

# Submission: 9 Year Plan 2025-2034

*Provided in response to a request for submissions, not to be used for any other purpose without consent.*

**Thank you for the opportunity to comment.**

This submission deals with some issues. That does not mean endorsement of any matters that have not been addressed.

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Abbreviation	Meaning
DCA	Dog Control Act 1996
LGA	Local Government Act 2002

**All legislative references are to the DCA unless specified otherwise**

## 1.0 Preliminary Statement

Given Councillor's abdication of their role this submission makes no effort to deal with the full range of problems being imposed on this city for the next nine years. However Councillors would be wise to question their belief their role is impotent given s 41 of the Local Government Act. That also provides a reminder of the role of the electorate:

(3) A governing body of a local authority is responsible and democratically accountable for the decision-making of the local authority.

## 2.0 General

**Overview:** Every consultation submitters complain about the difficult consultation materials. They continue to be misleading and are even more than usually impenetrable.

### Misleading information about rates increases

**2.1.** Council has lauded itself for limiting rates increases for the first three years to 10.5%, 10.2% and 10.1%, with an average of 6.2% for the remaining years<sup>1</sup>. Drilling down through the plethora of shambolic materials finds the actual increase buried in documents with deliberately unintuitive names like "How it works": The real limits are 12% for years 1-3, 8% in year 4, 7% for

<sup>1</sup> Multiple statements. For example, p. 9 of the Consultation document, and "At a Glance"  
<https://www.dunedin.govt.nz/council/annual-and-long-term-plans/9-year-plan-2025-2034>

years 5-6 and 6% for years 7-9<sup>2</sup>: The claims do not reflect the actual intentions.

**2.2.** However that leaves aside the failure to emphasise the entire Plan becomes irrelevant if the mode of delivery of water services changes. As even the Auditor noted:

**Uncertainty over water service delivery**

*“The Council’s nine-year plan has been prepared with three waters services included, to reflect its preferred option. **If the Council’s preferred option is not adopted, the content of the final nine-year plan will look significantly different.**”*

**2.3.** In short, the public has been given no information about the increases actually intended, and has no way of deducing them for themselves. While the public record shows Councillors prefer to make decisions without considering financial implications, it is unjustifiable to force that level of financial *un*-intelligence on rate-.

## Targeting the most vulnerable

**2.4.** Speeches in council meetings make it undeniable Councillors profess concern for those on lower incomes. The insincerity of that virtue-signalling is evident in the sample rates increases<sup>3</sup> which confirm the *highest* percentage increase is borne by properties of the *lowest value*.

**2.5.** Last year this disproportionality was claimed to result from the standard fee for the new waste disposal service weighting percentages against lower value housing. This year there is no attempt to provide an excuse: Councillors are *punching down*.

## Meaninglessness

**2.6.** The use of padding to inflate the documents has significantly increased this year. A stand-out is first paragraph of the *Financial Landscape* in the Financial Strategy:

When the last 10 year plan 2021-31 was prepared, the COVID-19 pandemic had created some unique financial challenges that the 10 year plan had to deal with. Since that time, the financial landscape has changed, and the city is now facing different financial challenges. In the intervening four years, national economy has been subject to high inflation and increasing costs that have impacted the DCC’s finances. At the same time, changes to central government environment have meant there have been different challenges that Councils across the country have to deal with to carry out local government functions.

**2.7.** The subsequent document makes no attempt to justify these descriptive statements and hyperbole by providing concrete examples or explaining how that impacts planning: It is just faff.

**2.8.** Worse, using Government recommended tools to measure readability<sup>4</sup>, that earns a *Gunning Fog Index* of 17.26 a *SMOG* educational level of 16.56 and *Flesh Reading Ease* of 38.69: That means even faff is written so it is only understandable on first reading by a University graduate. That is significantly higher than the expected reading age of 12 years. While a significant improvement on the recently consulted Reserves Policy which required a PhD, it is

<sup>2</sup> P1. Financial Strategy 2025-34.

<sup>3</sup> <https://www.dunedin.govt.nz/council/annual-and-long-term-plans/9-year-plan-2025-2034/our-finances>

<sup>4</sup> Digital Government, Readability testing tools

<https://www.digital.govt.nz/standards-and-guidance/design-and-ux/content-design-guidance/content-design-tools-and-resources/readability-testing-tools>

unjustifiable to deliberately write documents to lock out those of lesser ability.

