



Summary of submissions

Draft User Fees and Charges 2021/22

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Introduction

This document is a summary of the submissions received on the Draft User Fees and Charges 2021/22. Consultation ran alongside that of the Long Term Plan 2021-2031 opening on Saturday, 13 March 2021 and closing on Friday, 16 April 2021 allowing 23 working days for submissions, or one calendar month as per the requirements of consulting under the Local Government Act.

We received a total of 42 submissions during this time.

This summary has been undertaken by staff with the purpose of providing an overview of the main points raised in submissions. It is not intended to be a comprehensive capture of all points made by submitters. In addition to the summary of submissions, the following information is also available to help inform deliberations and decisions:

- The full submissions
- Full transcribes of the notes taken at the 'Have your say' events
- Staff recommendations

New fees proposed

Summary

39 of 42 submitters responded to this question. Of these, 29 disagreed with our proposal to increase the annual navigation safety bylaw fee, seven agreed, and three did not state either way.

Regarding improved organisation of mooring zones, common themes were that: this fee should be a one-off and not ongoing; it is revenue gathering and overinflated; and mooring owners appear to be targeted.

Regarding recovery of abandoned boats, common themes were that: it should be a user pays scheme; the cost of recovering abandoned boats should be borne by the owners; generally mooring owners were not responsible for these abandoned boats and shouldn't be required to pay more than general rate payers; it is revenue gathering and overinflated; mooring owners appear to be targeted; charges should also be imposed on runabouts/boat ramps; and it goes against councils own principle of fairness.

PROPOSAL TO INCREASE THE ANNUAL NAVIGATION SAFETY BYLAW FEE BY \$22.71			
Name	Organisation	ECC ref	Comment
David Nathan		UFC21_4	"Simply Outrageous !I have had a swing mooring and private boat ramp in the outer bay of islands for ever.There is literally NO COST to the Council other than what you have imposed on yourself by bureaucracy. Yet you have continually used us as a cash cow by increasing our fees year after year. Please charge increases on those who add cost and leave the decent people who pay and are compliant alone.If you have to remove boats,sell them and retrieve costs that way .I do understand that we are privileged to own moorings etc but we pay enough and you guys have to limit punitive charges in favour of controlling budgets."

Guy Wilson		UFC21_6	<p>"I do not support the increase in the charge. The existing charge has a significant fee for administration already, I see the increase as excessively inflationary, the existing charge is already increasing due to inflationary adjustment. If it is truly to "improved organisation of mooring zones, e.g. positioning of moorings;" surely this would be a one off event, Once organised they hardly need organising on an on going basis above existing management levels. Best budgeted as a one off project from existing funding. The levy to assist removing abandoned vessels seems unjustified, you are charging owners of moorings as being guilty by association. Those paying fees are not the people abandoning vessels. this goes against principles of fairness."</p>
	Riverside Drive Marina	UFC21_7	<p>"Riverside Drive Marina does not approve of the proposed increase to the navigation safety bylaw fee. After finally absorbing the last fee increase which we were informed was for the fight against Mediterranean Fanworm (now fully established in Whangarei Harbour) we believe that another increase is unfair. As a marina operator we look after our own zones and deal with the issue of abandoned boats ourselves, instances of which have become more common since the global lockdown caused by Covid-19, with owners of overseas vessels not being able to return to their boats."</p>
Mark Capill		UFC21_8	<p>Submitter disagrees with fee increase, saying that it fails to adequately explain the rationale for it and questions why moorings owners should even partially fund abandoned boats, stating "is there a proven linkage to owners of moorings abandoning boats?". Submitter suggests a levy on users of boat ramps would be more appropriate. {Staff summary; please see original submission}</p>
Michael Ward	Moturoa Island Limited	UFC21_9	<p>Submitter disagrees with fee increase, quoting councils charging principles and why they believe the increases do not meet these. Submitter further notes that charging mooring owners for abandoned boats is "nonsensical". Submitter states "As Moturoa is a sea-locked wildlife refuge its access and necessity for a number of moorings are dependent on climatic conditions and any imposition of an arbitrary charge unrelated to its actual usage is compounded by these factors." {Staff summary; please see original submission}</p>
John Harvey		UFC21_10	<p>"I do not support the increase in fees it would appear to me its just revenue gathering we pay enough already for no service except to support your bureaucratic jungle that is imposable to navigate."</p>

