>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) Manuherekia 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)</p>	<p>Omakau Recreation Reserve Committee Ophir Welfare Association Committee Central Otago Health Incorporated</p>
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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
Cromwell/Bannockburn¹	2049	8055	Lakes and natural ponds with dilution ration >50 <i>or</i> River with dilution ratio >250 (high)	Yes <i>or</i> Yes
Alexandra/Clyde	2038	6,016	River with dilution ratio >250 (high)	No
Ranfurly	2050	700	River or stream with dilution ratio <10 (very low)	Yes
Roxburgh	2045	665	Infiltration basins <i>or</i> <i>River with dilution ratio >250 (high)</i>	No
Omakau	2027	261	River with dilution ratio >250 (high)	No
Naseby²	2051	158	Infiltration basins River or stream with dilution ratio <10 (very low)	No
Lake Roxburgh Village	2029	81	Land, assessed against River with high dilution ratio >250	Yes

¹ 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”.

² Naseby has infiltration basins which are not covered under the proposed standard

³ 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

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

Significance, Consultation and Engagement (internal and external)	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



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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 korerero@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: korerero.taumataarowai.govt.nz/regulatory/wastewater-standards

Please direct any questions you may have in relation to the submission process to: korerero@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.

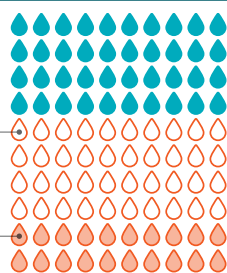
A What is the rationale for change?

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 reconsenting 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

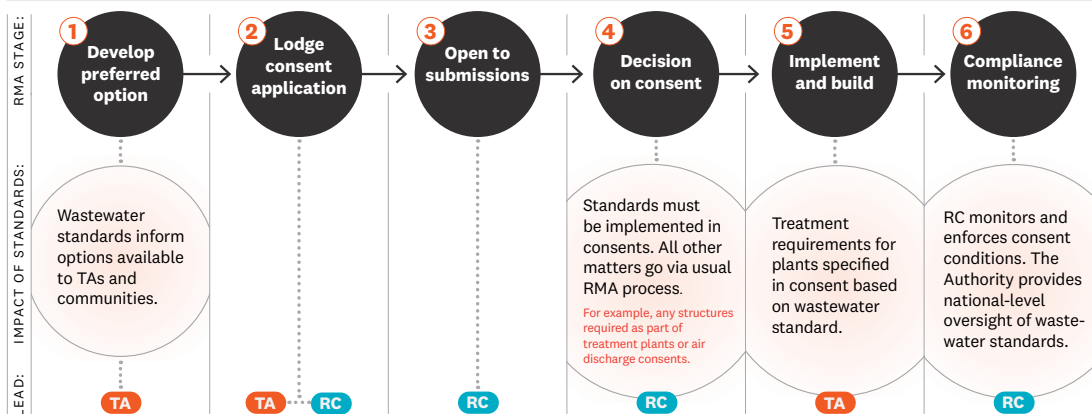
C How will territorial authorities (TAs) and regional councils (RCs) use the standards?

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:

- Public and environmental health
- Cost and time efficiencies
- Community aspirations

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.¹ 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.