**2.9.** That compounds the other obstructive techniques such as the shambolic organisation of the documents, fragmentation, lack of bookmarks, use of images for text, inaccessible .pdfs used to make this documentation as impenetrable as possible.

**2.10.** Using bad authoring and organisation to prevent easy access and understanding, and substituting padding for actual information is unjustifiable and fails the LGA requirements.

## Dark Tetrad

**2.11.** The implications of the dog abuse video have already been detailed so are not reproduced. Events since that was uncovered leave no doubt they remain a primary driver of Council affairs.

Label	Simplified/generalised accepted characteristics
Narcissism	Grandiose, arrogant, absence of empathy, no regard for others, vengeful
Machiavellianism	Manipulation and exploitation of others, absence of morality
Psychopathy	Anti-social behaviour (such as continual law-breaking), deceit, absence of positive emotional awareness, callous, remorseless
Sadism	Seeking to cause harm or psychological and physical suffering, controlling, deceitful, use of menace, intimidation, humiliation, degradation and disproportionate reactions to dominate

## 3.0 Dog Control Revenue

**Overview:** Dog fees and charges are subject to the usual irregularities and failure to justify increases. As previous analysis has been ignored time has not been wasted providing it again. However the irregularities are so obvious Councillors cannot pretend ignorance.

### Inconsistency with the Policy 2024

**3.1.** By the time the proposed fees and charges take effect the Dog Policy and Bylaw 2024 will be in force. Policy 4.2 specifies the registration fees <sup>5</sup>.

In considering dog registration fees, the Council will, in accordance with the Act:

- set a standard dog registration fee
- set a fee for Responsible Dog Owners that is less than the standard dog registration fee
- provide a discount for spayed/neutered dogs that is less than the standard dog registration fee
- set a fee for dangerous dogs that is 50% higher than the standard dog registration fee
- not set a fee for Disability Assist Dogs, and
- charge a penalty for the late registration of dogs i.e. an additional 50% of the registration fee.

**3.2.** The draft registration fees are exactly the same as previous years. That means Councillors policy decision to cease utilising s 37(1)(2) to set lower fees for working dogs has been ignored by at least:

<sup>5</sup> [https://www.dunedin.govt.nz/\\_data/assets/pdf\\_file/0010/1088317/Dog-Control-Policy-2024.pdf](https://www.dunedin.govt.nz/_data/assets/pdf_file/0010/1088317/Dog-Control-Policy-2024.pdf)

- Disregarding the decision to cease providing lower fees for working dogs;
- Disregarding the decision to cease setting fees for *Special Aid Dogs* which have never existed, and finally set them for *Disability Assist Dogs* which do<sup>6</sup>.

**3.3.** This is also another instance of Councillors disregarding s 80 of the LGA which specifies that when a decision is inconsistent with a policy Councillors must clearly identify:

- The inconsistency; and
- the reasons for the inconsistency; and
- any intention to amend the policy to accommodate the decision<sup>7</sup>.

**3.4.** History indicates Councillors will defend withholding that information by claiming setting fees inconsistent with the DCA *and* the Policy is not significant. That reflects on Councillors.

### Failing to justify increasing fees

**3.5.** Councillors have been repeatedly reminded of the legal requirement to justify increasing dog fees and charges, and that they must only recover reasonable costs that may lawfully be charged to dog owners. That includes information that a percentage increase is insufficient.

**3.6.** Councillors have responded by ceasing to make any attempt to justify increases. The only references to increases this year are<sup>8</sup>:

22 Fees and charges for Animal Services, Building Services, Environmental Health and Resource Consents have in the majority increased by 4%-7% to reflect increased costs.

...

15 Total external revenue is \$15.930 million. This is an increase of \$954k from the 2024/25 year. The increase comprises:

- Animal Services \$29k increase, in line with fee increases.