Bernd Bambus		UFC21_11	Submitter disagrees with fee increase noting that it's unfair mooring owners should have to pay for abandoned boats and that the cost should be covered by all recreational water users. Submitter questions why runabouts don't pay for anything and suggests a registration system for these boats to contribute. Submitter cites example of mooring that could be on-sold in Opuia to recover costs and questions placement of moorings in Tutukaka. {Staff summary; please see original submission}
Douglas Bakke	Secretary Mangonui Cruising Club	UFC21_12	Submitter disagrees with fee increase stating "targeted taxation directed at boat, yacht and launch owners" and questions why it's the financial responsibility of mooring owner to remove derelict vessels. Submitter suggests legal pursuit of owners or their heirs or sale of re-posessed boats/moorings. Submitter further states problems within mooring fields are not from the mooring owners making and states general rate payers should bear the financial burden for this organisation. {Staff summary; please see original submission}
Klaus Kurz		UFC21_13	"I strongly oppose those fees"
Harry Moloney		UFC21_14	Submitter disagrees with fee increase, noting compounding fees that come with owning a moored boat. Submitter suggests charging the owners of abandoned boats, not those who don't abandon their boat. {Staff summary; please see original submission}
Carl Mather		UFC21_15	"it is unnecessary to increase this fee."
Bruce Mauchline		UFC21_16	Submitter disagrees with fee increase, quoting councils charging principles and why they believe the increases do not meet these. Submitter further notes that charging mooring owners for abandoned boats is "nonsensical" and should be recovered through the sale of the boat/mooring if the owner will not settle outstanding fees. {Staff summary; please see original submission}
Phill Roberts		UFC21_17	<p>"If you are so stupid to increase fees to people struggling with getting their bussines back to normal levels after covid lockdowns you are to stupid to be council representatives. resign all of you!!!</p> <p>I tried to have my say but your system is the same as NRC workers - it dosnt WORK</p> <p>Presently i have a mooring in the Ngunguru Eastuary that i cant use because of the NRC refusal to tax logging companies and property developers that are destroying the Estuary environment.</p> <p>I am paying \$20 dollars a week to rent another mooring because the NRC cannot forfill its obligations to me as a mooring owner.</p> <p>I believe the NRC are gouging our pockets and it should stop.</p>

			I am a bussiness owner that supports the Marine industry and the development of it in Northland"
Vanessa McKay		UFC21_18	"I oppose this new fee"
Wayne Limbrick		UFC21_19	"I oppose this new fee"
Kevin Pugh		UFC21_20	"1. I have not viewed many "abandoned" vessels in the region. They are usually traceable back to owners. Please consider "user pays policy " back to the actual owner of the vessel."
E Metz		UFC21_21	"I am NOT happy with the new fees proposed an individual swing, pile and jetty moorings. The proposed rise of \$22.71 is over 8% and should be in line with CPI of around 1.4."
Peter Grau		UFC21_22	"I oppose this newly proposed fees and charges. The costs for the removal of abandoned boats should be retrieved from their owners, who will be easy to trace by council. Singeling out mooring/berth owners to recover the costs is not reasonable and unjust. The improvement and the organisation of mooring zones is in councils interest and not relevant for existing mooring owners. Any cost towards that could be covered by new mooring applicants and I believe it was always included in the application/resource consent fees."
Bruce McKay		UFC21_23	"I oppose the fee increase"
Uwe Schmutzler		UFC21_24	"DISAGREE with increase of this fee Any increase of this fee should only benefit aids to general navigation and navigational safety. The council has mucked about with mooring area issues and changes for many years. Enough to make sure their mooring maintenance contractors know exactly the boundaries of them as well as the permitted mooring numbers. They should not put any moorings down without council permission and they should be contractionally obliged to report any illegal deployments. I cannot see pressing reasons why this needs to be 'improved on' by additional 'organisation'. - Abandoned vessels remain the responsibility of their owners. If any mooring owner is adequately advised and held to knowing at any time which boat is using his mooring and who the owner is the council should be able to get on to those boat owners if required. If a mooring owner cannot supply the relevant contact the mooring owner would have to assume the responsibility for such boats unless he can prove he has ben given false name/addr by a user. If on a legitimate mooring those craft would also be extremely unlikely to present a navigational hazard anyway. Surely this would very much limit abandoned