¹ 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—

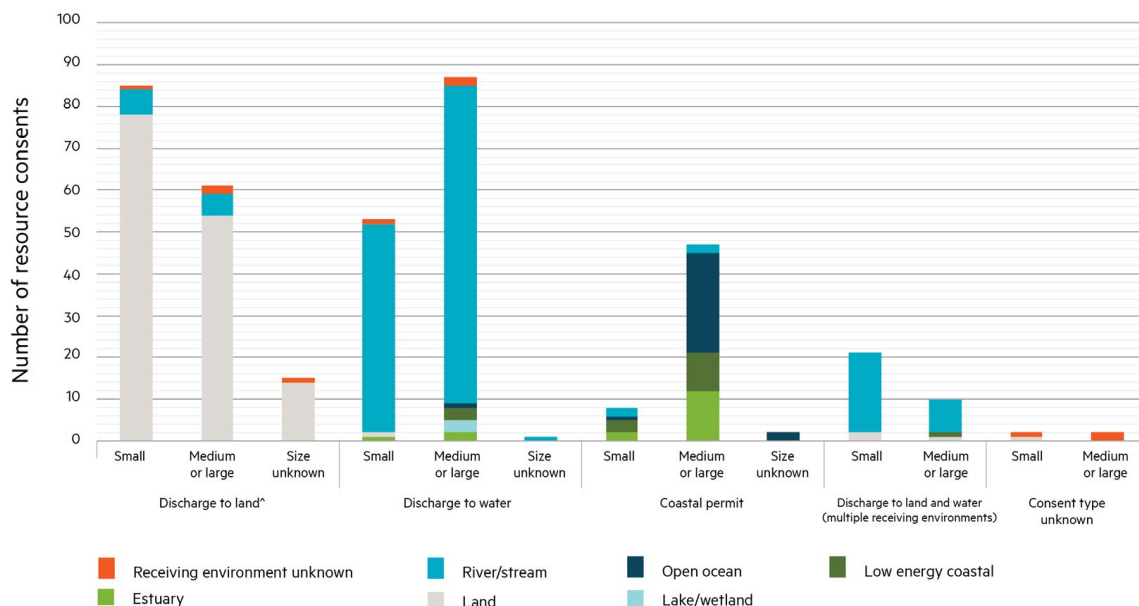
- (a) are used to collect, store, transmit through reticulation, treat, or discharge wastewater; and
- (b) are operated by, for, or on behalf of one of the following:
 - (i) a local authority, council-controlled organisation, or subsidiary of a council-controlled organisation;
 - (ii) a department;
 - (iii) 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 plants²

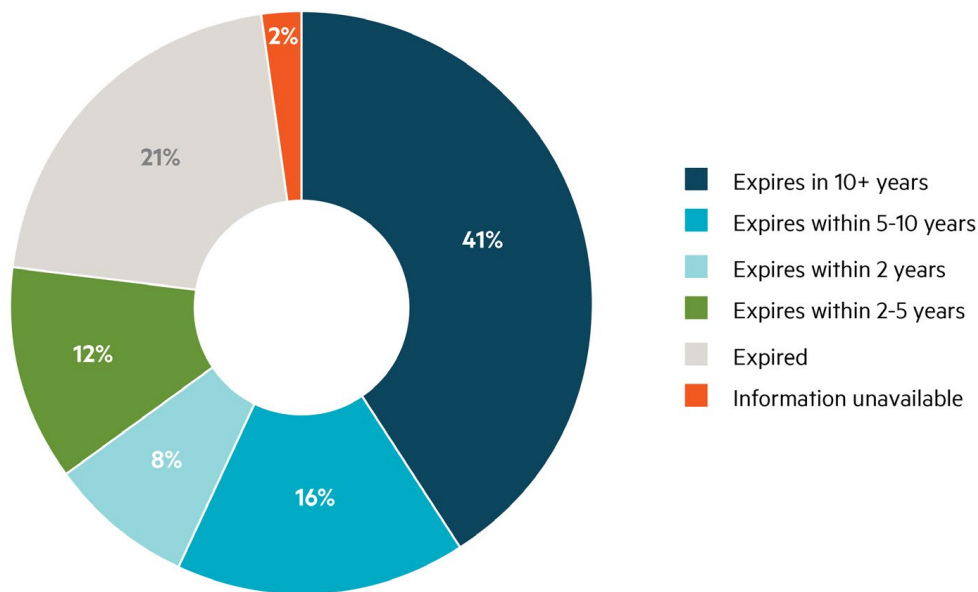
- There are 334 publicly owned wastewater treatment plants across New Zealand, which are owned and/or operated by councils, their council-controlled organisations, or by Crown agencies like the Department of Conservation and the New Zealand Defence Force.
- All 67 local councils operate one or more wastewater 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.³

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

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

³ 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.