**3.7.** That is legally inadequate, and the second very obviously incorrect.

**3.8.** The failure to provide relevant information naturally prevents a completely accurate calculation, but using 2024 dog numbers and the registration fees alone, a \$29,000 increase in revenue would be achieved if registration fees *alone* increased by \$1.56 per dog. The actual \$2-\$4 increase will very obviously produce significantly more: Councillors are collecting over \$120,000 or \$92,000 *more* additional revenue than claimed:

Dog Fee Category	Fee (\$)	\$ Increase	Affected dogs (Based on estimates provided by Council)	Estimated revenue increase
Non-working	115 → 123	8	12,000	\$96,000
Working dog (1st Dog)	56 → 60	4	Information withheld, estimated 1000 @ 500/500	\$2,000
Working dog (2nd+ dog)	29 → 31	2		\$1,000
Responsible Owner	64 → 68	4		\$22,000
<b>Estimated Total</b>			18,500	<b>\$121,000</b>

<sup>6</sup>DCA, s 2 definition of **working dog** <https://www.legislation.govt.nz/act/public/1996/0013/latest/DLM374415.html>

<sup>7</sup> <https://www.legislation.govt.nz/act/public/2002/0084/latest/DLM172324.html>

<sup>8</sup> REGULATORY SERVICES - DRAFT OPERATING BUDGET 9 YEAR PLAN 2025-34

## Failing to disclose the impact of removing Select Owner

**3.9.** However even that large amount is dwarfed when taking into consideration the other undisclosed increases to dog revenue. The largest contributor results from using the 2024 Policy to silently remove the Select Owner scheme from 5 May 2025. The replacement scheme has different criteria and the old scheme was not *grand-parented*. As Councillors would have been fully aware, and were notified using submissions, that stripped the existing Select Owner discount from current holders. As it has been removed for failing to meet the new criteria, they are prevented from reapplying so Council benefits in increased fees for at least two years.

**3.10.** The introduction of the new scheme was also timed to prevent other owners applying for the new discount. That means that for 2025-26 *no dog owners* will be eligible for a discount. That increases the *additional amounts* collected in *registration fees alone* to **over \$400,000**:

Dog Fee Category	Fee (\$)	\$ Increase	Affected dogs (Based on estimates provided by Council)	Estimated revenue increase
Non-working	115 → 123	8	12,000	\$96,000
Working dog (1st Dog)	56 → 60	4	Information withheld, estimated 1000 @ 500/500	\$2,000
Working dog (2nd+ dog)	29 → 31	2		\$1,000
Responsible Owner	64 → 123	59	5,500	\$324,500
<b>Estimated Total</b>			<b>18,500</b>	<b>\$423,000</b>

**3.11.** Every year dog owners have provided a detailed analysis of financial irregularities that result in large amounts of money simply disappearing. This year Councillors have outdone themselves by actively proposing an additional amount as a distractor. That does not hide the fact that \$423,000 is not \$29,000, and Councillors have made no effort to identify the beneficiary of the hidden \$331,000 difference.

**3.12.** Instead of requiring accurate financial accounting and close scrutiny to ensure compliance with s 9 of the DCA<sup>9</sup>, this triennium Councillors have increased the obviousness of irregularities. That makes Councillors failures wilful blindness, if not proactive complicity.

## 4.0 Dog Control Expenditure

**Overview:** Expenditure continues to be subject to the usual failure to separate dog revenue and expenditure to confirm s 9 of the DCA has been complied with. For the above reasons time has not been wasted providing an analysis of all expenditure issues either.

### Unclear staff numbers

**4.1.** The most recent statement on dog control staff numbers is 6 August 2024 when Councillors accepted the whole *Animal services* team comprises “a Manager, Team Leader, and six FTE Animal Services Officers” and is supported by the “Compliance Solutions Administration Team”<sup>10</sup>.

<sup>9</sup> <https://www.legislation.govt.nz/act/public/1996/0013/latest/DLM374493.html>

<sup>10</sup> Item 7, Attachment A, at para [2]

**4.2.** That varied from all previous information which had consistently stated the number of administrators was 3FTE. There is no reason to contemplate the number had reduced, and hiding the number is not an adequate response to dog owner's questioning the need for a disproportionate number of managers and administrators. Particularly when the number of FTE dog control officers had been reduced to four, *including* the officer who only performed the educational training for schools and commercial enterprises.