			boats for which owners cannot be traced. In those cases disposal of such craft is in the interest of the public in general and, accordingly, disposal costs should be born by the public as part of their rates and / or ,where possible and preferably, also partly covered by proceeds from saleable components of such craft."
Peter Doel		UFC21_26	"User pays"
Harata Waetford		UFC21_27	"This should be for user pays only decision not for all rate payers"
Neil Doherty		UFC21_28	"Don't know what it's about - no internet"
Janet Trass		UFC21_30	"Agree"
Stephen Trass		UFC21_31	"Agreed"
James Murray		UFC21_33	"Like any business, this is important"
Ian Hayes		UFC21_34	"In the past we have been sitting ducks to be used to carry funding issues. Personally we have been involved with the boating scene in the Whangaroa Harbour for many years. The number of trailer boats using the Whangaroa ramp is substantial. Surely the Safety Bylaw affects all boat users. Also, while discussing boating facilities, maintenance of boat ramps should be financed by the people who use them. One further issue. Facilities for doing necessary safety checks and maintenance on launches are minimal in the Whangaroa Harbour. Opua is a long way to have to travel from Whangaroa for maintenance and a safety check before considering a trip is wise."
Keith Sime		UFC21_35	"In response to your advice of the proposed increase of the fees charged to owners of moorings I advise that I cannot support this move. Reasons why- Firstly council is targeting a small number of recreational boating users who already pay council fees as well as considerable costs to maintain the mooring. There are hundreds of trailer boats that use the same navigation marks ect that are paid for by those with boats on moorings and pay nothing. If council must have more money then the load should be shared by all . Secondly- To use the excuse of covering the cost of dealing with abandoned boats will not stack up as council should recover any costs by the sale of the vessel and also the sale of the mooring."
Neil Dobbs		UFC21_36	"Over many years we have seen an increase in the cost of mooring fees - without any real improvement in services from the regional council. Combined with the use of targeted rating - also associated with having a mooring the NRC charge increase is completely inappropriate. In areas such as the whangarei heads which also has targeted pest control (per dealing not

			land holder) when also receiving millions from central govt the rates demands well out strip both inflation and delivery of any real form of service to the community"
R Clarke		UFC21_37	"That seems normal for you highly overpaid highschool dropouts. Get rid of the dead woods XXXX And Co and save thousands instead of charging more to pay more deadbeats to do nothing"
Wayne Radford	RnR Charters Ltd	UFC21_38	"Don't you people know that we are in Covid times? I don't know why you can't figure it out yet, things are not easy now. Council and Govt fees keep going up as if nothing has changed. As a charter operator trying to make ends meet in these difficult times, we can't put our fees up to our customers...Give us a fair go. Please give this a thought...."
Charlie Baker		UFC21_39	"NO!"
Richard Hall		UFC21_40	"I support the fee increase."
Sepp Koch		UFC21_43	"I am totally against the increases! I find the time to respond way too short and your link not working! This looks intentional and criminal to me, it is disgusting!"
John Law		UFC21_45	"We would be happy to pay an increase if you undertake to remove or at least required the owners to clean the uncared for boats in our harbour some of which have been sitting in the water for years. But we do have some boaties who live on board and keep an eye on our area and we like this. We would also like you to notify us by email to let us know when you remove or require a clean for uncared for boats so we know you are aware of and acting on our requests. Then we would know how you are spending the money you are asking us for."
Jonathan Gould		UFC21_46	"I tried to follow the link but unable to do so. Happy to support the funding required in both instances."
Andrew Vance		UFC21_47	"Really a 28.5% increase.....seems a lot higher than the rate of inflation!"
Erle Williams		UFC21_48	"I'm OK with this increase"
Michael Wrightson		UFC21_49	"The proposal to charge mooring holders for the cost of dealing with abandoned vessels. Where is the justification for this? Harbour Authorities are charged with dealing with abandoned vessels and are provided with the power to recover costs from the owners. This is a public service and if the owners cannot be found then the public should fund any shortfall. There is no justification for charging just mooring holders. Such a proposal does not meet the Councils stated objective of policies being equitable as well as the Council not being transparent."

