

30 April 2024

2024-34 Long Term Plan consultation  
Otago Regional Council  
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Dunedin 9054

By email: [longtermplan@orc.govt.nz](mailto:longtermplan@orc.govt.nz)

Tēnā koe

#### **SUBMISSION ON THE OTAGO REGIONAL COUNCIL'S 2024-34 DRAFT LONG TERM PLAN**

1. The Dunedin City Council (DCC) welcomes the opportunity to submit on the Otago Regional Council's (ORC) 2024-34 Draft Long Term Plan (the draft Plan).
2. The DCC appreciates the support and partnership of the ORC on matters of shared responsibility and interest. The DCC looks forward to continuing to work closely with the ORC for the benefit of Dunedin, its residents and ratepayers.
3. The DCC submission speaks to the three proposals outlined in the draft Plan, along with related topics included in the consultation document.

#### **Proposal 1: Investing in Our Environment**

4. The DCC welcomes the ORC's intention to establish a dedicated fund to support large-scale environmental projects, with a minimum of \$500,000 in funding starting in 2025-26, noting that this funding will be additional to the ORC's existing funding for environmental projects.
5. The DCC supports the proposed option that would see a targeted rate for each of the five districts in Otago, with the funds collected in each district being used in that district.
6. The DCC supports the ORC's intention to seek further investment from third parties over and above rates funding for environmental projects.
7. The DCC supports the ORC's approach to partnering with mana whenua and the community to manage water.
8. The DCC notes with interest the development of a Land and Water Regional Plan by the ORC, currently underway, and looks forward to its successful implementation.

9. The DCC notes that the ORC is developing an updated Regional Air Quality Strategy, working with mana whenua, local councils and others, and looks forward to positive, tangible outcomes from the implementation of this strategy as part of the draft Plan.
10. The DCC demonstrates support for biodiversity initiatives through the provision of advice and a biannual contestable funding programme, the Biodiversity Fund.
11. The DCC notes that a new Regional Biodiversity Strategy is being developed by the ORC and an indigenous biodiversity monitoring programme is being put in place and looks forward to seeing positive outcomes from these initiatives.
12. The DCC supports the ORC's work in delivering programmes that manage pest plants and animals through its Regional Pest Management Plan and Biodiversity Strategy.
13. The DCC, along with the ORC, is a core funder of the Predator Free Dunedin collective comprising 22 organisations. The DCC and ORC are working together to achieve a predator free status over 31,000 hectares, as part of the Predator Free New Zealand 2050 vision adopted by the Government in 2016. The DCC acknowledges and looks forward to the continued partnership with the ORC to achieve this shared goal.
14. The DCC acknowledges that the ORC is undertaking work focused on the environment at a time when some central government funding is coming to an end, and legislative changes that may impact on the environment are underway or have been signalled by the Government: for example, the Fast-track Approvals Bill, and revisions of the National Policy Statements for Indigenous Biodiversity and Freshwater Management.

## **Proposal 2: Investing in Public Transport**

15. The DCC supports initiatives to improve accessibility to transport, reduce the impacts of transport on climate change, improve urban environments and public health and reduce deaths and serious injuries. The DCC also supports the goal of public transport being used more often as a preferred mode of travel, to contribute positively to our environment and communities. This is aligned with the DCC's strategic goals and will be critical to achieving Dunedin's Zero Carbon by 2030 goal.
16. The DCC supports the ORC's proposal to increase public transport funding over the next 10 years.
17. In particular, the DCC is pleased that the ORC is proposing to spend approximately \$315 million on Dunedin's public transport before 2034, including: \$289 million to keep running the same services and upgrade the bus fleet to electric; and an additional \$26 million to make to increase operating hours and more frequent services for some routes (Pine Hill, Calton Hill, Ōpoho and Shiel Hill), and ensure demand is met when the Mosgiel park and ride is operational.
18. The DCC seeks more detail on how public transport services in Dunedin will be funded through the existing mix of fares and rates, as suggested in the draft Plan.
19. The DCC supports the ORC's intention to seek further investment from New Zealand Transport Agency Waka Kotahi (Waka Kotahi) to help fund the increased services, noting that funding is still to be confirmed by Waka Kotahi, and that the ORC would need to reconsider whether the extra services would proceed and how they would be funded without Waka Kotahi's investment.

20. The DCC notes that the Otago Regional Land Transport and Regional Passenger Transport Plans will be reviewed in 2024, and that projects included in these plans rely on co-funding from Waka Kotahi and local councils. The DCC advocates for the ORC to work closely with local authorities on the development of the Regional Passenger Transport Plan.
21. The DCC acknowledges that the ORC is undertaking work focused on transport at the same time as the Government is considering changes under the draft Government Policy Statement on land transport, which may impact on opportunities and expectations.
22. The DCC supports the inclusion of expenditure in the draft Plan to support district councils and communities to explore local public transport service trials, particularly for a Balclutha to Dunedin, including airport and bus service trial.
23. Overall, the DCC is pleased that the ORC continues its public transport work and management of related programmes, such as the Regional Total Mobility Service. The DCC welcomes information about the ORC's ongoing plans for the loop bus.

### **Proposal 3: Changing Our Rating System**

24. The DCC notes that the ORC is proposing changes to ensure rates are being applied fairly and supports any related work that gives ratepayers a better understanding of what their rates are funding. In principle, the DCC supports these changes to the rating system, as detailed below.
25. The DCC notes that the ORC has revised its Revenue and Financing Policy in association with the proposed changes to the rating system, with impacts on how the following activities are funded: public transport; flood protection, drainage, and river management; and other activities (catchment management, navigational safety and wilding pines).
26. In relation to the proposed changes to the rating system, the DCC offers comments on the following topics:

#### ***Public Transport***

27. The DCC supports the proposed introduction of a new 20% general rate funding allocation for public transport across Otago, and that the remaining 80% is funded through a uniform targeted rate across the districts where public transport services operate, acknowledging that the target rated area for Dunedin will be expanded to include its entire territorial area.

