



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth  
District Council**

# **COUNCIL MEETING AGENDA**

**Tuesday 19 March 2024  
at 1pm**

**Council Chamber  
Liardet Street, New Plymouth**

**Chairperson:**

Mayor Neil Holdom

**Members:**

Cr Tony Bedford
Cr Sam Bennett
Cr Max Brough
Cr Gordon Brown
Cr David Bublitz
Cr Murray Chong
Cr Amanda Clinton-Gohdes
Cr Harry Duynhoven
Cr Bali Haque
Cr Te Waka McLeod
Cr Anneka Carlson Matthews
Cr Dinnie Moeahu
Cr Marie Pearce
Cr Bryan Vickery

**Purpose of Local Government**

The reports contained in this agenda address the requirements of the Local Government Act 2002 in relation to decision making. Unless otherwise stated, the recommended option outlined in each report meets the purpose of local government and:

- Promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.
  - Would not alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of Council, or transfer the ownership or control of a strategic asset to or from Council.
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## **OPENING KARAKIA**

### **Tutawa Mai**

Tūtawa mai i runga	I summon from above
Tūtawa mai i raro	I summon from below
Tūtawa mai i roto	I summon from within
Tūtawa mai i waho	I summon from the outside
Kia tau ai	environment
Te mauri tū	to calm and settle
Te mauri ora	the vital inner essence
Ki te katoa	the wellbeing of everyone
Haumi e, hui e, tāiki e!	Be joined, together united!



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth  
District Council**

**Health and Safety Message / Te Whaiora me te Marutau**

In the event of an emergency, please follow the instructions of Council staff.

Please exit through the main entrance.

Once you reach the footpath please turn right and walk towards Pukekura Park, congregating outside the Spark building. Please do not block the footpath for other users.

Staff will guide you to an alternative route if necessary.

If there is an earthquake – drop, cover and hold where possible. Please be mindful of the glass overhead.

Please remain where you are until further instruction is given.

**APOLOGIES / NGĀ MATANGARO**

Cr Anneka Carlson Matthews

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**Elected Members Declaration of Interests (ECM9017076)**

**as at 7 March 2024**

(please advise the Governance Team of any amendments)

**Mayor and Councillors**

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Tony Bedford	Taranaki Electricity Trust Waitara Services and Citizens Club Hurricanes Schools Council Family Trust Taranaki Electricity Trust Hurricanes Alumni Tony and Wainui Bedford Family Trust Methanex Community Advisory Panel	Trustee Member Life Member  Member  Member

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Sam Bennett	Speaking Made Easy Full Circle Bespoke Life Events Heart of Brooklands New Plymouth Operatic Society Celebrants Aotearoa (CANZ) Celebrants Aotearoa (Taranaki) Residential Property Owner APJ and DM Bennett and PJ Bennett Star Gym Yarrow Stadium Joint Committee Age Concern Justice of the Peace for New Zealand Institute of Directors Taranaki Box Office Boxing Club New Plymouth	Ownership of company and contract with NPDC Ownership of Company Ownership of Company Sponsorship Manager Member Member and Committee  Family Trust Council representative Council representative Board member Ministerial duties and Nominated Person Oranga Tamariki Member Member
Gordon Brown	Taranaki Chamber of Commerce New Plymouth Bowls Club Writing Services Ltd	Contracting work Member Director

Name of Member	Interest Being Declared	Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)
Max Brough	Aluminium Imports (NZ) Ltd Edging Systems (NZ) Ltd Redneck (NZ) Ltd Knight Ridge Orchard Ltd Fitzroy Kiosk Ltd Max Brough Family Trust Residential properties TRC Solid Waste Working Party TRC Policy and Planning Committee Institute of Directors	Director Director Director Director Director  Alternate Council appointee Alternate Council appointee Member
David Bublitz	New Plymouth Boys' High School New Plymouth Golf Club Residential Property owner Bublitz Family Trust YMCA Taranaki Sport Taranaki	Employee Member  Board member
Anneka Carlson	Residential property owner Sutton Road Animal Sanctuary Charitable Trust	



<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Murray Chong	ZenVest Adviser Services Ltd Residential Home and Business Port Areas of Mutual Interest (PAMI) TRC Solid Waste Working Party	Council appointee Council appointee
Amanda Clinton-Gohdes	Institute of Directors Residential Property Owner Radar Trust District Licensing Committee Taranaki Biodiversity Trust (Wild for Taranaki)	Member  Deputy Chairperson Board member (Council appointee)
Harry Duynhoven	Habitat for Humanity (Taranaki) Ltd NZ Civil Aviation Authority Taranaki Habitat for Humanity NZ Federation of Motoring Clubs Automobile Association (Taranaki) Council NZ Motor Trade Assn Guild Residential Property Air Quality Asia (NGO based in New York) Private trustee  TRC Regional Transport Committee	Director Member Board member Member Member Member Trustee and beneficiary Secretary of Board Independent trustee of two private trusts for impaired individuals Council appointee

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Te Waka McLeod	Puna Hau Ltd Residential property interests	
Neil Holdom	New Plymouth Mountain Bike Club Lifestyle Block Owner (Smallholding) TRC Civil Defence Emergency Management Committee WOMAD NZ (Board Member)	Member Council appointee Council appointee
Bali Haque	Residential Property Toi Foundation Trustee Taranaki Regional Council Policy and Planning Committee	Council appointee

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Dinnie Moeahu	Institute of Directors Little Fighters Trust Change is Coming Coaching Ngā Manu Reo Toastmasters TDHB Consumer Council Te Kotahitanga o Te Atiawa Te Korowai o Ngaruahine Te Kahui o Taranaki Puketapu Ngāti te Whiti Ngati Moeahu Ngati Manuhiakai Whatu Ora Taranaki Consumer Council Hillary Institution/ Edmund Hillary Foundation Friends of Pukekura Park	Member Ambassador Managing Director Member  Affiliate Affiliate Affiliate Affiliate Affiliate Affiliate Affiliate Board member Directorship  Council appointee
Marie Pearce	Rural Property Owner Wakefield Family Trust Inglewood First Trust Inglewood Mini Golf Trust Inglewood District Health Trust Taranaki Arts Festival Trust	Council appointee

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Bryan Vickery	Bryan Vickery Media Taranaki Chamber of Commerce Friends of Pukekura Park Heritage Taranaki	Council Adviser Council Adviser

**Community Boards Declaration of Interests (ECM9017076)**

**as at 25 October 2023**

(please advise the Governance Team of any amendments)

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Mike Baker	Family Residence Waitara Bowling Club FENZ Operational Support New Plymouth Brigade	Member OS Fire Fighter
Jono Burrows	Burrows Lawn Mowing Family Residence Inglewood Bowling Club	
Graham Chard	New Plymouth and Districts Returned & Services Association NPRSA Support Trust NPRSA Poppy Trust North Taranaki Kings Empire Veterans Association Okato Community Trust Chardz Holdingz Ltd Chardz Investmentz Ltd Taranaki Iwi Trust	President  Chairman, Trustee Chairman, Trustee Treasurer  Vice Chairman, Trustee Managing Director Director Affiliate

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Paul Lobb	Asset Plus Contact Energy NZ King Salmon Sanford Solexin Industries Ltd Residential Properties Oakura Boardriders Club Kaitake Ranges Conservation Trust	Employee  Life member
Trevor Dodunski	Nil declared	
Christine Fabish	Dudley District Hall Society Hudson Essex Terraplane Club Family residence	Member Member
Teresa Goodin	Lumen Gallery Teresa Goodin	
Neville Hagenson	Nil declared	

<b>Name of Member</b>	<b>Interest Being Declared</b>	<b>Nature of Interest/Transaction (includes positional or transactional interests eg funding agreements, proposals and other relationships)</b>
Renee Hohaia	R & Co Skin and Beauty – Ōākura	Owner
Nick Jones	Indemic Limited Indemic Ventures Limited Rewild Limited Bangers and Mash Limited Taranaki Stadium Trust	Director Director Director / Employee Director
Sarah Lucas	Be Natural Soap Ltd Royal Society for Forest and Bird (until September 2024) East End Surf Lifesaving Club The Collaboration, design store and gallery Riding Programme (Inglewood Primary School) Alpine Club Residential Property	Director Employee

Jonathan Marshall	Private Wealth (Asia Pacific) Ltd – Investments Business 229 Brokers Ltd – Fire and General Insurance Veritus Financial Planning Ltd – Financial Advice Business 229 Financial Services – Financial Advice Jakin & Boaz Properties Ltd – Property Investments Sovereign Perpetual Investments Ltd – Investments The Crossroads Foundation Charitable Trust – Charity Kapa Solutions Ltd Naki Labour Hire NZ Labour Hire The New Plymouth Pistol Club Inc New Zealand Antique Arms Association The New Zealand Black Powder Shooters Federation Inc Residential Property Owner	Director Director / Employee Director Director / Employee Director Director Director / Employee Employee Employee Employee
Tyla Nickson	Stats NZ	Employee
Jane Parker-Bishop	The Finance Lady Ltd Sport Taranaki Residential Property	Employee



Council Agenda (19 March 2024) - Register of Interests

Joe Rauner	ANZCO Foods (Eltham)	Employee
Murray Seamark	MW & CJ Seamark Family Trust Tongaporutu Hall Society Inc Family residence	
Adrian Sole	Red Rabbit Coffee Co Ltd Red Rabbit Group Ltd Squirt Products Taranaki Health Foundation Efinity/Trackitportal.com MA & AE Sole Trust Residential Property	Director Director Director
Tane Webster	Voices for Freedom	Employee

## **CONFLICTS OF INTEREST / NGĀ ARA KŌNATUNATU**

1. People who fill positions of authority must undertake their duties free from real or perceived bias. Elected members must maintain a clear separation between their personal interests and their duties as an elected member. Failure to do so could invalidate a Council decision and leave the elected member open to prosecution and ouster from office.
2. An elected member is entitled to interact with the Council as a private citizen. However, they cannot use their position as an elected member to gain an advantage not available to the general public.
3. Elected and appointed members will:
  - Declare any interest whether pecuniary or non-pecuniary at a meeting where the interest is relevant to an item on that agenda.
  - Exclude themselves from any informal discussions with elected members relating to a matter they have an interest in.
  - Seek guidance from the Chief Executive if they are unclear of the extent of any interest.
  - Seek guidance or exemption from the Office of the Auditor General if necessary.

## **ADDRESSING THE MEETING**

*Requests for public forum and deputations need to be made at least one day prior to the meeting. The Chairperson has authority to approve or decline public comments and deputations in line with the standing order requirements.*

## **PUBLIC FORUM / ĀTEA Ā-WĀNANGA**

*Public Forums enable members of the public to bring matters to the attention of the committee which are not contained on the meeting agenda. The matters must relate to the meeting's terms of reference. Speakers can speak for up to 5 minutes, with no more than two speakers on behalf of one organisation.*

- Michael Carr – Sport Taranaki
- Murray Lilley - Blagdon roading

## **DEPUTATIONS / MANUHIRI**

*Deputations enable a person, group or organisation to speak to the meeting on matters contained on the agenda. An individual speaker can speak for up to 10 minutes. Where there are multiple speakers for one organisation, a total time limit of 15 minutes, for the entire deputation, applies.*

- Marie Riordan and Elaine Gill - Volunteering New Plymouth (Citizens' Awards Policy Review) – TAB 2

## **PREVIOUS COUNCIL MINUTES / NGĀ MENETI O MUA**

### ***Recommendation:***

That the minutes of the following meeting of the Council, and the proceedings of the said meeting, as circulated, be taken as read and confirmed as a true and correct record:

<b>Council</b>	<b>12 December 2023</b>
<b>Council Extraordinary</b>	<b>27 February 2024</b>
<b>Council Extraordinary</b>	<b>13 March 2024</b>

## **COMMITTEE MINUTES**

### ***Recommendation***

That the minutes of the following meetings, as circulated be received and:

- a) Decisions made under delegated authority by the committees be incorporated in the minutes of this meeting of the Council.

<b>CCO's Committee</b>	<b>13 December 2023</b>
<b>Strategy and Operations Committee</b>	<b>13 February 2024</b>
<b>Inglewood Community Board</b>	<b>21 February 2024</b>
<b>Clifton Community Board</b>	<b>22 February 2024</b>
<b>Waitara Community Board</b>	<b>23 February 2024</b>
<b>Kaitake Community Board</b>	<b>26 February 2024</b>
<b>Puketapu Bell-Block Community Board</b>	<b>27 February 2024</b>
<b>Te Huinga Taumatua</b>	<b>5 March 2024</b>
<b>Strategic Projects Committee</b>	<b>6 March 2024</b>
<b>Finance, Audit &amp; Risk Committee</b>	<b>12 March 2024</b>

END

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## **REPORTS**

- 1 Travel Safety Improvements – Changes to Speed Limits
- 2 Risk Management Update March 2024
- 3 Health , Safety & Wellbeing Quarterly Report – Period ending December 2023 (Q2) – Due Diligence Obligations
- 4 Class Four Gambling Venues and TAB
- 5 Te Tai Pari Board – Terms of Reference
- 6 Review of Citizens’ Awards Policy

END

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## **TRAVEL SAFETY IMPROVEMENTS – CHANGES TO SPEED LIMITS**

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### **MATTER/ TE WHĀINGA**

1. The matter for consideration by the Council is the proposed changes to speed limits for New Plymouth District.

### **RECOMMENDATION FOR CONSIDERATION / NGĀ WHAIKUPU**

**That having considered all matters raised in the report Council approve the following speed limits.**

#### **Item 1**

**Variable 30km/h speed limit adjacent to the Owae Marae on the following roads:**

- a) **Hutchins Street (Carey Street West to Richmond Street)**
- b) **Mouatt Street (Carey Street West to Richmond Street)**
- c) **North Street (Mouatt Street to Seymour Street South)**
- d) **Richmond Street East (Mouatt Street to Harris Street)**

#### **Item 2**

**Permanent 50km/h speed limit within Brixton on the following roads:**

- a) **Raleigh Street (~160m north of Tate Road to Devon Road (SH3))**
- b) **Tate Road (~140m north of Raleigh Street to Devon Road (SH3))**

#### **Item 3**

**Permanent 30km/h speed limits within the following Department of Conservation Reserves:**

- a) **Everett Park Reserve (off Everett Road)**
- b) **Lucy's Gully (off Upper Ahu Ahu Road)**

#### **Item 4**

**Permanent 60km/h speed limit on Egmont Road (National Park boundary to (~950m from the end of Egmont Road)**

**Item 5**

**Permanent 30km/h speed limits along the following roads:**

- a) **Lower Ahu Ahu Road (~820m from the northern end of Ahu Ahu Road to end)**
- b) **Egmont Road (~950m from the southern end of Egmont Road to end)**
- c) **Mangorei Road (~65m south of the entrance to the Mangorei Track carpark to the end of the formed road)<sup>1</sup>**

**Item 6**

**Permanent 50km/h speed limit within the Ridgewood Residential Area on the following roads:**

- a) **Eva Road**
- b) **Freeth Drive**
- c) **Hadley Drive**
- d) **McGiven Drive**
- e) **Ridgewood Drive**
- f) **Veale Road**

**STRATEGY AND OPERATIONS COMMITTEE RECOMMENDATION**

- 2. The Strategy and Operations Committee endorsed the officer's recommendation.

**COMMUNITY BOARD RECOMMENDATIONS**

- 3. The Inglewood, Waitara and Kaitake Community Boards endorsed the officer's recommendation.

**TE HUINGA TAUMATUA RECOMMENDATION**

- 4. Te Huinga Taumatua endorsed the officer's recommendation.

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<sup>1</sup> This recommendation reflects a verbal update at the Strategy and Operations Committee meeting 13 February 2024

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<b>COMPLIANCE/ TŪTOHU</b>	
Significance	This matter is assessed as being of some importance
Options	This report identifies and assesses the following reasonably practicable options for addressing the matter: 1. Approve the proposed speed limits 2. Retain the Status Quo
Affected persons	The persons who are affected by or interested in this matter are the residents of New Plymouth District.
Recommendation	This report recommends option one for addressing the matter.
Long-Term Plan / Annual Plan Implications	No
Significant Policy and Plan Inconsistencies	No

#### **EXECUTIVE SUMMARY / WHAKARĀPOPOPTOTANGA MATUA**

5. This report recommends Council endorse the proposed speed limits, to improve road safety and reduce potential harm to the community should a crash occur in these locations.

#### **BACKGROUND / WHAKAPAPA**

6. On 19 May 2022 new legislative changes came into effect, Land Transport Rule: Setting of Speed Limits 2022, creating a new process for setting speed limits.
7. Speed limits are now managed through regional/territorial authority speed management plans and are planned to be delivered every three years to align with the Long-Term Plan process.
8. A letter has been received from the new Minister of Transport in December 2023, strongly suggesting that NPDC delay delivering speed management plans as the new government considers changes to the rule.
9. In response to this NPDC is only proposing speed limit changes on roads that are specific to community concern, localised areas and support planned infrastructure improvements. The speed management plan will be revisited when more information is available from central government.



***What has been proposed and consulted on?***

*Item 1, variable 30km/h speed limit adjacent to Owae marae:*

10. Through the delivery of the safer speed review Council officers contacted Owae Marae trustees as the new rule requires Road Controlling Authority's (RCAs) to consult directly with mana whenua. Given the large number of events hosted at Owae marae it was recommended (to be consistent with the current rule) that a variable 30km/h speed limit be installed.
11. Officers were invited to meet and discuss options with Owae Marae trustees and what has been supported by Owae Marae trustees is a 30km/h variable speed limit around the Marae entrance.

*Item 2, permanent 50km/h on roads as they approach the planned roundabout on SH3, Devon Road in Brixton.*

12. This is following a request from Waka Kotahi to align with the roundabout on SH3/Waitara Road/Tate Road which is planned for construction later this year. The roundabout was designed with a speed limit approach on both Tate Road and Raleigh Street of 50km/h. This was also identified through the Safe System Audit as an 'integral part of the safe operation of the overall project'. If this speed limit is not approved, the roundabout will require a re-design which will put the project at risk.
13. This item was consulted on as part of the wider safer speed review, letters were sent to all residents living on the section of road with the proposed change, along with advertising in the paper and via social media. There was no feedback received specific to these proposed changes.

*Item 3, Department of Conservation reserves.*

14. As part of the safer speed review a meeting was held with the Department of Conservation (DOC) to ascertain their preferences for roads within their reserves. Following this meeting the proposed speed limits supported by DOC were 60km/h on Egmont Road from the National Park boundary up to the car park, and all other roads within their reserves were proposed at 30km/h.
15. This item was consulted on as part of the wider safer speed review, with advertising in the paper and via social media. There was no feedback received specific to these proposed changes.

*Item 4, 60km/h speed limit on Egmont Road*

16. Further to the discussion with DOC, Egmont Road from the Egmont National Park boundary has a 60km/h speed limit proposed.
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17. This item was consulted on as part of the wider safer speed review, letters were sent to all residents living on the section of road with the proposed change, along with advertising in the paper and via social media. There was no feedback received specific to these proposed changes.

*Item 5, Speed limits at localised beach and bush roads*

18. Permanent 30km/h speed limits at some localised beach and bush road ends to support reduced harm.
19. This item was consulted on as part of the wider safer speed review, letters were sent to all residents living on the section of road with the proposed change, along with advertising in the paper and via social media. There was no feedback received specific to these proposed changes.

*Item 6, Ridgewood Residential Area.*

20. Following ongoing requests from the community to reduce the speed to 50km/h: the speed limits in this area are currently 70km/h, council officers agree that given the level of development within this area and the lack of infrastructure for pedestrians and cyclists, a 50km/h speed limit would be safer.
21. This item was consulted on in April 2023 separate to the wider safer speed review, letters were sent to all residents living within the area of the proposed change, along with advertising in the paper. Council officers received feedback from 31 respondents, which can be seen in Appendix 2, 262 (84 per cent) of respondents were in support of the proposed safer speed and 5 respondents (16 per cent) were opposed.
22. Plans showing the proposed speed limit changes are attached as Appendix 1.

***Economic impacts***

23. It is expected that for all the roads where a reduced speed limit has been proposed there will be a negligible impact on travel time given the current infrastructure and operating speeds of the roads.

**CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA  
ĀHUARANGI**

24. Safer speed limits have a proven outcome of reducing transport emissions, through reducing the amount of acceleration and deceleration. In addition, safer speeds in urban areas are evidenced to increase the number of people choosing to walk and cycle, reducing the number of cars on the road. (Source: page 11: [Speed management guide: Road to Zero edition 2022 \(nzta.govt.nz\)](#))

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<sup>2</sup> This number is a correction following the Strategy and Operations Committee meeting 13 February 2024

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## **REFORM IMPLICATIONS**

25. There are no Reform implications for this proposal.

## **NEXT STEPS / HĪKOI I MURI MAI**

26. Should Council approve the proposed safer speeds, the proposed speeds will be submitted to Waka Kotahi for approval.

## **SIGNIFICANCE AND ENGAGEMENT / KAUPAPA WHAKAHIRAHIRA**

27. In accordance with the Council's Significance and Engagement Policy, this matter has been assessed as being of some importance. The proposed speed posting changes can be funded from current transportation budgets.
28. There are interested and affected parties regarding the matters raised in this report. Consultation has already been undertaken with these parties to obtain their views and preferences on the matters proposed in this report. Their views have been covered above and are shown in appendix 2.

## **OPTIONS**

29. There are two reasonably practical options:

### **Option 1 Approve the proposed speed limits**

### **Option 2 Retain the Status Quo**

The options have been assessed together below.

### *Financial and Resourcing Implications / Ngā Hīraunga ā-pūtea, ā-rauemi*

30. The costs for the delivery of the proposed speed limits includes the investigation, engagement, reporting phase (already undertaken); followed by the implementation phase of signage, road-marking, construction of traffic calming features and associated administration. All costs are covered within existing capex budgets.
31. There are no short-term costs associated with these items should the Council choose not to approve the proposed safer speeds at this time.

### *Risk Analysis / Tātaritanga o Ngā Mōrearea*

32. The proposed speed limits will improve safety for all people by reducing the number and severity of crashes should they occur.
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33. It has been identified that there is an existing risk on our roads due to unsafe speeds that can increase the level of harm to our community. Council has a duty of care to act on this.

*Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori*

34. The proposal aligns with all four goals of the Councils strategic framework and vision of a Sustainable Lifestyle Capital. It supports the delivery of safe and active communities, provides the opportunity to reduce carbon emissions and improve connectivity.

*Statutory Responsibilities / Ngā Haepapa ā-ture*

35. The proposed speed limits comply with the Land Transport Rule: Setting of Speed Limits 2022.
36. Although the new Minister for Transport has indicated changes to this rule, there is nothing to suggest that these speed limit changes would need to be reversed given their locations, the safety benefits and lack of objection.

*Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere*

37. The proposed speed limits are consistent with the Long-Term Plan 2021-2031. One of the key performance indicators for the transport network is reducing the number of fatal and serious crashes in the district.

*Participation by Māori / Te Urunga o Ngāi Māori*

38. Prior to starting the safer speed review an email was sent out to all marae trustees organisations and followed up with phone calls. The purpose was to request a hui to discuss both safer speeds and any other road safety concerns. Although there were a number of conversations held with individual marae trustees, the only formal request and support has been received from Owae Marae in Waitara.
39. This does not preclude safer speed limits being installed outside marae at a later stage.

*Advantages and Disadvantages / Ngā Huanga me Ngā Taumahatanga.*

40. The advantages of endorsing these safer speed limits will help us to improve the safety of our roads and roadsides. Reducing the risk of a crash happening and the harm should one occur.
41. It will support Council to achieve key performance indicators for reducing death and serious injury crashes on our transportation network.
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**Recommended Option**

This report recommends option 1 Approve the proposed speed limits.

**APPENDICES / NGĀ ĀPITI HANGA**

Appendix 1 Plans of Proposed Changes (ECM 9156233)

Appendix 2 Summary of community feedback on Ridgewood residential area (ECM 9153399)

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**Report Details**

Prepared By: Liz Beck (Senior Project Manager) and  
David Brown (Traffic and Safety Engineer)  
Team: Infrastructure  
Reviewed By: Rui Leitao (Infrastructure Manager)  
Approved By: Kathryn Scown (Acting Group Manager Operational Excellence)  
Ward/Community: Waitara, Inglewood, Kaitake and New Plymouth District  
Date: 15 January 2024  
File Reference: ECM 9162328

-----*End of Report*-----

## SAFER SPEEDS REVIEW - NEW PLYMOUTH DISTRICT - APPENDIX 1

### PLANS OF PROPOSED CHANGES<sup>1</sup>

#### Item 1. Variable 30km/h speed limit adjacent to the Owae Marae on the following roads:

- Hutchins Street
- Mouatt Street
- North Street
- Richmond Street East

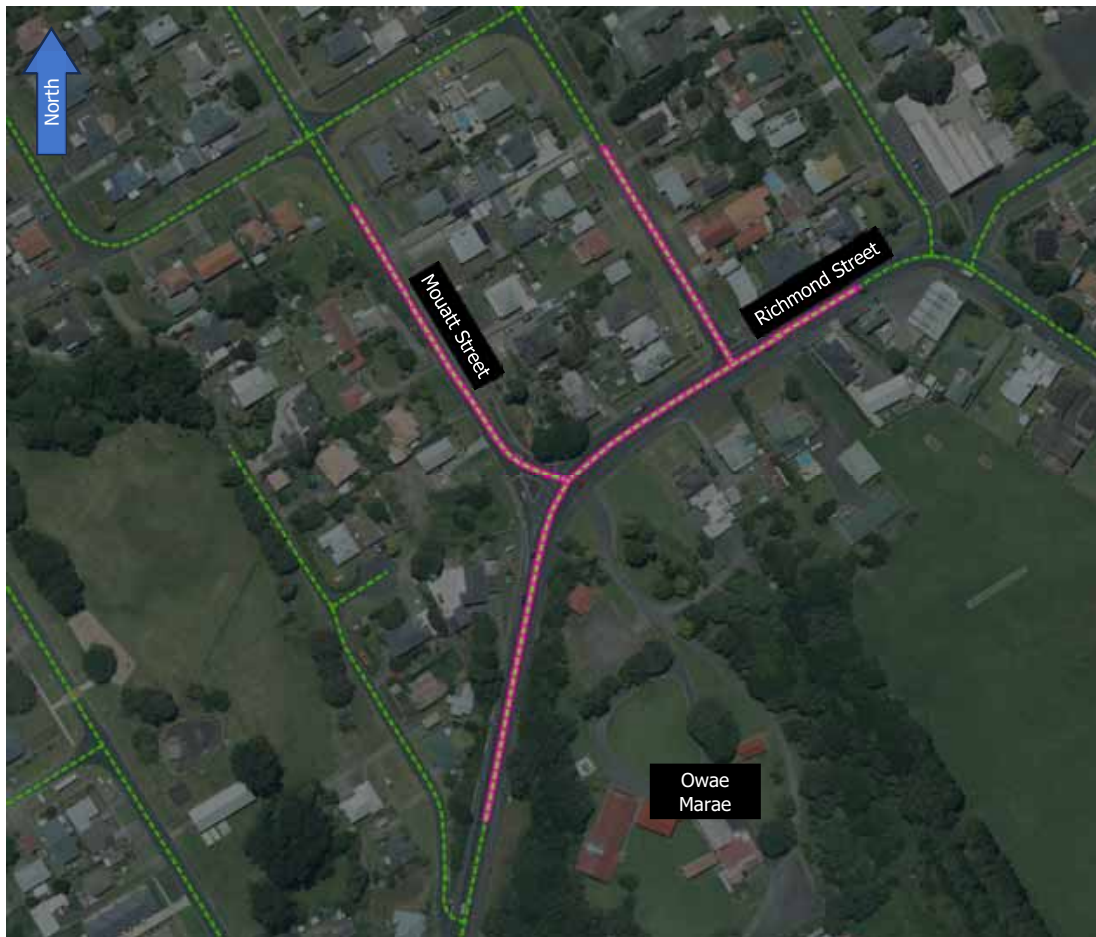




Figure one: Proposed variable speed limit for Owae Marae

Key:  
Proposed variable speed limits:  30 km/h  
Current permeant speed limits:  50km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

**Item 2<sup>1</sup>. Permanent 50km/h speed limit within Brixton on the following roads:**

- Raleigh Street
- Tate Road

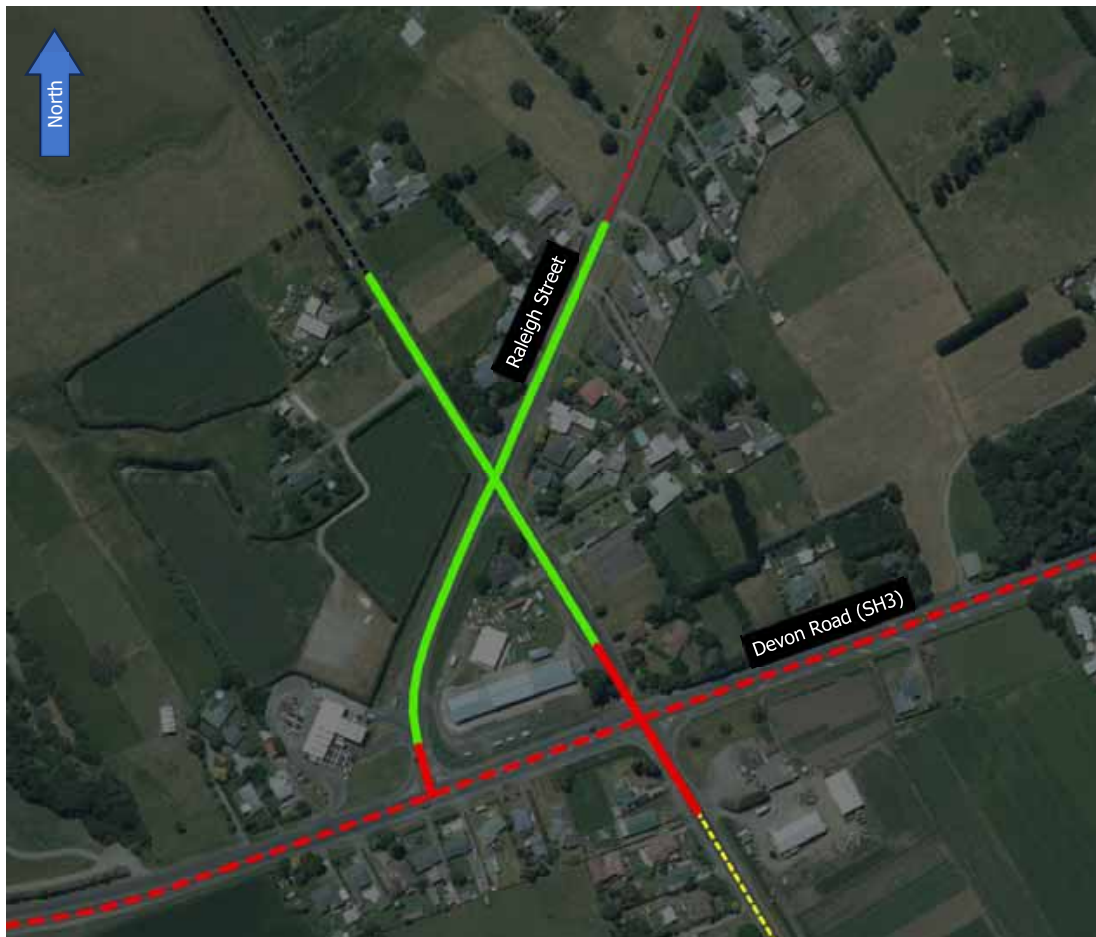







Figure two: Proposed changes to the Brixton Area

Key:

Proposed permanent speed limits:	Current permanent speed limits:
 50 km/h	 70km/h
 80 km/h	 80km/h
	 100km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

**Item 3a<sup>1</sup>. Permanent 30km/h speed limits with the following Department of Conservation Reserves:**

- Everett Park Reserve



Figure three: Proposed changes to the DOC roads within Everett Park Scenic Reserve

Key:  
Proposed permanent speed limits: 30 km/h  
Current permanent speed limits: 100km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings



**Item 3b<sup>1</sup>. Permanent 30km/h speed limits with the following Department of Conservation Reserves:**

- Upper Ahu Ahu Road
- Lucy's Gully

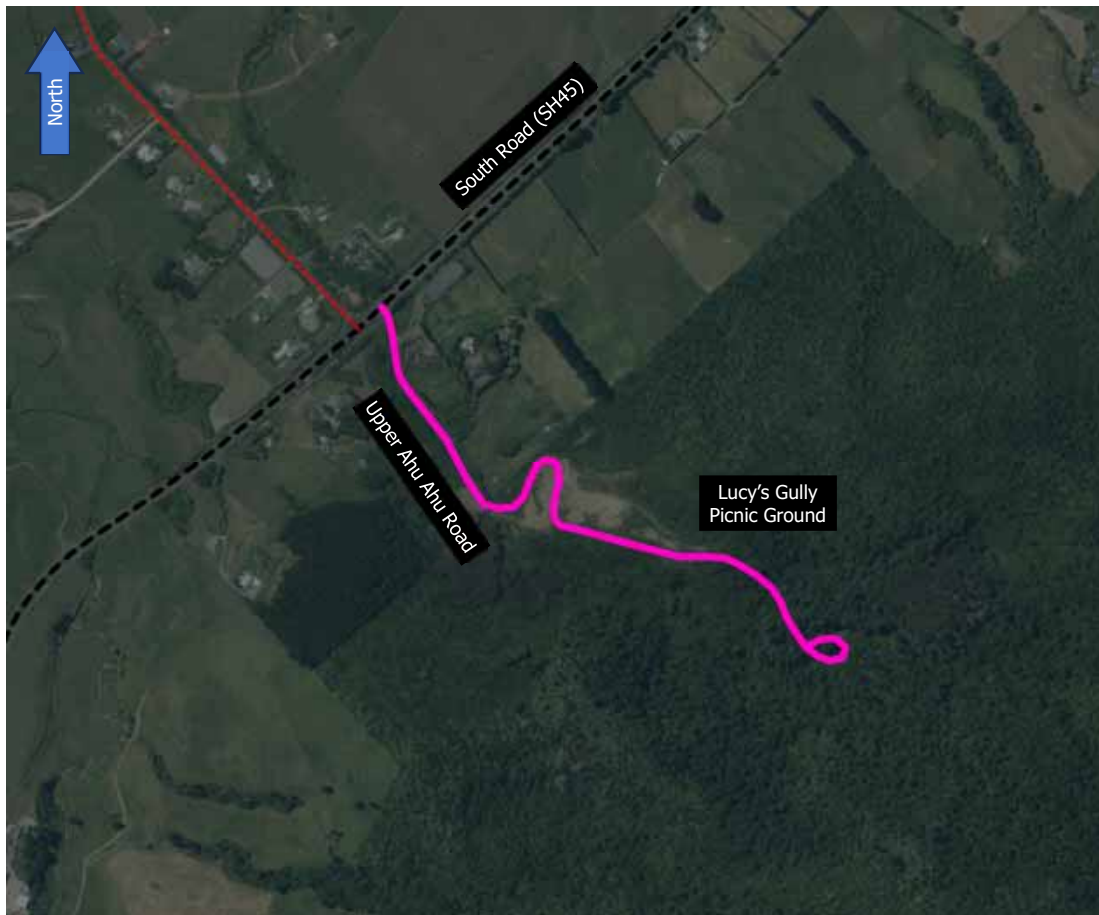


Figure four: Proposed changes to the DOC roads within Lucy's Gully Reserve

Key:  
Proposed permanent speed limits:      Current permanent speed limits:  
    — 30 km/h                                  — 80km/h  
    — 100km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

**Item 4<sup>1</sup>. Permanent 60km/h speed limit on Egmont Road:**



Figure five: Proposed changes to Egmont Road

Key:  
Proposed permanent speed limits:      Current permanent speed limits:  
    30 km/h                                      - - - 100km/h  
    60 km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

**Item 5a<sup>1</sup>. Permanent 30km/h speed limits with the following roads:**

- Lower Ahu Ahu Road



Figure six: Proposed changes to Ahu Ahu Road Reserve

Key:  
Proposed permanent speed limits:      Current permanent speed limits:  
    — 30 km/h                                      — — — 80km/h  
    — 80 km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

**Item 5b<sup>1</sup>. Permanent 30km/h speed limits with the following roads:**

- Egmont Road



Figure eight: Proposed changes to the North Egmont Visitor Centre

Key:  
Proposed permanent speed limits:  
    — 30 km/h  
    — 60 km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

**Item 5c<sup>1</sup>. Permanent 30km/h speed limits with the following roads:**

- Mangorei Road <sup>2</sup>

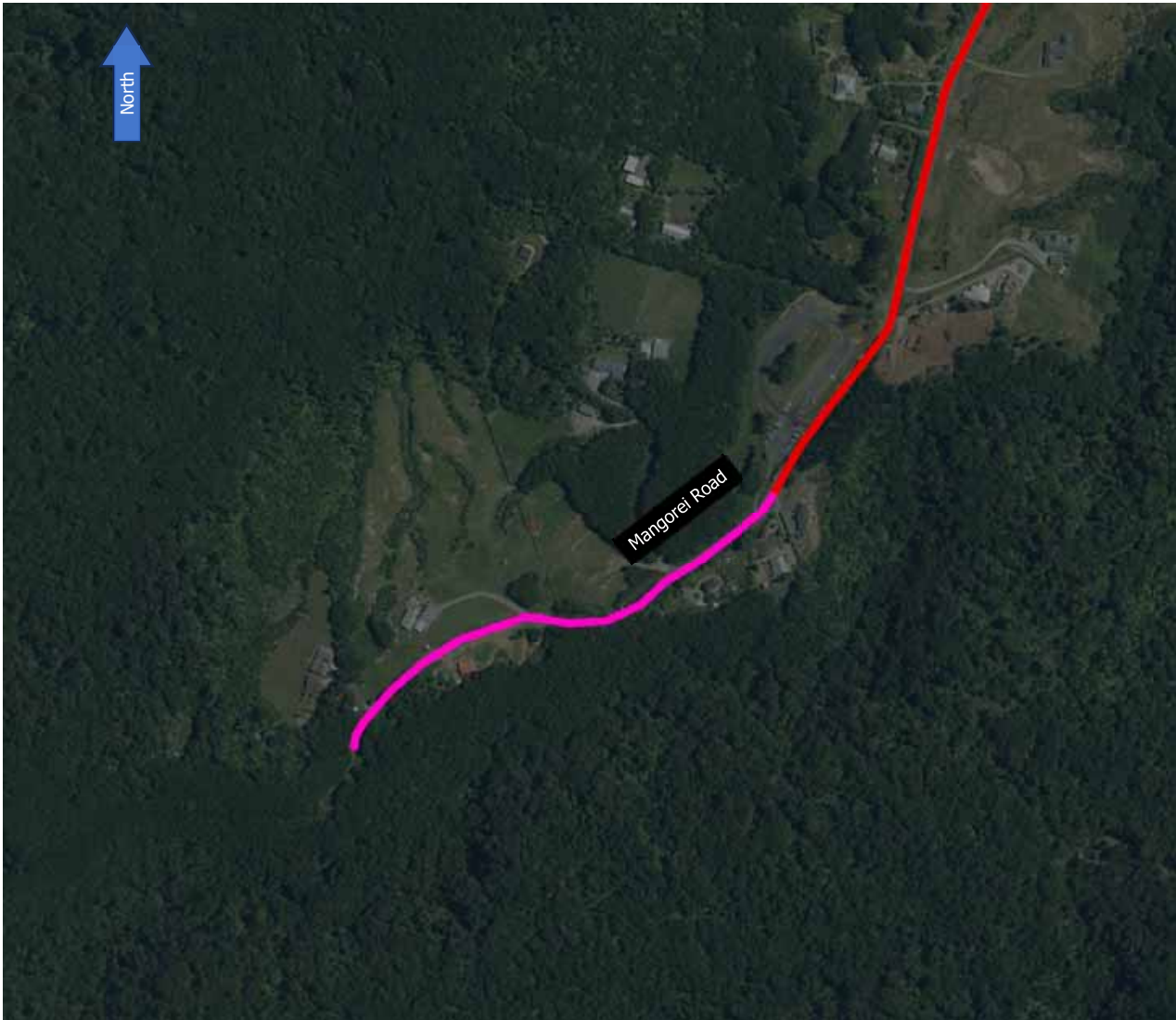


Figure seven: Proposed changes to Mangorei Road

Key:  
Proposed permanent speed limits:  
30 km/h  
80 km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is an updated map at 5c, and aligning maps 5b and 5c under the correct headings.

<sup>2</sup> This map was updated following the Strategy and Operations Committee meeting on 13 February.

**Item 6<sup>1</sup>. Permanent 50km/h speed limit within the Ridgewood Residential Area on the following roads:**

- Eva Road
- Freeth Drive
- Hadley Drive
- McGiven Drive
- Ridgewood Drive
- Veale Road



Figure nine: Proposed changes to the Ridgewood Area

Key:  
Proposed permanent speed limits: 50 km/h  
Current permanent speed limits: 50km/h

<sup>1</sup> Subsequent to the Strategy and Operations Committee 13 February 2024, this appendix was updated. Map numbers were corrected, there is a updated map at 5c, and aligning maps 5b and c under the correct headings.