Amendments and changes proposed to fees, charges and policy

Summary

23 of 42 submitters responded to this question. Of these, six disagreed with our proposed amendments and changes, four agreed, and 13 did not state either way.

One submission specifically opposed updating the fee structure for coastal structures stating that there was no need as the current system spread the cost amongst everyone. They further stated they would consider supporting a fairer system, however as is sought to maintain the current charging structure.

One submitter specifically agreed with the proposed changes to free time increasing to one hour and with the minor amendments to account for changes to the RMA and Regional Plan rules.

Overall, common themes were that: it is revenue gathering and overinflated; mooring owners appear to be targeted; the increase was too much; and there was no need to make the proposed amendments/changes.

AMENDMENTS AND CHANGES PROPOSED TO FEES, CHARGES AND POLICY			
Name	Organisation	ECC ref	Comment
David Nathan		UFC21_4	"Same comments as above"
Mr Guy Wilson		UFC21_6	"I fully appreciate the work of the maritime staff in managing our waters. I enjoy boating in many forms as a healthy recreational activity, like many others. There are many recreational activities available to the public, significantly funded by public funds, with no direct charging - parks, cycle tracks, playgrounds. Maritime activities relating to moorings and marinas and facilities seem to be targeted for substantial cost recovery, I would appreciate the council considering supporting recreational boating in a similar public good perspective for fairness sake. Keeping charges low would help support more healthy recreational boating activity."
John Harvey		UFC21_10	"I do not support the increase in fees it would appear to me its just revenue gathering we pay enough already for no service except to support your bureaucratic jungle thats imposable to navigate."
Douglas Bakke	Secretary Mangonui Cruising Club	UFC21_12	"Mangonui Cruising Club is opposed to any new taxes (aka, fees)."
Klaus Kurz		UFC21_13	"there is no need for such changes" Submitter agree with changes to free time increasing to one hour and with minor amendments to account for changes to the RMA and Regional Plan rules (see submission attached)

Harry Moloney		UFC21_14	"This proposal combined with others the FNDC is proposing (so called fairer and simpler rates) potentially means another \$600-\$800 a year for me. I vote NO to We're proposing to increase the annual navigation safety bylaw fee by \$22.71 (incl GST) per year."
Carl Mather		UFC21_15	"there is no need to increase the charges for moorings and marina berths"
Phill Roberts		UFC21_17	"gouging the pocets of your rate payers"
Vanessa McKay		UFC21_18	"I oppose these changes"
Wayne Limbrick		UFC21_19	"I oppose the change to the fees"
Kevin Pugh		UFC21_20	"The annual cost currently charged is already I imagine covers any annual cost for checking private moorings. Different situation for NRC owner moorings. But as a holder of 5 private moorings in Te Puna Inlet I see no reason for increased charges in consideration for no work being done on those 5 moorings. I pay already to a private contractor to maintain. Same applies to the two boat ramps I maintain."
E Metz		UFC21_21	"I am NOT happy with the proposed amendments and updates to annual charges for moorings. The proposed rise of \$22.71 is over 8% and should be in line with CPI of around 1.4."
Bruce McKay		UFC21_23	"I oppose the fee increase"
Tom Hollings	NZ Oyster Industry Association	UFC21_25	<p>"Objection 1; We object to the proposal to change the system from Marine Farm Inspection charges being per farm, to per developed area as rounded to nearest 0.5 hectare.</p> <p>Reasons; We see no need for this. The current system spreads the cost amongst everyone as it is. If the change was to be overall more fair we would consider supporting it but as yet we can find little info either way in consultation info.</p> <p>Relief Sought; maintain the current charging system.</p> <p>Objection 2; We object to NRC flying both a helicopter and annually, as this inevitably makes fark inspections expensive.</p> <p>Reasons; These changes/increases in charges come at a difficult time for us and we would appreciate any efforts made by the Council to reduce costs. One such approach is the use of drones, even buying a drone and flying that over the farms if it would save some money. Another is to reduce the inspection frequency, particularly for the good farms, eg to 18 monthly or biennial. Farmers who have improved in the interim could request inclusion in the next testing.</p>