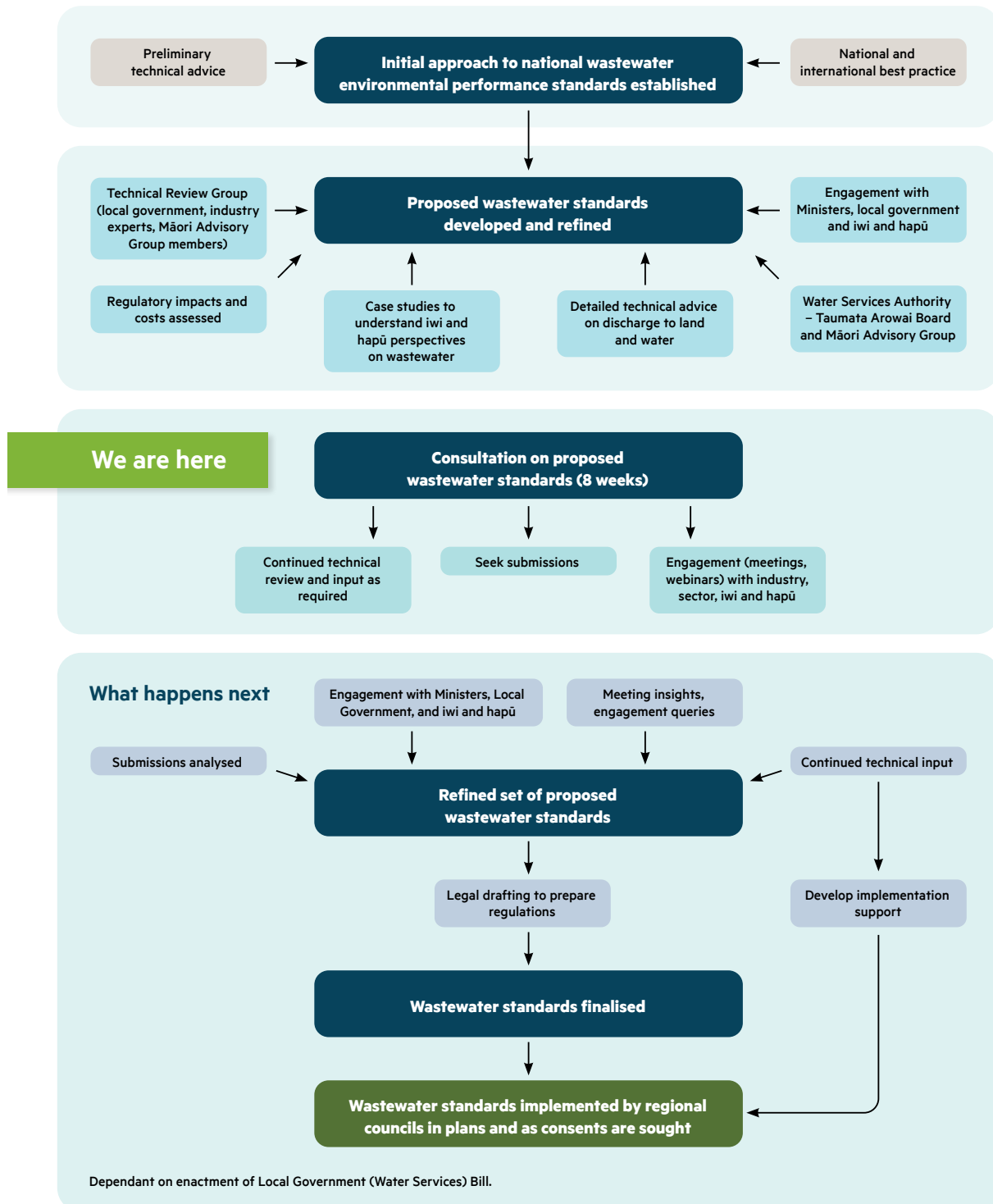
In many jurisdictions there is a population (or population equivalent) or flow (volume) component for setting standards, dependent on discharge type. While there are different approaches to setting, implementing and enforcing standards, there is widespread use of central parameters.

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 Affairs⁴
- 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.

⁴ 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.

⁵ 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)

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 communities⁵
- 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

- Quantitative Microbial Risk Assessments (QRMA), 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 (m³/day)

Flow: the average of the lowest 7 days average flow across a year (m³/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. ⁶
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.