Feedback received on proposed changes to Ridgewood 18 April – 19 May 2023

Submitter	Feedback	Support
Geoff and Julie Wong McGiven Drive	Letter below	Yes
Heather Walker McGiven Drive	Thank you for the consultation document received by email this week. I would like to write to support the proposed speed limit change in the Ridgewood area to 50 km/hr. This will make it safer for residents and all road users (which includes many pedestrians who run,walk, and bike around these areas).	Yes
Neil Tapsell	<p>As a resident of Ridgewood Drive I am in receipt of the proposal letter reference ECM 8965749, attached.</p> <p>In relation to the proposal to reduce the speed limit for the highlighted closed loop roading I submit the following:</p> <ul style="list-style-type: none"> <li>• I <u>do not</u> agree with the reduction of the speed limit in this closed loop rural property area.</li> <li>• The area is designated rural.</li> <li>• In 15 years of personal residency the additional home build in this area has been very minimal. There are only four recent home builds on Veale Road in the last 5 or so years &amp; 50% of those are in the first 100mtrs after the water tank &amp; prior to the first Ridgewood Drive turn off. Zero new home builds on Ridgewood Drive in 15 years &amp; I suspect &lt;5 in the last 10 years on McGiven, Freeth, Hadley &amp; Eva combined.</li> <li>• As there is zero through traffic the predominant traffic flow is for current road knowledable residents.</li> <li>• Any consented commercial activity (present or future) would need to adhere to the Rural Traffic plan volumes which does not necessitate reduction in speed limits.</li> <li>• What are the current traffic accident statistics for this 70km/hr area? Zero?</li> <li>• The area will prove very difficult to police as is evident from the pseudo skid pads appearing across the Frankley areas already desgnated 50km/hr zones. <ul style="list-style-type: none"> <li>○ This is a polite way of advising that you are wasting rate payers money or a suggestion to do it properly &amp; install speed humps.</li> </ul> </li> </ul> <p>I support the money be better utilised at intersections along SH3, like the Egmont to Devon intersection.</p> <p>Thank you for your consideration.</p>	No

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Lawson	<p>Regarding the speed limit change from 70km to 50km hr in Ridgewood area this is the best news. There has been in issue with ghe speed limit and popularity of locals using this area for walking around the block thankyou very much for doing this before we have an incident.</p> <p>Also will this mean we are no longer RD</p>	Yes
Grant Sarten McGiven Drive	<p>We have just received notification of the proposed speed limit changes in the Veal Rd / Ridgewood area.</p> <p>We think it's a good idea to drop the limit to 50k/hr.</p> <p>It matches the area around us and realistically it's probably only safe to do 70 along about a 100m of Veale Rd.</p> <p>We do get the odd hoodlem doing laps of Ridgewood Dr. Probably won't deter them but it's still better 50 rather than 70.</p>	Yes
Beverley and Guy Heaysman	<p>Further to your letter dated 18 April 2023 we would like to advise you that we support the proposal to reduce the speed limit in the Ridgewood Drive area from 70km/h to 50km/h.</p>	Yes
Michelle and Grant Roper	<p>Thank you for your letter regarding the speed limit for Ridgewood Drive area to be potentially lowered to 50k.</p> <p>We have been residents on McGiven Drive for 20+ years and do not consider the 70k speed limited as been excessive. Traffic flow is reasonably low.</p> <p>I do think the problem is that we need further foot paths installed that would be more beneficial for everyone.</p>	No
Michele McQuoid	<p>We are in full support of this proposed speed limit change. There are a number of concerns that we have experienced and witnessed on these roads.</p> <ol style="list-style-type: none"> <li>1. an increase in the number homeowners and consequently an increase in traffic, an increase in school age children walking from the bus stops on Govett Ave. There are no foot paths and the only safe place to walk is the road edge where the ground is level.</li> <li>2. addition of businesses with extra traffic in the area.</li> <li>3. an increase in the number of people biking or walking in the area and at times with animals.</li> <li>4. lifestyle animals grazing closer to the road which provide visual distractions for a driver.</li> <li>5. growth of vegetation along the roads which again can also be a visual distraction.</li> </ol> <p>The current speed restriction of 70 km I feel is too fast and unsafe for the actual road. The road is narrow in places and many motorists cut the corners and in doing so cross the middle of the road which can be very dangerous to on coming traffic. This is a daily concern to pedestrians who are walking or bike riding along side of the road.</p>	Yes
Jamie & Susan Sutherland Ridgewood Drive	<p>We would support the proposed 50 km/hr speed limit, as:</p> <ol style="list-style-type: none"> <li>A) It appears that many area people walk around the block, ride bikes and ride horses in our area</li> <li>B) And in junction with these activities, the area does NOT have any sidewalks.</li> </ol>	Yes



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	Therefore, reducing the speed limit to 50km, would make the area more safe for all (and also a little more quiet, which is 1 of the reasons many of us have chosen to live here.)	
Carolyn Crawford	<p>In response to your letter last week regarding the proposed changes.</p> <p>I am a resident in this area and am completely happy with the current 70k limit which feels in keeping with the rural nature of this area.</p> <p>I walk, run or bike these roads almost daily and have never felt unsafe.</p> <p>Traffic is easily heard and there is plenty of grass verge to divert to when walking.</p> <p>I have lived here 18 years and only know of one accident, which was caused by a car load of teenagers who had been drinking and were exploring 'drifting'.</p> <p>A speed limit change is unlikely to change that type of behavior and will only result in frustration and/or non compliance in the responsible drivers using these roads.</p> <p>My sense is the change is unnecessary.</p>	No
Godfrey Barclay Freeth Drive	<p>Your letter of 18th April regarding dropping the speed limit in the Ridgewood road area from 70 to 50 km/h is welcome news because that is exactly what we wanted in the first place when there was open road speed limits in our area and it was only dropped to 70.</p> <p>I look forward to the new speed limit signs in our area.</p>	Yes
Janet Young	<p>I would like to support wholeheartedly the change in speed limits for Ridgewood Drive ,Veale rd area from 70 km/h to 50km/h . I have lived here 34 years and there are a lot more houses and now a kindergarten in the area so a lot more traffic and the roads are so short it is very dangerous to reach those speeds. Pulling out from Ridgewood drive into Veale rd on the south end is really hard as poplar trees block vision so caution is needed and if a car comes over hill in Veale rd towards mountain at 70 they could never avoid a car pulling out from Ridgewood Drive.</p>	Yes
Michelle Coulton	<p>As part of the proposed changes to speed limits with regards to road design and safety measures are footpaths to be considered as part of the speed limit changes?</p> <p>Look forward to your reply as I am in favour of footpaths</p>	Yes
Lance & Amanda Brennan	<p>Further to your letter, I am in favour of the proposed 50km/hr speed limit.</p> <p>As there are no footpaths around the specified area, it makes sense to reduce the speed, as many families and walkers with pets use the roads for their recreation.</p> <p>Thank you for your letter outlining the proposed changes – I am in favour</p>	Yes
Brian and Marianne McCarthy	<p>We have previously corresponded with you regarding the council's proposal to make the speed limit on McGiven Drive 70km/hour. We were part of a group of concerned McGiven Drive residents that 70km/hour was too fast for McGiven Drive and requested that the speed limit on McGiven drive be reduced to 50km/hour.</p>	Yes

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McGiven Drive	We are still of that opinion and would like to see a 50km/hour speed limit on McGiven Drive.	
Richard Sheldrake / Patricia Blatti Veale Road	<p>Have numbered the comments in case you need more information or want to discuss.</p> <ol style="list-style-type: none"> <li>1. The length of Veale Road is relatively short and 70km/h to 50km/h would add a maximum of 20 seconds to travel time.</li> <li>2. There are more and more walkers doing the Veale Road/Ridgewood Drive circuit at all times of the day so it would be safer for them. There are currently no footpaths for most of the circuit so they are obliged to jump on the grass verges with traffic. Most residents are careful but strangers less so? Do you know of any plan to establish paths?</li> <li>3. I'm anticipating that the planned development on the old dump will start soon, which will add a little more risk for everyone.</li> <li>4. Apart from the walkers there are quite a few properties with livestock. It doesn't happen often but I have seen animals on or beside the road when they have escaped their fences. We had cats, now cat after one was run over on the road right outside our gate and for these pets a lower speed limit would be good.</li> <li>5. I was wondering what impact this might have on zoning, especially with the new development?</li> <li>6. There are more and more hoons visiting this area (like other NP areas?). Apart from the burn-outs they have no respect for even the current speed limit and any change would likely be ignored by them? Which leads me ask two things:             <ol style="list-style-type: none"> <li>a) Do you know if there would be legal objections to residents installing a camera or cameras to record their visits?</li> <li>b) Also, are you aware of a direct police number to call if/when they are "performing"? The regular routing of police calls to Palmerston North is a waste of time. Alerting local police vehicles who might be close by would need a direct call to New Plymouth police.</li> </ol> </li> </ol> <p>All the above to say that lowering the speed limit wouldn't be a problem in our house.</p>	Yes
Steve Bradley	<p>I thought id take the opportunity to reply to your letter sent on 18<sup>th</sup> April 2023 in regards to the proposed speed limit reduction from 70km to 50km in the Ridgewood Drive area.</p> <p><b><u>We are in favor of this change</u></b> as i believe that the current speed limit is unsafe for the current road layout.</p> <p>The area is used a lot by walkers and horseback riders and I have personally seen quite a few close calls and believe it is only a matter of time before there is an accident.</p> <p>Additional to that I believe that NPDC should extend the foot path that ends at Veale and Ridgewood drive throughout the area to keep local residents and road users safe.</p>	Yes
Chris Bush	Thank you for reaching out to me regarding the proposed changes to the speed limits in the Ridgewood Drive area. I am in full agreement with the proposal to reduce the speed limit from 70km/h to 50km/h. This change will not only increase the safety of drivers, but it will also benefit the pedestrians and other road users.	Yes

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	<p>Furthermore, I would like to suggest extending the footpath, which currently ends at the first intersection of Veale Road and Ridgewood Drive. Veale Road is narrow and has obscured visibility in places, making it a potentially hazardous location for pedestrians. By extending the footpath, pedestrians, dog walkers, and school children who are dropped off at the last bus stop at the second intersection of Veale Road and Ridgewood Drive will have a safer route to walk.</p> <p>I appreciate the New Plymouth District Council's consideration of community concerns and current traffic speeds in proposing these changes. Thank you for the opportunity to provide my feedback, and I am happy to support this proposal</p>	
Jamie Harding	<p>I've received a letter from David Brown re proposed speed limit changes from 70 to 50km/h on Ridgewood Drive Veale Road and accompanying off streets.</p> <p>I support this decision and would also suggest we continue with footpath (currently finishes at start of Ridgewood Drive) around Ridgewood Drive and back up Veale Road, we have an extremely large number of pedestrians using this route and they're currently walking on the roadside or grass verge which is a potential hazard to them and other road users.</p> <p>A dedicated footpath will allow pedestrians a clear demarked area to safely walk the Ridgewood loop</p>	Yes
Karla Mc Given Drive	<p>Our feedback regarding the speed reduction is we agree and will be very happy to see the speed change to 50Kms</p>	Yes
Bryan Blencowe Freeth Drive	<p>Good morning, in response to proposal to reduce the speed limit in Ridgewood Drive area from 70km-50km/hr we make the following comments</p> <ol style="list-style-type: none"> <li>1. Current speed limit is appropriate for area with approx. 97% of drivers driving at speeds between 50km &amp; 70Km/hr. The problem is the 3% who drive in excess of 70km/hr, so we feel the issue is not so much the current 70km/hr speed limit but enforcement to ensure 70km/hr is not exceeded. If speed limit reduced to 50km/hr unfortunately this will not address the core issue of the 3% speeding and make illegal a large majority of the responsible drivers who drive between 60-70km/hr.</li> <li>2. As highly unlikely that adequate enforcement will be put in place to address the 3%, can you please investigate the options of some form of permanent physical means to mitigate excessive speed in the area e.g. speed humps, road narrowing or possibly Irish bridges, the latter would also address the number of areas along Ridgewood drive that flood during rains, primarily due to poor drain maintenance. Additional signage warning of people on horse and walkers would also not go amiss.</li> <li>3. We have lived on Freeth Drive for over 25years and the increase of both vehicle and foot traffic has been noticeable. I personally now avoid walking my dog at peak times [9am-5pm] along Veale Road as vehicles tend to speed and pay little regard to pedestrians, though personally I would not wish to see footpaths constructed as this would detract on the rural feel of the "block". Ridgewood Drive for some time has been cursed with boy races who not only leave skid marks but also tear up the berms, so if permanent physical means applied they would need to be strategically placed such that they could not be driven around.</li> </ol>	No

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	<p>4. While not directly a road speed related matter, there are now a lot more people walking their dogs around the Ridgewood/Veale Road block, and again while majority are responsible dog owners and pickup their dogs litter, there is again a small percentage that don't, and while enforcement would be welcome, we believe the installation of a couple of dog litter bins would go a long way to encouraging everyone to act responsibly</p> <p>Should you wish to discuss, please feel free to give me a call or visit.</p>	
Donald & Wendy England McGiven Drive	We support reducing the speed limit on McGiven Drive and the other roads in the Ridgewood Drive area marked in green on the map included in NPDC's letter dated 18 April 2023 to <u>50 km/hr</u> , including for the reasons set out in the letter from Geoff and Julie Wong of McGiven Drive to NPDC dated 24 April 2023.	Yes
Claire and Brett Hobson McGiven Drive	<p>We support reducing the speed limit on McGiven Drive and the other roads in the Ridgewood Drive area marked in green on the map included in NPDC's letter dated 18 April 2023 to <u>50 km/hr</u>, including for the reasons set out in the letter from Geoff and Julie Wong of McGiven Drive to NPDC dated 24 April 2023.</p> <p>Further to Geoff and Julie Wong's letter, My husband and I have 3 boys who ride their bikes every week day to and from school along McGiven drive and Veale road. There have been a few incidents already where vehicles are speeding up McGiven drive, around concealed corners as my children are riding down. From a safety perspective, we believe it is crucial the speed limit be lowered to keep ours and neighbouring children safe.</p>	Yes
Dusty Eden Eva Road	<p>I am writing to you in support of the proposed speed limit changes from 70km/h to 50km/h in the Ridgewood area of New Plymouth.</p> <p>We live at Eva roads and regularly walk and drive in this area. I speak from experience when I say that there have been many close encounters between vehicles, people and horses along the section of Veale road between the two Ridgewood Drive corners. The visibility through this section of road is very short ranged and narrow with very little room for walkers, cyclists and horses etc. A reduced speed limit would greatly help to reduce the danger to users of this area. Over the past few years there has been a substantial increase of vehicles and pedestrians in this area especially kids on bikes, and we have noticed that already a lot of people do drive well below the 70km/h speed limit.</p> <p>Additionally, to the reduction in the speed limit the addition of a footpath through this blind section of road would give pedestrians a much safer path to use. We currently are very nervous when our children use this road so are in full support of any options that would make this area safer for the many families that live in the area.</p>	Yes
Suzanne Scott	<p>Writing to endorse your proposal to change the speed limit in the Ridgewood Drive area from 70km/h to 50km/h.</p> <p>This area is much busier with more housing and this, along with some narrow sections with very narrow verge, means that I agree the current speed limit is no longer appropriate.</p>	Yes
Karen Bolger	<p>Further to your letter dated 18 April 2023, we live on Veale Road (in the 70km/h zone) and since we moved here in 2006 we have seen a marked increase in traffic in the area.</p> <p>There have been a number of additional houses built/moved on in the area and also the opening of the preschool has caused an increase in traffic.</p>	Yes

	<p>As the driveway to our property (and four others) is on a bend in the road, it is increasingly dangerous trying to enter our driveways with vehicles coming up behind us at 70km/h.</p> <p>Also as there is only a footpath on one side of the road from Shelter Grove onwards up Veale Road, crossing the road can also be hazardous. It is even worse in Ridgewood Drive and streets in the area which have no footpaths and which makes walking in the area risky.</p> <p>Given the short distances involved between the 50km/h section of Veale Road and the end of the roads in the Ridgewood area it would not be a huge inconvenience for homeowners to have a reduced speed limit to 50km/h. It would also make for a much safer environment for walkers, children and pets in the area.</p> <p>You also may not be aware that there are people with disabilities who live on Veale Road, and the reduced speed limit would greatly benefit them by making it easier to cross the road independently to be able to more easily access public transport.</p> <p>I look forward to a reduction in the speed limit to 50km/h for the benefit of our neighbourhood.</p>	
<p>Tony &amp; Lynne Williams McGiven Drive</p>	<p>Thank you for your letter dated 18 April 2023 inviting feedback on NPDC's proposal to reduce the speed limit in the Ridgewood Drive area from 70 km/hr to 50 km/hr.</p> <p>In our opinion, for the reasons set out below, the speed limit on all of the roads marked in green on the map included in your letter dated 18 April 2023 (including in particular the speed limit on our road, McGiven Drive) should be reduced from 70 km/hr to 50 km/hr.</p> <ol style="list-style-type: none"> <li>1. <b>Nature of McGiven Drive</b> - McGiven Drive is a cul-de-sac that is about 700 metres long, beginning at the Ridgewood Drive / McGiven Drive intersection. McGiven Drive is not a wide, flat or straight road. It bends and ascends in a number of places, restricting the visible road ahead. There is a steep, winding ascent to the end of McGiven Drive, with the road terminating only about 100 metres from the brow of the hill. There is no centre line marking on the road, other than the first few metres at the start of McGiven Drive. There is no road shoulder or footpath.</li> <li>2. <b>Brooklands Pet Products</b> - Located at Nos. 21/23 McGiven Drive, on the left hand side about 200 metres from the Ridgewood Drive / McGiven Drive intersection, are the business premises of Brooklands Pet Products, which is described on its website as "<i>one of New Zealand's largest wholesale pet accessories distributors</i>". Trucks (sometimes with trailers attached) delivering goods to, or collecting goods from, Brooklands Pet Products commonly either a) drive forward onto Brooklands Pet Products' premises and reverse onto McGiven Drive when leaving, or b) drive past the entrance to Brooklands Pet Products and reverse onto Brooklands Pet Products' premises from that position. Given the bend on McGiven Drive approaching Brooklands Pet Products' premises, if another vehicle were to travel anywhere near 70 km/hr in the vicinity of Brooklands Pet Products' premises while one of these manoeuvres was being carried out, we believe there would be a serious risk of an accident occurring.</li> <li>3. <b>Other road users</b> - As well as McGiven Drive being used for transit by motor vehicles, it is regularly used by cyclists, walkers taking themselves and/or their dogs for exercise, and occasionally joggers and horse riders. Users of McGiven Drive include both residents and non-residents of McGiven Drive. Cyclists using McGiven</li> </ol>	<p>Yes</p>

	<p>Drive include, but are not limited to, school age children who live at properties on McGiven Drive, some of whom ride their bikes to and from school, this includes our own children. Due to the absence of a footpath beside the road and the grass verge sometimes being wet, muddy and/or slippery, walkers sometimes have no option but to walk on the road.</p> <p>4. <b>Wildlife</b> - As McGiven Drive comprises lifestyle blocks, there is often wildlife wandering on the road, including pukeko, rabbits and peacocks.</p> <p>We believe the same reasons apply to all roads in the Ridgewood area. To any decision makers who, despite the above, remain unconvinced that the speed limit should be reduced to 50 km/hr, we would encourage them to drive around the Ridgewood area, and along McGiven Drive in particular, or if this is not practical, to at least view the relevant roads through Google Street View to gain a better appreciation of the relevant circumstances.</p> <p>If you have any questions concerning these submissions, please do not hesitate to contact us.</p>	
<p>Paul Klenner</p>	<p>To ,</p> <p>With reference to your letter proposing speed limit changes to Ridgewood estates.</p> <p>I must say my first reactions was here they go again, more bull shit changes. I would love to view a copy of your assessment, as you being a safety Engineer I expect you have undertaken a detailed risk assessment looking at the relevant hazards, the consequences, and likelihood of occurrence, then run this through a model to determine that the hazards would be majorly reduced or eliminated by a simple 20km/hr reduction in the entire road area detailed. I would suggest this hasn't occurred and it won't show it.</p> <p>Having a few people complain, should be looked at in terms of the proximity of the complaints. I expect that by the city water tank where we enter the city boundary which is now high in residential dwelling would justify a 50 km zone, but not once you leave the city boundary. Hell, we can't even get pizza delivered up here because we are rural. They won't go past the city boundary. A change at the city bdy would also reduce the speed that is obtained coming down hill portion of Veale Road to the top of Govett Ave. That should be the only 50 km/hr area change.</p> <p>We have lived here for 43 years on Eva Road and as far as all the neighbours we know, no one on our road has asked for speed reduction. So, leave it alone.</p> <p>The council keeps reminding us we live in a rural lifestyle zone, not residential, hence we should not have residential speed limits applied. Many years ago, I expect way before your time, the roads in Ridgewood were an open speed limit (100 km/hr). We the residents asked for 70km/hr and that was then put in place, so leave it alone.</p> <p>So, what's happened since then? not much in Ridgewood, the council still hasn't upgraded Veale Road between the two Ridgewood drive intersections to make it safer, they have though allowed two businesses to commence operation between this section of Road. Remembering we are rural lifestyle, these should both be shut down to reduce traffic flows and they don't meet the rural lifestyle requirement. Who gave them permission to operate (the council)? was traffic flow and risk assessed? if it was it was obviously ok then, so again what's changed?</p> <p>What else. I am assuming you have driven these roads yourself and identified all the hazards and will have them removed. I can identify locations where flax has grown into the road area causing drivers to cross the white line to avoid being hit by it. Please have all of these removed to make it safer, as that is your role right. Also ban horses along Veale road, these are dangerous, along with people walking with dogs on the loose, I mean we are talking about safety right. The council hasn't provided enough berm for people to walk on, so they walk on the Road. Get it sorted,</p>	<p>No</p>

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	<p>speed limit reduction doesn't fix this. Do some remedial road works, that's what real safety engineering solutions sort out.</p> <p>Opposite the first Ridgewood/Veale Rd intersection, have the resident fence their gateway so no traffic can ever go in or out of that section. That is a really dangerous blind corner.</p> <p>On Veale Rd opposite Carringtons house there have been on going water and rain issues for ever. In the rain, the road floods here and the road needs to be sealed and run to a drain catchment properly, its just a mess and shambles, Carrington should not have been able to drain this and the mess be left in the road.</p> <p>Irrespective of the speed limit you put in place, you can never monitor or control it and we will continue to drive in a careful, watchful manner as we have done in the past, and that is generally at 60 to 65 km/hr. That won't change irrespective.</p> <p>So given you respond to and make changes to publics requests, I have a request - on Fernleigh St between Park View to Elizabeth Place – remove the parking from the side of the road (opposite the bank) and have yellow lines painted. If people are parked there, the traffic coming down the hill has to go to the other side of the road to get around them. Traffic cant not continue to flow both ways, if people don't give way, as many don't, some serious crashes have almost occurred. One arrogant ..... didn't give way to me this morning (and travelling fast) and caused me to almost hit the bank. This is where you need to be sorting safety out.</p> <p>If there is going to be any change, move 50 km/hr to city boundary only. Don't reduce the Rural Lifestyle area speed limits but tidy up the hazards to make it safer. Ban horses on Veale Road.</p> <p>I am happy to discuss further.</p>	
<p>Chris Pulford McGiven Drive</p>	<p>I support reducing the speed limit on McGiven Drive and the other roads in the Ridgewood Drive area marked in green on the map included in NPDC's letter dated 18 April 2023 to <u>50 km/hr</u>, including for the reasons set out in the letter from Geoff and Julie Wong of McGiven Drive to NPDC dated 24 April 2023</p>	<p>Yes</p>
<p>Sandra Titchener and Ian Bish Ridgewood Drive</p>	<p>Thank you for the opportunity to provide feedback on the PROPOSED CHANGES TO SPEED LIMITS in the Ridgewood Drive area from 70km/h to 50km/h. I see this proposal covers Veale Road, Ridgewood Drive, Mcgiven Drive, Freeth Drive, Hadley Drive and Eva Road.</p> <p>As residents and owners of Ridgewood Drive, we fully support the proposed reduction in speed limits in our area. Cars often travel at high speed down Veale Road in particular but our greatest concern to safety and property is the fact the Ridgewood Drive loop is used as a racetrack by boy racers both during the week and at weekends. They have absolutely no respect or regard for anyone's property, tear up our road berms (if you visit ours now you will see the mess it is in), if we put up standards and tape, they drive straight through it and they drive at high speed doing burn outs on corners. They are reckless, dangerous and a hazard to our community, animals and property.</p> <p>Any action taken to slow down traffic would be fully supported.</p> <p>Thank you for your consideration on this matter. We look forward to hearing of the decision made.</p>	<p>Yes</p>

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<p>Barry &amp; Shirley Hosking McGiven Drive</p>	<p>We support reducing the speed limit on McGiven Drive and the other roads in the Ridgewood Drive area marked in green on the map included in NPDC's letter dated 18 April 2023 to <u>50 km/hr</u>, including for the reasons set out in the letter from Geoff and Julie Wong of McGiven Drive to NPDC dated</p>	<p>Yes</p>
<p>Wayne Crawford</p>	<p>I am writing in regard to your proposal to reduce the speed limit around the Veale road area. As a resident of this area, I support your proposal as this area is becoming very built up, and the amount of traffic on the roads has increased significantly over the 20+ years that I have lived in the area.</p> <p>However as this is safety related, personally there are other safety related changes that could be made, which would improve safety considerably.</p> <ol style="list-style-type: none"> <li>1. Install street lighting, there are power poles all around this area, which would make installation easy, this area is used regularly by walkers, and in the winter months can be dangerous with people not wearing high visibility clothing, and having to walk on the road due to the verge not being suitable.</li> <li>2. Extending the foot path along Veale road, as above, the road is becoming frequented by foot traffic and by just lowering the speed limit does not make it safer.</li> <li>3. There is a property that has a gateway opposite Ridgewood drive intersection, very close to a blind corner. I believe that when the land was sub divided, one of the conditions of the consent was to have this gateway sealed off. Once the new owner took possession of the property, one of first things done was to open up this access. I have brought this to the attention of the NPDC on more than one occasion, with no real action. This access is a safety concern, and one that requires addressing.</li> </ol>	<p>Yes</p>



24 April 2023

To: [REDACTED]  
New Plymouth District Council  
By email to [traffic@npdc.govt.nz](mailto:traffic@npdc.govt.nz)

From: Geoff and Julie Wong  
[REDACTED] McGiven Drive  
By email from [gajumach@gmail.com](mailto:gajumach@gmail.com)

Your ref: ECM 8965749

**PROPOSED REDUCTION OF SPEED LIMIT IN RIDGEWOOD DRIVE AREA FROM 70 KM/HR TO 50 KM/HR**

Thank you for your letter dated 18 April 2023 inviting feedback on NPDC's proposal to reduce the speed limit in the Ridgewood Drive area from 70 km/hr to 50 km/hr.

In our opinion, for the reasons set out below, the speed limit on all of the roads marked in green on the map included in your letter dated 18 April 2023 (including in particular the speed limit on McGiven Drive) should be reduced from 70 km/hr to 50 km/hr.

**A. Route to McGiven Drive from Veale Road**

Currently there are 70 km/hr speed limit signs on both sides of Veale Road, about 55 metres past the intersection of Veale Road and Shelter Grove.



**Photo 1** - Taken from the corner of Veale Road and Shelter Grove, looking up Veale Road. The 70 km/hr sign on the left side of Veale Road is just visible in the photo.



**Photo 2** - Close up of 70 km/hr speed limit signs on Veale Road.

The distance from the 70 km/hr speed limit signs on Veale Road to the Veale Road / Ridgewood Drive intersection is about 475 metres.

From the 70 km/hr speed limit signs on Veale Road, Veale Road initially ascends over a distance of about 130 metres to a peak near the entrance to No. 37 Veale Road, just before the Veale Road Water Reservoir. Then, over a distance of about 345 metres, there is a descent down a significant gradient to the Veale Road / Ridgewood Drive intersection, with a left bend around the middle of this descent.



**Photo 3** - Google maps satellite image showing route and distance from Veale Road 70 km/hr

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speed limit signs to Veale Road / Ridgewood Drive intersection (about 475 metres).



**Photo 4** - View of Veale Road from 70 km/hr speed limit signs showing initial ascent.



**Photo 6** - View of descent on Veale Road to Veale Road/Ridgewood Drive intersection (at elbow at bottom of road as seen in this photo).



**Photo 4A** - View of initial descent from the highest point on Veale Road, with start of left bend at end of visible portion of road.



**Photo 7** - Close up of Veale Road / Ridgewood Drive intersection. There is a 90 degree left turn into Ridgewood Drive from Veale Road, while Veale Road bends to the right from the intersection.



**Photo 5** - View of descending left bend on Veale Road.

The distance from the Veale Road/Ridgewood Drive intersection to the Ridgewood Drive/McGiven Drive intersection is only about 52 metres. There is a left turn into McGiven Drive from Ridgewood Drive, with Ridgewood Drive bending to the right at this intersection.

About 20 metres before the Ridgewood Drive/McGiven Drive intersection, there is another pair of 70 km/hr speed limit signs. This second set of 70 km/hr speed limit signs so close to the entrance to McGiven Drive could further lull drivers unfamiliar with McGiven Drive into a false sense of security that it is appropriate and safe to drive along McGiven Drive at up to 70 km/hr.



**Photo 8** - Google Maps depicting Veale Road / Ridgewood Drive and Ridgewood Drive / McGiven Drive intersections, and distance between them (around 52 metres).



**Photo 9** - 70 km/hr speed limit signs on Ridgewood Drive, only about 20 metres from the entrance to McGiven Drive.

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**B. Submissions in relation to McGiven Drive speed limit**

In our view, for the reasons set out below, the current speed limit of 70 km/hr on McGiven Drive is plainly excessive and should be reduced to 50 km/hr in the interests of public safety.

1. **Nature of McGiven Drive** - McGiven Drive is a cul-de-sac that is about 700 metres long, beginning at the Ridgewood Drive / McGiven Drive intersection. As appears from the following series of photos arranged in sequence from the start to the end of McGiven Drive:

- a) McGiven Drive is not a wide, flat or straight road. It bends and ascends in a number of places, restricting the visible road ahead. There is a steep, winding ascent to the end of McGiven Drive, with the road terminating only about 170 metres from the brow of the hill.
- b) There is no centre line marking on the road, other than the first few metres at the start of McGiven Drive.
- c) There is no road shoulder or footpath.



**Photo 10** - View from Ridgewood Drive / McGiven Drive intersection showing first part of McGiven Drive. The road begins to ascend and bend to the right about 50 metres from the start of McGiven Drive.

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**Photo 11** - View from the bend referred to in the caption to the previous photo, showing the continuing ascending right bend. Part of the roof of one of Brooklands Pet Products' buildings appears in the distance (around the middle of the photo).



**Photo 13** - Entrances to Nos. 39 and 41 McGiven Drive on the left, and No. 38 McGiven Drive on the right, on one of the elbows on the road to the top of the hill.



**Photo 12** - View from a few metres before Brooklands Pet Products at Nos. 21/23 McGiven Drive, showing parts of the steep, winding ascent to the top of the hill on McGiven Drive (near the orange roof towards the top of the photo).

**Photos 14, 15 and 16** - Further photos of the road to the top of the hill



**Photo 14**



**Photo 15**



**Photo 16** - View of the last part of the road to the brow of the hill. The green roof on the left is the house at No.57 McGiven Drive. The driveway entrance to this property is beside the tree near the centre of this photo. Note the close proximity of this driveway entrance to the brow of the hill.



**Photo 17** - View from brow of hill towards the end of the public road on McGiven Drive, about 170 metres away (a few metres in front of the hedge in line with the road in this photo). The driveway entrance to No.57 is beside the rubbish bin on the left, and the driveway entrance to No. 44 is opposite, beside the letterbox on the right.



**Photo 18** - Cluster of driveway entrances near the cul de sac on McGiven Drive. The end of the public road is by the rubbish bin to the left of centre in this photo.

2. **Brooklands Pet Products** - Located at Nos. 21/23 McGiven Drive, on the left hand side about 200 metres from the Ridgewood Drive / McGiven Drive intersection, are the business premises of Brooklands Pet Products, which is described on its website as "one of New Zealand's largest wholesale pet accessories distributors".



**Photo 19** - Approach to entrance to Brooklands Pet Products (beside the rubbish bin on the left in this photo). As appears from this photo and **Photo 11** above, the entrance to Brooklands Pet Products is near the elbow of a curve on McGiven Drive.



**Photo 20** - On business days, numerous vehicles, including trucks and vans, go to and leave from Brooklands Pet Products' premises.



**Photo 21** - On business days, typically 2-4 cars are parked on each side of McGiven Drive near the entrance to Brooklands Pet Products' premises. This photo was taken beside the entrance to Brooklands Pet Products, about 20 metres from the nearest vehicle in this photo.



**Photo 22** - This photo was taken from our car (on a different day) while on McGiven Drive heading towards Ridgewood Drive. The truck is in front of the entrance to Brooklands Pet Products (on the right hand side of the truck in this photo). Note the number of cars parked on the side of the road.

Trucks (sometimes with trailers attached) delivering goods to, or collecting goods from, Brooklands Pet Products commonly either a) drive forward onto Brooklands Pet Products' premises and reverse onto McGiven Drive when leaving, or b) drive past the entrance to Brooklands Pet Products and reverse onto Brooklands Pet Products' premises from that position. Given the bend on McGiven Drive approaching Brooklands Pet Products' premises, if another vehicle were to travel anywhere near 70 km/hr in the vicinity of Brooklands Pet Products' premises while one of these manoeuvres was being carried out, we believe there would be a serious risk of an accident occurring.

3. **Other road users** - As well as McGiven Drive being used for transit by motor vehicles, it is regularly used by cyclists, walkers taking themselves and/or their dogs for exercise, and occasionally joggers and horse riders.

Users of McGiven Drive include both residents and non-residents of McGiven Drive.

McGiven Drive appears to be an attractive route for some non-resident walkers, possibly because of its convenient location and/or length, proximity of rural surroundings to nearby suburbs like Frankleigh Park, and/or the challenging hill climb.

Cyclists using McGiven Drive include, but are not limited to, school age children who live at properties on McGiven Drive, some of whom ride their bikes to and from school. For example, **Photo 19** above shows two boys riding their bikes near the entrance to Brooklands Pet Products.

Due to the absence of a footpath beside the road and the grass verge sometimes being wet, muddy and/or slippery, walkers sometimes have no option but to walk on the road.

4. **Wildlife** - As McGiven Drive comprises lifestyle blocks, from time to time there is wildlife wandering on the road, including pukeko, rabbits and peacocks.

#### C. Submissions in relation to speed limit on other roads in Ridgewood area

In our opinion, for the reasons set out below, the speed limit on the other roads marked in green on the map included in your letter dated 18 April 2023 should also be reduced from 70 km/hr to 50 km/hr.

1. As appears from **Photos 2 - 7** above and as noted above in relation to these photos, the distance from the 70 km/hr speed limit signs on Veale Road to the Veale Road / Ridgewood Drive intersection is about 475 metres. From the 70 km/hr speed limit signs on Veale Road, Veale Road initially ascends over a distance of about 130 metres to a peak near the entrance to No. 37 Veale Road, just before the Veale Road Water Reservoir. Then, over a distance of about 345 metres, there is a descent down a significant gradient to the Veale Road / Ridgewood Drive intersection, with a left bend around the middle of this descent. Turning into Ridgewood Drive from Veale Road involves a 90 degree left turn near the bottom of the hill.

It is inappropriate and dangerous to travel at a speed anywhere near 70 km/hr descending Veale Road towards the Veale Road / Ridgewood Drive intersection for the following reasons:

- a) The left bend around the middle of this descent.
  - b) The gradient is such that heavy braking would be required to safely make the 90 degree left turn into Ridgewood Drive.
  - c) A vehicle travelling at anywhere near 70 km/hr intending to continue on Veale Road past the Veale Road / Ridgewood Drive intersection poses a serious risk of running into the back of a vehicle in front decelerating in order to turn into Ridgewood Drive.
2. The other roads in the Ridgewood area marked in green on the map (Veale, Eva, Hadley, Ridgewood and Freeth) are also not wide, flat or straight, resulting in reduced visibility.

3. These other roads also lack a road shoulder and a footpath.

4. Each of the roads terminates less than 2 kms from the Veale Road 70 km/hr speed limit signs. Thus, there will not be a significant increase in travelling time for anyone with a destination at any of these roads if the speed limit from the Veale Road speed limit signs is reduced from 70 km/hr to 50 km/hr.

5. There are more and more new houses being built in the Ridgewood area. The trend of more people and more vehicles in the area appears set to continue, making a reduction in the speed limit even more necessary in the interests of public safety.

In case anyone wishes to argue against changing the speed limit on McGiven Drive or the Ridgewood area generally on the basis that there have been no or few accidents due to excessive speed, we would make the following comments:

1. We hope the above is sufficient to persuade the relevant decision makers that, regardless of whether or not there have been any accidents to-date, a speed limit of 70 km/hr is inappropriate and gives rise to unjustified risks.
2. We believe that accidents have been avoided because local residents are aware of the hazards referred to in this letter and, by and large, moderate their speed accordingly. This is not, however, a reason to not reduce the speed limit to an appropriate and safe speed limit, which we believe is 50 km/hr. Reducing the speed limit to 50 km/hr will hopefully (a) help persuade the small minority who do not appropriately moderate their speed to do so, and (b) help avoid visitors to the area potentially being lulled into a false sense of security that 70 km/hr is a safe driving speed.

#### D. Summary


In our opinion, for the reasons above, the speed limit on all of the roads in the Ridgewood area marked in green on the map included with your letter dated 18 April 2023, and in any event the speed limit on McGiven Drive, should be reduced from 70 km/hr to 50 km/hr in the interests of public safety.

So far as McGiven Drive is concerned, a speed limit higher than 50 km/hr is plainly excessive, inappropriate, and unjustified given the nature of McGiven Drive, the existence of Brooklands Pet Products' business on McGiven Drive, the shared use of the road by vehicle and non-vehicle users, and wildlife from time to time wandering onto McGiven Drive.

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We encourage any decision makers who remain unconvinced that the speed limit should be reduced to 50 km/hr to drive around the Ridgewood area, and along McGiven Drive in particular, or if this is not practical, to at least view the relevant roads through Google Street View. We believe that if this is done, reducing the speed limit to 50 km/hr will become a "no-brainer".

If you or any of the relevant decision makers have any questions concerning these submissions, please do not hesitate to contact us.

Yours sincerely  
Geoff and Julie Wong  
 (McGiven Drive)



## **RISK MANAGEMENT UPDATE MARCH 2024**

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### **PURPOSE/ TE WHĀINGA**

1. This report provides an update of risk management activities for monitoring and review purposes.

### **RECOMMENDATION / NGĀ WHAIKUPU**

**That having considered all matters in the report, Council:**

- a) **Note the report.**
- b) **Notes that developing the Climate Change Adaptation Plan in financial year 2025/26 creates a risk that actions in that Plan may not be included in the Long-Term-Plan 2027-2037 if there are any delays in the development process.**
- c) **Consider in the Long-Term-Plan 2024-2034 resourcing and funding the Climate Change Adaptation Plan in 2024/25 to avoid that risk.**
- d) **Notes that the funding to support the Rohutu Block Trustees in their managed retreat process was not included as a carry-forward in the 2023/24 financial year and that parts of that community are now at high risk in a significant storm event.**
- e) **Consider in the Long-Term-Plan 2024-2034 funding of \$100,000 for each of the first three years of the Long-Term-Plan, to support the Rohutu Block Trustees in their managed retreat process.**

### **FINANCE, AUDIT AND RISK COMMITTEE RECOMMENDATION**

2. The Finance, Audit and Risk Committee endorsed the proposed recommendations.

### **SIGNIFICANCE AND ENGAGEMENT / TOHUTOHU KAI WHAKAHAERE**

3. This report is provided for information purposes only, and has been assessed as being of some importance.

### **BACKGROUND / WHAKAPAPA**

4. Following the Council's resolution to adopt the current Risk Management Framework for monitoring, review and action on 31 October 2023, this report updates the developments since the last risk management update report (December 2023).
-

*Update of risk registers*

5. The focus of this update is on changes to existing risks, including closing and adding new risks, any changes in risk rating and how the most significant risks are managed. Appendix 1 details Council’s ‘high’ residual risks and how they are being managed.
6. Five risks have been added, specifically arising from the Project Risk space, and are risks that have been residually rated high:

<b>Risk description</b>	<b>Business unit</b>	<b>Residual risk</b>	<b>Treatment</b>
1. The Thermal Dryer Facility Replacement project has a breakdown between project management teams because of multiple contracts being managed in parallel with non-contractual interdependencies resulting in poor project collaboration and delivery.	Strategy and Planning	<b>High</b>	As part of early stages in the project, develop clear RACI matrices, communications plans etc. Promote ‘one’ team mentality. Ongoing various multi-party meetings at Senior Management and delivery level. A meeting between Council’s CEO and Haarslev Senior Representative occurred in October 2023. A charter culture workshop has been held. A 3rd party inspector is being used to verify the quality of goods being manufactured in China and adherence to project programme.
2. Specialist knowledge regarding the Thermal Dryer Facility Replacement project is lost because of movement/retirement of team members resulting in poor project delivery.	Strategy and Planning	<b>High</b>	Documentation, validation, and project management tools used to ensure that project knowledge is not lost due to movement of team members. A matrix of key people and alternatives are provided by each party.
3. The Patterson Road Project incurs significant cost increases because of economic uncertainties, geotechnical challenges, and resource limitations, resulting in budget overspend and project delays.	Strategy and Planning	<b>High</b>	Implement a proactive control plan during the Patterson Road Project’s design phase, focusing on contingency design planning, regular risk monitoring, engaging safety and design consultants, fostering collaborative design with key project partners, and optimising resources to enhance cost efficiencies and mitigate the risks of economic uncertainties, geotechnical challenges, and resource limitations where possible.
4. Knowledge of core systems, processes, and equipment is lost because reliance is placed on the skills and experience of key individuals, resulting in disruptions when those individuals leave the organisation.	Corporate Innovation	<b>High</b>	Business resources designated to the TechOne upgrade project with backfill.  The project team is to work with People and Performance team to ensure appropriate incentives are implemented in seconded business resource contracts for retention purposes during the project.

<b>Risk description</b>	<b>Business unit</b>	<b>Residual risk</b>	<b>Treatment</b>
5. The TechOne upgrade project's scope and/or strategy has to be changed/reduced because of a change in Te Ranga Urungi representative, project sponsor or project owner, resulting in project benefits and objectives not being met or only partially met.	Corporate Innovation	<b>High</b>	This risk is to be monitored through the restructure and will be escalated further if required.

7. Nine risks have been escalated:

<b>Risk description</b>	<b>Business unit</b>	<b>Current residual rating (previous)</b>	<b>Reason for escalating</b>
1. The Council is unable to run key Human Resource and Financial systems because of the absence or departure of key staff with knowledge of how those systems work and interact, resulting in disruption to business as usual processes e.g. pay runs.	Corporate Innovation	<b>High (Medium)</b>	The organisational restructure has escalated this risk, with a reduction of staffing reducing the ability to build depth in skill and knowledge.
2. We are unable to keep pace with changes in the sector because of inadequate workforce planning and an inability to recruit quality replacements for staff leaving the organisation, resulting in a disconnect between the skillsets needed to deliver on the Long-Term Plan and our existing capability.	Corporate Innovation	<b>High (Low)</b>	The organisational restructure has escalated this risk, with a reduction of staffing resulting in a loss of specialist knowledge required for the delivery of the Long-Term Plan and it being difficult to recruit staff with sufficient skillsets.