**4.3.** However a significant issue lies in contracting out the provision of after-hours services to Armourguard. Those services cannot legally be performed by officers who are not warranted under the Dog Control Act. It is also impossible for one person to perform the hours required, especially Friday evening to Monday morning. That means at least two of the six officers will need to be Armourguard employees, and Council has confirmed they have been warranted<sup>11</sup>.

**4.4.** That is consistent with previous information the number of FTE officers employed to work during ordinary working hours has been reduced from six to four.

**4.5.** Past dog fee increases have been justified by needing to pay for the Armourguard contract which was provided an *improved* after-hours service. It is now officially admitted to have only been an on-call only service since commencement in July 2023<sup>12</sup>. That is confirmed by regular sightings of dog control officers employed by Council patrolling popular dog walking spots during the weekend. That means dog owners are being charged so Armourguard can be paid for a full dog control service it is not providing, while the reduced number of Council employed staff are still working across the full seven days to cover the deficiency.

**4.6.** It should be alarming this arrangement was made at the same time Council disregarded procurement procedures to arrange to pay public money to a sponsor of a staff private club.

**4.7.** Staffing issues are compounded by the manager being confirmed by Council as on extended leave, therefore not performing work. Councillors change of staff to *fit the new organisational profile* means new-hires have no previous experience working with animals, or regulatory functions, and the new Team Leader's inexperience prevents her being warranted as a Dog Control Officer and Councils records confirm she does not perform any field work.

**4.8.** That means dog owners are funding two layers of management who are not contributing to fieldwork, Armourguard who is no longer providing it, while less existing officers are required to perform it. The Officers themselves lack the knowledge to perform the role, and experienced staff able to provide mentoring have been removed. That has already resulted an officer entering a property alone, without ascertaining aggressive dogs whereabouts, and being attacked: This is not safe or consistent with good employer obligations. Nor is it financially prudent.

### Inadequate capex

**4.9.** Councillors cannot plausibly consider it is possible to maintain and upgrade dog parks and stock pounds on a budget of \$5,000 *every second financial year*<sup>13</sup>. That alone confirms too little financial intelligence to be competent.

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<sup>11</sup> Email 19 December 2024

<sup>12</sup> *ibid*

<sup>13</sup> Draft 2025-34 Capital Expenditure Programme, Regulatory Services. The amount increases by \$1000/ from 2029/30.

## 5.0 Dog dying in Council custody

**Summary: The management of the pounds and impounding dogs has been consistently degraded by Councillors during this triennium, and the ability to impound *weaponised*.**

**5.1.** A dog died in the pound during 2023-24<sup>14</sup>. The stated cause of death was “a medical event”. Given death is a medical event, that tautology ensured the actual cause was hidden.

**5.2.** Despite being responsible for the first dog death in living or recorded memory, no Councillor demanded an explanation. Instead Councillors employed the techniques of *deflection* and *victim-blaming* to ask if there had been any incidents in which dogs placed *staff at risk*. Then astonishingly claimed to have been unaware the pound service had been contracted and accepted incorrect information about the contract period despite having renewed it themselves after performing the *s 17A review* in 2022<sup>15</sup>. They also complained the number of dogs in Dunedin is unknown because dog owners do not advise Council if they move.

**5.3.** A dog death is an obvious product of the filthy, broken-down and legally non-compliant dog pound facilities, and the maltreatment of dogs that has previously been detailed. The lack of concern by Councillors is consistent with the proven *Dark Tetrad* characteristics such as using public money to purchase videos of dogs being abused.

**5.4.** It is consistent with the identification of previous failures to comply with the Animal Welfare Act Temporary Housing of Companion Animals code by failing to identify the need for veterinary assessment and medication and returning them to the owner, unless there are over-riding grounds not to do so so council has to provide the required care and medication.

**5.5.** It is also logical product of replacing the experienced dog control officers with employees with no experience with animals, or performing duties subject to rigid and uncompromising legal obligations, and not just personal guesses.

**5.6.** The lowering standards during this triennium created such obvious risks the phrase “dogs will die” became commonplace amongst dog owners. It reflects on every Councillor this triennium has been used to drive dog management standards downwards until Councillors achieved the distinction of being the first Dunedin councillors to achieve that outcome.

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<sup>14</sup> s 10A Annual Report 2023-2024 at [26]

<sup>15</sup> Email 19 December 2024