⁶ 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
<p>Carbonaceous Biochemical Oxygen Demand (CBOD₅) Rationale: cBOD₅ can indicate the effectiveness of wastewater treatment processes. High levels of cBOD₅ can deplete dissolved oxygen and harm aquatic life. Statistic: Annual median</p>	15 mg/L	10 mg/L	15 mg/L	20 mg/L	20 mg/L	50 mg/L	Not applicable
<p>Total Suspended Solids (TSS) Rationale: 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. Statistic: Annual median</p>	15 mg/L	10 mg/L	15 mg/L	30 mg/L	25 mg/L	50 mg/L	Not applicable
<p>Nutrients (Total Nitrogen and Total Phosphorous) Rationale: 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.</p>	10 mgN/L	5 mgN/L	10 mgN/L	35 mgN/L	10 mgN/L	10 mgN/L	Not applicable
<p>Total Nitrogen – Statistic: Annual median</p>							
<p>Total Phosphorus – Statistic: Annual median</p>	3 mgP/L	1 mgP/L	3 mgP/L	10 mgP/L	10 mgP/L	10 mgP/L	Not applicable
<p>Ammoniacal-nitrogen (ammonia) Rationale: Ammonia can deplete oxygen levels in water, resulting in reduced biodiversity and declining fish populations. Statistic: Annual 90%ile</p>	3 mgN/L	1 mgN/L	3 mgN/L	25 mgN/L	15 mgN/L	20 mgN/L	50 mgN/L
<p>E. coli Rationale: As with enterococci, <i>E. coli</i> indicates the presence of pathogens and faecal pollution in freshwater. Statistic: Annual 90%ile</p>	6,500 cfu/100mL	1,300 cfu/100mL	6,500 cfu/100mL	32,500 cfu/100mL	Not applicable	Not applicable	Not applicable
<p>Enterococci Rationale: 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. Statistic: Annual 90%ile</p>	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 cBOD₅ load entering the treatment plant.

- If an existing plant receives a mean annual influent cBOD₅ 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 cBOD₅ 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 cBOD₅ 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 cBOD₅ rather than cBOD₅ 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.

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:

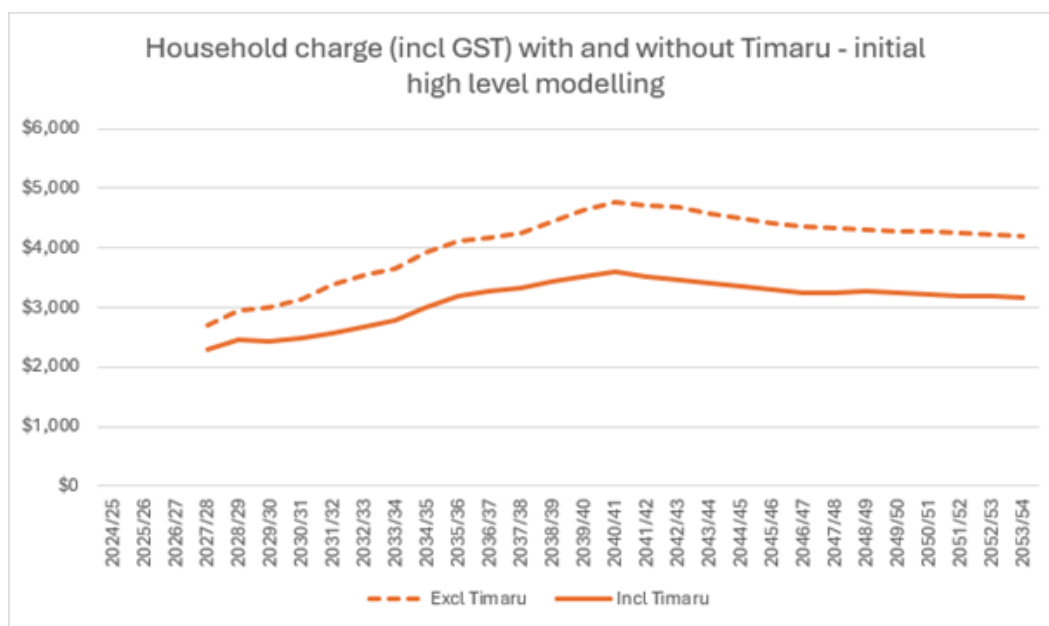
- Crown facilitators, who may work with Councils to assist, advise, or amend draft WSDPs and;
- Crown water services specialists, who may prepare, direct, or adopt a WSDP in accordance with their notice of appointment.