<p>3. Council has to adjust its planning work programme (and therefore its forecasts and budgets) because of significant changes in the legislative environment (e.g. Resource Management reform requires revoked/revised/replacement National Policy Statements) resulting in amendments to the Long-Term Plan through subsequent Annual Plans, and resourcing impacts.</p>	<p>Strategy and Planning</p>	<p><b>High (Medium)</b></p>	<p>The recent return to the Resource Management Act 1991 by the Government and its signals about amendments has created more uncertainty for the sector as it awaits clarity about the Government's intentions.</p>
<p>4. We fail to meet our statutory requirements because of a number of factors, resulting in central government attention and reputational damage.</p>	<p>Te Tiriti Partnerships</p>	<p><b>High (Medium)</b></p>	<p>The volume of material being reported to Council is increasing (including larger reports to enable robust decision-making), while the organisational restructure is resulting in the loss of institutional knowledge.</p>
<p>5. Council is unable to deliver asset management programmes because of inadequate resourcing and project prioritisation, resulting in poor investment decisions.</p>	<p>Operational Excellence</p>	<p><b>High (Low)</b></p>	<p>Reflects uncertainty during the long-term plan development and reorganisation.</p>
<p>6. Knowledge of core systems, processes and equipment is lost because reliance is placed on the skills and experience of key individuals, resulting in disruptions when those individuals leave the organisation.</p>	<p>Strategy and Planning</p>	<p><b>High (Low)</b></p>	<p>The organisational restructure has escalated this risk, resulting in a loss of institutional knowledge.</p>
	<p>Te Tiriti Partnerships</p>	<p><b>Medium (Low)</b></p>	
<p>7. Our procurement processes are challenged because of a flawed tender process, resulting in legal action and financial damage.</p>	<p>Strategy and Planning</p>	<p><b>Medium (Low)</b></p>	<p>The organisational restructure has escalated this risk, resulting in a loss of institutional knowledge.</p>

<p>8. The Council has a duty to comply with the requirements of the Public Records Act 2005. In particular Section 40 of the Act specifies Council must provide for adequate protection and preservation of the protected records it holds. The risk of non-compliance with the PRA may include loss, damage, and lack of access to records, damage to Council's reputation as a trusted local authority, and/or prosecution for failure to meet requirements.</p>	<p>Corporate Innovation</p>	<p><b>Medium (Low)</b></p>	<p>This change reflects adjustments made to the likelihood rating scale during the last review of the Risk Management Framework.</p>
<p>9. Our District Plan process does not meet statutory requirements because of non-compliance with components or timeframes, resulting in central government attention and reputational damage.</p>	<p>Strategy and Planning</p>	<p><b>Medium (Low)</b></p>	<p>The recent return to the Resource Management Act 1991 by the Government and its signals about amendments has created more uncertainty for the sector as it awaits clarity about the Government's intentions.</p>

8. One risk has been downgraded:

Risk description	Business unit	Current residual rating (previous)	Reason for downgrading
<p>There is misalignment between Officers and elected members because of elected members' expectations and Officers' existing delivery priorities, resulting in difficulty implementing the Long-Term Plan work programme.</p>	<p>Strategy and Planning</p>	<p><b>Low (Medium)</b></p>	<p>Long-Term Plan work programme for environmental and open space planning activities to be agreed and resourced.</p>

*Strategic risks*

9. Council's strategic risks (see Appendix 2) have seen little change from the previous update in December 2023. However, small updates have been made to reflect the current operating environment.

10. As per the Finance, Audit and Risk Committee's work programme a deep dive into Council's climate change-related risks has been completed (see Appendix 3) that updates the mitigation and adaptation deep dives previously reported in February 2021 and December 2020 respectively. The updated consolidated climate change deep dive has also resulted in some updates to the current treatments of strategic risk #5 (Council and the community are not ready for the impacts of climate change because of inadequate definition or communication of mitigation and adaption approaches).
11. We continue to closely monitor developments and their impact on our ability to meet strategic objectives, maintain public trust, and deliver services efficiently. The next risk management update is scheduled for June 2024.

### **CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA ĀHUARANGI**

12. Council's Strategic Framework identifies Sustainability (nurturing our environment, mitigating our impact, and adapting to climate change) as a community outcome and goal.
13. The implications to Council of its risks that have climate change impacts are recorded in the corporate risk module of Pinnacle. The management of climate change related risks with a high residual risk rating (or any rated extreme now or in the future) and risks of strategic importance are routinely provided to the Finance, Audit and Risk Committee as part of risk management update reports for monitoring and assurance purposes.
14. Council has been working on identifying and analysing climate risks to the organisation and its community assets. This work is ongoing and is reflected in the strategic risk in Appendix 2.

### **REFORM IMPLICATIONS**

15. There is nothing in the matter under consideration that has any significant implications for Council's involvement in the Local Government reform agenda.

### **NEXT STEPS / HĪKOI I MURI MAI**

16. The management of any new risks and changes to existing ones will be reported to the Committee every quarter in accordance with its approved work programme.
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## **FINANCIAL AND RESOURCING IMPLICATIONS / NGĀ HĪRAUNGA Ā-PŪTEA, Ā-RAUEMI**

17. Any financial and resourcing implications resulting from risk mitigation measures that are outside staff delegations will be reported and require approval from the Council before being incurred. No such implications have been identified to date.

## **IMPLICATIONS ASSESSMENT / HĪRANGA AROMATAWAI**

18. This report confirms that the matter concerned has no particular implications and has been dealt with in accordance with the Local Government Act 2002. Specifically:
- Council staff have delegated authority for any decisions made;
  - Unless stated above, any decisions made can be addressed through current funding under the Long-Term Plan and Annual Plan;
  - Any decisions made are consistent with the Council's plans and policies; and
  - No decisions have been made that would alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of the Council, or would transfer the ownership or control of a strategic asset to or from the Council.

## **APPENDICES / NGĀ ĀPITI HANGA**

- Appendix 1 Current high residual risks and how they are being managed (ECM 9192308)
- Appendix 2 Strategic risks March 2024 (ECM 9192306)
- Appendix 3 Updated deep dive into Council's climate-change activities (ECM 9189119)

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### **Report Details**

Prepared By: Gloriana Wilson (Risk and Assurance Advisor)  
Team: Legal, Risk and Assurance  
Approved By: Rowan Betts (Manager – Legal, Risk and Assurance)  
Ward/Community: District-wide  
Date: 20 February 2024  
File Reference: ECM 9192302

-----*End of Report*-----

**APPENDIX 1 - CURRENT HIGH RESIDUAL RISKS AND HOW THEY ARE BEING MANAGED**

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
<b>Corporate Innovation</b>						
RISK002	Information Management	There is an unplanned system outage of the production environment because of equipment failure, resulting in disruption to some Council activities.	<p>Council has replaced the computing environment within the last two years and now has renewal policies and funding for every five years to ensure equipment is up to date and fit for purpose.</p> <p>We have also implemented a dual data centre environment with one located in New Plymouth and the other in Hamilton.</p>	Major	Moderate	<p>The risk will be addressed as part of the 'Greenfields' project (Pakiaka).</p> <p>Infrastructure support renewals were only signed for three years so there will be a need to identify additional budget in subsequent years to allow the intended level of service.</p>
RISK003	Information Management	There is an unplanned system outage because of the loss of all data centre capability (flood, fire, sabotage etc), resulting in widespread disruption to Council activities for an extended period.	<p>Council has a dual data centre environment, with one located in New Plymouth and the other in Hamilton.</p> <p>Council services may still be affected if Council sites are affected by fire, flood etc.</p>	Catastrophic	Possible	Current response assumptions are based on a local event (flood, fire, sabotage etc) impacting a single data centre using a combination of Cloud Services, high availability, and back-ups to recover. A failover test of the alternative data centre is needed.
RISK006	People and Knowledge	Knowledge of core systems, processes and equipment is lost because reliance is placed on the skills and experience of key individuals, resulting in disruptions when those individuals leave the organisation.	Ensuring cross functional training, standardised systems and appropriate training helps mitigate this risk. Documented processes.	Moderate	Likely	No change.



Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK012	Financial	Planned revenue and expenditure are disrupted because of a natural disaster (exacerbated by climate change e.g. flooding, wild fire, storms), resulting in a substantial deficit and unplanned rates increases in subsequent years as we recover.	The Council has a range of insurance policies to help reduce the financial consequence of natural catastrophes, supported by a strong balance sheet and significant borrowing capacity.  Council can access funds from the Perpetual Investment Fund in an emergency, subject to Council approval.	Catastrophic	Unlikely	No change.
RISK014	Information Management	ICT systems are potentially exposed to greater security threats because of the move towards online and cloud services, resulting in the potential for hacking and subsequent outages and/or privacy breaches.	We have started to move to the use of an approved cloud services list as opposed to the current open access model. Once this is fully implemented the risk of any new and unauthorised cloud services will be greatly reduced.  This is expected to be fully operational within nine to twelve months.	Moderate	Likely	The risk is being addressed as part of the 'Greenfields' project (Pakiaka), which is nearing completion.  An independent internal security review recommended improvements that have been implemented. Budget includes periodic security reviews of external facing solutions.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK021	Planning and Strategy	We do not allow enough renewal funding because of poor budget planning, resulting in future shortfalls when assets need replacement.	The Council operates detailed Asset Management Plans by asset category. Renewal funding and reserve management is reviewed annually, which helps to ensure that adequate funding is available.  The Council also has significant borrowing capacity if required to meet any shortfalls. Council is considering funding strategy through the preparation of LTP.	Major	Moderate	No change.
RISK106	Information Management	The Council suffers the following because of inadequate physical security arrangements, resulting in financial, reputational, and potentially legal consequences:  1. Theft/Loss/Destruction of equipment (e.g. laptops) and records; and  2. Theft of records due to physical break-in, or a member of the public following staff through security doors and into a secure area.	Physical entry restrictions, security systems, procedures, and staff training, barriers between work areas and client service areas, restricted client access to physical files/documents/records, and secure records storage outside service area.	Major	Moderate	No change.  Encryption of data will be implemented as part of the 'Greenfields' project (Pakiaka).

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK152	Information Management	There is unauthorised access to Council data, systems and IS resources because of a lack of a security framework, resulting in financial, reputational, and potentially legal consequences.	<p>All solution decisions sit with the General Manager Corporate Innovation, and all Council websites have moved to HTTPS (Secure Web Services). Council is using security consultants to audit new websites and carry out penetration testing. Existing IS standards and policies are being reviewed to align with changes in technology, and a more mature security framework is being developed.</p> <p>Digital Enablement (formerly Business Technology Group) have instigated annual audits by external providers to review frameworks, policies and procedures to ensure best practice and industry standards are applied. Along with this, a "no trust" model has been adopted.</p>	Catastrophic	Moderate	With the Chief Information Officer role disestablished decision making now sits with the General Manager Corporate Innovation, who will oversee implementation of the current security road map in conjunction with the Manager Digital Enablement.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK170	Health, Safety and Wellbeing	A member of the public, a Council employee, or contractor working on Council's behalf is exposed to a critical risk because of the action or inaction of Council, resulting in serious harm or death. Council's critical risks are: - vehicle movements - personnel security - working at height - public health - contractor management - working with electricity	Ongoing implementation of the Health, Safety and Wellbeing (HSW) Framework. Particularly developing a sound culture in the organisation that encourages speaking up when staff observe unsafe behaviours, and having a robust process for learning from incidents to prevent a recurrence.  This includes sharing key lessons from accident investigations e.g. '5 Whys' and ICAMS.	Major	Moderate	No change.
RISK206	Information Management	The Council is unnecessarily exposed to external attacks on public facing services because of a lack of consistent standards, and a security framework, resulting in financial, reputational, and potentially legal consequences.	Windows Defender has been installed on all servers and laptops. The use of firewalls and moving to Identity authentication along with multi-factor authentication for external sites (internal implemented later in 2023).	Catastrophic	Moderate	No change.  Digital Enablement has also implemented a "No Trust Model".

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK207	Information Management	The Council suffers a loss of data or disruption to services (e.g. from malware), because of a lack of consistent standards, and a security framework, resulting in financial, reputational, and potentially legal consequences.	Regular malware mandatory training has been introduced across Council as well as Microsoft Defender for Identity (formerly known as Microsoft Advanced Threat Protection).	Major	Moderate	No change.  The need for improved security, standards, policies and guidelines for the Council has been identified. A security programme of work will be instigated to ensure the Council is aligned to industry best practice (including virtual networks to negate malware and phishing attacks). Full back-up capability will be designed as part of the 'Greenfields' project (Pakiaka). Mandatory staff training has been introduced.
RISK219	Health, Safety & Wellbeing  Financial  Operations and Service Delivery  Property and Assets	The Waitara Wastewater Transfer Pump Station is damaged because an earthquake (with a 1/1000 Annual Exceedance Probability) causes a failure of the stop bank on which the station is located, resulting in environmental damage through the discharge of untreated sewage to the river, and subsequent service disruption to the community for a prolonged period (potentially several weeks).	A project to upgrade the Waitara Wastewater Transfer Pump Station is being developed.  The project will assess the probable level of damage to the existing transfer station in more detail and identify what seismic strengthening measures (if any) are feasible.	Catastrophic	Unlikely	No change.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK223	Legislative Compliance and Control	Council breaches consent terms, regulations or standards relating to drinking, waste, storm water or assets such as the former Lake Mangamahoe Hydro Dam, because of an action or inaction by Council and/or its contractor(s) during works on infrastructure or business as usual operations, resulting in legal consequences, revoked accreditation, adverse media attention, or a public health outbreak.	Council has a robust compliance monitoring system, a dedicated compliance team, and continually developing processes and controls for our water infrastructure. Council ensures that we are clear about our consent terms and monitor our own compliance through regular inspections of our contractors' activities. Training is provided for our staff in high-risk areas and internal and external audits completed.	Major	Moderate	No change.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK111	People and Knowledge	We are unable to keep pace with changes in the sector because of inadequate workforce planning and an inability to recruit quality replacements for staff leaving the organisation, resulting in a disconnect between the skillsets needed to deliver on the Long-Term Plan and our existing capability.	<p>Policies and procedures, and training on them, Engagement Strategy, Remuneration Strategy and Policy, Remuneration Framework. Oku Wahi in place, which incorporates automation for some processes e.g. people requirements.</p> <p>Talent Adviser role established to support leaders with attraction &amp; retention, EVP and workforce planning from 30-11-21.</p> <p>Reviewed our people package to ensure that we are an attractive workplace and more competitive in the recruitment market.</p>	Moderate	Likely	The organisational restructure has escalated this risk.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK150	People and Knowledge	The Council is unable to run key Human Resource and Financial systems because of the absence or departure of key staff with knowledge of how those systems work and interact, resulting in disruption to business as usual processes e.g. pay runs.	<p>Close relationships are maintained with Digital Enablement and software vendors.</p> <p>Configuration manuals, process maps, and quick guides are available for users.</p> <p>Ongoing training of a number of staff to ensure the risk is mitigated by spreading knowledge across staff of how key systems work and interact rather than that knowledge being held just by individual staff.</p> <p>Ensuring that knowledge is shared between more staff.</p>	Major	Moderate	The organisational restructure has escalated this risk, with a reduction of staffing reducing the ability to build depth in skill and knowledge.
RISK239	People and Knowledge	Knowledge of core systems, processes, and equipment is lost because reliance is placed on the skills and experience of key individuals, resulting in disruptions when those individuals leave the organisation.	<p>Business resources designated to the TechOne upgrade project with backfill.</p> <p>The project team is to work with Human Resources team to ensure appropriate incentives are implemented in seconded business resource contracts for retention purposes during the project</p>	Major	Moderate	New risk.



Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK240	Planning and Strategy	The TechOne upgrade project's scope and/or strategy has to be changed/reduced because of a change in Te Ranga Urungi representative, project sponsor or project owner, resulting in project benefits and objectives not being met or only partially met.	This risk is to be monitored through the restructure and will be escalated further if required.	Major	Moderate	New risk.
<b>Operational Excellence</b>						
RISK073	Health, Safety and Wellbeing	A member of the public has an accident on our roading network because of a deficiency in our infrastructure, resulting in serious harm or death. Examples of deficiencies are things that do not meet current design standards or levels of service e.g. sharp corners with no signage or barriers, and a chip seal with insufficient skid resistance.	For the urban network, Council reduces the likelihood and severity of crashes with the Minor Improvement Programme, speed controls, monitoring of crash data and behaviour change programmes. More work needed in relation to the rural network to achieve Road Transport Standards - 5 (Rural Roads), compliance expected by 30 June 2024.	Catastrophic	Moderate	No change.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK161	Financial	A Council bridge or other structure fails or has to be closed because renewal funding was inadequate, resulting in potential harm to individuals and/or a financial impact associated with the necessary repair or replacement of the asset.	Some budget lines can be reallocated for smaller events. Potential to access the disaster recovery reserve, Council has a strong balance sheet and should not have to borrow to fund repairs. Alternative routes available for most Council bridges.	Major	Moderate	No change.
RISK213	Health, Safety and Wellbeing	Aquatic Centre staff are unable to respond quickly and appropriately to a natural disaster because of inadequate emergency preparedness, resulting in unnecessary serious harm or death of workers and/or members of the public.	All events are required to have a Health and Safety Plan. Thorough induction, Health and Safety training for all staff. Emergency plans, operations manual, pool risk management plans in place that are updated and reviewed frequently.	Catastrophic	Possible	No change.
RISK197	Property and Assets	The electrical distribution board located in the Main Control and Laboratory Building at the New Plymouth Wastewater Treatment Plant could be destroyed in a significant earthquake because of sub-optimal performance of the building (it has been assessed as an earthquake risk - 34% of NBS), resulting in disruption to wastewater services for over a week.	The plant can be controlled remotely.  Planning is underway to either upgrade the existing building or move the building and reinforce the switchboard area.	Catastrophic	Unlikely	No change.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK196	Governance	There is a mismatch between the expectations of iwi and Council about engagement and protection mechanisms regarding the environment and/or wāhi tapu on specific projects, particularly those involving excavation, resulting in delays and/or additional costs being incurred.	Council staff have discussed what engagement rules need to be to provide clarity for project managers going forward. Discussions between council management with hapu ongoing - National design engineering standards will provide guidance.	Moderate	Almost Certain	No change.  A workshop on 23 May 2023 with elected members that covered Te Tiriti in a local government context was intended to help with setting Council's strategic direction.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK147	Environment	There are damaging discharges to water, land or air from vehicles or plant and equipment parked/stored at the Hobson Street depot because those discharges are not managed appropriately, resulting in environmental damage.	<p>Daily plant check sheets are used to identify vehicles or equipment requiring maintenance. Parks have 11 spill kits at four sites: Hobson Street (six) Fernery (two), Zoo (two), and Cricket Shed (one). These kits are rated for oil/hydrocarbon, general purpose and chemical substances. In addition to this, 16 fleet vehicles have spill kits in them.</p> <p>The vehicle storage sheds have oil drip mats under the vehicles. A portable bund has also been obtained for the main workshop to contain fluids outside of the chemical and hydrocarbon storage areas. Staff have a daily vehicle check and been trained in its implementation.</p>	Moderate	Almost Certain	<p>No change.</p> <p>Further work needed to mitigate the risk of discharge includes installing purpose-built storage bays with leachate drainage and a specialised wash down area. Point of entry business cases for the storage bins and wash down area have been approved for delivery during years six and nine of the 2021-31 Long-Term Plan respectively.</p>

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK162	Legislative Compliance and Control	There is an overflow from the Mangati pump station because there is little emergency storage (only around three to five minutes' worth) in the event the pumps fail for any reason, resulting in environmental damage from sewage and potential prosecution.	<p>The Area Q pump station is now operating, which takes some load off the Mangati pump station.</p> <p>A standby generator for the Mangati pump station has been installed. An options study for storage at this pump station and failure mode analysis have been undertaken.</p>	Moderate	Likely	<p>No change.</p> <p>A project has been included in the 2021-31 Long-Term Plan to build emergency storage at the Mangati pump station.</p> <p>A business case has been loaded into P3M and a project manager assigned. An engineering consultant has been engaged to design the works. It is likely that construction will occur during the Summer of 2025/26, to allow sufficient time to complete planning, consultation and consenting requirements.</p>

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK149	Health, Safety and Wellbeing	The health and safety of workers at the Materials Recovery Facility (MRF) are endangered because of the contamination of recycled material by non-recyclable items (e.g. ashes, medical waste, sharps, gas cylinders), resulting in injuries to individuals or a fire risk to the facility itself. While there are sprinklers and firefighting systems in place recent work has identified the onsite water supply needs to be increased to provide sufficient water for sprinklers.	EnviroWaste (contractor) MRF procedures and Personal Protective Equipment; Contamination Management Plan; updated Solid Waste bylaw; bin audits; three warnings to properties found to be including contaminants in their recycling before collection ceases; regular (quarterly) education of the public; emergency response procedures at the MRF; increased face-to-face education with a dedicated bin auditor through the contractor; and a fire hose installed in the loading area of MRF.	Major	Moderate	<p>Analysis shows that the level of contamination of recyclables in Taranaki is comparable to other districts and fluctuates between 16-18% with a 12-month average of 19%.</p> <p>A review of the Contamination Management Plan identified a number of improvements to processes at the kerbside and at the MRF, and these have been implemented. Two optical sorters have now been installed (2022 and 2023) to automate some of the sorting process (reducing health and safety risk) and increase sorting efficiency and quality. Initial data indicates the optical sorters have resulted in significant improvement in contamination (now consistently under 20%, with a new low of 17% in April 2023), sorting efficiency, and quality. Other efforts are being made nationally through the current work by the Ministry for the Environment (standardisation of recycling collections nationally announced in April, that was implemented in February 2024). Hazardous contamination being observed at the MRF remains low.</p>

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK153	Property and Assets	A key infrastructure asset fails because of inadequate preventative maintenance (including poor use of asset information to inform maintenance decisions), resulting in an inability to maintain levels of service, subsequent community discontent, and potentially prosecution.	<p>Implementing an effective preventive maintenance programme. An Enterprise Asset Management system implemented in July 2016, and Asset Management Plans have been updated. Additional inspection and condition rating resources have been allocated in the Long-Term Plan 2021-31.</p> <p>Through the asset discovery work, the quantum of underfunding of renewals and maintenance has been quantified, including the scale of the backlog of deferred works.</p> <p>Only about half of plant and equipment assets have maintenance schedules in the Computerised Maintenance Management System with this coverage being increased continuously as inspections are completed by the Council's mechanical maintenance fitters.</p>	Major	Likely	There are a number of assets that have been inspected and found to be in poor condition, where total failure is close. Work on projects to address those assets are underway. (e.g. Onaero stormwater pipe etc.)

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK044	Operations and Service Delivery	Customers are provided with unreliable or inaccurate information (e.g. through responses to LIM and LGOIMA requests) because of Council's poor performance or decision making, resulting in successful challenges.	Documented processes and procedures, information management strategy, escalation protocol, internal and external audit, effective communication between teams and with other agencies. Ongoing training.	Moderate	Likely	No change.



Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK221	People and Knowledge Operations and Service Delivery	Council delivers a low quality and inconsistent service to our customers because of high staff turnover (so a loss of institutional knowledge), limited capability until new staff get up to speed, and poor customer service interactions, resulting in community dissatisfaction and discontent.	<p>Expectations on leads in annual performance plans to meet customer service response times and to ensure all leads understand our customer service processes and deliverables.</p> <p>In depth training of customer support roles, continuous improvement, KPIs on accuracy and timeliness of customer responses.</p> <p>Staff development/training, documented process and procedures, staff recognition, contract management, and succession planning.</p> <p>Contractors' documentation confirming suitably qualified.</p> <p>Training and monitoring of behaviours.</p> <p>Acting on feedback from customers.</p>	Moderate	Likely	As the Council moves through the organisational transformation there is a strong focus on enhancing processes, efficiencies, cross organisational integration, and better linkage to strategic priorities.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK115	Health, Safety and Wellbeing	<p>There is an incident involving a worker and/or a member of the public in the course of business as usual because of our action or inaction or that of the public, resulting in serious harm to, or the death of, a worker and/or member of the public. This risk can be the result of:</p> <ul style="list-style-type: none"> <li>• Inadequate induction</li> <li>• Inadequate operating procedures</li> <li>• Use of drugs or alcohol by staff or members of the public</li> <li>• Late night working and working alone (e.g. tiredness, harassment from the public, assault, injury, robbery)</li> </ul> <p>Staff administering first aid (e.g. exposure to blood).</p>	<p>Develop and maintain a Health and Safety culture and continually identify risks across Venues and Events. This includes only using approved contractors, thorough induction, Health and Safety training for all staff, maintaining good levels of casual pools of staff and provision of appropriate Personal Protective Equipment.</p> <p>Furthermore, all events are required to have a Health and Safety Plan. Consistent Standard Operating Procedures have been developed for all venues and are reviewed on a regular basis.</p>	Major	Moderate	No change.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK209	Health, Safety and Wellbeing  Legislative Compliance and Control  Environment  Financial  Property and Assets	Highlands Park Dam fails during a moderate flood event (1-in-50-year event) because identified safety deficiencies (as per the Building (Dam Safety) Regulations 2022) are realised, resulting in damage to people, property and/or environment.	<p>Tonkin &amp; Taylor (Dams Safety Advisor) notified Council that Highlands Park Dam meets 'Dangerous Dam' criteria in June 2023 and made recommendations to address the issue under the Building (Dam Safety) Regulations 2022, including notifying TRC (completed by the Quality and Compliance Lead 23 June 2023).</p> <p>A rapid assessment for remediation work was undertaken, considering the upgrade of the auxiliary spillway to temporarily de-risk the dam.</p> <p>However, the assessment shows that the spillway upgrade would significantly reduce the detention performance of the dam and introduce unknown risks to the downstream urban catchment.</p>	Catastrophic	Possible	<p>Tonkin &amp; Taylor to complete a review February 2024 that will help inform next steps regarding any remedial works needed to address risks identified or otherwise to ensure compliance with regulations.</p> <p>A temporary upgrade has been ruled out and a comprehensive assessment is underway (this includes a first stage of catchment wide flood modelling and subsequent remediation options assessment); the timeframe for this work is 12-14 months.</p> <p>In the meantime, Council is working on finalising the dam safety assurance programme and maintenance work on the existing spillway will be done to maximise its performance.</p> <p>TRC has endorsed the approach Council is taking.</p>

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK234	Environment  Financial  Legislative Compliance and Control  Operations and Service Delivery	There is an unauthorised discharge of sewage from the Eliot Street outfall because of the failure of a gibault on the outlet pipe from the Te Henui Pump Station, resulting in significant environmental damage and possible regulatory intervention.	A temporary repair (installation of a pipe clamp) has been applied and daily inspections will be completed to reduce the risk while options for a longer-term fix are considered.  A plan is being prepared to replace the gibault, noting that this will be a complicated task given the need to construct a bypass to install it.	Major	Likely	Preparations are in place for if the gibault fails before the bypass can be constructed. Three Waters will implement its Incident Response Plan to ensure impacted beaches are closed and to protect public health.  Council have consulted with the Public Health Unit and it has confirmed that the process in Council's IRP is sufficient in the event of an overflow.  Once the gibault has been replaced then the risk will be closed.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK36	People and Knowledge	Knowledge of core systems, processes and equipment is lost because reliance is placed on the skills and experience of key individuals, resulting in significant disruption when those individuals leave the organisation.	Development of an integrated quality management system is underway in alignment with the requirements of ISO 9001. this includes documenting end-to-end business processes as well as implementing a process compliance monitoring processes and change control.  This will provide a consistent and document way of doing business as well as creating training collateral for new employees.	Moderate	Likely	Risk escalated in last review.  Increase in consequence rating is reflective of the current organisational restructure.  Robust documentation tools are in place to capture knowledge and a comprehensive knowledge transfer process.  Relevant subject matter expertise remain in place, along with a matrix of key skills.  As the Council moves through the organisational transformation there is a strong focus on enhancing processes, efficiencies, cross organisational integration, and better linkage to strategic priorities.
RISK100	People and Knowledge	Council is unable to deliver asset management programmes because of inadequate resourcing and project prioritisation, resulting in poor investment decisions.	Resourcing reviews are underway as part of long-term planning so that resourcing levels match the demand. Implementation of a better business case process and portfolio management is ongoing and is helping with better project prioritisation.	Moderate	Likely	Risk escalated in last review.  Reflects uncertainty during the long-term plan development and reorganisation.  As the Council moves through the organisational transformation there is a strong focus on enhancing processes, efficiencies, cross organisational integration, and better linkage to strategic priorities.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
<b>Strategy and Planning</b>						
RISK232	Project/Quality Management	The Tūparikino Active Community Hub project is cancelled or delayed because a new lease with the Taranaki Racing Incorporated (TRI) for the racecourse cannot be agreed, resulting in financial loss and reputational damage given community expectations around delivery.	Ongoing discussions between Council's Chief Executive and the TRI Board. Main issue is in relation to the track crossings for the "in-track" fields. Solution is to do an underpass this would cost \$4-6m, which potentially makes the "in-track" elements of the project too costly. Team reviewing alternative locations for "in-track" elements of the project.	Catastrophic	Possible	Steering Group meetings are ongoing, including a TRI representative. With the focus on an indoor hub the lack of a lease is less likely to be an issue. For indoor hub main things are race day stand and tie ups.
RISK233	Project/Quality Management	The Tūparikino Active Community Hub project is cancelled, or there is a reduction in scope because of inadequate funding resulting in project benefits not being realised.	Seek additional Council and external funding, and consistent messaging about co-investment requirements by project partners and stakeholders. Scope has been reduced, and consideration being given to phasing over a longer period.	Moderate	Likely	Public feedback will be sought through the Consultation Document for the 2024-34 Long-Term Plan, and this will likely provide more direction about the project's future direction.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK169	Governance	We do not meet the statutory requirements or timeframes for the Long-Term Plan or Annual Plan because of our resource allocation/prioritisation, resulting in a breach of legislation, central government attention, reputational damage, and an inability to lawfully strike rates.	For each Long-Term Plan and Annual Plan actively establish governance structures, project management, project plan and timelines. Monitor progress against the project plan and milestones, working party meetings, and escalate any issues likely to impact on delivery of the plan. Early and ongoing briefing of elected members regarding project timelines and key milestones. Use of Taituarā guidance. Increasing focus on improving project management.	Catastrophic	Unlikely	No change.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK210	Financial	The LTP is undeliverable because forecasting assumptions and budget data on which it is based prove inaccurate (i.e. the economy performs worse than predicted), resulting in a need to delay or re-scope major projects, and possibly reduce levels of service.	Finance staff will produce a monthly report to Te Ranga Urungi to indicate the size of those variances to the Council approved plan, and management (with the help of budget holders) will need to complete a forecast during the year and reassess priorities accordingly.  From Year two onwards, Council has the opportunity to re-state and approve an Annual Plan, which would address any material changes to the Long-Term Plan 2024-34.	Catastrophic	Moderate	These risks will be monitored by the Project Manager and reported to the Delivery Team and Steering Group as appropriate and will be updated in this report accordingly.
RISK228	Governance	Completion of the LTP is delayed or pressured because of the lack of adequate resourcing (Audit NZ and Council) for the LTP audit, resulting in flawed decision-making as decisions need to be made in a compressed timeframe to meet legislative requirements or otherwise breach them.	The agreed Audit Plan includes timelines. Te Ranga Urungi will confirm available resources required to deliver the Long-Term Plan.	Moderate	Likely	As above.



Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK225	Governance	The LTP is impacted because of the uncertainty caused by a change in government and the resulting modifications to local government reforms (e.g. Local Water Done Well, RMA, CDEM), resulting in an LTP that may soon be superseded by unanticipated requirements of reform and/or legislative change.	In conjunction with any sector-wide initiative through Taituarā, Council will communicate with the incoming Minister of Local Government about how any significant change in direction will need to be accompanied by allowing more time for the LTP process. Work with the internal Organisational Transformation team, and keep across legislative changes and central government announcements.	Moderate	Likely	As above.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK214	Health, Safety and Wellbeing	Additional pressure is placed on staff because the CAPEX available is inadequate to deliver planned projects yet expectations are not reduced accordingly, resulting in wellbeing impacts on staff (e.g. fatigue, stress, absence, resignations).	<p>Managers to have regular wellbeing and workload check-ins with their staff to monitor the level of pressure and stress, and take any necessary corrective actions as appropriate.</p> <p>Resource planning is reviewed regularly and may include backfilling arrangements and sharing of workloads where staff are being negatively impacted.</p> <p>Provide appropriate support to staff such as access to the Employee Assistance Programme, Occupational Health Nurse, or GP referral, HR &amp; HSW guidance and appropriate wellbeing training.</p>	Moderate	Almost Certain	As above.
RISK212	Project/Quality Management	The LTP is unachievable because it does not consider the ability of the supplier market to deliver planned work, resulting in delayed or deferred major projects, and higher carry forwards than planned.	Regular conversations with key suppliers around capacity when prioritising based on deliverability.	Major	Moderate	As above.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK226	Legislative Compliance and Control	Progress with the LTP is impacted because of a significant legal non-compliance, resulting in a need to include a new project/s and/or reprioritise projects in the LTP at short notice.	Project structures and timelines in place, maintain close stakeholder communication, engage legal experts for compliance, and develop contingency plans to proactively address legal non-compliance, ensuring minimal impact on the Long-Term Plan and facilitating timely adjustments and reprioritisation if required.	Moderate	Likely	As above.
RISK227	People and Knowledge	Key staff are either not involved or not at the right time because role responsibilities are unclear, resulting in late changes of direction and otherwise a sub-optimal LTP.	Project Management structure and clarity on roles in the structure. Opportunities to upskill people.	Moderate	Likely	As above.
RISK215	People and Knowledge	The quality and timeliness of decision making leading up to critical stage gates before LTP approval is inadequate because of the loss of key staff following the organisational restructure (and an inability to delegate), resulting in late changes of direction, a lack of continuity, and a sub-optimal LTP.	Ensuring the organisation is aware that the LTP is the key project and everyone's responsibility. Ongoing monitoring. A strong Delivery Team. Reducing single person risk areas. Utilising external support where required.	Moderate	Almost Certain	As above.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK229	Project/ Quality Management	Preparation of the LTP is disrupted because bottlenecks are created by teams without the resourcing needed to complete tasks when needed, resulting in delayed achievement of critical stage gates or non-compliance with legislative reporting timeframes (e.g. agendas not released to Elected Members in line with notice requirements).	Finance and Policy to work closely together through final budget stages to enable Policy to have sufficient time to write reports by using drafts. Push ELT, Managers etc to make earlier decisions and ensure Elected Members are informed. Focus on timeframes and Delivery Team meetings, and escalate quickly any time slippage to the sponsor and Steering Group for quick action to resolve in a timely matter.	Moderate	Likely	As above.
RISK230	Project/ Quality Management	A major project starts to fail because specified time, quality, scope, or cost requirements are not realised, resulting in a need to reframe the LTP at a late stage.	P3M structure and Framework. Workshops on project prioritisation, clarity on the must do projects (e.g., HSE and Legal). Budget accuracy through the adherence to the endorsed Cost Estimating Framework, utilising the Excel template for cost estimates, regular project forecasting within the P3M tool and reviews and updates of project budgets and timelines.	Major	Moderate	As above.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK211	Project/ Quality Management	The LTP is undeliverable because the number and scale of projects in the LTP exceeds the capacity and capability of the organisation (e.g. finance, project management, other support functions), resulting in pressure on deliverability in future years and on internal resourcing, increasing carry forwards, and discontent as projects are not delivered in line with the LTP or community expectations.	Develop a robust forecasting assumption on capital deliverability and place into supporting information before audit process. Prioritisation process with realistic timing. Building the capability of resources.  Drive efficiencies throughout the organisation to increase delivery.	Major	Moderate	As above.
RISK139	Legislative Compliance and Control  Financial	Council has to adjust its planning work programme (and therefore its forecasts and budgets) because of significant changes in the legislative environment (e.g. Resource Management reform requires revoked/revised/replacement National Policy Statements) resulting in amendments to the Long-Term Plan through subsequent Annual Plans, and resourcing impacts.	The recent return to the Resource Management Act 1991 by the Government and its signals about amendments has created more uncertainty for the sector as it awaits clarity about the Government's intentions.	Major	Likely	Risk escalated at last review.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK235	Project/ Quality Management	The Thermal Dryer Facility Replacement project has a breakdown between project management teams because of multiple contracts being managed in parallel with non-contractual interdependencies resulting in poor project collaboration and delivery.	As part of early stages in the project, develop clear RACI matrices, communications plans etc. Promote 'one' team mentality. Ongoing various multi-party meetings at Senior Management and delivery level. A meeting between Council's CEO and Haarslev Senior Representative occurred in October 2023. A charter culture workshop has been held. A 3rd party inspector is being used to verify the quality of goods being manufactured in China and adherence to project programme.	Moderate	Likely	New risk.
RISK236	Project/Quality Management	Specialist knowledge regarding the Thermal Dryer Facility Replacement project is lost because of movement/retirement of team members resulting in poor project delivery.	Documentation, validation, and project management tools used to ensure that project knowledge is not lost due to movement of team members. A matrix of key people and alternatives are provided by each party.	Moderate	Likely	New risk.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK238	Financial	The Patterson Road Project incurs significant cost increases because of economic uncertainties, geotechnical challenges, and resource limitations, resulting in financial implications and project delays.	Implement a proactive control plan during the Patterson Road Project's design phase, focusing on contingency design planning, regular risk monitoring, engaging safety and design consultants, fostering collaborative design with key project partners, and optimising resources to enhance cost efficiencies and mitigate the risks of economic uncertainties, geotechnical challenges, and resource limitations where possible.	Moderate	Likely	New risk.

Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
<b>Te Tiriti Partnerships</b>						
RISK192	Project/Quality Management	The delivery of significant projects is disrupted because of uncertainty caused by supply chain disruption, tight labour market conditions, and inflationary pressures, resulting in negative impacts on project cost, quality, and/or timeframes.	Council has a limited ability to manage this risk. Activities are focused on ensuring project reporting is clear about the implications of the operating environment on Council's ability to deliver significant projects within planned budgets and timeframes. Elected members were briefed on this matter on 9 August 2022.	Major	Moderate	Council projects are being impacted, for example the Thermal Dryer Facility and Downtown Carpark. Cost Estimating Framework launched. Increased focus on prioritisation of projects. Inflation appears to be levelling off
RISK208	Governance	Council is unable to progress projects and other initiatives in the Long-Term Plan and Annual Plan because its processes do not identify matters of significance to tangata whenua, resulting in a disconnect between that work and the imperatives of tangata whenua, and therefore challenges in giving effect to the principle of partnership under the Treaty of Waitangi.	Refer to the strategic risk in Appendix 2 for more detail, but in summary the Significance and Engagement Policy sets out expectations about the extent of engagement required with iwi. The Local Government Act and Resource Management Act also require Council to support Māori participation. Te Huinga Taumatua provides strategic guidance and advice to Council.	Moderate	Likely	No change.



Risk Number	Type of risk	Description	Current treatment	Residual risk assessment		Comments
				Consequence	Likelihood	
RISK108	Legislative Compliance and Control	We fail to meet our statutory requirements because of a number of factors, resulting in central government attention and reputational damage.	Digital agenda distribution, alternative sources of delivery e.g. same day courier, and monitoring of statutory timeframes. Extensive report review process.	Major	Moderate	Risk escalated at last review.  The volume of material being reported to Council is increasing (including larger reports to enable robust decision-making), while the organisational restructure is resulting in the loss of institutional knowledge.
RISK59	Governance	There is a dysfunctional relationship between elected members and management/key staff (and within the organisation itself) because of a number of factors resulting in reputational damage, undermining of management decisions, or the appointment of a Crown Manager to replace the Council.	Each triennium a comprehensive Induction programme is provided for new elected members which highlights the respective roles of management and governance. It endeavours to ensure the relationship between elected members and senior staff is based on high levels of trust and mutual respect and encourages a "no surprises" approach. The organisational culture is based on a strong set of values and behaviours that underpins everything we do.	Catastrophic	Possible	No change.

## STRATEGIC RISKS MARCH 2024

### Key Council objectives

Council should:

- Act as kaitiaki/intergenerational guardian for our district – protecting the community, taonga, environment, democracy, assets.
- Design and deliver services that support the four wellbeing pillars (social, economic, environmental, and cultural) across the district in a way that is effective, efficient, sustainable, legally compliant, and measurable through realistic Long-Term Plan Key Performance Indicators.
- Build partnerships – with tangata whenua and other key partners such as Central Government agencies.
- Make this a better place – grow public wealth and support a prosperous community.
- Advocate for Taranaki nationally and globally.

### Opportunities

- Adapting our approach to engagement with our diverse community, gaining more creative and diverse ideas through modern communication methods. Being bold and innovative, while balancing political and personal risk, when seeking community feedback on its needs and wants. There’s a need for more regular and personal contact with the community when seeking feedback.
- Challenging economic conditions force us to rethink about how we can operate financially more effectively and efficiently, and deliver more or the same with less e.g. leveraging off the PIF, CCO performance, and accessing Central Government funding when it makes sense to do so. A continuous improvement focus.
- The changing face of NPDC. Central Government reforms and the Future for Local Government review outcomes require a rethink of what Council delivers via Long-Term Plans and how, ensuring a robust and enduring strategy to drive a reshaped organisation supported by the right processes, and technology and tools. This involves building leadership capability via the Learning and Development Framework, and implementing an Attraction Strategy (Employee Value Proposition) and Wellbeing Strategy to optimise talent recruitment and retention in a competitive market. It also needs tangible action on staff engagement survey findings, and building the organisation’s culture to improve the delivery of services to our community, and improving the alignment of individual performance goals with the Corporate Plan.
- The need to build more robust and trusted partnerships with tangata whenua and all key partners. This will help to lower transaction costs and improve performance.
- Transforming our economy to a low emissions future and advocating/driving economic growth for the region (Team Taranaki). Increasing economic development grows the community’s standard of living.
- Building back better when recovering from a widespread damaging event caused by the impacts of climate change and other natural disasters. Factoring resilience into asset management decisions and practices.