			Relief Sought; Address use of drones and of lower monitoring frequency.” { Staff summary; please see original submission }
Peter Doel		UFC21_26	“User pays”
Harata Waetford		UFC21_27	“OK”
Neil Doherty		UFC21_28	“Don't know what it's about - no internet”
Janet Trass		UFC21_30	“Agree”
Stephen Trass		UFC21_31	“Agreed”
James Murray		UFC21_33	“Like any business, this is important”
Ian Hayes		UFC21_34	“In the past we have been sitting ducks to be used to carry funding issues. Personally we have been involved with the boating scene in the Whangaroa Harbour for many years. The number of trailer boats using the Whangaroa ramp is substantial. Surely the Safety Bylaw affects all boat users. Also, while discussing boating facilities, maintenance of boat ramps should be financed by the people who use them. One further issue. Facilities for doing necessary safety checks and maintenance on launches are minimal in the Whangaroa Harbour. Opuia is a long way to have to travel from Whangaroa for maintenance and a safety check before considering a trip is wise.”
R Clarke		UFC21_37	“One can only assume that you are on a massive salary to invent ways to generate income from the already overcharged rate payers for your own fiscal gain. Leaches in society should all be exterminated from human existence”
Jonathan Gould		UFC21_46	“I tried to follow the link but unable to do so. Happy to support the funding required in both instances.”

Any further feedback on user fees and charge

Summary

Eight of 42 submitters responded to this question, with the most common theme being that any increase was opposed.

FURTHER COMMENTS			
Name	Organisation	ECC ref	Comment
Christine Williams		UFC21_5	“Understand a need to increase fees, and feel proposal is not unreasonable.”
Guy Wilson		UFC21_6	“Using inflation adjustments to increase fees is self perpetuating. Stop increasing fees stop inflation. My wage income has never been inflation adjusted. Why should yours?”

Douglas Bakke	Secretary Mangonui Cruising Club	UFC21_12	"Mangonui Cruising Club cordially invites representatives of the NRC to present in person at the club's premises (Silver Egg Road, Mangonui) their rational for these fees to the club's membership and the larger boating community in Doubtless Bay. To be presented at a mutually agreeable time before the cutoff date for community consultation."
Carl Mather		UFC21_15	"the annual rate charges are already far in excess of what you need, any increase is just theft."
Phill Roberts		UFC21_17	"Any increase with regards to abandoned boats should be the councils problem not that of law abiding insured boat owners. Is the council willing to compensate me for the mooring i have and cant use ? I am paying someone else to rent another mooring because mine is high and dry Interlectuall idiots the lot of you!!!!"
Peter Doel		UFC21_26	"You have once again seriously let ratepayers down. You should be ashamed of yourselves. Your total disrespect of the majority of ratepayers is typical of your arrogance, self serving nature and deceitfulness."
Neil Doherty		UFC21_28	"I'm broke. NRC are just another leech sucking my already depleted blood supply. No more."
William Lyon		UFC21_42	"I need more information . What happened to the fan worm. If you have a boat have insurance or register it , charge at launch ramps . I have payed a resource consent to know where my space is so that should be all ready be on file .biosecurity over seas boats yachts aren't coming in , ships are. check the ship log to make sure they clean the bilge. The outside should be clean before the leave there home port ."

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