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

<p>Local Government Act 2002 Purpose Provisions</p>	<p>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.</p>
<p>Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.</p>	<p>The requirements of LWDW requires the Group of Councils to revisit their respective Long-Term Plans and associated supporting strategies (including Financial & 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>

	<p>Impacts of the selected options will be further defined and put forward for community feedback through the planned consultation in May 2025.</p>								
<p>Considerations as to sustainability, the environment and climate change impacts</p>	<p>Changes are administrative in nature. Climate Change impacts would be assessed as part of any change to service provision</p>								
<p>Risks Analysis</p>	<table border="1"> <thead> <tr> <th data-bbox="740 465 1062 517">Risk</th> <th data-bbox="1062 465 1385 517">Impacts</th> </tr> </thead> <tbody> <tr> <td data-bbox="740 517 1062 763"> <p>Individual Councils do not approve or progressing with a Joint CCO approach.</p> </td> <td data-bbox="1062 517 1385 763"> <ul style="list-style-type: none"> • Group may become unviable • Individual Councils may not be able to complete a compliant WSDP • Risk of DIA intervention with associated loss of decision-making control </td> </tr> <tr> <td data-bbox="740 763 1062 920"> <p>The Group of Councils is not fully compliant with new legislative requirements – within the required timeframes</p> </td> <td data-bbox="1062 763 1385 920"> <ul style="list-style-type: none"> • Reputation risk for Councils • Cost and time to rectify • Potential DIA or Regulator Intervention </td> </tr> <tr> <td data-bbox="740 920 1062 1093"> <p>One or more Councils may not approve new entrants to the Group.</p> </td> <td data-bbox="1062 920 1385 1093"> <ul style="list-style-type: none"> • Consensus view may not be recognized. </td> </tr> </tbody> </table>	Risk	Impacts	<p>Individual Councils do not approve or progressing with a Joint CCO approach.</p>	<ul style="list-style-type: none"> • Group may become unviable • Individual Councils may not be able to complete a compliant WSDP • Risk of DIA intervention with associated loss of decision-making control 	<p>The Group of Councils is not fully compliant with new legislative requirements – within the required timeframes</p>	<ul style="list-style-type: none"> • Reputation risk for Councils • Cost and time to rectify • Potential DIA or Regulator Intervention 	<p>One or more Councils may not approve new entrants to the Group.</p>	<ul style="list-style-type: none"> • Consensus view may not be recognized.
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<p>One or more Councils may not approve new entrants to the Group.</p>	<ul style="list-style-type: none"> • Consensus view may not be recognized. 								
<p>Significance, Consultation and Engagement (internal and external)</p>	<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 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 Council’s 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:

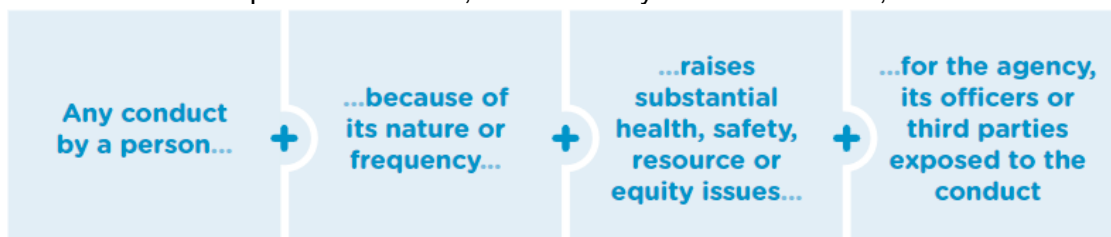


Figure: Queensland Ombudsman ‘Managing unreasonable complainant conduct.’

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

Local Government Act 2002 Purpose Provisions	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.
Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.	Consistent with other Council plans and policies. Complemented by the Complaints Policy and our Customer Experience workstreams.
Considerations as to sustainability, the environment and climate change impacts	No environmental implications.
Risks Analysis	

	Policy deals with an area of known risk.
Significance, Consultation and Engagement (internal and external)	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 [↓](#)

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. OptionsOption 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

Local Government Act 2002 Purpose Provisions	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.
Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.	Yes.
Considerations as to sustainability, the environment and climate change impacts	There are no impacts upon sustainability, the environment, or climate change as a result of this decision.
Risks Analysis	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.
Significance, Consultation and Engagement (internal and external)	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 [↓](#)

25.4.7 2024/25 ORGANISATIONAL BUSINESS PLAN: SECOND QUARTER RESULTS

Doc ID: 2397885

Report Author:	Christina Martin, Project Manager - Organisational
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.