### Strategic risks that could prevent the achievement of Council’s objectives

For ease of reference each risk is numbered but is in no particular order. Some of the risks have more than one type associated with them, but generally the risks are generally assigned to a ‘primary’ type rather than duplicated.

The intention is that the focus should be on the residual risk and whether it is acceptable based on Council’s risk appetite (currently defined in the Risk Management Framework, page 8). If not acceptable, then additional treatments and timing are noted (when known) that are designed to reduce the risk to as low as reasonably practicable within existing resourcing. If the implementation of treatments is to be accelerated to reduce the residual risk to within risk appetite sooner, then the allocation of more resources may be needed.

ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
1	Environment	An environmentally damaging event occurs because of Council action or inaction, resulting in negative impacts on human health and potentially prosecution action.	Extreme	<ul style="list-style-type: none"> <li>• Incident Response Plans and duplications built into our systems will minimise the risks. Specifics include a robust compliance monitoring system, including a dedicated compliance team in Three Waters.</li> <li>• Undertaking work on the safety management systems for the four flood detention dams and creating business cases for works needed to bring them into compliance with the Building (Dam Safety) Regulations 2022. Understanding potential failure modes and potential consequences for downstream properties.</li> <li>• Annual safety inspections and comprehensive safety review of the dams. Dams are regularly monitored (for seepage) to inform the reviews and annual safety inspections. Remedial works may be the outcome from dam inspections (e.g. repairs required).</li> <li>• Where there are events that damage the environment e.g. unauthorised discharges, Council proactively reports them and investigates the reasons, which can inform business cases for remedial works where justified.</li> <li>• Parks have 11 spill containment kits at four sites: Hobson Street (6) Fernery (2), Zoo (2), and Cricket Shed (1). These kits are rated for oil/hydrocarbon, general purpose, and chemical substances. In addition to this, 16 fleet vehicles have spill kits in them.</li> </ul>	High	<p>Several projects (e.g. Mangati pump station storage) and processes are underway (e.g. Resource Consent renewals) that are intended to either reduce the risk of unauthorised discharges to the environment or otherwise to address existing legal non-compliance. Progress is already reported to the Finance, Audit and Risk Committee through the approved work programme.</p> <p>Tonkin+Taylor is completing a review in February 2024 that will help to inform next steps regarding any remedial works needed to address risks identified to ensure compliance with the Building (Dam Safety) Regulations 2022.</p>

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ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
2	Health and Safety	A member of the public, a Council employee, or contractor working on Council's behalf is exposed to a critical risk because of the action or inaction of Council, resulting in serious harm or death.	<b>Extreme</b>	<ul style="list-style-type: none"> <li>Ongoing implementation of the Health, Safety and Wellbeing (HSW) Framework. Particularly developing a sound culture in the organisation that encourages speaking up when staff observe unsafe behaviours and having a robust process for learning from incidents to prevent a recurrence. This includes sharing key lessons from accident investigations e.g. '5 Whys' and ICAMs.</li> <li>Code compliant buildings with fire protection systems covered by Building Warrants of Fitness, addressed at the time of new build or renovation.</li> <li>Strengthen earthquake prone buildings to ensure statutory compliance. Ensure insurance, emergency evacuation plan and business continuity plans are in place, have Civil Defence alert. Regular earthquake preparedness audits and agenda on monthly team meetings, e.g. tie down of furniture.</li> <li>Supervision of contractors to ensure they are following industry best practice (compliance with HSWA).</li> <li>Pre-tender Health and Safety plans developed for larger contracts. Project manager training, contractors' competency assessed in tender process and contractors to be Health and Safety approved, site inductions, inspections, and auditing, and permit to work system at some sites.</li> </ul>	<b>High</b>	<p>Best practice guides are being developed, and staff are being educated on existing controls, with continuous monitoring of control effectiveness. Simultaneously, project management training is being provided in parallel with embedding P3M. Ensuring the consistent completion of Health and Safety Plans is a priority, extending to smaller contracts, standardised Safety in Design processes, and 'Hazard and Operability (HAZOP) Studies' as applicable.</p> <p>Capacity building and information sharing with contractors and consultants remain ongoing initiatives. A learning tool is under development to educate staff on critical risks and their mitigating controls, set to be implemented by May, coinciding with the critical risk review starting in May 2024. This review aims to identify and assure the effectiveness of critical control measures in managing NPDC critical risks.</p> <p>Q3 witnessed the completion of a confined space review, while preparations for introducing psychological risk assessments are slated to commence in August, beginning with an assessment of current processes. Additionally, the final stages of the contractor management e-learning, including competency assessments, are nearing completion. The rollout is scheduled by the end of March 2024, facilitated through Oku Wahi for tracking of completion.</p>
3	Planning and Strategy	Council is unable to respond and recover effectively and efficiently from events that disrupt service delivery (including more frequent extreme weather events, natural disasters, fires, chemical spills, malicious actions, and the failure of a key delivery partner), because we are insufficiently prepared, resulting in critical services being unavailable for a prolonged period.	<b>High</b>	<p>Council has a purpose-built Emergency Operations Centre at TSB Stadium that has been operational since 2018. NPDC has also adopted the Co-ordinated Incident Management System (CIMS) approach to managing both Civil Defence and business continuity level events. NPDC has a database of CIMS trained staff and volunteers. All Business Continuity Plans were reviewed as of March 2022 in preparation for the Omicron wave of COVID-19 to ensure continuity of services to our community. These plans were proven to be very effective in managing potential disruption to services.</p> <p>Work began in 2023 around the recruitment of community volunteers and the delivery of training to these centres.</p> <p>Insurance is in place to help reduce reliance on ratepayers to fund recovery activities.</p> <p>Incident Response Plans and duplications built into our systems will minimise the risks. Specifics include a robust compliance monitoring system, including a dedicated compliance team in Three Waters that is continually developing processes and controls, Council's Water Safety Plan that was approved by the Ministry of Health in 2022, and the adoption of the Drinking Water Supply Safety Quality System process which ensures safe drinking water is produced in accordance with the Water Services Act.</p>	<b>Medium</b>	<p>Appointment of Local Controllers has been a strong focus for the Emergency Management Team. Recruitment for Controllers has begun again as a result of recent departures. Currently the Manager – Emergency Management and one staff member are undertaking the necessary training.</p> <p>Recruitment has been completed for the Emergency Management Resilience Advisor Role and work started on developing a 12-month exercise schedule. As part of that the Emergency Management Team is reviewing business units that need to update their Business Continuity Plans and Emergency Plans. Business units that hold the most risk and contain critical roles will be reviewed and exercised first. Given the size of the organisation, and the number of plans needing an update, this process will be carried out during 2024, factoring in the national Exercise Ru Whenua to be run by NEMA in 2024.</p> <p>A significant project around building capability of marae is being undertaken by Nga Iwi o Taranaki, and Council will provide support.</p> <p>NPDC's Emergency and Crisis Management Plan is under review to incorporate the use of CIMS and to align response plans with national guidelines. The Emergency Management Team engaged a consulting firm to assist with developing a new Emergency Management Framework. Meetings were held with managers from each business unit and the draft framework was developed. A workshop session was held in early December to run scenarios against the framework with the framework being signed off in December 2024.</p> <p>The Finance, Audit and Risk Committee last reviewed Council's emergency preparedness and insurance programme at the July</p>

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ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
						2023 meeting as part of an annual process, and is scheduled to do so again in July 2024.
4	Governance  Legislative Compliance and Control	We breach legislation (e.g. Local Government Act, Privacy Act and Health and Safety at Work Act) or fail to meet critical regulatory standards (e.g. drinking water standards) because of flawed internal processes, resulting in legal challenges to our decision-making, potential Central Government intervention, potential loss of accreditation, and reputational damage.	<b>High</b>	<ul style="list-style-type: none"> <li>• Strong control environment relating to our financial systems, employment of appropriately qualified personnel, and implementation of recommendations from previous audits, continually reviewing and strengthening controls.</li> <li>• Policies and procedures, and training, use of professional staff (internal and external resources), audits – e.g. the annual external audit, ACC Partnership Programme audit, and internal audit programme, legal advice, attendance at conferences/ seminars etc for legislation updates, and association memberships e.g. Taituarā, LGNZ, HRINZ etc. Any non-compliance is identified on a three-monthly basis through executive management (Te Ranga Urungi (TRU)) reporting as well as quarterly Due Diligence Health and Safety reporting.</li> <li>• We outsource the conduct of the election process to Independent Election Services Limited. Their conduct is overseen by the Manager Governance.</li> <li>• Documented processes and procedures, information management strategy, internal audit, staff training, strengthened links between teams, and quality assurance processes.</li> <li>• Monitoring and review of consent data is used to inform planning processes. Changes to legislation are monitored and staff are trained to deal with any changes.</li> <li>• Auditing of the Building Consent Authority and Food Act compliance in accordance with our Quality Management System.</li> <li>• The Procurement Manual is in place, and procurement plans are completed before tendering. Project managers receive training on developing and using procurement plans.</li> <li>• Ensuring that the procurement process is well documented and in line with our Procurement Manual, supported by training of staff involved in procurement.</li> <li>• Well-established documented approvals process. Processes have been mapped and documented with training being developed.</li> <li>• Internal audit reviews of contract management and procurement have been completed and all recommendations addressed. Positive audit results from Waka Kotahi as part of their investment assurance work.</li> </ul>	<b>Medium</b>	Many of the current treatments are ongoing activities, especially those relating to providing assurance that controls are effective. The outcomes of those activities will continue to be reported at relevant governance forums. This will be supplemented by activities that will flow from the Corporate Assurance and P3M Assurance Frameworks.

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ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
5	Planning and Strategy	<p>Council and the community are not ready for the impacts of climate change, because neither mitigation or adaptation approaches are adequately defined or communicated, resulting in more significant negative impacts than if Council and the community were better prepared.</p>	<p><b>High</b></p>	<p>Public engagement is needed, while managing town/city planning and cost implications.</p> <p>Council has a Coastal Erosion Policy which sets out when we will intervene. Existing seawalls are managed in accordance with consent conditions and are inspected regularly and maintained as needed.</p> <p>The District Plan provides an activity-based approach to zoning, which will address coastal zoning decisions. Otherwise the alignment of activities across Council is improving in line with the approach being defined to meet the challenges of climate change. Council approved NPDC's Climate Action Framework in December 2019, and this is guiding adaptation and mitigation efforts in this space.</p> <p>Work to identify and analyse climate change risks for Council continues, and risks identified as aligned with the National Climate Change Risk Assessment process were provided to the Committee in the March 2022 risk management update report. Since then, Council teams have participated in workshops with Tonkin+Taylor to assess climate change risks and this information (captured in ECM#8763448) will be used to inform asset management and other critical plans. In addition, corporate level risks have been identified and are being aligned with Council's Risk Management Framework. These will be reported to the Committee in risk management update reports. The intention is that the Committee will receive progress updates on Council's climate work stream through this strategic risk, supplemented by at least an annual deep dive depending on the Committee's prioritisation of deep dive topics.</p> <p>As part of Council's routine and long-term planning, resilience to key natural hazards (including climate change) is informing decisions about our infrastructure. For example, as we plan for a new water source (the need for which is largely driven by predicted population growth), consideration is being given to a drought level of service, the likely forecasts of rainfall intensity as our climate changes and the opportunities to create redundancy in our water supply from the source, treatment plants and pipe distribution network.</p> <p>Work continues on assessing historic landfills that are at risk of coastal erosion to identify any required protection measures. Work has also been completed to model the maximum probable loss from a natural hazard emergency event to better inform the level of insurance Council has for its assets.</p> <p>Waitara Stormwater Catchment Management Plans include forecasts for the effects of climate change on rainfall intensity for the next 100 years. The plans will inform future land use planning and development decisions as well as investment decisions to address current and future flooding risks.</p> <p>Emergency spares and equipment are in stock and available. Natural catastrophe insurance is in place.</p>	<p><b>Medium</b></p>	<p>Other work starting before the next Long-Term Plan includes:</p> <p><i>Mitigation:</i> The district-wide Emission Reduction Plan, adopted on 12 September 2023, outlines Council's path to achieve the nationally legislated net-zero carbon target by 2050. Implementation is the next step, with identified projects assessed for feasibility and potential inclusion in upcoming Annual Plans and Long-Term Plans. A detailed progress report on climate change mitigation activities is available in the Committee's February 2021 agenda.</p> <p><i>Adaptation:</i> A Climate Change Risk Assessment has been completed, and the draft Climate Change Adaptation Plan is set for community consultation in early 2024. The Long-Term Plan 2024-2034 includes a Climate Adaptation Planner role and increased funding for adaptation work starting in year two. The Climate Change Adaptation Plan will predominantly be developed in year two, allowing the Long-Term Plan 2027-2037 to consider inclusion of projects arising from the plan.</p> <p>High-level assessments of risks to assets and values across sectors are underway, guiding detailed planning for climate change adaptation. Identification of corporate-level risks will be communicated through existing reporting mechanisms. Ongoing work includes locating critical assets in high hazard exposure zones, with potential investment in resilience options/projects. This aligns with the water resilience program and analysis of conclusions from completed insurance risk modeling, detailed in the Committee's December 2020 agenda.</p> <p>A consolidated update on Council's climate change mitigation and adaptation activities is appended to the March risk management update report.</p>

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ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
6	People and Knowledge  Governance  Legislative Compliance and Control	<p>Council is unable to deliver the Long-Term Plan (especially critical services) because it does not have the right people, in the right place, at the right time, resulting in service disruption, decreased levels of service as key infrastructure fails, community discontent, and possible prosecution if a disruption results in non-compliance.</p> <p>Issues here are associated with adapting to sector-level changes generated by reforms that may lead to amalgamations, managing changes to organisational structure, financial management, talent recruitment and retention, a competitive market for the skills we need to deliver, a need for effective and role-specific training, strained mental wellbeing (burnout) of stretched teams/key people, low staff engagement, a drop in productivity, and challenges maintaining service delivery during transitions.</p> <p>This may result in Council losing the social license to operate, with low public trust in our ability to deliver in line with the majority of community views and preferences. Council needs to ensure that it does not become insular from our communities and to be mindful that some feel disenfranchised and distrustful of authority, with diminishing community cohesion and growing social division. Council needs believable goals rather than undeliverable aspirations, and to have organisational processes that enable the achievement of the strategic objectives.</p>	Extreme	<ul style="list-style-type: none"> <li>• Policies and procedures, and training on them, Engagement Strategy, Remuneration Strategy and Policy, Remuneration Framework. Ōku Wāhi in place, which incorporates automation for some processes e.g. people requirements. Talent Advisor role established to support leaders with attraction and retention, Employee Value Proposition (EVP) and workforce planning.</li> <li>• In light of the changed form of Affordable Waters reform, Council (along with its neighbouring Local Authorities) is working through what a process and schedule looks like for forming a Taranaki Water Service Entity.</li> <li>• Council will continue to actively monitor and engage on this issue with Taituarā, LGNZ, Central Government, and local stakeholders as more detail on proposed reforms is announced now that the legislation associated with the previous Government's Affordable Waters reform has been repealed.</li> <li>• Council will also maintain a watching brief on changes associated with the Resource Management Act and Emergency Management reforms, and anything that comes from the Future for Local Government review and respond as more information on the reforms becomes available.</li> <li>• Council will communicate with the Minister of Local Government about how the significant changes in policy direction will need to be aligned with existing processes associated with the LTP.</li> </ul>	High	<ul style="list-style-type: none"> <li>• Workforce planning – People &amp; Performance is working with Senior Leaders to complete People Plans with HR business partners regularly checked in, updating content, and supporting any workforce planning required actions.</li> <li>• Succession and talent management – for non-TRU staff this is being addressed in People Plans, Goal &amp; Development plans and as part of EVP and Talent Management Planning.</li> <li>• Staff engagement survey – the 2024 annual engagement survey is due for release in August 2024. Organisational and Team Action Plans will be produced as outcomes of the survey's results no later than 1 November 2024.</li> <li>• Recruitment – the Talent Advisor's primary role is to centralise as much of the function as possible to improve the organisation's ability to attract talent, improve the candidate experience, and on-board more efficiently and effectively. This forms part of the EVP and Talent Management Planning.</li> <li>• Learning &amp; Development – the current Organisational Development Workplan is placing priority on initiatives to improve induction, systems training/portal improvements, performance reporting, a culture reset, change enablement and leadership development.</li> <li>• Council has previously provided input into the Affordable Waters reform programme and will do so as more detail is provided about the 'Local Water Done Well' replacement. Council will continue to respond to that and other Central Government proposals as they are released.</li> <li>• A Manager Regional and Organisational Transformation has been appointed and will monitor and co-ordinate local and regional responses to the various reforms.</li> </ul>
7	Information Management	<p>Delivery of Council services and/or their efficiency are disrupted because it lacks the right technology and other tools to enable success (i.e. current state slows us down or is prone to falling over), resulting in poor customer service outcomes and community discontent.</p>	High	<p>Ongoing vendor relationship management. Annual review of contract.</p> <p>As part of Project Pakiaka Council has replaced the computing environment and now has renewal policies and funding for every five years to ensure equipment is up to date and fit for purpose. We have also implemented a dual data centre environment with one located in New Plymouth and the other in Hamilton. Council services may still be affected if Council sites are affected by fire, flood etc.</p> <p>The implementation of the P3M Framework and software will ensure project managers are provided with fit for purpose tools to be able to perform their roles to a high standard. The P3M Framework also provides clarity of roles and associated expectations during project delivery.</p>	High	<p>The TechOne Upgrade project has commenced. Preparatory work has been ongoing with a review of TechOne reports that are used across the business to determine if these reports are still required. By meeting with the owners of the reports our Subject Matter Experts are able to refine/reduce/delete reports to prevent unnecessary rework during the lift and shift.</p>

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ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
8	Information Management	Council's ability to optimise the management of its assets is compromised because of the quality and completeness of the asset data it holds, resulting in flawed investment decisions. This impacts on Council's ability to identify the true cost of operating assets (and whether the current level of investment in maintenance and renewals is appropriately matched to asset criticality and condition), the accuracy of asset valuations and insurance coverage, proper maintenance scheduling, and asset management planning.	High	<p>Council's asset inventories contain virtually complete and high-quality asset age data. As a fall back, this data can be used as a substitute for condition rating data to forecast asset renewals budget needs.</p> <p>Council has a budget for the CCTV inspection of stormwater assets, which allows for the systematic collection of condition rating data and addressing one of the largest data gaps. Bringing in-house the maintenance of mechanical maintenance for Three Waters assets allowed Council to routinely collect data from the field so that gaps in metadata quality and completeness are closed.</p> <p>Council adopted the NZTA's new national metadata standard for roading assets and is working with the NZTA's REG programme to develop a set of data quality scripts. These are used to audit the asset inventory and reports the total number of data errors in the system, including the number of errors corrected and the number of new errors created during the reporting period. Using roading inspectors to gather missing asset data in a targeted way has meant that Council has significantly improved the completeness and quality of its asset data and is consistently fixing significantly more errors than it is creating.</p> <p>Council is piloting new processes for the capture of asset as-built information to better ensure asset data is kept current and accurate. Subject to the success of these pilots, the process will be standardised as part of the implementation of asset management software. Other projects are improving the data record as needed to achieve project outcomes (e.g. water metering, water conservation, sewer modelling) with this data being appropriately recorded.</p> <p>We have developed formal metadata standards for Three Waters, Property and Parks assets, and similar data quality auditing scripts as those implemented for Roading assets.</p>	Medium	<p>Use of asset management software system is to be considered to allow data more easily to be directly entered via mobile devices during field inspections in order to avoid data transcription errors introduced by double handling.</p> <p>A deep dive relating to asset data quality was provided to the Committee in March 2022.</p>
9	Information Management	Council suffers a significant cyber incident because of inadequate security arrangements, resulting in extended internal and external service disruption.	Extreme	<ul style="list-style-type: none"> <li>All solution decisions sit with the Digital Enablement Manager, and all Council websites have moved to HTTPS (Secure Web Services). Council is using security consultants to audit new websites and carry out penetration testing. Existing IS standards and policies are being reviewed to align with changes in technology, and a more mature security framework is being developed. The Digital Enablement team (previously known as the Business Technology Group) has instigated annual audits by external providers to review frameworks, policies, and procedures to ensure best practice and industry standards are applied.</li> <li>Windows Defender has been installed on all servers and laptops. The use of firewalls and moving to Identity (formerly known as Microsoft Advanced Threat Protection) authentication along with multi-factor authentication for external sites (internal implemented later in mid 2024).</li> <li>Regular malware mandatory training has been introduced across Council.</li> </ul>	High	<p>The need for improved security, standards, policies, and guidelines for the Council has been identified. A security programme of work has been instigated to ensure the Council is aligned to industry best practice (including virtual networks to negate malware and phishing attacks). Full back-up capability forms part of the 'Greenfields' project (Pakiaka).</p> <p>The Digital Enablement team has also implemented a "No Trust Model".</p>
10	Governance	There are regular changes in the political environmental at both Local and Central Government levels because of their three-year election cycles, resulting in short-term and reactive decision-making, and difficulty managing competing interests/priorities.	High	<ul style="list-style-type: none"> <li>We have outsourced the conduct of the election process to Independent Election Services Limited. Their conduct is overseen by the Manager Governance.</li> <li>Each triennium a comprehensive induction programme is provided for new Elected Members which highlights the respective roles of management and governance. The programme endeavours to ensure the relationship between Elected Members and senior staff is based on high levels of trust and mutual respect and encourages a "no surprises" approach. The organisational culture is based on a strong set of values and behaviours that underpins everything we do.</li> </ul>	Medium	<p>Many of the current treatments are ongoing activities, especially those relating to providing assurance that controls are effective. The outcomes of those activities will continue to be reported at relevant governance forums. This will be supplemented by activities that will flow from the Corporate Assurance Framework.</p>

Council Agenda (19 March 2024) - Risk Management Update March 2024

ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
11	Governance  Operations and Service Delivery  Planning and Strategy  Financial	<p>Council is unable to progress projects and other initiatives in the Long-Term Plan and Annual Plan because its processes do not identify matters of significance to tangata whenua, resulting in a disconnect between that work and the imperatives of tangata whenua, and therefore challenges in giving effect to the principle of partnership under the Treaty of Waitangi.</p> <p>There is a need for a common understanding of what Council can and cannot do, and to be consistent in that across the organisation. A poor relationship may stem from a gap in cultural competency within Council.</p>	<b>Extreme</b>	<p>The <a href="#">Significance and Engagement Policy</a> sets out how Council will work out the significance of an issue, proposal, decision or other matter, and the extent of engagement required with Iwi-Māori and identified key stakeholders. This ensures a consistent approach to taking into account Māori contributions to Council's decision-making by:</p> <ul style="list-style-type: none"> <li>• Providing opportunities for Māori to contribute to our decision-making processes in a meaningful way.</li> <li>• Engaging with Māori where any matter involving a significant decision affecting the relationship of Māori and their culture and traditions with their ancestral land, water, sites, wāhi tapu, valued flora and fauna and other taonga; and</li> <li>• Considering specifically engaging with Māori on other matters as they arise.</li> </ul> <p>The Local Government Act 2002 and Resource Management Act 1991 are the key pieces of legislation that require us to support Māori participation in our decision-making processes.</p> <p>There are a range of Māori committees in place to help different Council teams to consider the Māori voice and viewpoint in their work. They include the Te Rewarewa working group, He Puna Wai, Te Kaumātua Kaunihera o ngā Whare Taonga o Puke Ariki, and Ngā Kaitiaki.</p> <p>During the 2019-22 triennium Te Huinga Taumatua was established as a joint committee made up of elected Council and iwi members. The Committee's purpose is to provide strategic guidance and advice to Council on issues of importance to Māori. In practice, the Committee also assists Council to identify matters of significance and to understand tangata whenua values impacted by decisions.</p> <p>Te Huinga Taumatua was involved in discussions leading, in July 2020, to a Council resolution to establish a Māori ward ahead of the 2022 local triennial elections.</p> <p>Council has an Iwi Relationships team that aims to facilitate clear communication and build partnerships to ensure Māori have a strong and well-informed voice in decision-making. Engaging and consulting with tangata whenua early in decision-making helps lead to a better understanding of the issues and opportunities that exist for tangata whenua in our district. There are examples of collaborative partnerships already in place across the organisation e.g. in the Three Waters and Events spaces, as well as during the airport terminal redevelopment project.</p> <p>A workshop on 23 May 2023 with elected members that covered Te Tiriti in a local government context was intended to help with setting Council's strategic direction.</p>	<b>High</b>	<p>Moving forward, NPDC will explore ways in which Te Huinga Taumatua can build strong relationships and its influence, and initiate reports on topics of relevance to Māori.</p> <p>Develop a Treaty Partnership approach and complete a Treaty of Waitangi internal audit.</p>

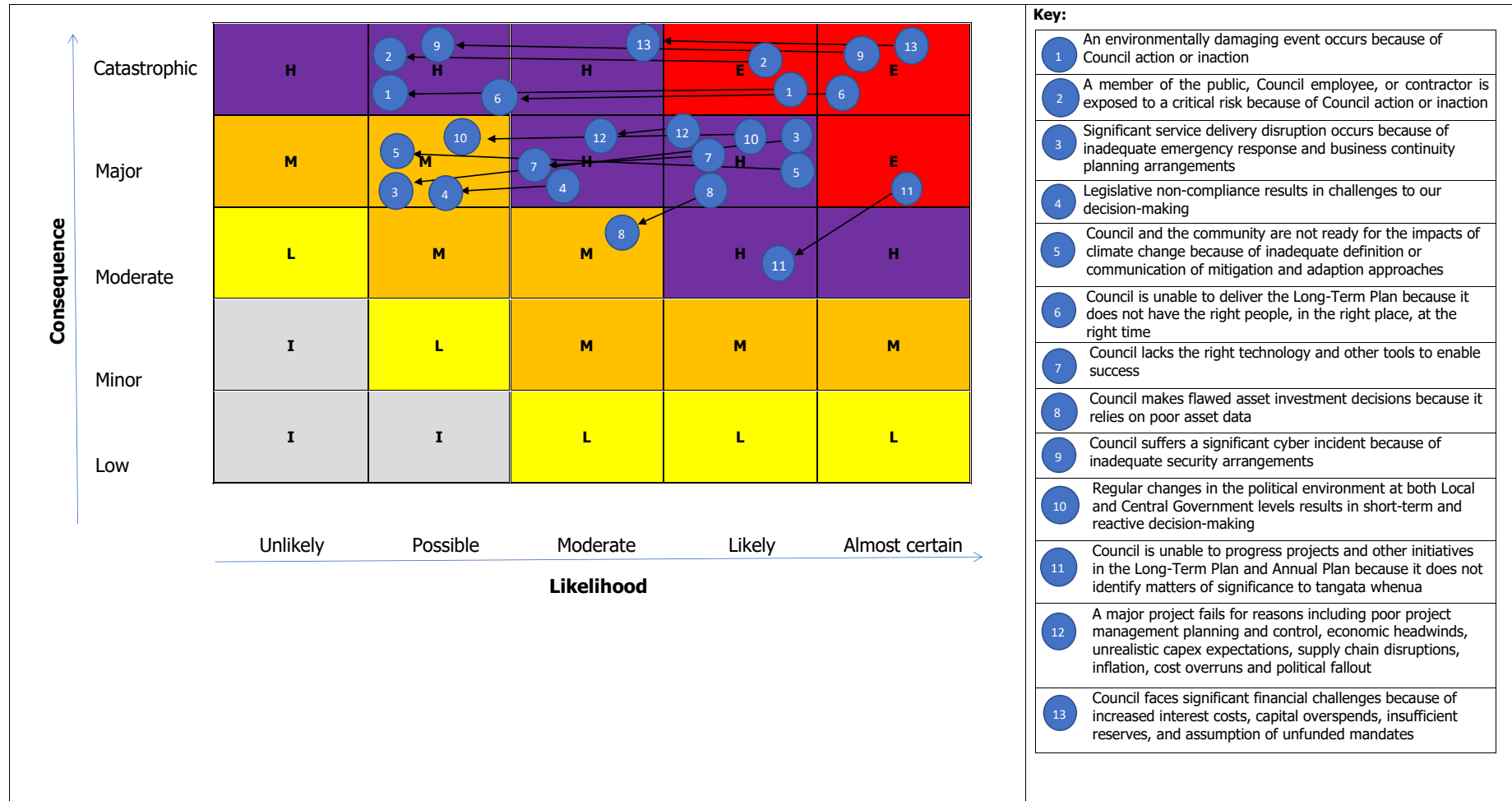


Council Agenda (19 March 2024) - Risk Management Update March 2024

ID	Type(s) of Risk	Description	Inherent Risk	Current Treatments	Residual Risk	What else is to be done (and by when) to reduce the residual risk to as low as reasonably practicable?
12	Project/ Quality Management	A major project fails because of reasons including poor project management planning and control, economic headwinds, unrealistic capex expectations, supply chain disruptions, inflation, cost overruns, and political fallout, resulting in financial and reputational damage.	High	<p>Robust project management (especially scoping and budget definition), contingency allowed, project risks identified and mitigated.</p> <p>Project Portfolio Management disciplines have been implemented, which are supported by software (P3M) to improve visibility of individual projects via monthly reporting. A business case process has been implemented (includes benefits tracking) that will improve project planning, implementation, and benefits realisation for all projects. P3M provides greater structure and visibility across all Council projects.</p> <p>A class 1-5 system for project budgets has been adopted, incorporating peer review of our cost estimates for major projects. Only projects with class 1 or 2 budgets are in the first three years of the Long-Term Plan 2021-31. The Long-Term Plan process is more robust using the Point of Entry system, with projects then prioritised across all Council activities. A Cost Estimator has been employed and a Cost Estimating and Control Framework implemented.</p> <p>Governance oversight is provided by the Strategic Projects Committee. Internal oversight of projects is provided by Project Steering Groups. Project Lead positions are in place to manage portfolios of projects to provide improved internal governance. There has been increased use of the Early Contractor Involvement approach to get more input from contractors at the early stages of a project. There are robust processes for appointing consultants to supplement the existing experience of project managers and other Council staff.</p> <p>A standard process is in place for contingency setting depending on the nature of the project, and a contingency calculator implemented within the Projects Team as a database to check forecast versus actual costs. There is improved reporting within TechOne on CAPEX forecasting, with management reports previously produced by the Portfolio and Programme Manager.</p> <p>Deloitte's June 2022 report on Council's Portfolio and Project Framework confirmed that Council is on track to having a 'well controlled' environment.</p>	High	The Project Management Office will undertake more pre-planning over major capital projects to enable more robust cost estimates in future Long-Term Plan processes.
13	Financial	Council faces significant financial challenges because of increased interest costs, capital overspends, insufficient reserves, and Council assuming unfunded mandates from Central Government, resulting in questions about rates affordability (given current economic challenges for our community), the place of the Perpetual Investment Fund, and increased internal and external fraud risk.	Extreme	<p>Council has strong controls around its operational budgets with regular budget reporting and analysis. Council has in recent years not completed capital projects to plan, so greater emphasis on capital works reporting is now in place. Council has access to two months of funds via our credit lines as per the Treasury Management Policy.</p> <p>Council operates detailed Asset Management Plans by asset category. Renewal funding and reserve management is reviewed annually, which helps to ensure that adequate funding is available. Council also has significant borrowing capacity if required to meet any shortfalls.</p> <p>There are robust project management processes (especially in scoping and budget definition (including contingency)), and project risks are identified and mitigated.</p> <p>There are detailed policies around managing investment risk through investment diversification as per the Treasury Management Policy. Outsourcing of the Perpetual Investment Fund means that its management is at arm's length from Council.</p> <p>A strong focus on legislative and legal compliance helps Council mitigate against this risk. Also, there is a degree of financial resilience within the financial strategy, which ensures Council has the flexibility to manage unforeseen events.</p> <p>The interest rate controls applied as per the Treasury Management Policy in relation to hedging interest rate risks mean Council is protected from material adverse impacts from large movements in interest rates.</p> <p>Council has a range of system and management controls to help detect and prevent fraud. These include internal financial controls around procurement practices and authorisation, and regular and thorough management reporting. Council also has an anti-fraud policy and framework, and is the subject of external audit and runs an internal compliance program around financial controls. Fraud awareness training is provided by Deloitte as needed.</p> <p>Governance oversight is provided by the Strategic Projects Committee and Finance, Audit and Risk Committee.</p>	High	This risk always has significant focus, but Council is now undertaking a phased restructure to, among other things, enhance the efficiency and effectiveness of the organisation.

## Migration of strategic risks

The purpose of this figure is to demonstrate the difference between the inherent and residual risk ratings for each strategic risk. Each risk is shown to have reduced as a result of applying the treatments noted in the table above.





Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth  
District Council**

## DEEP DIVE OF COUNCIL’S RESPONSE TO CLIMATE CHANGE

Council’s risk register currently has risks around climate change. The risk relate to planning the district’s adaptation to the impacts of climate change and mitigating them by reducing emissions. Council’s response to climate change is also recognised as a strategic risk for the organisation and our community.

In December 2019, Council voted to recognise climate change requires an urgent response, and as a result the Climate Action Framework was adopted. The Council is delivering a range of planning initiatives and projects that integrate Climate Change into the Council’s considerations.

A Deep Dive on Climate Change Adaptation risks and action was completed in December 2020 as part of the Finance, Audit and Risk Committee’s work programme. This was supported by the Deep Dive on Climate Change Mitigation risks and action that was completed in February 2021. These risk assessments provided information on the work programme at that stage.

The purpose of this Deep Dive is to update the committee on how Climate Change Adaptation and Mitigation risks (as articulated by the strategic risk below) are being managed. The previous Deep Dives are attached for reference so only new information is considered below.

Overall, Council continues to have a Medium residual risk rating for climate change. The adoption of the District-Wide Emissions Reduction Plan in September 2023 improves planning to reduce Council’s greenhouse gas emissions although contains risks to its implementation and will require ongoing revision to ensure Council meets its emission reduction targets. Council has progressed some further work towards adapting to climate change, but still has not overall plan or strategy in place. The draft Long-Term Plan 2024-2034 includes increased and permanent budgets to continue the planning work for Council’s response to these risks. The ongoing management of risks will be transitioned over to a New Zealand Climate Standards Report (a TCFD-style report) over time to improve risk management.

Risk description	
<i>Risk is the effect of uncertainty on the achievement of objectives. The risk description for this risk is:</i>	
<b>Council and the community are not ready for the impacts of climate change, because neither mitigation or adaptation approaches are adequately defined or communicated, resulting in more significant negative impacts than if Council and the community were better prepared.</b>	
It should be highlighted that the risk includes two discrete aspects:	
<ol style="list-style-type: none"> <li>1. The Council is unable to mitigate the effects of climate change because it does not effectively plan to reduce its greenhouse gas (GHG) emissions and those of the wider community.</li> <li>2. The Council and community is unable to adapt to effects of climate change after it has occurred.</li> </ol>	
Mitigation:	Reducing greenhouse gases
Adaptation:	Responding to the changing climate
<i>Source: Ministry for Environment – National Climate Change Risk Assessment, August 2020.</i>	

**National Context**

In December 2019, the Government passed the Climate Change Response (Zero Carbon) Amendment Act. Part of this legislation set a new GHG emission target to:

- Reduce all greenhouse gases (except biogenic methane<sup>1</sup>) to 50 per cent below 2005 levels by 2030 and then net zero by 2050.
- Reduce emissions of biogenic methane within the range of 24-47 per cent below 2017 levels by 2050 including to 10 per cent below 2017 levels by 2030.
- Set a series of emissions budgets to act as stepping stones towards the long-term target.

This target set New Zealand’s ambition to reduce emissions in line with the Paris Agreement’s long-term goal of limiting global warming to 1.5 degrees Celsius above pre-industrial levels.

The reduction in Aotearoa’s emissions will be supported by the Climate Change Commission’s (CCC) creation of five-yearly emissions budgets, providing a stepping stone to net zero by 2050.

The National Emission Reduction Plan was released in May 2022 and the National Adaptation Plan was released in August 2022. These set out Government actions that Council may be involved with.

**Analyse and evaluate the risk**

Risk	Consequence	Likelihood	Rating
Inherent	Moderate	Likely	High
Residual	Moderate	Possible	Medium

**Treat the risk**

**Controls**

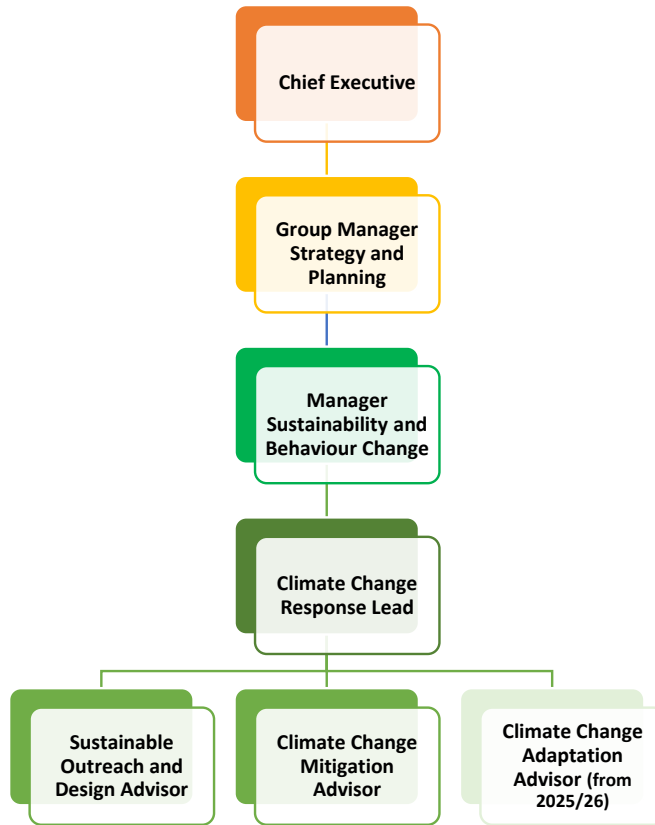
*What we already have in place to manage the risk identified – are the controls effective, sustainable, or even redundant (so resources can be reallocated)?*

**Changed internal resourcing and approach**

In 2021/22 and 2022/23 Council’s Climate Action Framework has been driven and develop as a project by Council’s Project Management Office. At the beginning of 2023/24 a new ‘business as usual’ team was established. This team now sits within the Strategy and Planning Group. The change to a ‘business as usual’ function will, over time, enable the greater embedding of climate change considerations within Council. It also reflects that climate change considerations will not be easily and quickly resolved for Council and the New Plymouth District community. However, there is currently reduced resourcing arising from staff departures (with a Climate Change Adaptation Advisor having left in late 2022 and not being replaced; and a short-term BAU vacancy being filled at the time of writing).

The diagram below shows the organisational structure for the Climate Change Response Team. The Climate Change Adaptation Advisor role is currently scheduled for year two of the draft Long-Term Plan 2024-2034.

<sup>1</sup> Biogenic methane is produced from biological (plant and animal) sources. Biogenic methane is emitted by livestock, waste treatment and wetlands, for example. On the other hand, fossil methane sources include coal mining, natural gas leakage and methanol production from natural gas – Ministry for Environment.



### Climate Change Strategy and Planning

Council’s climate change response is effectively a matrix of mitigation or adaptation actions and whether the focus is on Council-as-an-organisation or on the community. These need to work in holistically in their approach.

	Mitigation	Adaptation
Council		
Community		

Each of the four foci have different appropriate responses and actions.

### District-Wide Emissions Reduction Plan

The District-Wide Emissions Reduction Plan (the Plan) focuses on the mitigation of climate change through the reduction of greenhouse gas emissions. The Plan predominately focuses on Council’s emissions, but also includes various actions towards reducing community emissions (particularly where those are related to the use of Council infrastructure and services).

The draft Plan was approved for community consultation in July 2022 and a finalised Plan was adopted on 12 September 2023.

*Organisation emissions*

The Plan includes targets to reduce Council’s organisational emissions as follows:

- By 2050:
  - Reduce greenhouse gas emissions other than biogenic methane to net zero
  - Reduce biogenic methane to between 24 to 47 per cent from 2017/18 levels
- By 2030:
  - Reduce greenhouse gas emissions other than biogenic methane by 49 per cent from 2017/18 levels
  - Reduce biogenic methane by 10 per cent from 2017/18 levels
- To achieve the 2030 targets the Plan includes interim targets (by scope of emissions):
  - Scope 1 and 2 emissions (direct emissions and those associated with energy use) will need to reduce by 50.4 per cent or around 4.2 per cent per annum
  - Scope 3 emissions (indirect emissions, predominately those associated with goods and services purchased), measured by emissions intensity (CO2e per dollar of spend), will need to reduce by 20 per cent or around 2.5 per cent per annum. An intensity target is used for scope 3 emissions because the annual emissions will vary depending on the annual capital works programme.

There are risks associated with achieving the Plan. In particular, the Plan’s 2030 targets for Council’s emissions – aligning to the national targets – require a considerable reduction in greenhouse gas emissions over the next six years. The achievement, or not, of that target relies in large part on the projects and operating changes identified in the Long-Term Plan 2024-2034 being funded, , and for those projects and operating changes to continue in subsequent Annual Plans and Long-Term Plans. If identified projects are not prioritised, even if they receive priority in future plans, the time lost may mean it is not possible or financially viable to meet the targets.

Within those projects, the fuel switching of internal heating systems projects (both buildings and pools), the Landfill Gas Capture project and the Decarbonisation Programme are seen as the highest priority. There are varying risks associated with these.

- *Fuel switching projects*  
Five fuel switching projects are in the draft Long-Term Plan 2024-2034. These are:

Project	Years	Cost (uninflated)
Puke Ariki Library and Museum Boilers Renewal	2024/25 and 2025/26	\$775,000
Waitara Pool Heating Replacement	2025/26 and 2026/27	\$697,000
Civic Centre Renewals-South HVAC Boiler	2025/26 and 2026/27	\$775,000
GBAG LLC HVAC Boiler Renewals	2025/26 and 2026/27	\$542,000
Inglewood Pool Heating Replacement	2026/27 and 2027/28	\$460,000

The current systems for the facilities identified above for fuel switching are nearing or beyond end of life. Fuel switching can require electrical upgrades both in the building and potentially to the local network (expected to be within budget). While the timing fuel switching at the natural renewal point minimises unnecessary costs, there is a risk that if these systems fail early Council may not be able to source an electric solution as part of an urgent system replacement and, therefore, could end up replacing the current system with another gas boiler. Council would then need to determine whether to proceed with using that new gas boiler through to the end of its life or mitigate risk to climate change by replacing the gas boilers early. Waiting until the gas boilers end of life would mean not meeting emissions reduction targets and accepting the transition risks with a decreasing gas supply (such as increased pricing and reduced supply).