#### ***Flood Protection, Drainage and River Management Rates***

28. The DCC supports the priorities of drainage control, river management and flood protection and supports the ongoing work on coastal erosion and inundation risk. The DCC supports flood protection for Taieri and South Dunedin and supports climate resilience for all low lying communities.
29. The DCC supports the ORC's proposal to make the general rate allocations 20% for all flood protection and 10% for all drainage schemes; on the understanding that, as outlined in the draft Plan, the amount of targeted rates in each scheme remains the same, and only those currently paying the rates would be impacted.

30. The DCC notes that, under changes to the rating system detailed in the draft Plan, Leith indirect is now applied to the whole Dunedin district. According to the draft Plan, this reflects that approximately half of the property in the targeted rate zone is non-rateable, and this cost is now allocated to the entire district rather than a smaller defined area. The differential for the Forsyth Barr Stadium has also been removed.
31. The DCC notes that the ORC has applied the Leith rating to the whole Dunedin district. It would like clarification about the area of the city where the airport is located. The DCC views the airport as a strategic asset, and supports a portion of the rating to be allocated for flood protection in this area.
32. The DCC requests that the draft Plan includes an assurance that flood protection for East Taieri, West Taieri and Silverstream is maintained to capacity.

#### ***Catchment Management Rates***

33. The DCC supports the work undertaken by the ORC to protect indigenous species, biodiversity and water quality.
34. The DCC supports the proposed introduction of a catchment management rate to cover this work, particularly if it simplifies how this work is funded and provides transparency to ratepayers about the purpose of this rating.

#### ***Navigational Safety Rates***

35. The DCC supports the ORC's work promoting safe navigation and safety in Otago harbours and waterways.
36. The DCC supports the proposed introduction of a new navigational safety rate to fund harbour and navigational safety activity in those areas of the region where it is applicable to reflect who benefits from this work and increase transparency in the rating system.

#### ***Wilding Pine Control Rates***

37. The DCC acknowledges the work undertaken by the ORC to control and reduce the spread of wilding conifers in Otago, including working with wilding pine groups in the community.
38. The DCC supports that the separate wilding tree rate is proposed to be discontinued, and that the amount budgeted for supporting wilding pine groups (\$250,000) be incorporated into one rate for biodiversity.
39. The DCC requests information about how funding to support wilding pine groups will be administered and managed at an operational level, if the funding is incorporated into one rate.
40. The DCC requests that the wilding pines in East and Coastal Otago be included in the draft Plan.

#### ***Climate Change and Resilience***

41. In Dunedin, collaborative planning and action to address climate change risk is already well underway. The DCC values the ORC's partnership on the South Dunedin Future programme, working closely with the local community on ways to adapt to the climate challenges facing South Dunedin. While collaboration on these projects is crucial to their success, this needs to

be done in a way that ensures ultimate decision-making sits with the responsible governing body.

42. The DCC requests that its coastal communities, such as Long Beach, Osborne, and Aramoana, are included in planning and action to address climate change risk.
43. The DCC commends the ORC's commitment to continuing its work in: Otago Natural Hazards Risk Assessment; Flood Hazard Assessment; natural hazards adaptation in South Dunedin; and Community Resilience and Lifelines work.
44. The DCC welcomes additional funding for climate change action, such as the implementation of natural hazards management and adaptation programmes based on the Otago Natural Hazard Risk Assessment, and the intention of the ORC to integrate the warning system for critical civil defence and emergency management messaging.

### **Regional Leadership**

45. The DCC is strongly supportive of the ORC's investment in regional leadership, particularly in partnering with Kāi Tahu and in community engagement.
46. The DCC is committed to its own partnership with mana whenua and to Te Taki Haruru – Māori Strategic Framework, which it adopted in 2023.
47. The DCC is pleased that the ORC will continue its leadership in the following areas, as outlined in the draft Plan: support for the elected members; partnership with Kāi Tahu and iwi liaison; communications and engagement; implementing Regional Planning Programme Consent processing; compliance monitoring; and investigations and enforcement.
48. The DCC welcomes new leadership initiatives from the ORC, as outlined in the Plan: delivery of National Policy Statements on Urban Development statutory requirements with the DCC and Queenstown Lakes District Council; reviewing its Climate Change Risk Assessment and providing information to the community about this work; increasing regional meetings to 3-4 per year and providing additional full-time equivalent staffing to support decision-making.

### **Infrastructure Strategy**

49. The DCC welcomes the introduction of the ORC's Draft Infrastructure Strategy 2024-2054 to manage flood protection and drainage infrastructure over the next 30 years.
50. The DCC notes the ORC's proposal to increase spending to maintain and renew key infrastructure assets, estimated at \$315 million over the 30 years, with \$67 million of this being in the first 10 years of the draft Plan.
51. The DCC notes the ORC's acknowledgement that there are risks associated with this proposed expenditure programme, including the impacts of severe weather events and contractor availability, and that it has staged its investment programme for 2024-2054 to ensure that it is deliverable and allows more time for key decisions between different stages of significant work programmes.

### **Conclusion**

52. The DCC thanks you for the opportunity to submit on the ORC 2024-34 Draft Long Term Plan.

53. The DCC wishes to speak to this submission at any hearings.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'J. Radich', with a stylized, flowing script.

Jules Radich  
**MAYOR OF DUNEDIN**