Recommendations

That the report be received.

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 [↓](#)

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' 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

Local Government Act 2002 Purpose Provisions	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.
Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.	Council has previously used random order as the method by which names are placed on voting papers.
Considerations as to sustainability, the environment and climate change impacts	There are no considerations to be made as a result of this decision.
Risks Analysis	There are no risks associated with this decision.
Significance, Consultation and Engagement (internal and external)	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.

Recommendations

That the Council receives the report.

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 [↓](#)

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

Recommendations

That the unconfirmed Minutes of the Teviot Valley Community Board Meeting held on 5 February 2025 be noted.

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 12th February at the Ettrick Hall.

Mr Rae then responded to questions.

3 CONFIRMATION OF MINUTES

----- 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.

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

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.

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.

25.1.3 REPRESENTATION ON EXTERNAL COMMITTEES

To consider replacing Russell Read on two external committees.

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

6 MAYOR'S REPORT

25.1.4 MAYOR'S REPORT

Her Worship the Mayor was not present at the meeting.

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.
-

COMMITTEE RESOLUTION

Moved: Dalley
Seconded: Jessop

That the report be received.

CARRIED

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 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.

COMMITTEE RESOLUTION

Moved: Dalley
Seconded: Booth

That the report be received.

CARRIED

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.

COMMITTEE RESOLUTION

Moved: Dalley
Seconded: Jessop

That the report be received.

CARRIED

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.

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

.....
CHAIR / /

Unconfirmed

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

Recommendations

That the unconfirmed Minutes of the Audit and Risk Committee Meeting held on 14 February 2025 be noted.

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

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.

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.

COMMITTEE RESOLUTION

Moved: Browne
Seconded: Alley

That the report be received.

CARRIED

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

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

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

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.

COMMITTEE RESOLUTION

Moved: Alley
Seconded: Paterson

That the report be received.

CARRIED

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.

COMMITTEE RESOLUTION

Moved: Robertson
Seconded: Alley

That the report be received.

CARRIED

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.

COMMITTEE RESOLUTION

Moved: Robertson
Seconded: Alley

That the reports be received.

CARRIED

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.

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.

CARRIED

8 STATUS REPORTS

25.2.10 FEBRUARY 2025 GOVERNANCE REPORT

To report on items of general interest and the current status report updates.

COMMITTEE RESOLUTION

Moved: Robertson

Seconded: Alley

That the report be received.

CARRIED

9 DATE OF THE NEXT MEETING

The date of the next scheduled meeting is 6 June 2025.

10 RESOLUTION TO EXCLUDE THE PUBLIC

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

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
<p>Confidential Minutes of Ordinary Committee Meeting</p>	<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>
<p>25.2.11 - Bad Debts and Abandoned Land</p>	<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>

	<p>from improper pressure or harassment</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 prevent use of the information for improper gain or advantage</p>
<p>25.2.12 - Cybersecurity, Information and Records Management and Privacy Plans for 2022-2025 Implementation Update</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 prevent use of the information for improper gain or advantage</p>
<p>25.2.13 - Risk Management Update</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 prevent use of the information for improper gain or advantage</p>
<p>25.2.14 - Litigation Register</p>	<p>s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege</p>	<p>Legal professional privilege</p>

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
Confidential Minutes of Ordinary Council Meeting	<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>
25.4.13 - Manuherekia Valleys Community Hub Construction Tender Award	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
25.4.14 - Fitch Credit Rating	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	
25.4.15 - Risk Register Update	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
25.4.16 - March 2025 Confidential Governance Report	s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege s7(2)(h) - the withholding of the information is necessary to enable Council to carry out, without prejudice or disadvantage, commercial activities 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)	Legal professional privilege To enable commercial activities To enable commercial or industrial negotiations
25.4.17 - Confidential Minutes of the Audit and Risk Committee Meeting held on 14 February 2025	s7(2)(a) - the withholding of the information is necessary to protect the privacy of natural persons, including that of deceased natural persons 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 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 s7(2)(g) - the withholding of the information is necessary to maintain legal professional privilege 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 protect a person's privacy Commercial sensitivity To protect people from harassment Legal professional privilege To prevent use of the information for improper gain or advantage