To minimise the risk of not having an electric solution planned should a failure occur, feasibility studies and early planning early are being undertaken so that Council has sufficient knowledge on the requirements for replacement if required prior to planned replacement. Council is currently undertaking such studies for Civic Centre, Puke Ariki and Govett-Brewster Art Gallery/Len Lye Centre buildings now. Similarly, Council has previously completed a feasibility study for the Waitara Pool heating system and is now progressing with more detailed assessment.

The three building fuel switching projects, Civic Centre, GBAG/LLC and Puke Ariki, are co-dependant on the renewals of the Chillers. The Chillers are all at, or beyond, end of life so will need renewal if fuel switching or not.

Project	Years	Cost (uninflated)
Puke Ariki Library HVAC Renewals - Chillers and Ahu	2024/25 and 2025/26	\$852,500
Civic Centre Renewals-South HVAC Chiller 1	2025/26 and 2026/27	\$620,000
GBAG LLC HVAC Chiller Renewal	2025/26 and 2026/27	\$398,000

- *Landfill Gas Capture*

The Landfill Gas Capture project involves installing additional pipes to feed the existing flare system to capture methane emissions from anaerobic breakdown of waste. The project is best timed in line with the landfill capping programme as the capping limits aerobic breakdown from occurring. Emissions from closed landfills naturally reduce over time as breakdown has occurred.

The Landfill Gas Capture project has been included as an add-on to the Colson Road Closure Works in 2023/24. Undertaking the work this way has reduced the costs significantly rather than undertaking it as a separate project in coming years.

- *Decarbonisation Programme*

Officers have initiated the Decarbonisation Programme. This Programme seeks to bring a carbon-lens to decision-making within capital projects, and often brings in additional sustainability and environmental considerations at the same time. This Programme reflects that 60 per cent of Council's emissions (once the closed landfill is excluded) are from Council's purchasing of goods and services and capital goods.

Similar programmes (both internationally and nationally) are that such programmes may result in some minor additional costs during the planning and concept phases of projects, but often result in lower overall spend in both capital and operating phases. These savings come from a range of sources such as reducing resources used in construction and greater energy efficiency in operations.

The Decarbonisation Programme is operating a phased approach. A small number of projects are being piloted to understand interventions, potential sustainability initiatives, and to build internal knowledge. This will be followed by developing a permanent programme with appropriate targeted interventions in the project management process.

The Decarbonisation Programme will be an ongoing process of improvement in order to make sustainability and climate change part of the business-as-usual process throughout the project lifecycle.

Similarly, there are risks beyond the 2030 target to achieving the 2050 target. Decisions now may lock-in the use of greenhouse gas emitting infrastructure and services, or community emissions in using infrastructure and services. These decisions may arise due to a lack of considering greenhouse gas emissions, giving greater weight to other matters, or accepting solutions that partially decrease emissions (e.g. focusing on lowering embodied emissions in construction that result in higher operational emissions).

Council is also subject to broader emission risks. While Council has placed emphasis on reducing overall energy needs, actions such as the fuel switching programme transitioning from gas to electricity as a way of reducing emissions from energy use. However, reduction in the carbon emissions from electricity supply are largely outside of Council's control as they rely on the electricity generation market increasing renewable supply. Officers are working with Papa Rererangi I Puketapu Ltd (New Plymouth Airport) to explore options around the proposed solar farm for Council's electricity supply as one way of reducing this risk, and may explore other opportunities that arise in the future (such as assessing the feasibility of solar panels at Council facilities).

#### *Community emissions*

Council's amendments to the (then draft) Plan included greater emphasis on Council playing a role reducing emissions within the community.

Initially the Plan focused on reducing Council emissions and continuing with programmes being undertaken by Council that reduce community emissions. Many of these programmes already in place were developed or designed with other goals in mind but with emission reduction as an additional benefit. These include:

- Let's Go and the Integrated Transport Framework
- Waste minimisation
- Te Korowai o Tāne grants
- Sustainable Homes advice
- Water conservation
- The Proposed District Plan

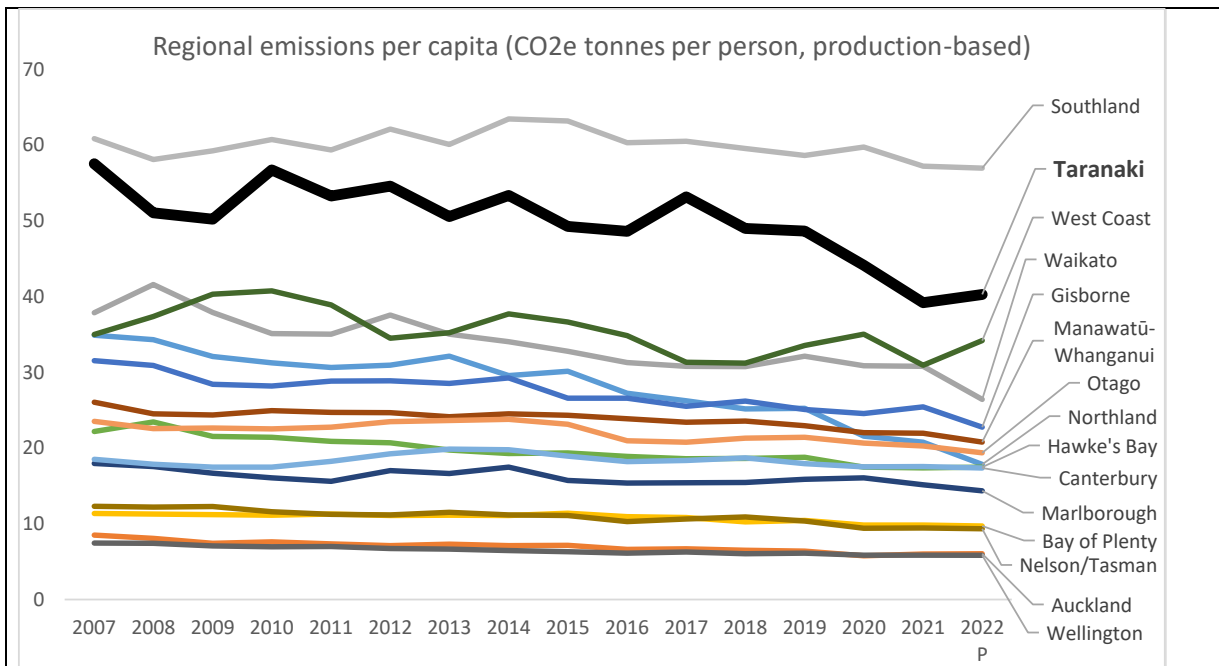
Many of these programmes rely on changing behaviour within the community. There are also risks that relate to behaviour change programmes. If Council is unable to achieve the desired levels of behaviour change then emissions will not reduce in line with the Plan. To address this risk, a new Sustainability Behaviour Change Team has been created as part of the organisation restructure. This new Team enables the development of holistic programmes for different industries (commercial, community, education) and the sharing of insights and resources.

The Plan also identifies areas where Council could undertake further initiatives to reduce community emissions. These are high-level areas and generally focus on household initiatives. To effectively determine the most appropriate and effective initiatives, Council needs to understand where emissions are generated from within the community and where potential levers are for Council.

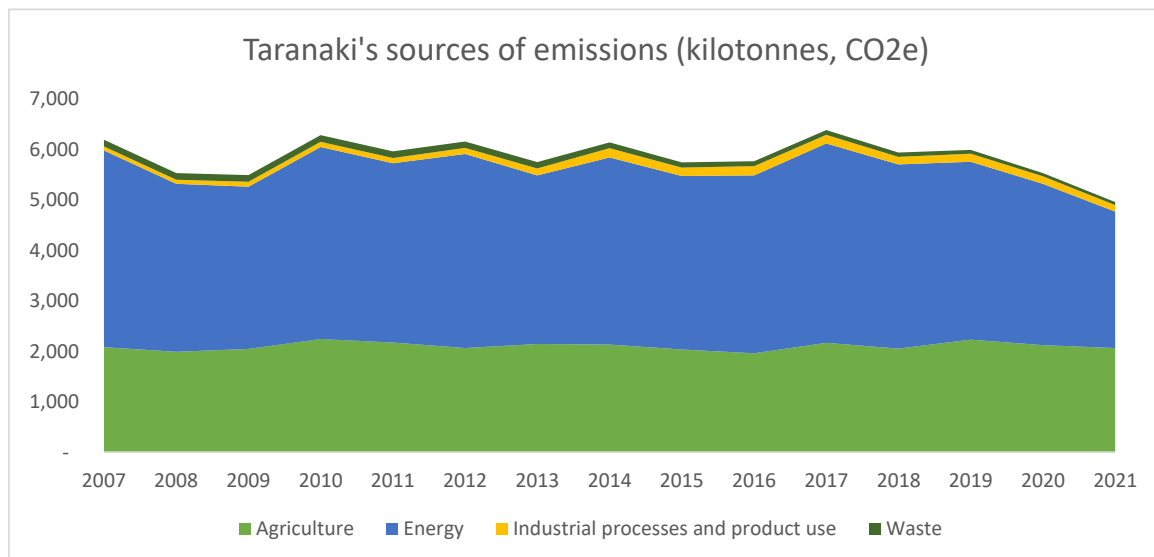
Council's current understanding of community emissions is from two sources. First, the 2017/18 community emissions profile that Council obtained – this is included in the February 2021 Deep Dive on climate mitigation. Second, Statistics New Zealand release annual regional emission profiles, with the most recent data from 2022 (although some data is only available to 2021).

The following graph shows the annual emissions profile of the different regions of New Zealand on a per capita basis from that Statistics New Zealand data. The data is based on the *production* of greenhouse gas emissions rather than using a *consumption* lens. Taranaki is the second highest per capita emitter of greenhouse gas emissions across the 15 regions, although Taranaki has had the largest decrease per capita and the third highest per capita percentage decrease since 2007.





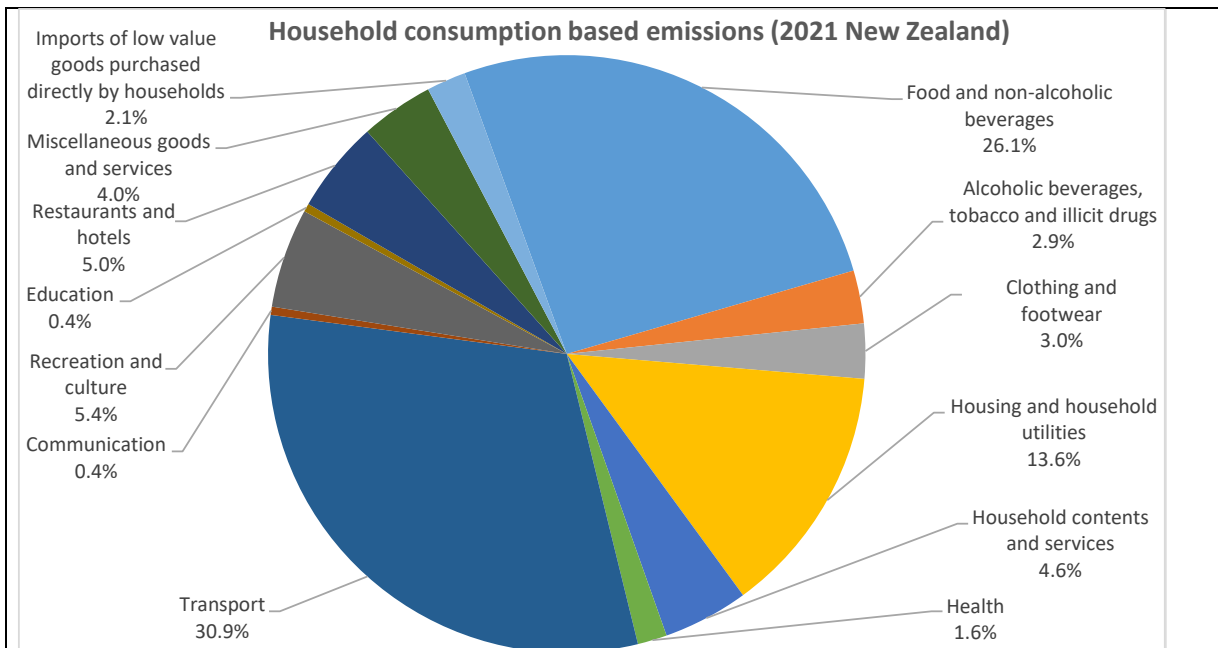
Within Taranaki, the two largest sources of emissions are in the energy and agricultural sectors (in this assessment, transport emissions have been merged into their associated use). The major decline in emissions seen above has been from the energy sector. Waste emissions have also reduced over time in Taranaki and are now less than 50 per cent of 2007 emissions. Other sources of emissions have largely been flat or slightly increasing.



Statistics New Zealand [have also released household consumption-based emissions at a national level](#) up to 2021. This data shows that most household emissions arise from three sources – transport (31%),<sup>2</sup> food and non-alcoholic beverages (26%), and housing and household utilities (14%).<sup>3</sup>

<sup>2</sup> Transport includes the purchase and operation (i.e. fuel) of personal vehicles as well as the use of public transport and the transport of goods.

<sup>3</sup> Housing and household utilities includes household energy use (electricity and gas).



To effectively contribute to reducing community emissions, Council will also need to consider its various levers for each source. For instance, Council has direct levers in relation to waste and transportation emissions as they occur in relation to Council services and infrastructure. In contrast, there are emission sources where Council only has indirect levers, such as in the agricultural sector.

**Climate change considerations within Council’s other Plans, Strategies etc.**

Other plans, strategies and documents are increasingly considering climate change issues. Doing so integrates mitigation and adaptation requirements into Council’s assets and infrastructure planning upfront. This results in integrated consideration of climate change rather than as an ‘add-on’ through separate planning processes.

- **Infrastructure Strategy**

The Infrastructure Strategy 2021-2051 has four drivers including “Resilience and responding to climate change”. In turn, that key driver had three asset management objectives, including “We provide reliable services and infrastructure that is resilient to natural hazards and adapts to climate change”. The draft Infrastructure Strategy 2024-2054 for the draft Long-Term Plan 2024-2034 places increasing emphasis on climate adaptation.

- **Integrated Transport Framework (draft)**

Transportation emissions are one of the main sources of community emissions within New Plymouth District, and are the largest source of community emissions associated with Council infrastructure (i.e. where Council has direct influence). The (draft for community consultation) Integrated Transport Framework targets a reduction in vehicle kilometres travelled in the District by 2053 (noting that there would be a significant increase in population over that time period meaning a larger per capita reduction). This will be delivered through interventions including increased uptake of public transport, alternatives to private vehicle use such as walking and cycling, road pricing and land use changes. These interventions have been modelled to result in VKT reduction which would in turn significantly reduce one of the main sources of emissions in the District. The final Integrated Transport Framework will be presented to Council for adoption shortly.

- **Ngāmotu New Plymouth City Centre Strategy**

The Ngāmotu New Plymouth City Centre Strategy has five principles, including “Hāpaingia te ahuarangi Responding to climate change”. This includes reducing reliance on fossil fuels and supporting resilience in the future. Key moves include restoring the Huatoki awa, which could help to provide greater resilience for extreme weather events in the City Centre.

- **Waste Management and Minimisation Plan**

Another significant source of community emissions arise from waste. The Waste Management and Minimisation Plan seeks to reduce waste and therefore reduces emissions from that waste. The Plan includes a target, and action towards, of a 30 per cent reduction in biogenic methane from waste by 2030 (primarily through the Landfill Gas Capture project).

- **Significance and Engagement Policy**

A new Significance and Engagement Policy was adopted in December 2023. The Policy includes assessing how a matter incorporates climate change adaptation and mitigation in its significance assessment. This means that where Council is proposing an issue that increases emissions or creates greater adaptation requirements then the issue would become more significant (all else being equal in the other criteria). That would require more assessment of options and would increase the likelihood of public engagement.

The Infrastructure Strategy, Integrated Transport Framework, Ngāmotu New Plymouth City Centre Strategy and the Waste Management and Minimisation Plan also require funding in the Long-Term Plan 2024-2034 to achieve their outcomes. All of these have their own risk factors associated with them.

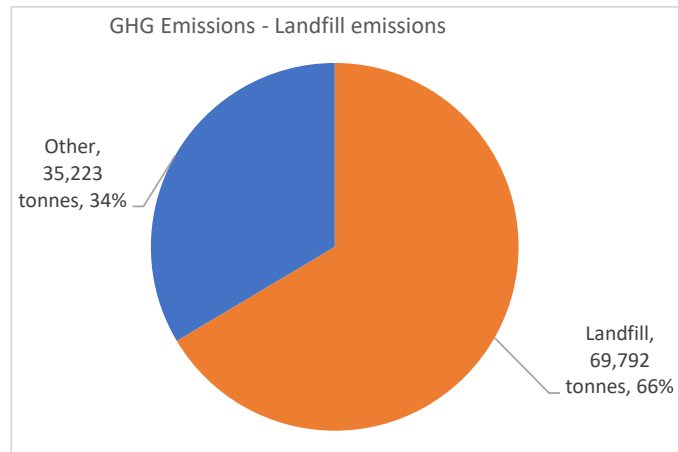
## **Climate Change Mitigation**

An in-house inventory of Council’s 2021/22 greenhouse gas emissions has recently been completed in accordance with ISO 141064-1. This inventory received third-party verification. The assurance level achieved in Reasonable Assurance for ISO Cat 1-2 and Limited Assurance for ISO Cat 3-6. A copy of this inventory is attached (ECM 9079544).

The 2021/22 inventory is not directly comparable to the previous 2017/18 inventory. The ability to directly compare is limited because:

- The 2021/22 profile focuses on Council and does not include the emissions of CCOs. This aligns to the ISO standard used to develop organisational emissions inventory. Subsidiary organisations should only be included where the parent has operational control over the subsidiary, whereas the Local Government Act 2002 provides for CCOs to have a relatively high degree of operational separation with governance-level levers that do not provide operational control. This aligns to how other local authorities around New Zealand are reporting their greenhouse gas inventories, but differs from the 2017/18 inventory.

- Further, there is now emerging practice across local authorities in New Zealand to *not* report greenhouse gas emissions from closed landfills as part of their organisational emissions profile. This is because there tend to be few levers to reduce emissions from closed landfills (particularly older closed landfills) and closed landfills are excluded from the Emissions Trading Scheme. The Colson Road Landfill accounts for two-thirds of total Council emissions in 2021/22, so significantly reduces total emissions *reported* in the inventory (although has no impact on total emissions per se). This amount will reduce over coming years, particularly with the Landfill Gas Capture project.



- 2021/22 was impacted by Covid-19, including the second national lockdown (around 3 weeks across alert levels 4 and then 3), the 'red' traffic light (around 2½ months) and the 'orange' traffic light (approximately 4½ months across two periods). These different restrictions have different implications for Council operations and energy use, although some of the largest energy uses (such as the Wastewater Treatment Plant) were generally unaffected.
- Additional emission sources have been uncovered across Council, such as approximately 316 hectares of grazing land which has associated emissions that were not previously included. Organisations often discover new emission sources as they undertake more regular emission inventories. There is the potential that further new emission sources will be uncovered in future emissions inventories.
- Emission factors have been revised. These factors are effectively assumptions about the emissions from specific activities. To make the inventories comparable would require revising the previous inventory in line with these new factors. For instance, while overall Scope 1 emissions have increased by approximately 27 per cent, this is mainly due to a change in methodology for WWTP emissions calculation that increases emissions by an eight-fold factor.

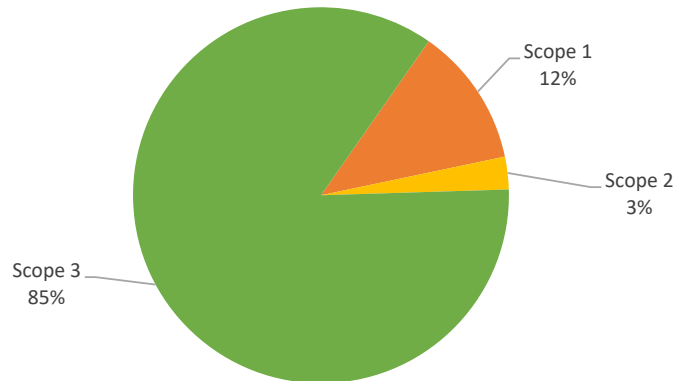
The District-wide Emissions Reduction Plan includes a commitment to undertake a greenhouse gas emissions inventory on an annual basis in the future, including third party verification. Budget for this has been included in the draft Long-Term Plan 2024-2034.

#### Results

Overall Council emissions were 35,223 Te CO<sub>2</sub>e in 2021/22 (excluding Colson Road landfill emissions).

Emissions can be categorised into three main scopes. Council's emissions are predominately in Scope 3 – these are supply chain emissions from what Council purchases or sells. Scope 1 emissions are direct emissions from fuel use and account for 12 per cent of Council's emissions. Scope 2 emissions are our smallest, these are emissions from electricity use through the national grid and therefore takes into account New Zealand's high proportion of renewable electricity generation.

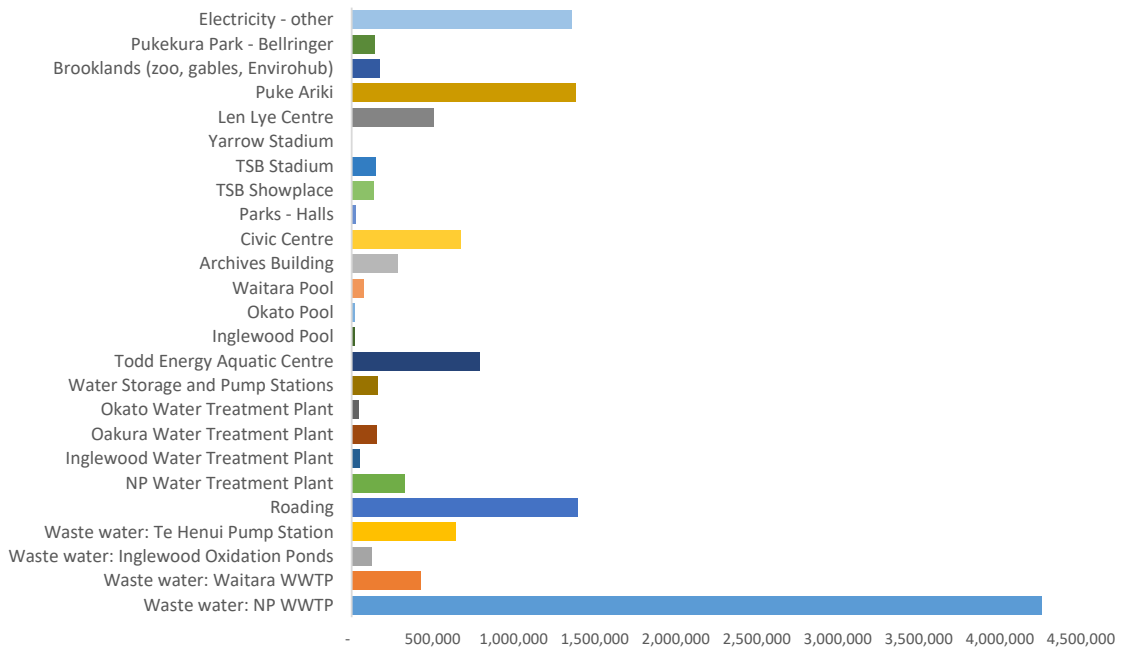
NPDC emissions by scope (excluding closed landfill)

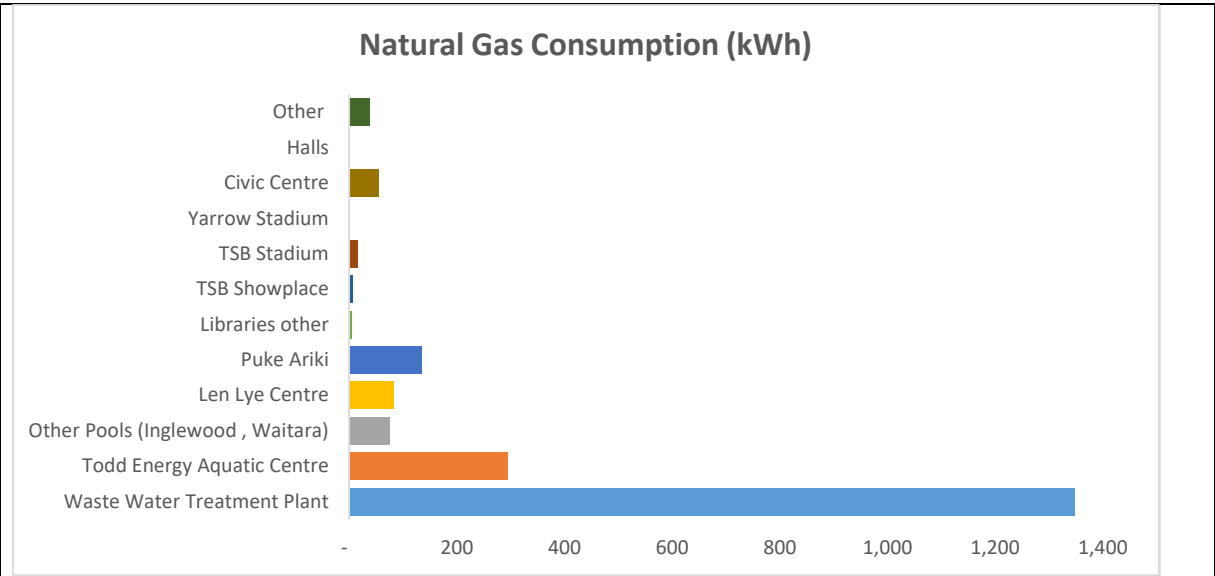


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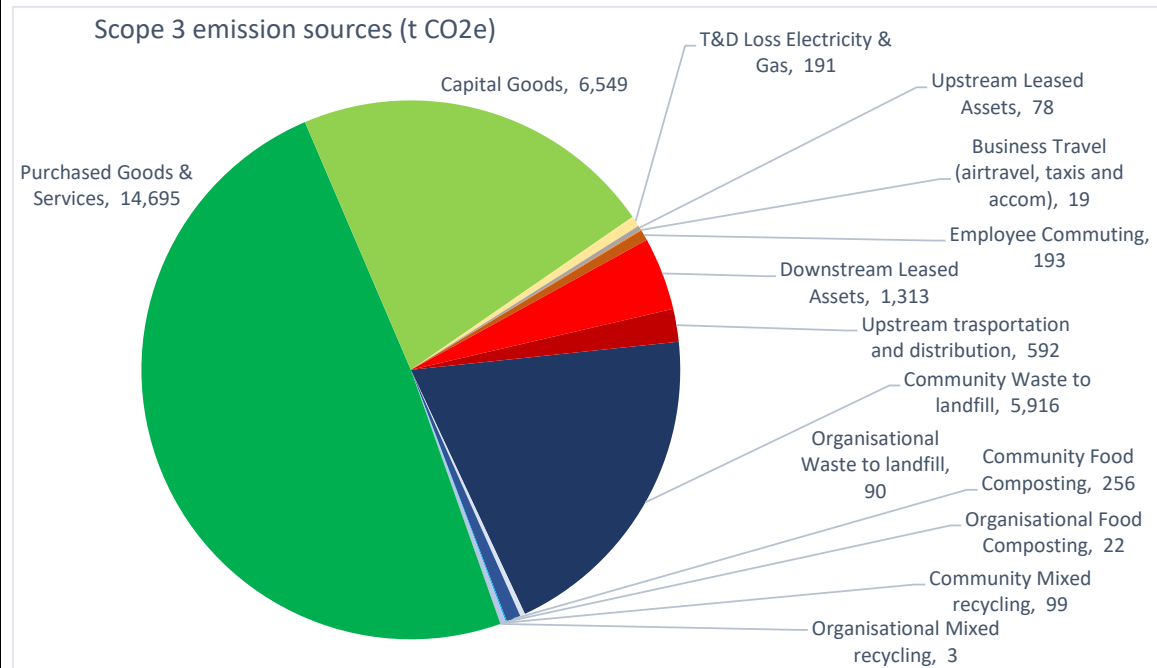
terms of scope 1 and 2 emissions, electricity and natural gas use dominate these emissions. The Thermal Dryer at the New Plymouth Wastewater Treatment Plant continues to be the single largest user of natural gas, and the Wastewater Treatment Plant is also a significant electricity user.

Electricity Consumptions (kWh)





Breaking down Scope 3 emissions into sources shows that half of emissions arise from purchased goods and services and just under a quarter from capital goods. Various waste emissions make up 21 per cent, although almost all these emissions are categorised as community waste to landfill rather than from food waste and recycling. These emissions reflect ongoing waste being transferred, rather than the Colson Road emissions which is historic waste.



### *Comparison*

While there are factors that limit the direct comparison of the 2021/22 inventory to the 2017/18 inventory (noted earlier), there are some conclusions that can be drawn.

#### Scope 1:

- Scope 1 emissions from Fossil Fuels has reduced by approximately 22 per cent from 2017/18. This decrease in energy due mainly to energy efficiency measures although Covid-19 may have had some impact on operations.
- The Wastewater Treatment Plant energy efficiency increased by 20 per cent largely due to improved efficiency in dewatering of wastewater sludge prior to thermal drying.
- Reductions in fossil fuels at the Govett-Brewster Art Gallery/Len Lye Centre are significant and are largely due to modifications in the building controls and sensors for temperature and humidity control.

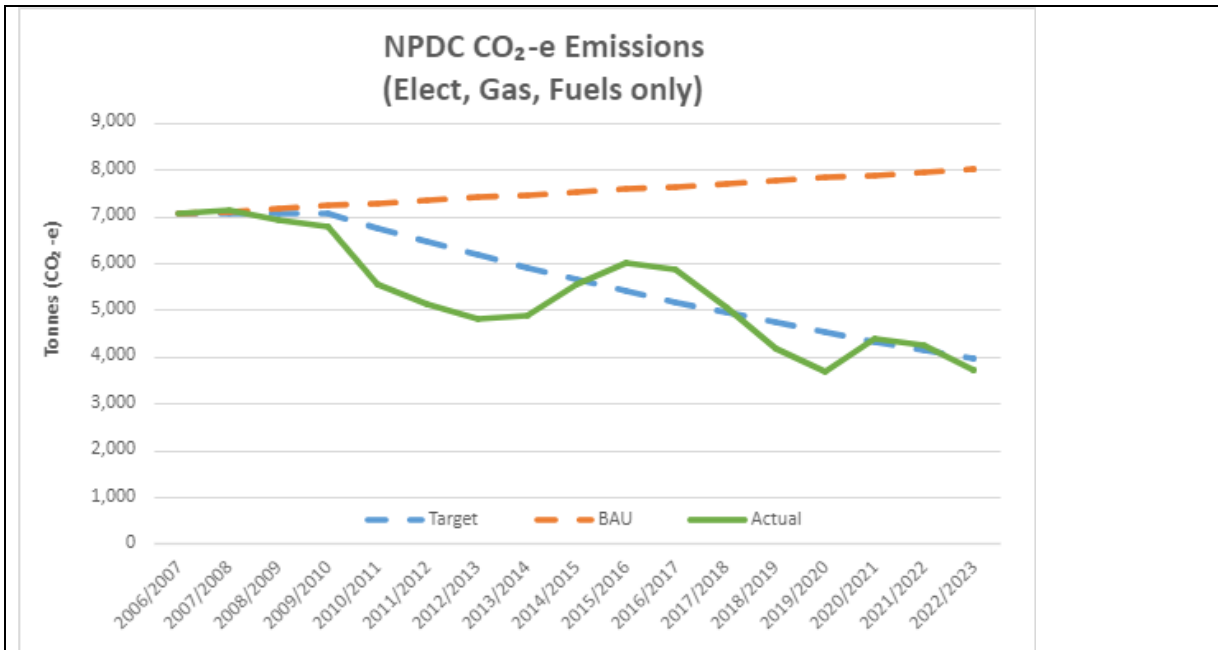
#### Scope 2:

- Scope 2 emissions from electricity has reduced by half. This is due mainly to the national electricity grid emissions factor, followed by electricity efficiency measures and less so by some impacts of Covid-19 on operations. Between 2017 and 2022 the national grid emissions factor dropped by approximately 35 per cent. The national grid electricity emissions factor may fluctuate up and down over the next few years, but trend down in line with the Government's target of 100% renewable electricity grid by 2030.
- Electricity consumption is continuing to trend downward across facilities and has reduced by 17 per cent from 2017/18. This is largely due to the work of the Carbon and Energy Management Team such as optimisation of Building Management Systems, LED lighting, and promoting behaviour change of tenants.
- A major electricity efficiency was achieved at NPDCs largest electricity user – the Wastewater Treatment Plant. The key initiative was the increase of efficiency of the aeration with new efficient diffusers installed within the bioreactors (aeration consumes ~60 per cent of the electricity) and more efficient mixers.

#### Scope 3:

- Scope 3 emissions are largely driven by NPDC's purchased goods and services and capital works programme and therefore fluctuates based on the LTP and its delivery. There was an increase in spend by approximately 20 per cent between 2017/18 and 2021/22.
- Scope 3 emissions increase was also based on Waste emissions including transportation of Waste out of the region. This methodology uses MFE emissions factors for third party landfills and transportation.
- Business travel emissions dropped ten-fold between 2017/18 and 2021/22. Travel was impacted by Covid-19 during the 2021/22. It is anticipated that business travel will increase but is unlikely to be back to the 2017/18 levels as virtual meetings and conferences are now more widely used and accepted.

Overall, NPDC emissions from electricity, gas and fuels continue to decrease. The following graph tracks the CO<sub>2</sub>e emissions from these three sources over time compared to previous business-as-usual (around 0.1 per cent per annum increase) and a target (around 4.5 per cent per annum reduction). The strong focus on energy management within Council has resulted in a 54 per cent reduction from the business-as-usual approach by 2022/23. This has achieved almost \$20m in cost avoidance since 2008. It should be noted that over this period Council has also opened new facilities (such as the Len Lye Centre) that have significant energy requirements.



As noted above, the intention is to use the 2021/22 inventory as a baseline to measure future inventories against. However, water reforms may, depending on final outcomes, impact on the emission inventory such that a new baseline inventory is required. For instance, Water and Wastewater sites consume over half of Council’s electricity use and two-thirds of natural gas use, and the three water services are approximately half of the capital works programme and therefore have significant scope 3 emissions.

**Specific actions to mitigation in the Long-Term Plan 2021-2031**

The Long-Term Plan 2021-2031 provided two immediate specific actions towards emissions reduction – electric vehicles and planting our place.

*Fleet and fleet infrastructure*

Council has an extensive fleet to support service delivery across the District. The Long-Term Plan 2021-2031 included specific funding to ‘top-up’ the standard fleet renewal budget to incorporate electric vehicles and other lower emission transport options for Council’s fleet.

The Council has diversified its vehicle fleet, incorporating five electric vehicles (EVs), three plug in hybrid electric vehicles (PHEVs) and ten hybrids, along with the introduction of e-bikes and e-scooters. To support the adoption of the sustainable modes of transport, the Civic Centre carpark now features multiple charging stations for EVs and PHEVs, with additional infrastructure in place for an additional six chargers.

The Councils internal Fleet Strategy focuses on fostering a culture of environmentally sustainable transport and is supported to explore low carbon options for future fleet replacements. The strategic evolution aligns with the Council’s commitment to environmentally conscious practices.

As part of this forward-thinking approach, the draft Long-term Plan for 2024-2034 integrates the budget for sustainable fleet initiative into the main fleet renewal budget rather than having a separate ‘top-up’ budget. The streamlined integration reflects the Council’s dedication to making eco-friendly fleet choices a routine ‘business-as-usual’ aspect of the fleet operational framework rather than as an addition. This provides a more flexible approach to fleet management as well.



*Planting our Place*

The Planting our Place programme was established through the Long-Term Plan 2021-2031. The programme supports planting of indigenous vegetation on existing Council land within urban areas. While the 2021-31 LTP made a ten-year commitment to achieve an initial 17 hectares of new native forest and wetland planting, a longer-term goal was established to achieve up to 34 hectares of planting over a 20 year period.

The programme has dual mandates – to increase indigenous vegetation within urban areas and to sequester carbon. The native biodiversity mandate will help enable the District to meet biodiversity requirements under the National Policy Statement on Indigenous Biodiversity (issued under the Resource Management Act 1991) for at least ten per cent indigenous vegetation cover in urban areas. The sequestration from Planting our Place is seen as a critical aspect to achieve Council’s net zero target by 2050 because it is unlikely that Council operations will be completely free of utilising fossils fuels and other carbon sources by 2050. However, this dual mandate does create some risks.

In practice, officers have found that many eligible sites available for restorative indigenous planting within urban areas of the district are relatively small - generally being in the range 0.25 – 1+ hectares.. To register new plantings into the New Zealand Emissions Trading Scheme, these need to be a minimum 1 hectare and at least 30m wide. Native plantings tend to have a slow rate of sequestration when compared with exotic forests, and especially so in their first ten years. The one-off costs of registering new plantings, and ongoing administration costs (e.g. regular mandatory emissions returns reporting) mean that small urban plantings, if eligible, are likely to be cost prohibitive for formal registration to the ETS. This means that it may not be practical to formally use carbon sequestration achieved through the programme in its current form to help meet Council’s carbon sequestration targets.

The programme is currently running ahead of schedule, and some of the early gains have also come about through recent funding partnerships between Iwi and the Crown (Jobs for Nature/Kaimahi for Nature). These projects have been supported by officers alongside Council led initiatives; in turn supported by the community during public plantings days.

Carbon sequestered in these planted areas can be ‘modelled’ using the standard ETS ‘look-up table’ for indigenous forestry. So far, 8.3 hectares has been planted. This equates to 1,978.81 tonnes of carbon removed from the atmosphere by 2050; if appropriate ongoing management occurs such as enrichment planting and control of animal pests and weeds.

Year Planted	Hectares Planted	Carbon sequestered per hectare at 2050	Total Carbon sequestered by 2050
2021/22	4.6	242.2t	1,114.12t
2022/23	3.7	233.7t	864.69t
Planting planned for 2023/24	3.1	224.6t	696.26t

One of the focus points to date has been on restoring wetlands. Currently within Council reserve land there are many degraded wetlands that are being integrated into the Planting our Place programme of work. These consist of a mix of taller canopy trees and shrub/flax/reed species that reduces the percentage of canopy tree compared with forest. Global research has confirmed the sequestration benefits of wetland soils but there is currently no mechanism in New Zealand to assess the degree of sequestration for wetland plantings. However, Officers consider it is important we recognise that sequestration benefit and are exploring work with the Peoples, Cities and Nature Research Team at the University of Waikato on what and how we might be able to recognise this more effectively. In the meantime, Officers are maintaining records of wetland planting for future recognition of the carbon sequestration rates.

The draft Long-Term Plan 2024-2034 includes continuing with Planting our Place, but with a focus on developing a larger 10-hectare forest. This 10ha forest focus will require changes to the site selection process,

but will result in an improved carbon sequestration focus and accountability through the registration to the New Zealand Emissions Trading Scheme. Over 25 years an additional 10ha native forest planting has the potential to sequester 2,150 tonnes of carbon, over and above current Planting Our Place Programme outcomes.

Note, there may be other risks associated with the Planting Our Place programme (such as pest plants and animals, fire, disease), but this assessment has focused on those risks relating to carbon accounting rather than those other risks. A report was presented to Council in September 2022 that provides more details on the Planting our Place programme.

A Council report in that being prepared to outlines the future work programme for Planting our Place is currently being drafted and will include updated data on urban biodiversity across all urban environments within the District. This will aim to shape and refine our urban revegetation strategy.

## **Adaptation**

Climate change adaptation is about preparing for the impacts of climate change. It involves understanding the various forecasts for Taranaki and assessing how they may impact on the District. Adaptation includes decisions on urban form (such as where people can live, infrastructure that services people) and also other areas such as economic changes (e.g. changes to farming for a different climate). Climate change adaptation does not include undertaking emergency management functions and roles.

### **Forecast implications for Taranaki**

Taranaki Regional Council commissioned NIWA to undertake an updated projection for climate change impacts in Taranaki in 2022. The report is available on the [Taranaki Regional Council website](#).

NIWA have provided forecasts for RCP4.5 and 8.5. RCPs are 'representative concentration pathways' of greenhouse gas emissions – RCP4.5 is a scenario whereby there is moderate global action to mitigate greenhouse gas emissions, whereas RCP8.5 is a scenario whereby greenhouse gas emissions continue to increase. NIWA provide this information for 2031-2050 (termed 2040) and 2081-2100 (termed 2090), and compared to the 1986-2005 average. The report outlines limitations and caveats to NIWA's modelling.

NIWA provide a range of modelled forecasts at a regional level, as well as including maps that show modelled forecasts by area. This information is summarised below. RCP8.5 to 2090 is commonly used below as it is the outermost change to the climate within the report. The main forecasts are:

- Temperatures are forecast to increase:
  - The average annual temperature is expected to increase by 2090 by 1-1.5°C (RCP4.5) to 2.5-3°C (RCP8.5) across Taranaki.
  - In terms of seasons, summer and autumn are forecast for the biggest increases by 2090 across Taranaki (2-3.5°C and 2.5-3.5°C respectively by 2090 under RCP8.5), with parts of New Plymouth District expected to have the highest increases compared to the rest of the region.
  - The number of frost days per annum, already low for much of the District, is expected to fall further. Frost would become uncommon for most of Taranaki under RCP8.5 in 2090.
  - The number of hot days (maximum temperature above 25°C) would increase. There would be 50-63 more hot days per annum for the New Plymouth-Bell Block-Waitara coastal area and around Urenui, with increases being smaller closer to Taranaki Maunga.
- Rainfall is generally forecast to increase:
  - Annual total rainfall is expected to increase by 2090 by up to 8 per cent (RCP4.5) to up to 12 per cent (RCP8.5) across Taranaki. However, under RCP4.5, annual rainfall may change by -2 per cent to 4 per cent by 2040.

