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**From:** Kelly Langton <klangton@fedfarm.org.nz>  
**Sent:** Thursday, 16 May 2024 7:31 pm  
**To:** haveyoursay  
**Cc:** 'Chris Irons'; Keith Holmes  
**Subject:** Waitomo District Council LTP Submission - Federated Farmers  
**Attachments:** 2024 LTP Submission Waitomo.pdf

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Good evening

Please find attached the submission from Federated Farmers on the Waitomo District Council's Long Term Plan.

Please note we wish to be heard in support of our submission.


Kind regards

Kelly



**Kelly Langton**

North Island Policy Manager

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# SUBMISSION

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To: Waitomo District Council  
[haveyoursay@waitomo.govt.nz](mailto:haveyoursay@waitomo.govt.nz)

Submission on: **Draft Long Term Plan 2024-34**

Date: 16 May 2024

Submission by: Chris Irons  
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**SUBMISSION TO WAITOMO DISTRICT COUNCIL  
LONG TERM PLAN CONSULATION DOCUMENT 2024-2034**

**1. INTRODUCTION**

- 1.1 Waikato Federated Farmers (WFF) welcomes the opportunity to submit to Waitomo District Council (WDC) on its *Long Term Plan Consultation Document 2024-2034*.
- 1.2 WFF submits on Annual Plans (**APs**) and Long-term Plans (**LTPs**) throughout New Zealand and make constructive proposals whenever the opportunity is provided.
- 1.3 WFF also submit on central government policies that affect local government revenue and spending, with the aim of ensuring that local government has the appropriate resources to carry out their functions.
- 1.4 WFF base our arguments on the considerable cost of rates to farm businesses, in terms of the value and relative accessibility of farmers to ratepayer funded services, the rates levels on farms compared to other residents and businesses, and the failure of property value to reflect the incomes of farmers and their relative ability to pay.
- 1.5 WFF feedback represents the views of 122 farming members and rate payers from the Waitomo District. We gently remind WDC of this so that our members' views, expressed here, are weighed appropriately.
- 1.6 We acknowledge any submissions from individual members of Federated Farmers.
- 1.7 Federated Farmers is focused on the transparency of rate setting, rates equity and both the overall and relative cost of local government on rural ratepayers.
- 1.8 WFF is conscious that there may be significant 'consultation fatigue' out in the community, following the 18 months' worth of significant central government proposals.
- 1.9 Our members do not want their busy silence to be misconstrued as disinterest in the proposed changes. Given the challenging regulatory and economic environment we are currently in, we acknowledge this may result in a low response rate to the consultation process.
- 1.10 WFF requests the opportunity to discuss this submission with the Council during the hearing process.

**2. SUMMARY OF RECOMMENDATIONS**

- **That WDC introduces an appropriate targeted or differential roading rate for forestry without delay.**
- **That the targeted or differential roading rate is proportionate to the costs associated with maintaining and upgrading roads impacted by forestry operations.**

- **FFNZ recommends that WDC fully utilise the UAGC mechanism at 30% of the total rates income, to provide equity between ratepayers.**
- **FFNZ recommends that WDC actively promotes the rates rebates scheme and encourages ratepayers to apply.**
- **That the Council work with individual communities and hall committees to determine whether option 1, 2 or 3 is appropriate for each rural hall.**

### **3.0 DISTRICT ROADING RATE**

- 3.1 Federated Farmers commends the Council for its proposal to introduce a targeted or differential roading rate for forestry.
- 3.2 Federated Farmers has long advocated for the forestry sector to contribute more equitably towards maintaining, upgrading and repairing roads affected by forestry activities.
- 3.3 Roading is by far the Council's largest expense and damage from forestry a significant contributor to road quality degradation.
- 3.4 It is unfortunate that the costs from roading degradation caused by forestry activities have been borne for so long by ratepayers at large. It is anathema to our members that, without the differential, a reduction in road maintenance for all roads will occur as funds are directed towards repairing roads damaged by forestry activities. It is therefore imperative that the Council implements the roading differential immediately.
- 3.5 Recommendation: That WDC introduces an appropriate targeted or differential roading rate for forestry without delay.**
- 3.6 Recommendation: That the targeted or differential roading rate is proportionate to the costs associated with maintaining and upgrading roads impacted by forestry operations.**

### **4.0 RATES STRUCTURE**

- 4.1 Federated Farmers supports the Council simplifying its rating structure and adding transparency. However, in using this approach, the Council must fully utilise the UAGC mechanism at 30% of the total rates income, to provide equity for all ratepayers.
- 4.2 Low UAGC percentages shift a large, often unsustainable, portion of rates onto rural properties. The majority of Council expenditure benefits the whole district, this should be reflected in the base level of rates contributed by all ratepayers.

- 4.3 FFNZ does not accept the simplistic assumption that a property's value has a correlation to income or ability to pay. Central government has better information through the income tax system and it is best placed to respond through its social support mechanisms. The Government's Rates Rebate Scheme is targeted specifically to provide rates relief to low income ratepayers. We would support council to promote this scheme and actively encourage ratepayers to apply.
- 4.4 **Recommendation: FFNZ recommends that WDC fully utilise the UAGC mechanism at 30% of the total rates income, to provide equity between ratepayers.**
- 4.5 **Recommendation: FFNZ recommends that WDC actively promotes the rates rebates scheme and encourages ratepayers to apply.**
- 5.0 **RURAL HALLS**
- 5.1 Federated Farmers recognises that rural halls can be of great importance to local communities, but some may be expensive to maintain and underutilised.
- 5.2 Federated Farmers recommends that that the Council works with individual communities to determine the appropriate action for each hall.
- 5.3 **Recommendation: that the Council work with individual communities and hall committees to determine whether option 1, 2 or 3 is appropriate for each rural hall.**

Federated Farmers thanks Waitomo Council for considering our submission.

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Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.



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

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

This submission is representative of member views and reflect the fact that local government rating and spending policies impact on our member's daily lives as farmers and members of local communities.