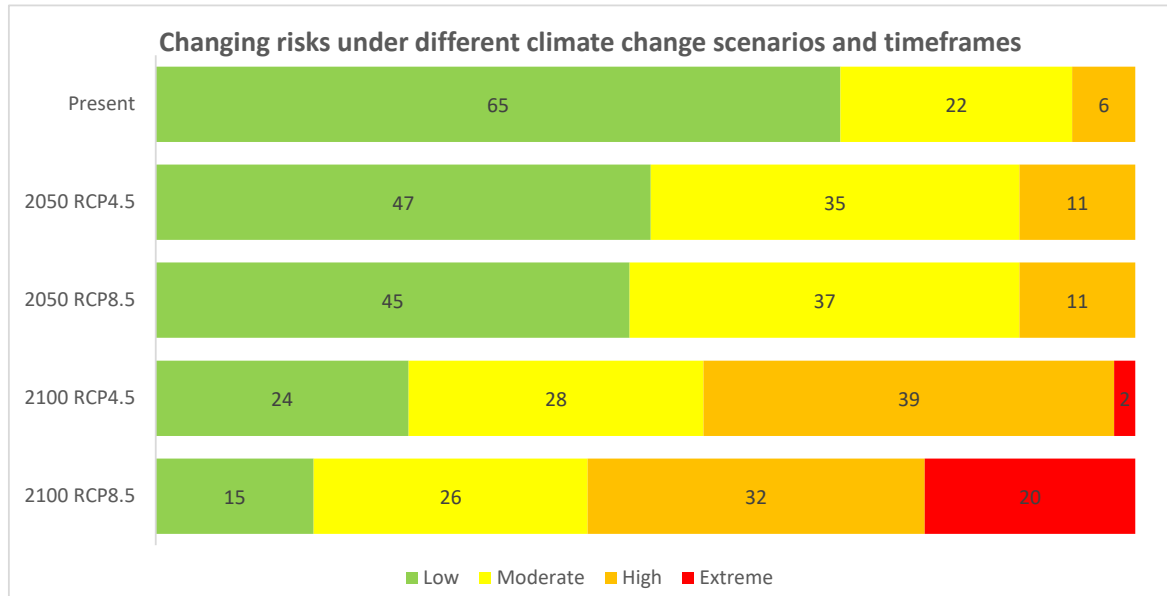
- The largest percentage rainfall increases are generally expected around coastal areas with smaller percentage increases inland.
- Seasonal rainfall patterns are expected to change significantly.
  - Winter will see larger increases under all forecasts with much of the District expected to see 12-16 per cent increases in winter rainfall by 2090 under RCP8.5. The area north of Tongaporutu is expected to see an increase of 16-22 per cent in that forecast.
  - Autumn is also expected to see increased rainfall across the District by varying degrees (with coastal areas forecast to see 4-8 per cent increase by 2090 under RCP8.5).
  - Summer has a mixed forecast, with the area around New Plymouth City forecast for a 2-4 per cent increase (RCP8.5 by 2090), and other parts of the District forecast for minimal change through to decreased rainfall.
  - Spring is generally forecast for decreased rainfall in the District with some inland areas receiving up to a 4 per cent decrease (RCP8.5 by 2090).
- Extreme rainfall events are forecast to become heavier.
  - A 1-in-50 year 12-hour event is forecast to increase from 133mm of rainfall to 167mm under RCP8.5 for 2090 – this is above the current 1-in-100 year event rainfall level
  - A 1-in-100 year 12-hour event is forecast to increase from 151mm of rainfall to 191mm under RCP8.5 for 2090
- Drought is, however, also expected to become more regular.
  - The ‘potential evapotranspiration deficit’ is expected to increase across Taranaki. However, the forecasts for New Plymouth District is generally lower than for Soth Taranaki and Stratford Districts.
- Wind speed changes are variable.
  - Summer and autumn are forecast to see lower average wind speeds (up to 9 per cent lower in 2090 under RCP8.5), while spring and winter average wind speeds are forecast to increase with New Plymouth City and east of it expected to increase between 3 and 6 per cent by 2090 under RCP8.5.
  - Projected maximum wind speed are forecast for relatively small changes.
- Sea levels are forecast to rise at an accelerate rate.
  - The sea level in 2090 is expected to be 0.5m (RCP4.5) to 0.7m (RCP8.5) higher than the 1986-2005 baseline.

These forecasts from NIWA are generally the most up-to-date forecasts available to Council. There are other sources of forecasts available. For instance, [the NZ SeaRise project](#) (hosted by Victoria University of Wellington and [supported in interim guidance by the Ministry for the Environment](#)) includes vertical land movement rates in its projections of sea level rise. This can create significant differences between different locations. For instance, at Port Taranaki (where the land is moving upwards) the 2090 median forecast for RCP8.5 is for the sea level to be 0.62m higher than in 2005, whereas in Urenui (when the land is subsiding) the same forecast is for the sea level to be 0.82m higher than in 2005 – a 20 centimetre difference in relative sea level rise due to land movement changes. Most of the New Plymouth District coast is subsiding.

### **NPDC asset and services implications of climate change forecasts**

In 2021, an exercise was done to consider the physical risks Council’s infrastructure and services face based on climate change scenarios. Ninety-three different risks to assets were considered. These risks were considered on their current risk rating, and then their potential future risk rating based on two different climate change scenarios (RCP4.5 and RCP8.5) in 2050 and 2100.

Under both scenarios, there is an increase in risk across these assets and services arising from climate change. No risks are classified as extreme presently or by 2050 under either scenario, and there are only five additional risks that move to being rated as high risks by 2050. However, extreme risks are forecast for 2100 under either scenario as well as significant increases to the number of high risks. The below graph shows the overall risk changes at present and the four assessed forecasts.



Whilst risks tend to increase relative to each other, there are seven risks that move from currently being a low risk to being an extreme risk under RCP8.5 in 2100. The table below shows the 20 assets and service risks that are rated as extreme under RCP8.5 by 2100, and shows their current risk as well as the other scenario risk assessments.

Risk Statement	Present	2050 RCP4.5	2050 RCP8.5	2100 RCP4.5	2100 RCP8.5
Risk to onsite wastewater infrastructure from coastal erosion	High	High	High	Extreme	Extreme
Risk to walkways, boardwalks and parks features from changes to temperature extremes	High	High	High	High	Extreme
Risk to parks soft assets (turf, trees, gardens, and dunes) from increasing coastal erosion	High	High	High	High	Extreme
Risk to flood control schemes from inland flooding.	Moderate	High	High	Extreme	Extreme
Risk to drainage and culverts from changes in rainfall patterns and extremes	Moderate	High	High	High	Extreme
Risk to Council owned buildings and venues from increasing high winds storms and ex-tropical cyclones.	Moderate	High	High	High	Extreme
Risk to parks structures, roads, paths, bridges and carparks from increasing landslides	Moderate	High	High	High	Extreme

Risk to wastewater outfall from storms and ex-tropical cyclones	Moderate	Moderate	Moderate	High	Extreme
Risk to potable water supply sources from increased fire weather	Moderate	Moderate	Moderate	High	Extreme
Risk to wastewater infrastructure from groundwater rise.	Moderate	Moderate	Moderate	High	Extreme
Risk to roading infrastructure from increasing landslides.	Moderate	Moderate	Moderate	High	Extreme
Risk to resource recovery facilities, landfills, and kerbside collection from changes to temperature extremes	Moderate	Moderate	Moderate	High	Extreme
Risk to parks soft assets (turf, trees, gardens, and dunes) from increasing temperatures, changes in seasonality, temperature extremes, dry spells and drought.	Moderate	Moderate	Moderate	High	Extreme
Risk to stormwater infrastructure from changing rainfall patterns	Low	Moderate	Moderate	High	Extreme
Risk to coastal / critical wastewater infrastructure from coastal erosion	Low	Moderate	Moderate	High	Extreme
Risk to stormwater infrastructure from sea-level rise	Low	Moderate	Moderate	High	Extreme
Risk to coastal roading infrastructure and bridges from increasing coastal erosion	Low	Moderate	Moderate	High	Extreme
Risk to footpaths & cycleways from increasing coastal flooding, storms and ex-tropical cyclones and coastal erosion	Low	Moderate	Moderate	High	Extreme
Risk to closed landfill and old dump sites on the coast from increasing coastal erosion.	Low	Moderate	Moderate	High	Extreme
Risk to parks soft assets (turf, trees, gardens, and dunes) from increasing fire weather conditions	Low	Low	Moderate	High	Extreme

As noted earlier, the draft Infrastructure Strategy 2024-2054 for consideration in the Long-Term Plan 2024-2034 places increasing emphasis on climate adaptation requirements for Council infrastructure and services. These risks have been considered in developing the Infrastructure Strategy.

The draft Long-Term Plan 2024-2034 also includes some specific actions. For instance, the Kawaroa to Belt Road Cliff Erosion and Seawall project will provide protection from the sea for park assets and the Coastal Walkway.

**Future or additional treatments**

*If the residual risk is not acceptable then further treatment or treatments are noted here.*

**Draft Long-Term Plan 2024-2034 budget**

The draft Long-Term Plan 2024-2034 includes budgets and resourcing towards further planning around climate change for both mitigation and adaptation. A high-level breakdown of the budgets is outlined below.

	Year one	Year two and onwards	Purpose
<b>Baseline budget</b>			
Emissions inventory and energy management system	\$90,000	\$90,000	Undertake annual emissions inventory (including third party verification) and to maintain an energy management oversight system.
Emission studies and investigations	\$100,000	\$100,000	Feasibility studies, business cases, technical assessments etc. to reduce NPDC emissions.
Community emissions inventory and initiatives	\$0	\$100,000	Understanding community emissions and developing and supporting initiatives to reduce those community emissions.
Community funding	\$0	\$100,000	Fund community groups undertaking climate change related initiatives. A community funding policy will need to be developed to support its allocation. This could support community groups to lower their emissions or adapt to climate change, fund community groups to support the community to lower emissions or adapt to climate change.
Adaptation planning studies and investigations	\$50,000	\$250,000	Planning, scientific and other technical advice into climate change adaptation. Year two budget to support development of a Climate Change Adaptation Plan (see below).
<b>SUB TOTAL</b>	<b>\$240,000</b>	<b>\$640,000</b>	
Accelerator funding	\$300,000	\$300,000	To accelerate NPDC’s climate change and sustainability response, including being able to undertake an agile response to support emissions reduction, adaptation and other sustainability initiatives.
<b>TOTAL</b>	<b>\$540,000</b>	<b>\$940,000</b>	

The staggered approach to increasing budgets reflects three factors. First, to help reduce year one rating requirements for the community. Second, the staggering reflects that increasing investment requires time and there would be a risk of applying the full budget in year one of an underspend. Third, the adaption advisor role is scheduled for year two of the draft Long-Term Plan 2024-2034 so there is little advantage in a significant budget for adaptation planning studies and investigations before then (the budget that is available will be used to undertake a gaps analysis for a New Zealand Carbon Standards report as outlined below).

A framework for the Accelerator funding will be developed to ensure that it is used appropriate, including both a prioritisation methodology and governance. The Accelerator funding may also be used for wider sustainability issues and not necessarily related to climate change.

## Climate Change Adaptation Plan

The climate change adaptation plan has been delayed due to a range of factors. These factors include:

- Priority being given to the District-Wide Emissions Reduction Plan first. That Plan has taken longer than expected.
- Government delays in national legislation. The Randerson Report into the RMA reforms recommended specific legislation be developed to support climate adaptation. Officers have undertaken the position that awaiting this legislation would ensure that any approaches by Council fulfil potential new legal obligations. Otherwise, Council may risk making commitments to the community around adaptation that it cannot fulfil due to changed legal requirements (e.g. that Council would follow a certain process whereas the legislation specifies a different process). Whilst the other two pieces of legislation under the RMA reforms were introduced and enacted (and subsequently repealed by the new Government), the climate adaptation legislation has not been progressed to date.
- Wider role of local government. The previous Government's Three Waters Reforms (and its Affordable Waters reset) created uncertainty as to the future role of territorial authorities in climate adaptation around stormwater. Council's stormwater networks, including their links to transportation and parks, are a key climate change adaptation consideration. This is because one of the main forecasts of climate change for Taranaki (and elsewhere in New Zealand) is increased heavy rainfall events so having an effective stormwater management and network will be a critical climate change adaptation initiative.
- Resourcing issues. Resourcing issues particularly arise from the decision in the Long-Term Plan 2021-2031 to only fund the Climate Action Framework for the first three years (i.e. through to 30 June 2024). This has resulted in retention and recruitment issues for an adaptation advisor role. This is exacerbated because climate adaptation is an emergent field with few experienced practitioners and increasing demand. The draft Long-Term Plan 2024-2034 re-includes this position from year 2 onwards.

In August 2023 the then Minister of Climate Change asked Parliament's Environment Committee to inquire into the climate adaptation legislation, and the Ministry for the Environment released two supporting documents – an issues and options paper and an expert working group paper to support the inquiry. The Environment Committee initiated the inquiry as requested. These papers both predominately focus on managed retreat issues rather than a holistic regime relating to climate adaptation, indicating that the climate adaptation legislation may focus on managed retreat (particularly the powers to relocate communities). The expert working group paper also indicates that both local and central government will be involved in the process.

A submission to this Inquiry into Climate Adaptation was signed off under delegated authority. A copy of the submission is attached (ECM 9101872). The main points of the submission are:

- The importance of finding political consensus and acting swiftly
- How more holistic adaptation legislation could improve adaptation by ensuring agencies work together
- Funding arrangements need to provide certainty, sufficiency, suitability and inter-generational equity
- Iwi and hapū need to be empowered as kaitiaki throughout the process
- Guidance and direction setting can reduce uncertainty and grounds for legal challenges
- Processes need to adapt to local community needs and issues, and be adaptive to new information
- Hazard information needs to be improved
- Compensation payments for relocation should not create perverse impacts.

There is no clear timeframe for when the Inquiry will issue its report, nor any indication as to how quickly the Government may respond to the Inquiry with a bill.

The other two pieces of legislation relating to the Resource Management Reforms were enacted and then repealed after 2023 election. The Spatial Planning Act 2023 and the Natural and Built Environment Act 2023 both included provisions relating to climate adaptation and developing the plans under those Acts would have been a part of climate adaptation planning. It is uncertain how the new Government's Resource Management replacement will address climate adaptation requirements.

A further uncertainty in developing an adaptation plan at this stage is the implications of water reforms. One of the key risks to the District from climate change is an increase in severe weather events with heavy rainfall. Improving the management of stormwater (such as through a 'spongy city' approach) will be a key part of the District's adaptation. The separation of stormwater services from Council may reduce the ability of Council to determine this aspect of climate adaptation. Depending on the final nature of the new Government's reforms, Council may need to work with a new CCO on this aspect of climate adaptation. There may also be other implications for Council, such as how to work alongside the new organisation for coastal protection structures that protect three water assets.

While some work has been progressed to contribute towards an adaptation plan, the ongoing uncertain legislative environment has hampered the ability of Council to deliver a meaningful adaptation plan in the near term. Developing a plan before legislation is in place can result in Council making commitments to the community that it may be unable to deliver on. However, at the same time, ongoing delays in adaptation planning may compromise the ability of Council to adapt to climate change in a cost-effective manner, particularly given the three-year long-term plan cycle.

The draft Long-Term Plan 2024-2034 includes a Climate Change Adaptation Advisor role from year two onwards and proposes an increase in funding for climate adaptation work from year two onwards as well. Practically, this means that the Climate Change Adaptation Plan will predominately be developed in year two. This should enable the Long-Term Plan 2027-2037 to consider the inclusion of any projects, programmes or other initiatives that arise from the Adaptation Plan, although there is a risk that the Plan's development takes longer than expected.

Council is progressing with considering adaptation in its infrastructure and service delivery in the meantime (as can be seen through the draft Infrastructure Strategy 2024-2054). Any immediate storm or other events are managed in accordance with standard emergency management procedures.

A Climate Change Adaptation Plan would address adaptation requirements. However, as noted above Council will need to assess how to reduce community emissions. There is risk that these plans are not aligned and undermine each other (such as by taking an approach to reduce community emissions that results in increased adaptation requirements). One approach is to develop a singular Climate Change Transition Plan in the future that brings all the various strings together, or could even be included in a larger singular vision/strategy 'New Plymouth District 2050' type document that addresses those plans and a wider community vision. This could potentially be a future planning step.

## **TCFD Reporting**

Council resolved to investigate implementing a governance framework for assessing and reporting on climate risks and opportunities when it considered community feedback on the (then draft) District-Wide Emissions Reduction Plan on 2 May 2023 (Council minute number C/2023/031).

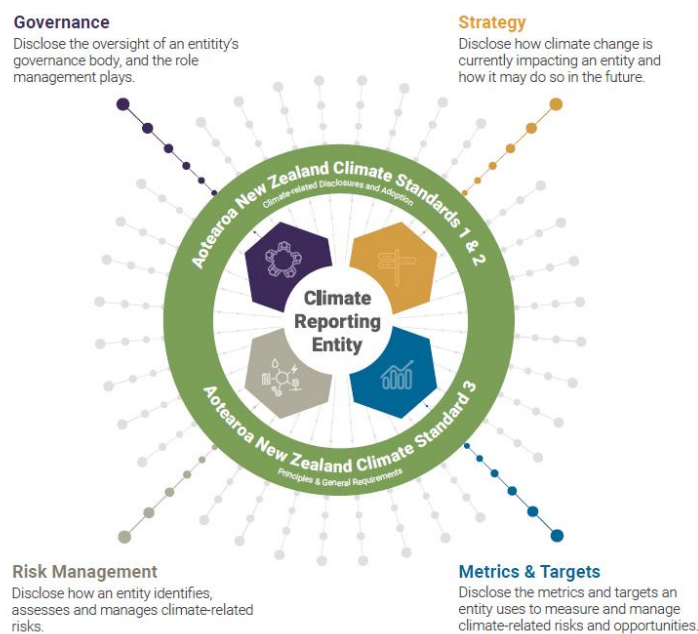
The Task Force on Climate-Related Financial Disclosures (TCFD) Reporting is a systemised approach to reporting climate risks and opportunities. In New Zealand, such reporting has been made compulsory for around 200 large financial institutions (including two local authorities organisations) following passage of the Financial Sector (Climate-related Disclosures and Other Matters) Amendment Act 2021. The reports required by this law are regulated through the [Aotearoa New Zealand Climate Standards \(NZCS\) issued by the External Reporting Board](#) (XRB). NZCS is based on the TCFD framework with some minor differences in disclosures.



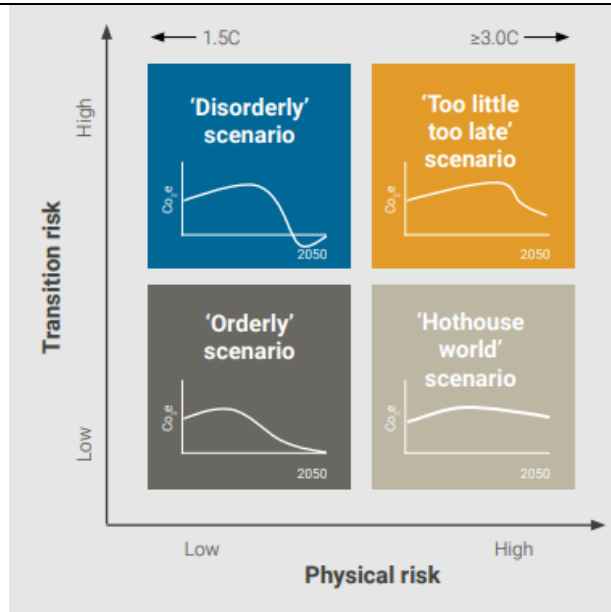
Undertaking this work with the NZCS framework rather than the international TCFD framework enables Council to ensure comparability with other organisations in New Zealand.

Developing an NZCS Report for Council is an appropriate approach to better understanding and regularly reporting on climate risks and opportunities. There is the potential that the legal threshold for organisations will change over time and Council could become required to undertake reports at some point in the future. Doing so ahead of legal requirements provides greater risk management before that time and enables Council to iterate reporting and improve over time rather than having to meet mandatory standards from the first reporting deadline.

NZCS reporting aims to bridge governance, strategy, risk management and metrics and targets into a cohesive approach.



One of the key aspects of NZCS is to understand how different potential climate scenarios may impact on organisations and their risks. The NZCS requirement is to assess at least three different scenarios. There are four main scenarios that organisation analyse, which are shown in the diagram below. Each of these scenarios will result in different types of risks for both the community and Council.



The assessment of implications of these scenarios can be wide-ranging, particularly for a local authority. For instance, under the high physical risk scenarios, Council may need to consider whether New Zealand will become a relatively more attractive location to live resulting in increased migration and population growth that, in turn, places pressure on Council infrastructure and services.

Auckland Council began reporting in using the TCFD framework in 2019 and have more recently aligned to the NZCS Reports (as one of the local government organisations legally required to do so). They have continued to build their reporting annually and have an ongoing multi-year work programme to improve their reporting.

XRG [guidance](#) notes the importance of undertaking NZCS reporting with internal resourcing as much as possible so that the organisation understands climate risks, rather than having the full process undertaken solely by external contractors. (XRB does note that external support may be required to assist in the development process, just that it should not be fully outsourced.) This will, however, require dedication of internal resourcing (potentially including from Councillors) on top of existing resource constraints across the organisation.

While an NZCS Report can be used as a compliance and reporting tool, there is also significant opportunity to use it as a strategic document in itself. The transitional and physical risks highlighted by it can be used to help to determine the type of future preferred by Council and then to implement work programmes towards it. In this way it can then inform planning initiatives across Council.

Developing a NZCS Report will require significant resources over several years, followed by ongoing review and updates. The first step will be to undertake a gaps analysis of the information Council currently does or does not have. This gap analysis is planned for 2024/25.

### **Local Government Funding Agency Sustainable Leading schemes**

The Local Government Funding Agency (LGFA) has two Sustainable Lending schemes that can provide local authorities with discounted lending. These are the Green, Social and Sustainability Loans (GSS Loans) scheme and the Climate Action Loans (CALs) scheme. These schemes have different criteria and eligibility.

[GSS Loans](#) are available to debt fund projects that meet one of twelve categories (nine green categories and three social categories). These categories align to the United Nations' Sustainable Development Goals. These

categories include energy efficiency, green buildings, clean transportation (including walking and cycling infrastructure), water and wastewater, renewable energy, pollution prevention and control (including waste facilities) and climate change adaptation projects. Each category has specific eligibility criteria. There is no published information on the margin decrease available for these loans.

[CALs](#) are available to local authorities that have made certain commitments to reduce emissions. These loans are not specific to certain projects and can cover all borrowing. The commitments include adopting an emissions reduction plan with science-based targets, undertaking an annual emissions inventory (including third-party verification), and confirmation whether the local authority is meeting its emissions reduction targets. At present, CALs have a publicised margin decrease of 0.02%.

Local authorities can utilise both loans by using CALs for their overall borrowing and a GSS loan for a particular project.

Council is largely compliant with the CAL criteria, however there are a small number of areas where Council would need to make changes to the District-wide Emissions Reduction Plan to become eligible. These can be addressed in the next revision of that Plan.

GSS loans can be assessed on a case-by-case basis in the future. It may require Council to change how it accounts for and tracks debt to being project specific. Officers will need to assess whether the marginal reduction in interest is exceeded by the additional costs associated with such a switch, or whether there is a threshold above which it becomes viable.

Utilising these types of loans, and particularly the CALs, are a way of financially incentivising Council to meet its commitments and targets for climate action. The risk that then generates is if Council does not meet its commitments and targets then it will not receive the financial benefits and therefore will face increased borrowing costs in the longer-term. It may be difficult to successfully re-apply to obtain a CAL in the future if that occurred. As such, Council would need to be confident and committed to its emissions reduction work programme before applying.

#### **When they will be implemented by**

*Is this timing realistic? Should it be brought forward or pushed back. If so, why?*

An NZCS Report will be developed over coming years. An initial step will be undertaken in 2024/25 to ascertain what information Council already has available to inform the report, what the key information gaps are and how they can be filled, and developing a work programme from there. It is expected that a fully developed NZCS Report may take several years to achieve.

As noted above, a Climate Adaptation Plan has been delayed as Council awaits guiding legislation. Whilst this is a realistic and practicable approach, it has delayed this work. The draft Long-Term Plan includes the necessary resourcing and budgets to undertake this work in 2025/26. As noted above, this timing should provide an opportunity to include key work into the Long-Term Plan 2027-2037 development process, although there are risks if timeframes slip or the next Long-Term Plan process starts earlier than expected.

While it may appear to be more intuitive to focus on the Climate Adaptation Plan before the NZCS Report, there are advantages in doing it that way. It enables the NZCS Report process (and particularly the initial gap analysis assessment) to provide an assessment of what the Adaptation Plan may need to cover.

LGFA Sustainable Lending schemes will be investigated as resourcing allows for suitable projects.

<b>Monitoring, review and reporting</b>
<b>Management comment</b>
<p><i>How does management get assurance that the risk is effectively managed to the extent possible?</i></p> <p>The establishment of a permanent Climate Change Response Team provides clear ownership for climate change planning within management, albeit with many of the risks and opportunities located in other parts of the organisation.</p>
<b>Emerging issues</b>
<p><i>The nature of the risk and its management are affected by changes in the internal and external environment. Are any changes anticipated or underway that require a review of how the risk is described, rated, and then managed?</i></p> <p>As noted above, a new legal framework for climate adaptation is being considered. This may result in greater legal powers to assist climate adaptation and may change roles and functions of Council in this space.</p> <p>Further, the national approach to climate mitigation and adaptation is likely to continue to evolve. This may create further work for Council to undertake (either voluntarily or required by law) which may or may not be funded by Government. The new National-Act-New Zealand First Government has already signalled several key changes around mitigation, such as removing the Clean Car Rebate Scheme and the GIDI Fund (Government Investment in Decarbonising Industry). The new Government includes a greater focus on the Emissions Trading Scheme being the key lever for emissions reduction which may result in carbon prices increasing.</p> <p>Community expectations are also likely to continue to evolve and change, particularly if there are local severe weather events attributed to climate change (or, to be more precise, made significantly more likely as a result of climate change).</p>
<b>Risk assurance</b>
<p><i>Has there been any external/independent review of the controls for this risk? Include detail on the nature of the work completed or underway.</i></p> <p>No external reviews have been completed so far.</p> <p>Independent reviews will be required as part of developing (and ongoing improvements to) a NZCS Report. An NZCS Report would also be published and thereby enable the public to provide feedback.</p>
<b>Conclusion regarding the management of this risk</b>
<p><i>What level of assurance can the Finance, Audit and Risk Committee have that the risk is effectively managed?</i></p> <p>NPDC is well-placed to manage the risk by ensuring the ongoing long-term planning is undertaken and supported by the investment in:</p> <ul style="list-style-type: none"> <li>• Climate change professional advice and expertise</li> <li>• Efficiently reducing emissions to meet national targets of net zero by 2050</li> <li>• Effectively communicating the risk and advocating for the wider community to reduce emissions</li> </ul>

**Attachments**

- Previous Deep Dive on Climate Change Adaptation Risks (ECM 8428384)
- Previous Deep Dive on Climate Change Mitigation Risks (ECM 8466249)
- 2021/22 NPDC Greenhouse Gas Emissions Inventory (ECM 9079544)
- NPDC Submission to the Environment Committee’s Inquiry into climate adaptation (ECM 9101872)

## DEEP DIVE OF COUNCIL'S RESPONSE TO CLIMATE CHANGE



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth  
District Council**

Council's risk register currently has risks around climate change relating to both planning the district's adaptation to the impacts of climate change, and mitigating them by reducing emissions.

In December 2019, Council voted to recognise climate change requires an urgent response and as a response the Climate Action Framework was adopted. The council is delivering a range of planning initiatives and projects that integrate Climate Change into Council considerations.

The purpose of this deep dive is to outline how risks identified within the risk register are being managed.

### Risk description

*Risk is the effect of uncertainty on the achievement of objectives. The risk description for this risk is:*

**“Council is unable to adapt to, or mitigate the effects of climate change because of inadequate planning for anticipated impacts, resulting in environmental, financial, and reputational damage”.**

It should be highlighted that this risk includes two discrete aspects;

1. The council is unable to mitigate the effects of climate change because it does not effectively plan to reduce its greenhouse gas emissions and those of the wider community.
2. The council is unable to adapt to effects of climate change after it has occurred.

Due to the breadth and scale of this risk, this deep diver report will focus on the second part only, council's ability to adapt to the effects of climate change. Details of Council's planning to mitigate the effects of climate change by setting emissions reduction targets will be reported separately as part of the climate action framework.

In order to understand the risk that the effects of climate change will have it is important to understand the current scenarios that predict how the climate will respond to a range of greenhouse gas emissions up until the year 2100. These scenarios, called Representative Concentration Pathways (RCP) forecast the trajectory of greenhouse gas concentrations in the earth's atmosphere (not the actual emissions).

The United Nations Intergovernmental Panel on Climate Change (IPCC) initially established four RCPs. These are summarised in the table 1. A fifth scenario, RCP1.9, was subsequently added after the adoption of the Paris Agreement to represent the mitigation pathways that would achieve the aspiration of that agreement to limit warming to 1.5°C.

Scenario	Emission Trend	Temperature Increase at 2100 Mean and likely range <sup>1</sup>	Sea Level increase projections <sup>1</sup>
RCP1.9	Very strongly declining Emissions	>1.5°C	
RCP2.6	Strongly declining Emissions	1.0°C mean (range 0.3 to 1.7°C)	0.40m mean (range 0.26 to 0.55m)
RCP4.5	Slowly declining emissions	1.8°C mean (range 1.1 to 2.6°C)	0.47m mean (range 0.32 to 0.63m)
RCP6.0	Stabilising Emissions	2.2°C mean (range 1.4 to 3.1°C)	0.48m mean (range 0.33 to 0.63m)
RCP8.5	Rising Emissions	3.7°C mean (range 2.6 to 4.8°C)	0.63m mean (range 0.45 to 0.82m)

<sup>1</sup>IPCC 5<sup>th</sup> Assessment Report WG1 2013

Furthermore, the National Institute of Water & Atmospheric Research (NIWA) provides a useful summary of the Ministry for the Environment's predictions of the effect climate change will have on New Zealand's weather patterns and climatic conditions by the year 2090. These are summarised as follows:

- **Daily Precipitation Extremes – number of Dry days:** likely to increase by about 10 days per year.
- **Daily Precipitation Extremes – very wet days:** more than 20% increase in the 99<sup>th</sup> percentile of daily rainfall
- **Extreme Wind Speeds** – up to a 10% increase for some parts of New Zealand
- **Storms** – a poleward shift of mid-latitude cyclones but with a possible reduction in frequency
- **Solar Radiation levels** – seasonal variations of -5% and +5%
- **Relative humidity** – increase of up to 5%

In combination, this information provides useful context to the likely impacts the Council and the New Plymouth community will have to adapt to if the ambitious aspirations of the Paris Agreement are not met – noting that even if the Paris agreement is met there will be continued warming and associated effects until the climate stabilises.

The following provides a summary of the likely consequences on Council, the services it provides and the wider community services and infrastructure as well:

- More intense rainfall, particularly during the winter months, will increase the frequency of localised flooding and reduce the level of service council's storm water infrastructure provides.
- More intense rainfall, particularly during the winter months, will increase the frequency that the city's flood protection dams are activated and, over time, the level of protection they provide will reduce.
- Increased rainfall and the associated increase in flooding will reduce the availability of suitable land for urban development or increase its cost to develop as increased levels of infrastructure will be required to service it.
- Reduced rainfall during the summer months will put additional stress on the rivers that council abstracts from for the district's drinking water supplies
- Reduced rainfall during the summer will increase the risk of drought impacts on agricultural irrigation
- Coastal erosion is likely to be accelerated by sea level rise along some localised stretches of the district's coastline
- Coastal erosion over the next 80 years will result in water, wastewater and road infrastructure being damaged and/or destroyed in localised areas.
- Storm surges result in localised inundation to low lying urban areas more frequently
- Sea level rise increases the static head conditions that the marine outfall pipe operates under which reduces its hydraulic capacity triggering the need for upgrades to the wastewater treatment plant.
- Increased rainfall and higher groundwater levels increases the rate of inflow and infiltration into the wastewater network resulting in reductions in capacity, increased probability of sewage overflow and increased consumption of energy and consumable chemicals required to pump and treat the increased volume
- Increased temperatures and solar radiation results in accelerated deterioration of the districts road pavements due to "bleeding" bitumen and UV damage.
- Some plant and tree species and ecological habitats within the parks estate will suffer reduced health due to the changes in daily temperatures, rainfall and relative humidity.
- Warmer, wetter and more humid conditions may increase biosecurity risks with conditions being more favourable to invasive pest and weeds.
- Warmer winters may alleviate some cold-related illnesses and reduce "fuel poverty" (the unaffordability for some residents to pay to heat their homes). However, hotter summers will likely increase heat stress related illness and be more favourable conditions for the spread of sub-tropical disease
- Sea level rise will reduce the level of protection provided by the council's coastal protection assets (sea walls) and increase the frequency of damage and/or trigger the need to abandon them and retreat in land.

- The cost of insurance for both the council’s infrastructure and assets as well as for the community in general are likely to increase over time, particularly for those parts of our community that are located in geographical areas that are at increased risk, such as flooding.
- 

One of the most significant mitigating factors for the district is that the topography of the region, namely the rapid increase in elevation when travelling inland towards Mt Taranaki reduces the district’s vulnerability to sea level rise and localised flooding compared to flatter, low lying regions in New Zealand. However there are particular locations within our district where the community will be particularly vulnerable to Climate Change, such as the Rahotu Block risk of inundation and Waitara’s risk of storm water flooding. Given the demographic of these areas, it is not unreasonable to expect that Māori will disproportionately be affected. This may create additional demand on some council services and functions such as the Iwi liaison, community partnerships and Civil Defence teams.

Without any controls in place, the above consequences of this risk are consistent with a major impact under the Council’s risk management framework which describes a “levels of service significantly below expectations in one or more outcome categories” and with financial losses of between \$5m and \$10m.

Given the impacts of climate change are expected to progressively develop over the next 80 year period, council’s risk management framework would place the Likelihood as Unlikely as it is not likely that major impacts such as a \$10m loss would occur in the next 5 years.

It is important to note that, whilst there is a low likelihood failing to adapt in the short term, this should not be interpreted as a lack of urgency to mitigate the effects of climate change.

**Analyse and evaluate the risk**

Risk	Consequence	Likelihood	Rating
Inherent	Major	Unlikely	Medium
Residual	Moderate	Unlikely	Low

**Treat the risk**

**Controls**

*What we already have in place to manage the risk identified – are the controls effective, sustainable, or even redundant (so resources can be reallocated)?*

**District Plan and Development Control:**

The Council’s Proposed and operative District Plans details natural hazard zones, including those areas of the district that are at risk of localised flooding, coastal flooding and coastal erosion. Development activity within these zones is regulated and restricted through the land use consenting process in order to avoid future development in areas that are at a higher risk.

The proposed District Plan uses the most recent Climate Change science and features updated Coastal Hazard information. The Plan also introduces an Adaptive Management approach to managing the risks from natural hazards on development that requires consideration of:

- the risks and consequences under a range of climate change scenarios;
- the range of viable adaptation options;
- The development of adaptive pathways, with associated trigger points so that an adaptive management response can be made.

**Infrastructure Renewals Planning**

There are a number of infrastructure assets, including drinking water and wastewater pipes, roads and wastewater pump stations located in the coastal hazard zones that are expected to be impacted by accelerated

coastal erosion. However, many of these assets are already aging with many already halfway through their expected design lives. As such, the majority of the assets exposed to this hazard will be replaced before they actually suffer damage and loss. As assets become due for replacement, it will be the most cost effective opportunity to relocate them away from the hazard zones – this practice is already included in the council’s Asset Management Plans and procedures as a standard consideration whenever replacing any asset and the assessment includes all natural hazards, not just climate change.

**Storm Water Design standards**

NPDC has adopted the practice of using the High Intensity Rainfall Design System (HIRDS) and now bases the design of new storm water systems on a 100 year design life expectancy and with the capacity to manage up to the IPCC’s RPC6 climate change scenario. The last review of the Council’s NZS4404 Subdivision Development Infrastructure Standard, incorporated the requirement to use the HIRDS rainfall data in the engineering designs for subdivisions. This ensures that assets that are built by private developers and then vested to council are also future proofed.

**Flood Protection Dams:**

The progressive erosion of the level of protection offered by the District’s Flood Protection Dams has been identified and included as of the key issues in the Council’s infrastructure Strategy. This will allow for early planning of dam upgrades to be undertaken in the future before the levels of protection start to noticeable decrease.

**Drinking Water Source Security:**

Based on river flow data and recession curves, New Plymouth’s drinking water supplies are estimated to have a drought level of service sufficient to withstand a 1:100 year drought. This is considered to be a relatively high level of services, particularly compared to some international benchmarks where the level of service can be as low as a 1:20 year drought.

The effect of implementing universal water meters and the anticipated reduction in the district’s gross consumption of water will likely mitigate most if not all reductions in level of service. Furthermore, long term planning for developing supplementary water sources has been ongoing for several years now with adaptive management plans starting to be developed that would set out a series of key milestones or conditions that would trigger the implementation of successive stages of the plan and progressively bring on line new/supplementary water sources.

**LiDAR Data Project:**

Council has successfully worked with the other district and regional councils in Taranaki as well as the Taranaki Emergency Management Office (TEMO) to successfully apply for 56% grant funding from LINZ as part of the Provincial Growth Fund. This funding will allow the entire Taranaki region to be mapped using high resolution LiDAR. Once completed, this data will be used for flood modelling and storm water catchment management planning (this has already been completed for the urban Waitara catchments) as well as monitoring the progression of coastal erosion. This information will also be included in the District plan to support appropriate development controls.

**Adaptive Management Planning for at risk Coastal Communities:**

The Council has started working with some of our at risk coastal communities to develop adaptive management planning. Adaptive management planning seeks to find sustainable long-term solutions for vulnerable communities over a 100 year timeframe, including monitoring and planning for how they will adapt to coastal hazards and climate change.



The Council has undertaken a district wide assessment of coastal hazards to support the Proposed District Plan. A more detailed assessment was carried out for the Onaero community with the results informing the Proposed District Plan that was notified in late 2019. Beach 'walk and talk' sessions and other meetings with Council staff, experts and the community have been held to develop a shared understanding of the risk (based on an analysis of consequence and likelihood) posed by coastal hazards.

The District Plan applies rules on activities within the Coastal Erosion Hazard Area, which is that area identified as most 'likely' to be at risk from natural hazards over the next 100 years. Resource Consent is required for building and subdivision in this area. There is also a level of rule control for the mapped Coastal Environment area, which includes areas 'potentially' subject to future hazards over the next 100 years.

The rules provide a regulatory process which uses resource consent conditions to manage risk. This is a consents based contract between the Council and consent holders and manages expectations regarding the management of coastal hazards.

Discussions are continuing with the Onaero community on the options and the implications for the community over the short, medium and long-term.

**Wastewater Network Modelling:**

The project to develop an engineering computer model of the District's wastewater infrastructure network is underway. Once complete, this tool will allow the likely effects of storm water flooding and the associated inflow and infiltration (I&I) into the sewer system to be explored. This will enable projects to be identified to target and resolve hotspots of I&I. This work will also assess the hydraulic capacity of the wastewater treatment plant under different sea level conditions and identify the necessary upgrades to future proof the performance of this asset.

**Storm Water Network Modelling:**

Storm water catchment management plans (along with the supporting engineering computer models) for the east and west Waitara catchments have been developed. These plans provide natural hazard data for the proposed district plan as well as serving as a predictive/analytical tool that allows council to take a risk based approach to the management and ongoing development of its storm water infrastructure. In particular, the catchment management plans allows council to design and model the performance of its systems under the IPCC RCP6.0 scenario so that it is effectively future proofed for the next 100 years. Furthermore, the models have allowed council staff to assess both the impact and the likelihood of coincident events such as high intensity rainfall occurring at the same time as a storm surge during a high tide and what the likely impacts climate change and sea level rise will have. For most coincident events of any material significance, the probability of them occurring is so low they are not considered to be credible scenarios due to the prohibitive cost of mitigating events that may only occur once every thousand or so year.

The current (2018-28) Long Term Plan (LTP) provides funding to replicate the approach taken to the Waitara catchments across the rest of the urban catchments in the District. These new catchment management plans would replace the existing plans (where they exist) which have now become dated and obsolete. However, in order to deliver these plans, the level of funding allocated to this work in the 2021-30 LTP will need to be significantly increased in order to provide broad coverage across all of the urban catchments in the District.

**Infrastructure Vulnerability Assessment:**

Council staff worked with TEMO to assess the Region's infrastructure vulnerabilities to natural hazards, including the effects of climate change, sea level rise and coastal erosion. This work provided a GIS mapping tool that geospatially overlaid infrastructure location data from almost all Lifeline Utility operators with the Region's known natural hazard zones. This information was then used to identify infrastructure that was both vulnerable

and exposed to natural hazards and, in particular where multiple infrastructure networks converged into hotspots – e.g. where power and water utility networks crossed a river at a single road bridge. This work also investigated the interdependencies between different infrastructure networks – e.g. where wastewater pumping is vulnerable to loss of electrical power. The intelligence gained from this tool is being incorporated into infrastructure improvement and risk reduction programmes in order to systemically reduce the risk of vulnerable infrastructure being exposed to natural hazards.

**Climate Action Framework:**

The Climate Action Framework, approved by Council in December 2019 includes a number of initiatives that are aimed at both mitigating council’s greenhouse gas emissions and preparing the council and community to be ready to adapt to the impacts of climate change. In terms of adapting to climate change, the framework seeks to build on the adaptive management planning (described earlier in this report) by undertaking a climate risk vulnerability assessment and then developing a district wide adaptation plan. In addition, information regarding Council’s climate change planning and preparedness is required to be reported to the Ministry for the Environment so that it can be incorporated into the National Adaptation Plan (due to be released in Nov 2022).

**Urenui & Onaero Wastewater Systems:**

The communal septic tank systems at both Urenui and Onaero bachs/camp grounds have been identified as being at risk to coastal erosion and sea level rise. Funding has been provided as part of the 2020/21 Annual Plan to start the work to investigate feasible options for providing wastewater services to these communities as well as the wider Urenui township.

**Future or additional treatments**

*If the residual risk is not acceptable then further treatment or treatments are noted here.*

**Coastal Protection Assets:**

Council has a number of coastal protection assets that will, over time, become increasingly difficult and costly to maintain and repair. Most of these assets are protecting council infrastructure or urban areas such as the New Plymouth CBD. Currently there are no long term plans in place for what the council will do when these structures become untenable. Development of adaptive management plans for these assets will allow both:

- The council to plan for the eventual replacement or abandonment of these assets with suitable trigger points/milestones/conditions identified up front, and;
- For the parts of the community that rely on these assets to protect their own properties to have visibility of the council’s long term plans and to make their own plans accordingly.

**Resilience Framework:**

Work has commenced on developing a draft Resilience Framework that will provide direction for the ongoing management of natural hazards (including the effects of climate change), including risk reduction, preparedness and emergency response & recovery. Part of this work will include developing scenarios for the probable level of loss/damage to council services and infrastructure for different natural hazards and estimating the likely time it will take to restore the service. This assessment will be used to inform the community of the level of personal preparedness required to support themselves to bridge gap until council services are restored.

**Adaptive Management Plans:**

Continue the current work to develop adaptive management plans and broaden its coverage to include all vulnerable coastal communities.

**When they will be implemented by**

*Is this timing realistic? Should it be brought forward or pushed back. If so, why?*

Implementation of additional controls is subject to funding being made available in the 2021-30 Long Term Plan.

<b>Monitoring, review and reporting</b>
<b>Management comment</b>
<p><i>How does management get assurance that the risk is effectively managed to the extent possible?</i></p> <p>The current controls are subject to ongoing monitoring and management oversight either through project steering committees or via the councils asset management steering committee and the associated reporting of the implementation of the Asset Management Plans.</p>
<b>Emerging issues</b>
<p><i>The nature of the risk and its management are affected by changes in the internal and external environment. Are any changes anticipated or underway that require a review of how the risk is described, rated, and then managed?</i></p> <p>There are no current emerging issues at the moment.</p>
<b>Risk assurance</b>
<p><i>Has there been any external/independent review of the controls for this risk? Include detail on the nature of the work completed or underway.</i></p> <p>No external reviews have been completed so far.</p>
<b>Conclusion regarding the management of this risk</b>
<p><i>What level of assurance can the Finance, Audit and Risk Committee have that the risk is effectively managed?</i></p> <p>By comparison to other natural hazards within the district, such as volcanic eruption (circa 50% likelihood in the next 50 years), this risk has a relatively moderate potential consequence and a significantly lower likelihood of impacting on the council's ability to adapt to changing climatic conditions in the sort to medium term.</p> <p>NPDC is currently well-placed to manage the risk by ensuring the ongoing long term planning is undertaken, supported by the investment in:</p> <ul style="list-style-type: none"> <li>• critical tools such as engineering network models,</li> <li>• LiDAR data gathering</li> <li>• Risk reduction infrastructure upgrade programmes</li> <li>• Climate change professional advice and expertise</li> <li>• Timely reviews of the District Plan</li> <li>• Adaptive Management Planning for vulnerable coastal communities</li> <li>• Refining the draft resilience framework and;</li> <li>• Effectively communicated the risk and supporting the wider community preparedness</li> </ul> <p>Planning work that has already commenced is timely with ample lead-in time before the progressive impacts of climate change have a material effect. This early planning will allow adaptive management plans to be prepared that enable council to minimise the cost of adapting to climate change by upgrading, phasing out and/or relocating vulnerable infrastructure as part of its cyclical renewals lifecycle management practices.</p>



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth  
District Council**

## DEEP DIVE OF COUNCIL’S RESPONSE TO CLIMATE CHANGE

Council’s risk register currently has risks around climate change relating to both planning the district’s adaptation to the impacts of climate change, and mitigating them by reducing emissions.

In December 2019, Council voted to recognise climate change requires an urgent response, and as a response the Climate Action Framework was adopted. The Council is delivering a range of planning initiatives and projects that integrate Climate Change into the Council’s considerations.

In December 2020, a Deep Dive on Climate Change Adaptation risks and action was reported on.

The purpose of this Deep Dive is to outline how Climate Change Mitigation risks identified within the risk register are being managed.

Risk description	
<p><i>Risk is the effect of uncertainty on the achievement of objectives. The risk description for this risk is:</i></p> <p><b>“Council is unable to adapt to, or mitigate the effects of climate change because of inadequate planning for anticipated impacts, resulting in environmental, financial, and reputational damage.”</b></p> <p>It should be highlighted that the risk includes two discrete aspects:</p> <ol style="list-style-type: none"> <li>1. The Council is unable to mitigate the effects of climate change because it does not effectively plan to reduce its greenhouse gas (GHG) emissions and those of the wider community.</li> <li>2. The Council is unable to adapt to effects of climate change after it has occurred.</li> </ol>	
Mitigation:	Reducing greenhouse gases
Adaptation:	Responding to the changing climate
<p><i>Source: Ministry for Environment – National Climate Change Risk Assessment, August 2020.</i></p>	
<p>This Deep Dive report focuses on the Council’s ability to mitigate the effects of climate change. It provides a summary of mitigation initiatives undertaken over the last several years as well as detailing the planning and future initiatives it will undertake in order to reduce greenhouse gas (GHG) emissions within its direct control. The Council’s mitigation of climate change also includes planning the advocacy role that NPDC can take to support the wider community to reduce their emissions.</p>	
<p><b>National Context</b></p> <p>In December 2019, the Government passed the Climate Change Response (Zero Carbon) Amendment Bill. Part of this legislation set a new GHG emission target, to:</p> <ul style="list-style-type: none"> <li>• Reduce all greenhouse gases (except biogenic methane<sup>1</sup>) to net zero by 2050.</li> </ul>	

<sup>1</sup> Biogenic methane is produced from biological (plant and animal) sources. Biogenic methane is emitted by livestock, waste treatment and wetlands, for example. On the other hand, fossil methane sources include coal mining, natural gas leakage and methanol production from natural gas – Ministry for Environment.

- Reduce emissions of biogenic methane within the range of 24-47 per cent below 2017 levels by 2050 including to 10 per cent below 2017 levels by 2030.
- Set a series of emissions budgets to act as stepping stones towards the long-term target.

This target set New Zealand’s ambition to reduce emissions in line with the Paris Agreement’s long-term goal of limiting global warming to 1.5 degrees Celsius above pre-industrial levels.

The reduction in Aotearoa’s emissions will be supported by the Climate Change Commission’s (CCC) creation of five-yearly emissions budgets, providing a stepping stone to net zero by 2050.

The National Emission Reduction Plan that will underpin the actions the country needs to take to transition towards net zero emissions by 2050, will be released as a draft in February 2021 for consultation.

The Council is working carefully to align its planning and action to Government-led policy and plans. Timeframes for both the district-wide Emissions Reduction Plan and the district-wide Adaptation Plan have been aligned to incorporate publication timings of national policy and plans.

**Analyse and evaluate the risk**

Risk	Consequence	Likelihood	Rating
Inherent	Moderate	Likely	High
Residual	Moderate	Possible	Medium

**Treat the risk**

**Controls**

*What we already have in place to manage the risk identified – are the controls effective, sustainable, or even redundant (so resources can be reallocated)?*

**Energy and Emissions Management**

In 2006, NPDC created an Energy Management Team, tasked with managing energy and emissions reduction. The team meet on a six-weekly basis and report quarterly to the Executive Leadership Team. Subsequently, in 2008, NPDC set a corporate carbon reduction target to stabilise carbon emissions at 2006 levels by 30 June 2010, and then reduce emissions by 20 per cent by 30 June 2015. This target was not only met, but exceeded, as shown in Figure 1, below:

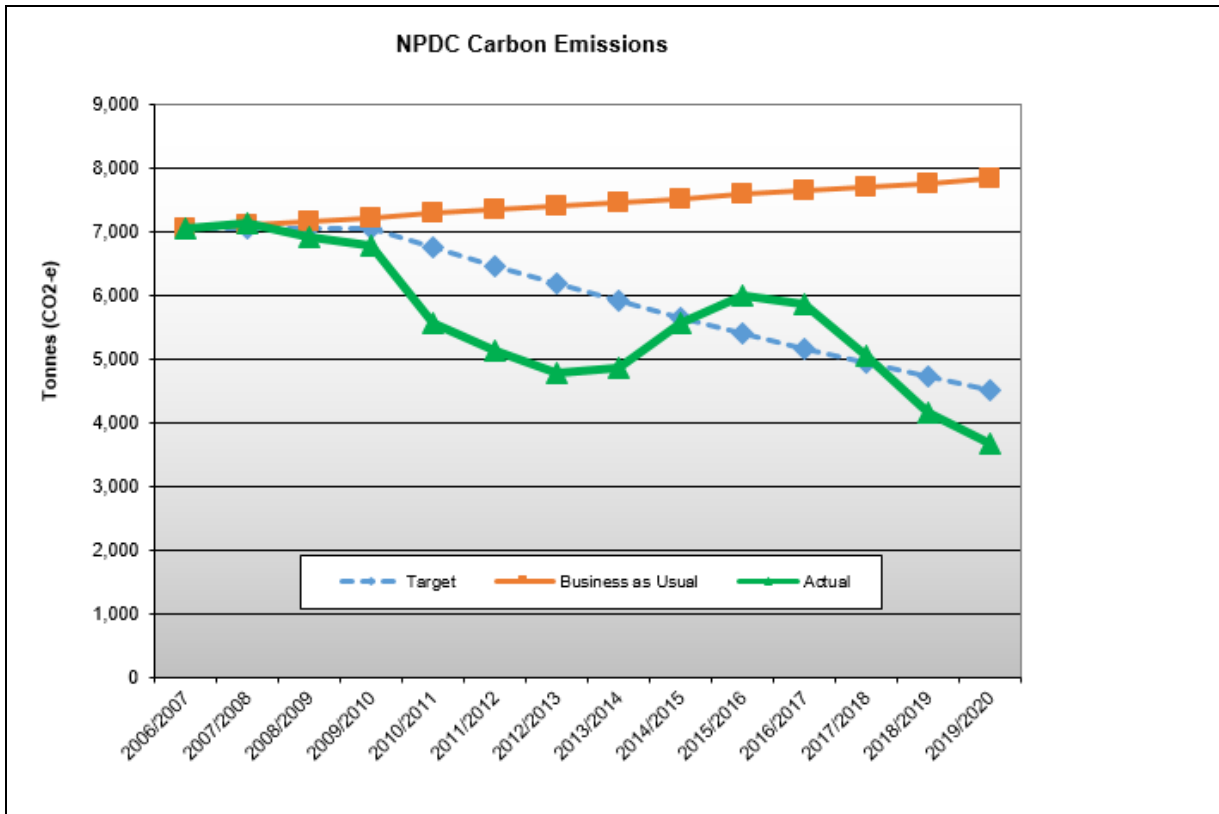


Figure 1: Graph showing NPDC carbon emissions from 2006/2007 – 2019/2020

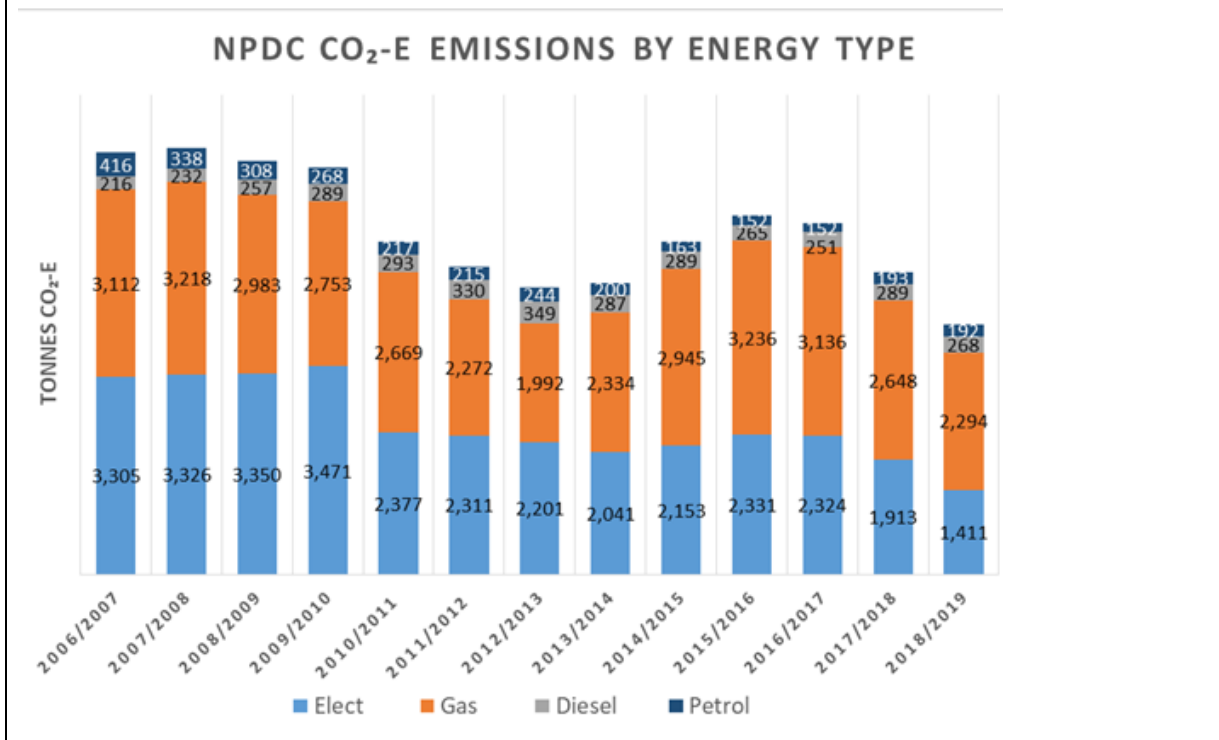


Figure 2: Graph showing NPDC emissions by energy type.

It should be noted that the reductions illustrated in figures 1 and 2 have been achieved despite population growth increasing the demand on Council services such as, increased wastewater inflows to the New Plymouth Wastewater Treatment Plant (WWTP), construction of new subdivisions increasing the number of roads and associated streetlights and the addition of the Len Lye Centre building.

Some of the more notable initiatives that helped achieve the energy and emissions reductions are listed below:

- **LED Street Lighting Upgrade**

The replacement of the ageing streetlight system with LED technology achieved monthly energy and carbon savings of approximately 61 per cent - this was against a business case target of 45 per cent.

- **Mechanical de-watering upgrade of the Waste Water Treatment Plant (WWTP)**

The installation of the Ishigaki Screw Presses in 2016/17 resulted in a significant reduction in gas usage to dry the sludge produced in bioreactors and convert it into the bio-solid fertiliser that the Council sells as Bioboost fertiliser.

In the 2018/19 year, a reduction of 25 per cent less gas was achieved in comparison with 2006/07 usage. This figure was achieved despite the WWTP processing almost 50 per cent more solids than in 2006/07 (due to growth in the city, and sewage being directed from Waitara and Ōākura).

- **Bioreactor Aeration Upgrade**

In 2012/13, the Council converted Carrousel Aeration Ditches with mechanical aeration to plug flow bioreactors, which use blowers and diffusers for aeration. In the 2018/19 year, a reduction of 18 per cent energy was achieved, despite the nearly 50 per cent increase in the plant load, noted above.

- **Civic Centre Energy Management**

A Building Management System was installed in 2011 to control the Heating Ventilation and Air Conditioning.

During the Level 1 office upgrade at Civic Centre in 2016/17, LED lighting was installed. Subsequently, LEDs have replaced traditional bulbs in the Basement, Lower Ground and Level 3 of Civic Centre. Other areas have also been updated to LED lighting.

The result of the above changes and continuous improvement in energy management has reduced energy use at Civic Centre significantly, with electricity use down 49 per cent from 2006 to 2019, and gas use down 66 per cent over the same period.

These changes also contributed to the Civic Centre in 2019, despite its age and building type, to be the first building in Taranaki to be awarded the four stars NABERNZ rating.

- **Colson Road Landfill Gas Management System**

A landfill gas management system was installed at the Colson Road Landfill. The primary purpose of this system is to flare the methane landfill gas produced by decomposing waste in order to prevent odours. At the time of installation it was also expected that the flare would provide a reduction in greenhouse gas emissions by converting methane gas to carbon dioxide. Whilst the landfill still emits carbon dioxide, in terms of carbon dioxide equivalent (CO<sub>2</sub>e) methane gas, has approximately 25 times more warming potential than carbon dioxide.

Since its installation, there has been discussion about the long term benefits associated with converting methane (which is relatively short lived before breaking down) to carbon dioxide which has a relatively long life in the atmosphere, and their respective contributions to global warming potential.

In 2020, the Council aligned its emission reduction target to the national, net zero emissions by 2050 goal, set by Government.

**Breakdown of NPDC electricity, gas and fuel data**

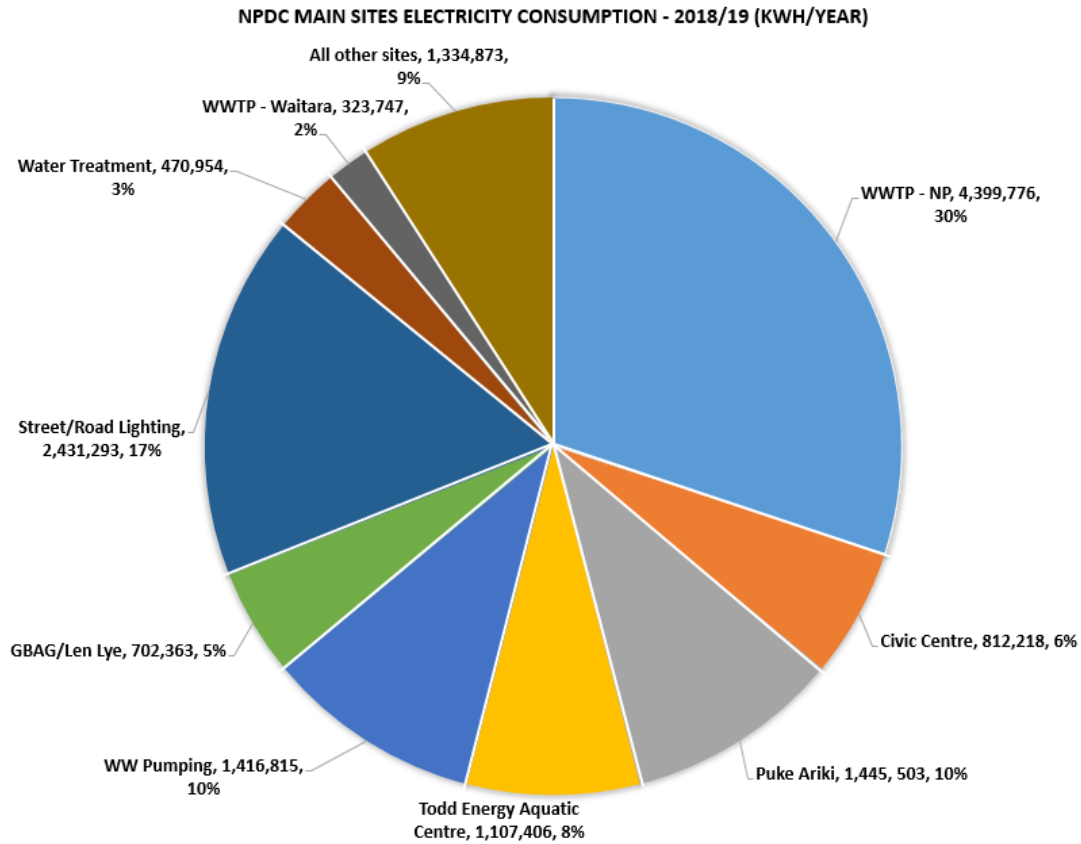


Figure 3: graph showing NPDC main site electricity consumption, 2018/19.

Note: due to COVID-19 the 2019/20 data does not provide a true representation of current emissions levels which is why the 2018/19 data is being used as the most up to date and reliable source.



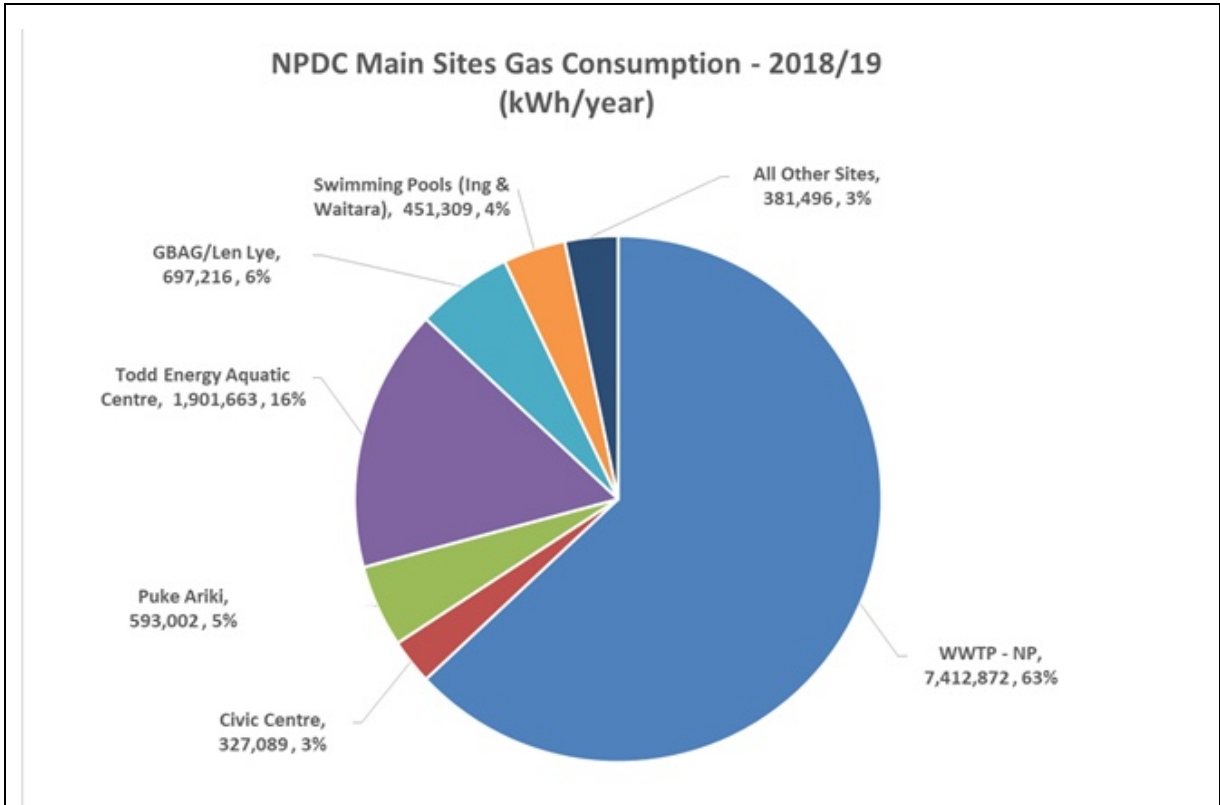


Figure 4: graph showing NPDC main site gas consumption, 2018/19.

Transport and vehicle fuel usage trends show a slight increase over a five year period from 2015 to 2020, which can be attributed to both a change in operations, such as completing road inspections by Council officers, as well as a growth in fleet numbers. Council is currently undertaking a fleet rationalisation exercise that looks at utilisation and streamlining efficiencies within the fleet.

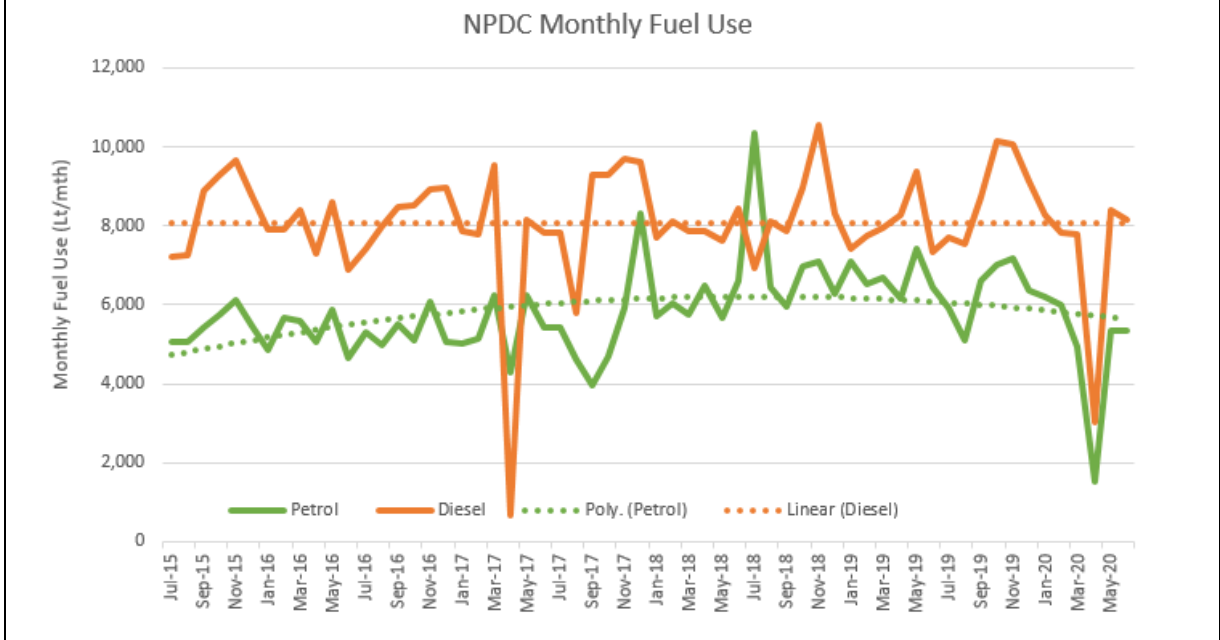


Figure 5: Graph showing NPDC monthly fuel use

### **New Plymouth district-wide emissions inventory**

AECOM New Zealand Limited (AECOM) produced a footprint of the district's greenhouse gas emissions in March 2020, using the data from the 2017/2018 year.

The district-wide inventory assessed both direct (production-based) emission sources within the geographic area (Scope 1) and indirect emission sources from electricity from the national grid (Scope 2), and transport that originates or terminates outside the District boundary, e.g. aviation (Scope 3).

The following aspects should be noted when reviewing the overall results of the inventory, below:

- Emissions are expressed on a carbon dioxide-equivalent basis (CO<sup>2</sup>e) including climate change feedbacks using the 100-year Global Warming Potential (GWP) values<sup>2</sup>.
- Total emissions are reported as gross emissions (excluding forestry) and net emissions (including forestry).
- Where district-level data was not accessible, information was calculated via a per capita breakdown of national level data. This method was applied to the following sectors: industrial product use, solid waste emissions from closed landfills (1967 to 1997), stationary energy fuel types: coal, biofuel and LPG figures have been assumed on a per capita basis from national figures
- Transport emissions associated with air, rail and port activity were calculated using the induced activity method. Fuel consumption data was determined from the number of journeys taken, distance travelled and consumption rates for the appropriate transport mode.
- Solid waste emissions were calculated for the region's only operating landfill site (Colson Road), which is used by all three districts (New Plymouth, Stratford and South Taranaki). The emissions were split on a per capita basis between the three districts
- This inventory accounts for forest carbon stock changes from afforestation, reforestation, deforestation and forest management (i.e. it applies land-use accounting conventions under the UN Framework Convention on Climate Change rather than the Kyoto Protocol). It treats emissions from harvesting and deforestation as instantaneous rather than accounting for the longer-term emission flows associated with harvested wood products.

#### **Overall Results**

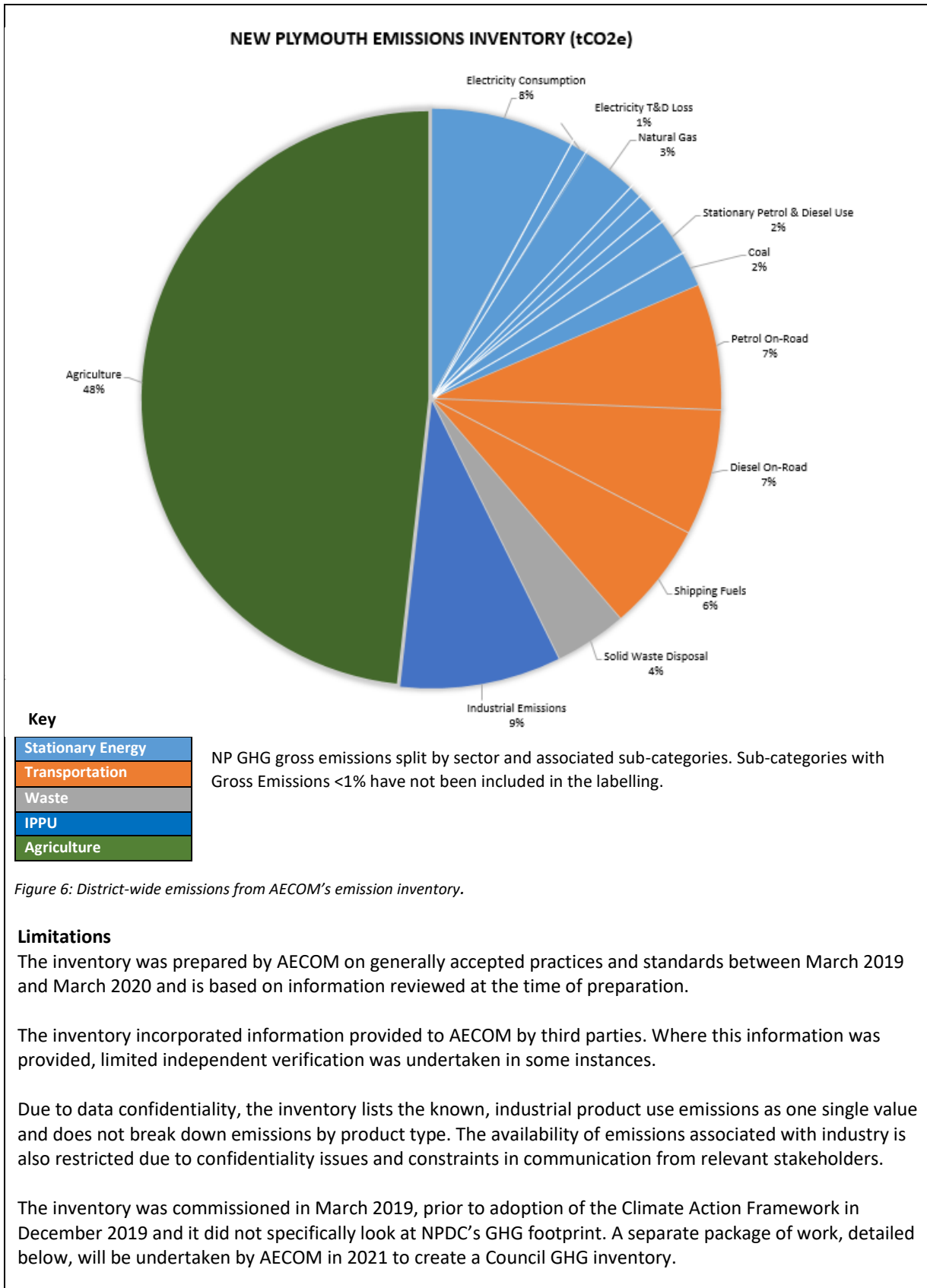
During the 2017/18 reporting period, the New Plymouth District produced gross 1,776,478 tCO<sub>2</sub>e and net 1,563,630 tCO<sub>2</sub>e emissions. This equates for approximately 38% of Taranaki's total gross emissions for the reporting year. For the 2017/18 reporting period, New Plymouth's emissions contributed 2 per cent to New Zealand's gross emissions. This figure is likely under representative, due to the limitations in data, listed below.

The population in 2017/18 was approximately 81,900 people<sup>3</sup>, resulting in per capita gross emissions of 21.7 tCO<sub>2</sub>e /person<sup>4</sup>. Agricultural emissions are the largest contributor to the inventory for the District, followed by Transportation and then Stationary Energy.

<sup>2</sup> [https://www.ipcc.ch/pdf/assessment-report/ar5/wg1/WG1AR5\\_Chapter08\\_FINAL.pdf](https://www.ipcc.ch/pdf/assessment-report/ar5/wg1/WG1AR5_Chapter08_FINAL.pdf) (Table 8.7)

<sup>3</sup> Population data source from Statistics New Zealand

<sup>4</sup> Gross emissions exclude forestry related emissions, while net emissions also consider the effects of forestry (sinks and sources). This distinction has been made where the forestry sectors sequester more carbon than they emit (through harvesting trees) and thereby offset some of the other district wide emissions.



The Council has recently engaged AECOM to complete a footprint of NPDC-specific greenhouse gas emissions. Further detail around this can be found in the 'Further energy and emissions reduction initiatives' below.

## **Energy and emission reduction initiatives in progress**

### **Switching to Emulsion in Road Resealing**

The Council successfully achieved a CO<sup>2</sup> saving of 367t in 2019/20 through switching from cutback bitumen to emulsion. This is based on the 723t of emulsion used on resealing roads.

### **Upgrade to the Thermal Dryer**

NPDC has secured \$37 million of central Government funding to upgrade the thermal dryer to run on a blend of natural gas and green hydrogen. Once complete, the upgrade is forecast to reduce the Council's emissions by approximately 13,300 tonnes over the next 20 years.

The existing dryer is fuelled by natural gas and produces approximately 2,000 tonnes of carbon dioxide a year – the equivalent of 432 passenger vehicles driven for one year.

The thermal dryer serves approximately 76 per cent of the district's total population and produces about 1,600 tonnes of Bioboost fertiliser a year from bio-solids, or sludge. NPDC is the only wastewater operator in New Zealand that produces fertiliser and sells it commercially.

### **Recycling and food waste electric trucks**

In October 2019, NPDC introduced a fleet of six electric recycling and food waste trucks. These are split equally between food scraps and landfill. The trucks run daily, usually recharging at lunchtime and overnight. Emissions savings, on the basis that New Zealand produces approximately 80 per cent of its electricity from renewable sources, allow for emissions reduction of 60 per cent compared with internal combustion engine vehicles over the vehicle lifecycle.

### **Resource Efficiency and GHG Energy Policy**

As part of the Climate Action Framework, in July 2020, NPDC's Resource Efficiency and GHG Emissions Policy was updated to align more closely with aspirations of a low-emissions future. The updated policy was created through a series of staff workshops held in late 2019, and took into consideration the Council's energy and resource usage and distribution.

Aligning to national such as, the Government's Net Zero Carbon by 2050, and existing Council targets such as, Zero Waste by 2040, the policy encourages lower energy and resource consumption and higher efficiency, creating room for future-proofing and cost-effective actions, as well as offering environmental benefits.

### **New Plymouth District Council Emissions Inventory**

As noted above, the Council has commissioned AECOM to develop an organisation GHG inventory, compliant with GHG Protocol Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The footprint will be measured separately from the work completed for the community footprint in a parallel data collection and emissions measurement process.

The organisational carbon footprint will be consistent with the NPDC community carbon footprint. This will allow direct comparison and provide a benchmark showing how much of the district's emissions are made up from NPDC activities. The Council will then work to release an Emission Reduction Plan, and outline how the Council can advocate for the community to lower their emissions. For further detail on the Emission Reduction Plan, see the Climate Action Framework summary.

#### **Future or additional treatments**

*If the residual risk is not acceptable then further treatment or treatments are noted here.*

### **Climate Action Framework**

Adopted in December 2019, the Climate Action Framework programme of work focuses on both adaptation and mitigation aspects of climate change.

From 2021, the framework will be subject to more regular reporting through the Strategy and Operations Committee meeting.

Mitigation initiatives contained within in the Climate Action Framework are as follows:

#### **Immediate Initiative - Electric Vehicle Fleet Trial**

A budget of \$80,000 was allocated to trial the introduction of two electric vehicles (EVs) into the Council fleet via the renewal process. The trial, which seeks to ascertain if EVs are fit-for-purpose for the Council's needs and runs from November 2020-March 2021. Early results suggest the trial will be successful and there is a project within the draft LTP budget for extending future funding for this initiative, for further details, see Climate Action Framework LTP project inclusions, below.

#### **Immediate Initiative - Planting our Parks**

Three planting initiatives have been set up to pilot plant on Council-owned land. NPDC is supporting Sustainable Taranaki around a community garden in Marfell, as well as working with local hapū to support their tree planting work. The Council has also worked with hapū to identify Peringa Park as the ideal-site for an NPDC-led initiative to pilot. There is a project within the draft LTP budget for scaling the pilots and extending the funding to include a community grant, for further details, see Climate Action Framework LTP project inclusions, below.

#### **District-wide Climate Action (Emission Reduction) Plan**

NPDC signed up to the Global Covenant of Mayors for Climate and Energy in February 2018. This programme of work centres on community engagement, and requires the development of a district-wide Climate Action (Emission Reduction) Plan.

The district-wide Climate Action (Emission Reduction) Plan (ERP) will identify the specific contribution the Council makes to the district's emissions through its operations, and outline a plan to reduce these in line with the national target of net zero emissions by 2050. The NPDC emission inventory, mentioned above, is a data input that will inform the reduction plan and help the Council to outline the plan it will take to reduce emissions. The ERP will also contain ideas and a draft plan for how the Council can advocate for the community to lower their emissions.

A draft of the ERP will be published in late 2021 for consultation. The publication date takes into consideration specific pieces of government work, as they will provide substantial guidance to our direction. Feedback will be considered and a final ERP will be published in April 2022, outlining the actions the Council will take to lower its emissions, as well as the plans it has to advocate for the community to lower theirs.

### **Climate Action Framework LTP climate mitigation project inclusions**

NPDC has a variety of initiatives which contribute to lowering emissions that are included in the draft Long-Term Plan (LTP) budget for consideration. Projects specific to the Climate Action Framework included for consultation in March 2021 are:

#### **Planting our Parks**

The overall vision for the Planting our Parks project is to "improve biodiversity, carbon sequestration and allow for community participation in NPDC's response to climate change by delivering revegetation to Council-owned reserves through tree planting".

Realising the benefits from tree planting are long term. The benefits from sequestration normally come around 20 years after planting, as young trees do not sequester much carbon. Rough calculation, using the Trees that Count carbon calculator<sup>5</sup>, shows: 34ha of planting (70 per cent trees and 30 per cent shrubs) @ 1 tree per m<sup>2</sup> would remove 26,445 tonnes (nearly 2 per cent of the District’s current net emissions) of CO<sup>2</sup> from the atmosphere each year from year 20 on, and increases exponentially beyond this as the graph below shows:

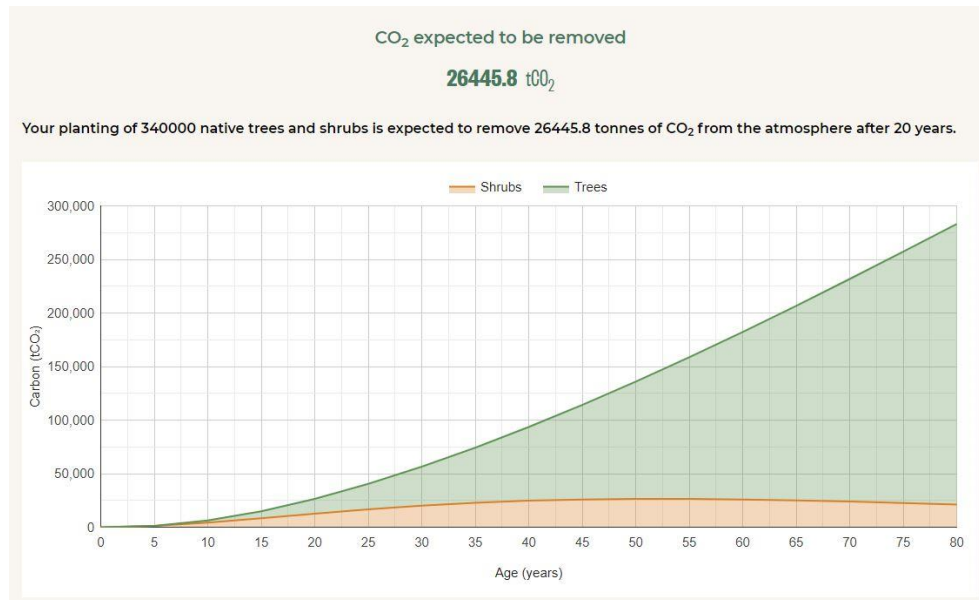


Figure 8: Trees that Count carbon calculator showing sequestration over 20 years

An example of the impact the above sequestration could achieve is: New Plymouth’s stationary energy emissions per year are 25,752 tonnes of CO<sup>2</sup>. The programme at year 20 would be offsetting that component of the District’s emissions.

The LTP draft budget provides funding to plant 34ha of Council-owned land over 20 years at an operational cost of \$170,000 per year from Forestry Reserve funding. Officers are currently exploring any external funding opportunities to support this work.

**Te Korowai o Tāne**

As a practical way to support landowner and community efforts to contribute to the district’s achievement of the 10 per cent urban vegetation cover this project would provide community assistance for revegetation. This would be a complement to planting on public land and be facilitated through a grant to community organisations/groups and iwi/hapū. The grant provides for a non-regulatory approach to encouraging support of the Climate Action Framework and biodiversity outcomes.

The LTP draft budget includes funding to provide a grant for planting on private land to community organisations, spread over 10 years of the LTP at a cost of \$100,000 in Year 1 and \$200,000 for years 2-10.

**Electric Vehicles**

Electric Vehicles (EV) represent a fuel saving cost to the Council of approximately \$1,800/year each, and a net reduction in carbon dioxide of 1,795kgs per annum, per vehicle. As part of the Climate Action Framework, a

<sup>5</sup> <https://www.treesthatcount.co.nz/native-trees-carbon-calculator/>

budget of \$80,000 was allocated to assist in the procurement of two EVs to be trialled. Early results show the trial, to ascertain if EVs are fit-for-purpose for the Council's needs, shows a strong indication of success.

To ensure the Council continue to make progress toward the legislated net zero carbon by 2050 goal, the continuation of introducing EVs during the fleet renewal process is an option that makes procuring EVs more affordable.

The LTP draft budget includes funding for the continuation of introducing EVs to the Council's fleet through the renewal process, spread over 10 years at a cost of \$800,000.

### **Wider organisational LTP projects**

Outside of formalised climate action-related projects aiming to secure funding in the draft LTP budget, the following projects contribute to helping NPDC mitigate its impact on climate change by reducing emissions:

- **RD3017 Integrated Transport Strategy**

The LTP draft budget includes funding for the integrated transport strategy – the aim of the strategy is to respond to New Plymouth's strategic transport problems (e.g. constraints of topography and infrastructure gaps, poor safety trends, poorly targeted investment for growth, car-oriented transport system) in a co-ordinated and integrated fashion. The strategy will help encourage better accessibility and low-emission alternatives to the car (e.g. walking, cycling, public transport and car sharing), support the City's 'place' aspirations, and achieve more sustainable transport outcomes in the longer term. A budget of \$350,000 has been allocated for the development of the Integrated Transport Strategy over the new two years.

A list of further projects helping reduce emissions by are:

- PK3017 – Parks On-site composting
- CB3011 – Puke Ariki Library HVAC Renewals – Chillers and Ahu
- CB3013 – Puke Ariki Library and Museum Boilers renewal
- AQ3005 – Aquatic Centre Indoor Air Ventilation Replacement
- AQ3011 – Inglewood Pool Heating Replacement
- AQ3017 – Waitara Pool Heating Replacement
- CB3035 – TSB Stadium Radiant Heater Replacement
- CB3037 – TSB Showplace Theatre Royal – Split Air Conduction
- PE3003 – TSB Bowl of Brooklands Air Conditioning
- CB3017 - Archives Building Heat pump replacement
- CB3021 – Civic Centre Renewals – South HVAC Diffusers
- CB3022 – Civic Centre Renewals – South HVAC Chiller 1
- CB3025 – Civic Centre Renewals – South Fit out Floor 2
- CB3027 – Civic Centre Renewals – South Fit out GF Staff 3
- CB3028 – Civic Centre Renewals – South Fit out GF Main Counter Area
- CB3029 – Civic Centre Renewals – LGF Fit out – Locker Room, records
- CB3030 – Civic Centre Renewals – North HVAC Diffusers
- CB3031 – Civic Centre Renewals – North HVAC General
- CB3033 – Civic Centre Renewals – South HVAC Boiler

### **Proposed District Plan**

#### **Urban Development**

The Proposed District Plan identifies a new planning paradigm around urban development, and encourages a compact urban form and opportunities for more intensive and efficient housing types. These policies support more sustainable outcomes by reducing travel times and prevents the outward sprawl of the city. The new

<p>plan also encourages efficient development and building practises. The Proposed District Plan provisions include a suite of changes from the Operative District Plan. Examples include:</p> <ul style="list-style-type: none"> <li>• General changes for residential allotment sizes (for subdivision) in New Plymouth, Inglewood and Waitara reduced from 450m<sup>2</sup> to 400m<sup>2</sup>, Ōākura residential allotment sizes reduced from 750m<sup>2</sup> to 600m<sup>2</sup> to allow for different housing types</li> <li>• The introduction of a medium density zone in areas close to the city and town centres to allow for smaller houses. Residential allotment sizes have been reduced from 300m<sup>2</sup> to no minimum</li> <li>• Requirement of at least 25 per cent of residential sites to be planted in grass, vegetation or landscaped with permeable materials to minimise run-off and reduce pressure on storm water</li> <li>• Increased maximum heights for building in the CBD (i.e. Business A zone changed from 14m to 22m, height management areas identified) to encourage more intensive development</li> <li>• Identification of development areas for managed growth</li> <li>• Onsite parking requirements have been relaxed to support compact urban form and to encourage alternative modes of transport to the motor vehicles.</li> </ul> <p><b>Protection of Native Forest</b></p> <p>Compared to other cities in New Zealand, the New Plymouth urban area contains a relatively high percentage of native bush close to the centre of the city, with approximately 8.9 per cent cover, compared to the national average of 2per cent.</p> <p>Approximately 55,000 hectares of land within the district is subject to legal protection by mechanisms outside the District Plan. The Proposed District Plan protects an additional approximate 24,000 hectares through the identification of Significant Natural Areas.</p>
<p><b>When they will be implemented by</b></p> <p><i>Is this timing realistic? Should it be brought forward or pushed back. If so, why?</i></p> <p>Timings are realistic, and based on national policy and plan publication dates.</p>
<p><b>Monitoring, review and reporting</b></p>
<p><b>Management comment</b></p> <p><i>How does management get assurance that the risk is effectively managed to the extent possible?</i></p> <p>The current controls are subject to ongoing monitoring and management oversight through project governance measures.</p> <p>The Climate Action Framework currently reports to the Council through the Climate Response, Zero Waste and Sustainability Portfolio Group. From 2021, the framework will be subject to more regular reporting through the Strategy and Operations committee meeting.</p> <p>Some of the LTP projects listed above, will be reported through the Strategic Projects Committee.</p>
<p><b>Emerging issues</b></p> <p><i>The nature of the risk and its management are affected by changes in the internal and external environment. Are any changes anticipated or underway that require a review of how the risk is described, rated, and then managed?</i></p> <p>There are no current emerging issues at the moment.</p>
<p><b>Risk assurance</b></p> <p><i>Has there been any external/independent review of the controls for this risk? Include detail on the nature of the work completed or underway.</i></p>



No external reviews have been completed so far.

**Conclusion regarding the management of this risk**

*What level of assurance can the Finance, Audit and Risk Committee have that the risk is effectively managed?*

NPDC is well-placed to manage the risk by ensuring the ongoing long-term planning is undertaken and supported by the investment in:

- Climate change professional advice and expertise
- Timely reviews of the District Plan
- Efficiently reducing emissions to meet national targets of net zero by 2050
- Effectively communicating the risk and advocating for the wider community to reduce emissions.

Planning work that has already commenced is timely with ample-lead in time. The planning work takes into consideration publication of national policy and plans.



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New Plymouth District Council

27-Sept-2023

# New Plymouth District Council Corporate Carbon Footprint

2021/2022

New Plymouth District Council CF 21/22  
New Plymouth District Council Corporate Carbon Footprint

## New Plymouth District Council Corporate Carbon Footprint 2021/2022

Client: New Plymouth District Council  
Co No.: N/A

Prepared by:  
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Reviewed by: EKOS

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			Name/Position	Signature
1	1 June 2023	Issued for Review	Dustin Courage NPDC Climate Change Mitigation Advisor	
2	6 June 2023	Issued for Review	Dustin Courage NPDC Climate Change Mitigation Advisor	
3	Aug.7 2023	Issued for Auditor post Ekos Comments	Dustin Courage NPDC Climate Change Mitigation Advisor	
4	Sept 15, 2023	Post Audit Comments	Dustin Courage NPDC Climate Change Mitigation Advisor	
5	Sept 20, 2023	Audit Calculation Issues Identified and resolved.	Dustin Courage NPDC Climate Change Mitigation Advisor	
6	Sept 22, 2023	ISO categories – Community Waste as Cat. 6.	Dustin Courage NPDC Climate Change Mitigation Advisor	
7	Sept 25, 2023	Audit comments addressed	Dustin Courage NPDC Climate Change Mitigation Advisor	
8	Sept 27	Audit Section 3.1 updated	Dustin Courage NPDC Climate Change Mitigation Advisor	

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## 1.0 Introduction

In Jan 2023, New Plymouth District Council (NPDC) Climate Action Team, decided to update its organisation Greenhouse Gas (GHG) inventory for the 2021/2022 financial year. One previous GHG inventory was produced in 2021 by AECOM for the 2017/ 2018 financial year; it was not third party verified. This report outlines the methodology for undertaking the assessment (section 2.0) and provides the results (section 3.0).

This second revision of NPDCs corporate carbon footprint has been triggered by material changes in NPDC's operations and emissions sources and sinks. This GHG inventory is a calculated estimate of all GHGs emitted as a result of activities under the control of NPDC for financial year 21/22, between 1<sup>st</sup> July 2021 and 30<sup>th</sup> June 2022.

This 21/22 Inventory will form the baseline for subsequent GHG reporting and will allow the NPDC to report on the effectiveness of its organisational emissions reduction plan produced in 2022 by WSP (ECM 8726026).

This inventory excludes the emissions from three Council-Controlled Organisations (CCOs): Venture Taranaki; Papa Rererangi i Puketapu Ltd (PRIP) (New Plymouth District Airport, hereafter referred to as NPDC Airport), and; New Plymouth PIF Guardians Ltd. For the purpose of this inventory, NPDC is deemed not to have operational control of its CCOs.<sup>1</sup>

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<sup>1</sup> Overall control of Operations sits with CCO's Board of Directors. NPDC is the 100% shareholder

## 1.1 Inventory Purpose

The objectives of this corporate carbon footprint are to:

- Provide information to the Council on their overall organisation GHG emissions for which they have operational control.
- Highlight key emission sources for future management
- Provide a standard methodology for use in future years
- Develop an improved system of carbon accounting within the organisation
- Establish a baseline for the inventory that is third party verified
- Establish emissions reduction targets
- Demonstrate to key stakeholders that NPDC is actively involved in monitoring and managing its GHG emissions.

## 1.2 Statement of Intent

This inventory is prepared as a management tool for NPDC to:

- Assist NPDC in managing its GHG emissions and complying with its Emissions Reduction Plan and achieving its Emissions Reduction Targets.
  - Act as a communication tool for all interested parties and stakeholders that NPDC has identified its emissions profile and is taking action to mitigate emissions. The majority of NPDC rate payers demand NPDC to take more action in Climate Change and there is an expectation of integrity and transparency with respect to GHG emissions.
  - Intended users, Stakeholders and interested parties include NPDC Management, Executive Leadership Team, Community members, IWI / Hapu and other community groups. Other interested parties are external suppliers, central government and regulatory bodies.
-



Figure 1: New Plymouth District Council location

## 2.0 Methodology & Baseyear

This section covers the methodology and approach to developing this corporate carbon footprint, including boundary definition and exclusions, emission factors, activity data and assumptions and limitations.

The assessment follows the guidelines in the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, 2004 (GHG Protocol); and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard, 2011.

In calculating this footprint, an operational control rather than an investment or economic approach. This approach has been taken to minimise uncertainty and produce accurate, consistent and reproducible results. This methodology is also based on Greenhouse gases-Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals (ISO standard 14064-1:2018).

### 2.1 Organization Boundary / Consolidation Approach

The organisational boundary identifies which facilities or subsidiaries of NPDC are included or excluded from the carbon inventory. Emissions from all aspects of the organisation are consolidated to determine the total. Consolidation is done using one of these methods:

- Control, whereby all emissions over which the organisation has either financial or operational control are included in the inventory



- Equity share, whereby the organisation only includes emissions for the portion of the facilities and business that the organisation owns.

For NPDCs inventory the operational control method has been used to consolidate emissions. This means that all emissions over which NPDC has operational control will be included.

### 2.1.1 Organisation Boundary- Operational Control

Figure 2 and Table 1 below illustrates the organisation boundaries as defined in this report. The key business unit of each group or activity is also provided below. For the purpose of this inventory NPDC is deemed to not have control of the operations of any of the CCOs (Council Controlled Operations) that are included in table 1 below: Venture Taranaki and Papa Rererangi i Puketapu Ltd (PRIP) (New Plymouth Airport), PIF Guardians and Forestry JV.

NPDC does not have the day-to-day ability to direct activities of a CCO as the two main levers – appointment of directors and the statement of intent process – do not provide either the ability to direct policies or the full authority to introduce and implement operating policies. Council does have reserve powers to require a CCO Board to modify its statement of intent. A statement of intent is, however, relatively high-level of the activities and intentions.

**Table 1; NPDC's CCO Functions**

CCO	Function
Venture Taranaki	Partially funded by NPDC, Venture Taranaki (VT) are the regional economic development agency. The agency offers professional services.  VT has its own independent board of directors and CEO. VT has its own GHG inventory by Toitu.
PIF Guardians	The New Plymouth PIF Guardians Limited was set up in 2017 and is a council-controlled organisation. Since 2017, the PIF has been managed at arm's length by independent investment firm Mercer. Release payments / annual revenue from PIF are used to offset rates and keep rate rises minimised.  The New Plymouth District Council (Perpetual Investment Fund) Act 2023 sets out requirements for investment decisions for the PIF to be made independently of elected members.  NPDC does not have operational control of PIF Guardians or Mercer.
Papa Rererangi i Puketapu Ltd (PRIP)	New Plymouth Airport services the regional flights.  PRIP has its own independent board of directors and CEO.  PRIP has its own GHG inventory and is apart of the international Airport Carbon Accreditation Programme.
Forestry JV	NPDC and Multiple Land Owners. The JV's set out that the landowners provide the land and the Council plants the trees and undertakes the silviculture (pruning) of the trees. When they are harvested, the profits are split between the landowner and council. The landowner's return is a form of rental for the land, and the council gets back money to reflect that spent growing the forest.  NPDC has already used and cancelled its Carbon credits from its pre 1990 Forests.

New Plymouth District Council CF 21/22  
 New Plymouth District Council Corporate Carbon Footprint

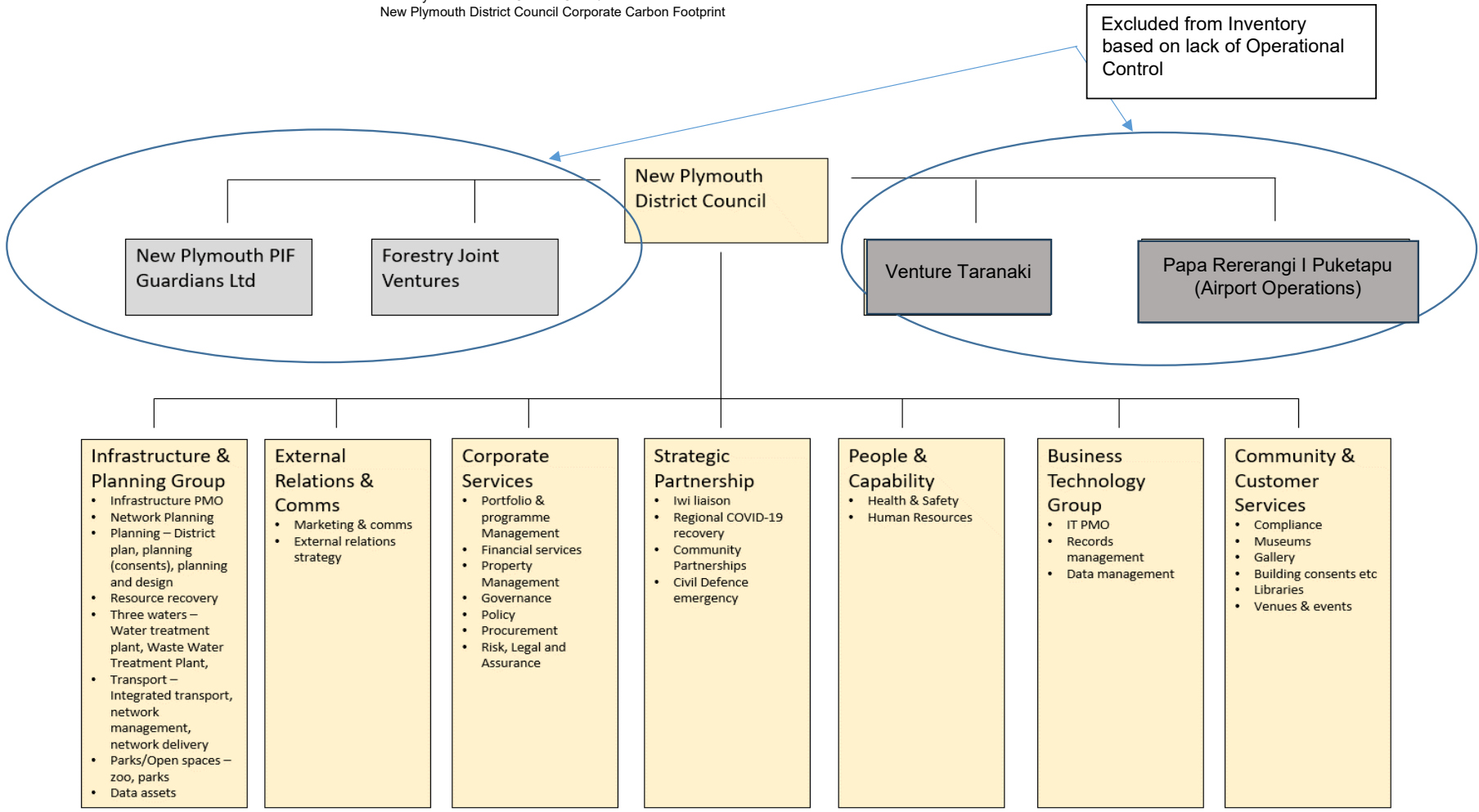


Figure 2: New Plymouth District Council activities and organisations included in the organisation boundary by scope

### 2.1.2 Operational Boundary Exclusions

An operational boundary defines the scope of direct and indirect emissions for operations that fall within a company’s established organisation boundary. Potential emission sources and sinks and their inclusion in the project boundary were decided by the Energy and Emissions Advisor in collaboration with the respective NPDC leaders. To determine the materiality of the various emission sources and their inclusion in the boundary, several factors were considered. These included the size of emissions, stakeholder interest, and potential reduction opportunities, as well as the ability of stakeholders to measure emissions.<sup>2</sup>

An effort has been made to include as many emissions sources as possible within NPDCs operational boundary. However, not all emissions sources were able to be captured. Table 2 summarises why some emission sources were excluded from the operational corporate carbon footprint.

**Table 2; Emission sources and sinks excluded from NPDC footprint**

Potential emission source	Reason for Exclusion
<b>Scope 1</b>	
Direct removals from land use, land use change and forestry sinks	Carbon Credits for their pre -1990 forest land have been claimed previous to this inventory
Combustion of Biomass and Biofuel is not happening within NPDC boundary.	Not happening within the operational boundary.
<b>Scope 3</b>	
CCOs  PIF investments	Not within Operational Control of NPDC  Airport and Venture Taranaki (VT) have their own GHG inventories and emissions reduction programmes.
<b>Other Scope 3</b>	
<ul style="list-style-type: none"> <li>• Downstream transportation and distribution (Category 9)</li> <li>• Processing of sold products (Category 10)</li> <li>• Use of sold products (Category 11)</li> <li>• End-of-life treatment of sold products (Category 12)</li> <li>• Franchises (Category 14)</li> </ul>	<p>Cat. 9 – freight is included within the purchase price and emissions factors used for purchased goods and services.</p> <p>Cat. 10, 11, 12: Use of Bioboost Fertiliser made from Wastewater sludge has been excluded from the assessment. It is uncertain if the use of Bioboost would save end user GHG emissions.</p> <p>Cat. 14 – Not applicable</p>

### 2.1.3 Base year recalculation policy

Base year data may need to be revised when material changes occur and have an impact on calculated emissions. NPDC have aligned with common industry practice. When the changes are estimated to represent more than 5% of Scope 1, 2 or 3 emissions, or when there are significant changes to the organisational or reporting boundaries or calculation methodology, a recalculation of base year data will be completed with explanation.

<sup>2</sup> Please refer to the NPDC Org Inventory Results 2021-2022 excel workbook for further details.

## 2.2 Inventory Emission Sources, Emission Factors and Activity Data

This section describes the activities covered within each scope. It provides a brief description on each activity, referencing the source of both the activity data and the relevant emission factor. It also provides a rating of the data quality based on previously used data quality assessment (see Appendix B - Data Quality for details). Emission factors all include the six direct Kyoto gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs and SF<sub>6</sub>) in accordance with requirements under the GHG Protocol.

Emission factors are derived from a range of sources, principally those provided in MfE (2023) and Auckland City Council Capital Carbon Emissions assessment (2023).

### 2.2.1 Scope 1 Direct Emissions Stationary Combustion (natural gas, diesel, petrol, refrigerants, and LPG)

Natural gas is consumed at 22 of NPDC's operated locations, including wastewater treatment plants, pools, museums and libraries, stadiums and events, property and parks and reserves. It is predominantly used for heating of the main facilities including Civic Center, Len Lye, Puki Ariki, Todd Energy Aquatic Center and other pools. The largest user of fossil gas is the Waste Water Treatment plants Thermal Drying Facility (TDF) consuming ~ 65%.

NPDC have been operating an energy management software since 2016 which records historical trends. The energy management software was previously E-Bench and has recently been shifted to ESP Utility Hub. Data accuracy is high (M1).

#### **Crematorium:**

NPDC owns and operates two cremation furnaces. The 2021/22 inventory has the old model of furnaces that was used and they used approximately 34,862 kg of LPG. One furnace has been replaced in 2022 with a new furnace that is 30% more efficient. The second furnace is being replaced in 2025 with a similar furnace, both of which operate at 2.3v GJ/hr.

#### **Refrigerants:**

This covers the leakage of refrigerant gases used in both domestic-sized refrigerators and heating, ventilation, and air-conditioning (HVAC) systems used by Council operated entities.

Actual quantities of leaked gases were not measured due to a lack of reliable data. Leakage rates (per equipment type) were estimates based on average leakage rates provided by MfE (2023).

As leakage rates are only estimates, the quality of the data is of a lower quality (D1).

#### **Mobile Combustion:**

Fleet NPDC's fleet consists of petrol and diesel vehicles. During the inventory period, NPDC fleet vehicles ran on either diesel or unleaded petrol. Fuel consumption data has been provided by NPDC. Emission factors were taken from MfE (2023). The activity data is of a high quality (M1). Rental car use for business travel was included under Scope 3 and data was provided directly by the finance team. Emission factors were taken from MfE (2023).

#### **Waste – Landfills:**

NPDC has operational control over multiple closed landfills.

Old historic landfills are Okato, Inglewood, Okoki Road, Oakura, Waitara, Marfell Park, Waiwhakaiho, Tongaporutu and have been closed and capped for over 17 years. Based on the Scholl Canyon LFG generation curve these landfills have negligible LFG emissions.

Colson Road is the most recent and largest landfill which closed in 2019 and contains just under 1 million Tonnes of waste. The final capping on Colson Road is currently ongoing and due for completion by 2024/25. Since the previous GHG inventory in 2017/18 the Colson Road Landfill has had a landfill gas capture system

installed in 2018. Based on data analysed, the gas capture system was approximately 7% effective in destruction of the LFG produced.

The Colson Road LFG Gas Generation modelling was done within the ERP by WSP. This uses the Scholl Canyon LFG generation curve with the data provided from landfill operations on LFG destruction (Ref. Colson Road System Upgrades Memo Rev.4 + WSP NPDC ERP Analysis Graphs Final – Community Solid Waste Tab). The assessment did not include for 10% reduction of LFG emission from the Landfill Cap as the cap was just started at the time of the 21/22 inventory.

The previous 2017 /18 GHG inventory considered the global warming potential for landfills with climate carbon feedbacks to IPCC FirstOrder Decay model, a model that assumes the organic, degradable component of waste decays slowly across decades, producing both CH<sub>4</sub> and CO<sub>2</sub>. This inventory uses more site specific information and the Scholl Canyon LFG model which has approximately doubled the GHG emissions estimate for the Colson Road Landfill while ruling out GHG emissions from the older landfills +18 years old as immaterial.

There are still uncertainties in this modelling based on the assumption that the LFG that is not captured and destroyed is all being released to the atmosphere without oxidation through the soil layers above the waste. This is conservative in that it may overpredict the GHG emissions of the Colson Road landfill and therefore the accuracy of this data is at D2, derived from waste volumes and accepted formulas with a satisfactory accuracy.

**Modelled within NPDC Emissions Reduction Technical Report (22-2-18) –based on “NPDC ERP Analysis Graphs Final :- Saved as – Colson Rd.LFG modelling 21 22”.xls.** and included in 21/22 GHG Inventory as Tab Colson Road LFG.

GHG inventory 21/22 = 80,663+66,267/2= 73,465 Te CO<sub>2</sub> e

The total share of the GHG emissions from Colson Road has been attributed to NPDC based on Operational control of the landfill. This is a change from previous 2017/18 inventory by AECOM who shared the % of GHG emissions among the three Territorial Authorities by amount of waste contributed on that year.

**Waste Water Treatment Plant (WWTP)**

Emissions associated with NPDC owning and operating the New Plymouth Wastewater Treatment Plant New have also been included in Scope 1, Scope 2 and Scope 3.

**Table 3 NPDC main WWTP Emissions Sources**

Scope	Source	Quantity Te CO <sub>2</sub> e
Scope 1	Biogenic N <sub>2</sub> O and CH <sub>4</sub> from BOD process. Water NZ Calculation	1,551
Scope 1	Fossil Gas for Thermal Dryer	1,409
Scope 2	Electricity for plant	353
Scope 3	Waste Sludge to Landfill – Hampton Downs + Screenings to Bonnie Glenn	74

**2.2.2 Scope 2 Electricity**

All Electricity Data is available for electricity usage across the different NPDC operated facilities. NPDC have been operating an energy management software since 2016 which records historical trends. The energy management software was previously E-Bench and has recently been shifted to ESP Utility Hub. Data accuracy is high (M1).

The emission factors for electricity were taken from MfE (2023) and were based on the 2022 average. NPDCs largest electricity using sites are shown in the Figure 5 below. NPDC have an Energy Management Team that has been implementing energy efficiency projects to decrease energy use across its facilities.

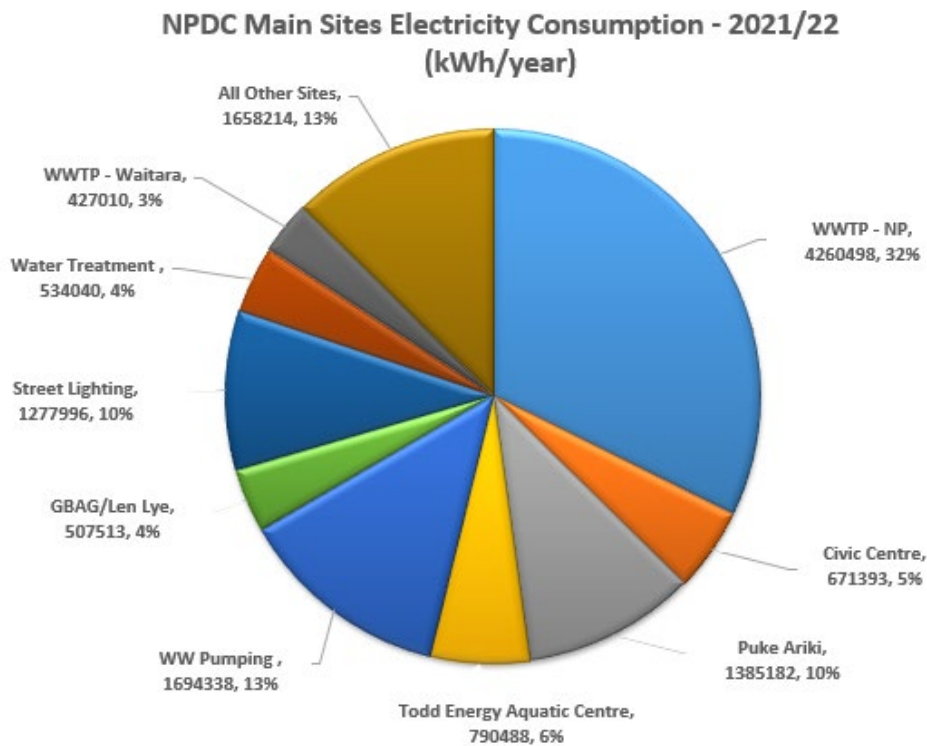


Figure 3: NPDC Main Scope 2 Sites by % of Total for FY 2021/22

**2.2.3 Scope 3 Other Indirect Emissions**

**Table 4 NPDC Scope 3 Inclusions and Exclusions:**

<b>Subcategory - Scope 3 Category (SBTi/GHGP S3)</b>	<b>Source</b>	<b>Included yes or no</b>
1. Purchased goods and services	NPDC OPEX Spend including: Consumables ie. Paper & Chemicals, Professional Services, IT services, Maintenance, library books and IT goods.	Yes
2. Capital goods	NPDC CAPEX Spend including: Construction cost to delivery infrastructure assets Capital Programme.	Yes
3. Fuel and energy related activities	Transmission and distribution losses for electricity & gas	Yes
4. Upstream transportation and distribution	Community and Operational Waste Transportation out of the district	Yes
5. Waste generated in operations	Community Kerbside Collections (Landfill, Food Scraps, Recycling) + Organisational Waste	Yes
6. Business travel	Travel Tab	Yes
7. Employee commuting	Commuting Tab	Yes
8. Upstream leased assets	NPDC is a lessee for 4 properties mainly associated to carparks. These emissions are immaterial but reported for completeness.	Yes
9. Downstream transportation and distribution		No
10. Processing of sold products		No
11. Use of sold products		No
12. End-of-life treatment of sold products		No
13. Downstream leased assets	Leased Land for Grazing	Yes
14. Franchises		No
15. Investments		No

**Business Travel – Air Travel**

Air travel data has been sourced from the Orbit Carbon Emission report. It has been categorised by ‘Domestic’, ‘Short Haul International’ and ‘Long Haul International’.

**Business Travel – Taxis, Private mileage claims and Accommodation**

NPDC provided dollar values of taxis and private mileage spend. NPDC provided the dollar value of money spent on business accommodation.

However, to calculate emissions accurately, the number of room nights stayed in hotel accommodation is needed rather than the dollar value spent. We estimated the number of nights for both entities based average dollar spend per night. For NPDC we used an average of 165NZD per night. Staff private vehicle mileage claims in in dollars spent was provided by the NPDC.

Emission factors were taken from MfE (2023). The activity data is of a lower quality (D1).

**Employee Commuting**

Employee commuting data has been sourced through a staff survey conducted by NPDC in 2023. 21/22 FTE numbers were used to apply this commuting data to the 21/22 time period. This data was used to estimate the GHG emissions associated with employee travel to and from work during the reporting year.

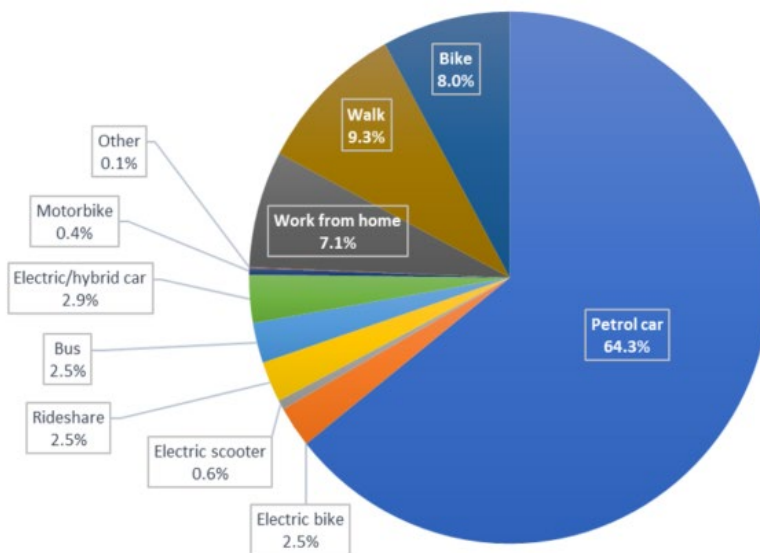


Figure 3 Percentage of trips to and from work by mode

Figure 4:NPDC LetsGo Travel Survey FY 2021/22

**Transmission and distribution losses for electricity & gas**

The emissions factors used for transmission and distribution losses from electricity and gas consumption from are based on national average figures for electricity and natural gas lost in the transmission and distribution network provided by MfE (2023).



## Waste

NPDC's organisation waste is managed by Waste Management. Waste Management send in-organic waste to Bonnie Glen, organic waste to commercial composting in Taranaki, and recycling to NPDCs MRF (Material Recycling Facility). The MRF further distributes this waste to Envirowaste for recycling at various places across the country.

NPDC also manage the community kerbside collection of Food Scraps, Recycling and Landfill Waste. This contract is with Envirowaste who transport Food Scraps to Hampton Downs for Composting, Bonnie Glenn for landfill, and Recycling to various places across the country. (ie. HDPE and PP to Aotearoa NZ Made in Palmerston North and PET to Flight Plastics in Lower Hutt .) NPDC have not currently used specific emissions factors for recycling and have defaulted to MFE.

There are Site Specific Emissions factors (Unique Emissions Factor) for the both Hampton Downs and Bonny Glen which have been used in the calculations of GHG emissions. NPDC have decided to use MFE 2023 generic emissions factor based on comments from the GHG audit.

Waste generated in operations has been broken down to general waste to landfill, mixed recycling and recycled food waste. Data was provided by Waste Management (the Council's waste service provider) in kilograms. The activity data is of a high quality M1.

Currently, NPDC do not have specific emissions factors for its end of life recycling facilities. Further, the MFE 2023, is also silent on Recycling emissions factor. This inventory uses recycling emissions factor from the **UK Government Greenhouse gas reporting: conversion factors 2022**.

## Water Supply

Emissions from water supply are included within the operational energy use for the Water Treatment Plants (WTP). There are 4 WTPs in total with the New Plymouth WTP servicing the majority of the district.

## Wastewater Treatment Plant

NPDC operates the NP wastewater treatment plant (WWTP) which consumes 65% of NPDC's fossil gas (Scope 1) and approximately 31% of NPDC's electricity (Scope 2). It is also a large producer of N<sub>2</sub>O and CH<sub>4</sub> emissions due to the processing of Waste Water. NPDCs WWTP is an aerobic process as described on a high level on NPDCs website.

WWTP GHG emissions were calculated based on Water NZ, Carbon Accounting Guidelines for Wastewater Treatment Aug. 2021. The BOD methodology was chosen as it was the most conservative (highest GHG emissions).

## Purchased Goods and Services (Cat 1), Capital Goods (Cat 2), Upstream Transportation and Distribution (Cat 4) & Upstream Leased Assets (Cat 8)

Estimated emissions under categories **Cat1** and **Cat2** were previously calculated using the Motu (2014) emissions factors for average industry sectors and activities in New Zealand and have now been calculated using **Toitu / Auckland City Council, Capital Carbon Emissions Report (Ref.4) and Ref.5, Consumption Emissions Modelling Market Economics, Auckland Council, March-2023**.

Under Cat 1 Purchased Goods and Services emissions sources were included such as office paper, contractors used for professional services, fleet and plant consumables and maintenance and chemicals use.<sup>3</sup>

The Toitu report (Ref.4) provides High level spend-based emission factor recommendations for capital carbon emissions relating to New Zealand Local Government Long-Term Plans. They are reported in kilograms of carbon dioxide equivalent per dollar (kg CO<sub>2</sub>e/\$).

Activity data (dollar spend information) for Cat 2 capital goods was extracted from the general ledgers of the Council Finance system (Tech1). Estimated emissions under these categories were also calculated using Ref. 4 &5.

<sup>3</sup> Within this category there are different data sources and the data quality of each source is E1.

<sup>11</sup> The quality of this data is robust and all emission sources are rated as D1.

Emissions associated with the lease of operating premises, including a library, land and sports ground has been included within Upstream Leased Assets (Cat 8). The data quality for this category is E1.

Emissions associated with Upstream Transportation and Distribution are due to community waste and its Third-party transportation services purchased by NPDC in the reporting year. Waste is transported via third party from NPDC to Landfill (Bonnie Glenn) and Composting facilities (Hampton Downs).

## Forestry

NPDC have the following forestry lands as displayed in the NPDC Forestry Management Plan 2022. NPDC have received 15,420 NZU Carbon Credits for their pre -1990 forest land that have been claimed previous to this inventory. Hence, there are no forestry carbon sinks to claim within the context of this GHG inventory.

A key initiative in NPDCs organisational emissions reduction plan is planting our place with an objective of planting 40 ha of native forest on council land over the next decade to sequester carbon and increase biodiversity within NPDC boundary. Planting our Place has been modelled in emissions reduction projections within NPDCs organisational ERP. At the time of this inventory no emissions have been sequestered.

**Table 5 NPDC Forestry Areas**

*Table 4: Net stocked area*

Forest	Area as at June 2022 valuation (ha)
Alfred Road	3.9
Busing	21.0
Colson Road	33.9
Dudley	9.8
Duthie (JV)	21.1
Herekawe	3.1
King Road	15.8
Mangamahoe	159.3
McKay (JV)	74.2
Total	342.1

NPDC have a forestry Policy which states, “Forestry investment is considered to be a secondary objective for the Council to the extent that it was not the dominant purpose for acquiring the current land in the first place and will not in future be the dominant reason for acquiring further land or land rights;” – [Microsoft Word - ECM 1253503 v1 P04-008 Forestry \(npdc.govt.nz\)](#)

## Leased grazing land

Emissions associated with NPDCs leased grazing land is a Scope 3 emissions source based on Downstream leased assets. NPDC leases out 316 hectares of grazing land across 57 different grazing leases. To estimate the emissions associated with these grazing leases, NPDC used the data and emissions factors developed by the STDC Environment and Sustainability team in collaboration with EKOS in 2022.

Grazing emissions consist of enteric fermentation emissions, manure management emissions, agricultural soils emissions, and fertilizer use emissions. The calculations for each of these emission sources is described in the Appendix B.

Total emissions associated with STDC's 872.33 hectares of leased land were derived as 3,624 tonnes CO<sub>2</sub>-e for the 2020/21 financial year. These emissions are comprised of the following:

**Table 7: Leased Land Agriculture Emissions Sources**

<b>Agriculture Source</b>	<b>GHG emissions, tonnes CO<sub>2</sub>-e</b>
Enteric fermentation emissions	2,820
Agricultural soils emissions	518
Fertilizer use emissions	177
Manure management emissions	107

NPDC uses the combined grazing emissions factor of 3624 tonnes CO<sub>2</sub>-e /872 hectares = 4155 kg CO<sub>2</sub>-e / Ha. This is derived and has the data quality of D2.

### 3.0 Assumptions and Data Quality

For a full list of all assumptions and limitations in relation to each source, please see the 'Notes' column for each emission source under NPDC Org Inventory Results 2021-2022 excel workbook.

A description of the data quality indicators used in the above sections, with explanations of the terms used in the table, is provided below.

Table 9: Data Quality

Data management	Data collection		
	Measured	Derived	Estimated
Robust	M1	D1	E1
Satisfactory	M2	D2	E2
Questionable	M3	D3	E3

**Measured** = Data directly provided by a service provider, contractor or directly obtained from a monitoring device. For example, electricity invoices, contractor receipts, emissions monitoring equipment, incident reports, consultant reports etc.

**Derived** = Data obtained from calculations, mass balances, use of physical/chemical properties, use of coefficients and emission factors etc., for example converting cubic meters of waste into tonnes.

**Estimated** = Usually, where there is no other available method for obtaining the data. Such data could be pro-rated on previous results, use precedents or historical data, or even be based on a calculated guess.

**Robust** = Evidence from a sound, mature and correct reporting system, where room for error is negligible. Examples would include well-kept spreadsheets, databases and on-line reporting.

**Satisfactory** = Examples would include manual, but structured keeping of records, files and results. Some potential for error or loss of data.

**Questionable** = No logical or structured approach to data or record keeping. High potential for error &/or loss of data. Data may appear to differ from those initially reported.

### 3.1 Inventory Auditing

The emission inventory was completed in alignment with ISO 14604-1, 2018.

This is the first NPDC GHG inventory third party verified in alignment with ISO 14064-3, 2019. The independent verification was completed by McHugh & Shaw Limited and that the assurance level achieved is Reasonable Assurance ISO Cat 1-2 and Limited Assurance ISO Cat 3-6.

### 3.2 Data Quality Improvement

The below table summarizes the various sources of the data that should be improved for the next inventory.

**Table 10: Data Quality Improvement**

Data Source	Data Quality	Materiality (>5%)
Refrigerants	D2	No
Employee Commuting Data	D2	No
Business Travel Accommodation	D2	No
Capital Goods (excluding Office Paper)	E2	Yes
Purchased Goods and Services	E2	Yes
Colson Landfill Gas	D2	Yes
Upstream Transportation and Distribution	E2	No
Upstream Leased Assets	D2	No
Downstream Leased Assets	D2	No
Operational Mixed Recycling	E2	No

To increase the accuracy of subsequent corporate carbon footprints it is recommended that NPDC:

1. Increase the data quality of upstream scope 3 emissions. Currently a spend based analysis has been completed for upstream Scope 3 GHG emissions based on the latest Toitu and Local Government emissions factors (Ref.4 & 5) . Increase the accuracy of activity data and emissions factors by collecting detailed information from Capital Goods and Purchased Goods and Services. This is being planned as part of NPDCs Infrastructure Decarbonisation Process.
2. Increase accuracy of Colson Road Landfill Gas Emissions based on Flux Box Emissions monitoring across the landfill. This is currently being planned as part of NPDCs Landfill Gas Capture Improvement Project.
3. Increase accuracy of emissions factor for NPDCs upstream and downstream leased assets including Grazed Land.
4. Collect records of refrigerant top-ups (maintenance). This will ensure that fugitive emissions from these sources can be calculated and included in the boundary in future footprints.
5. Survey employee travel behaviours multiple times throughout the year vs. a randomised week during summer period.

## 4.0 Emissions Summary

This section presents the results of the NPDC corporate carbon footprint. It provides:

- a broad summary covering all activities
- an outline of the corporate emissions
- a focus on each of the key emission sources.

Emissions are presented in carbon dioxide equivalent (CO<sub>2</sub>e), a standard unit for measuring and reporting greenhouse gas emissions.

### 4.1 All Activities and Groups

In 2021/22, NPDC's carbon footprint is estimated as 35,223 Te CO<sub>2</sub>e which excludes the closed landfill. Table 11, 12 and 13 provides a summary breakdown of all the emissions included in the carbon footprint. When the closed landfill is included the emissions jump to 105,014 Te CO<sub>2</sub>e. For the purpose of this baseline year the closed landfill has been excluded from the total based on standard practice.

**Table 11: NPDC 21/22 Inventory Summary**

ISO Cat	Source	Te CO <sub>2</sub> e	% of total	% of Total (LFG removed)	CO <sub>2</sub> (Te CO <sub>2</sub> -e)	CH <sub>4</sub> (Te CO <sub>2</sub> -e)	N <sub>2</sub> O (Te CO <sub>2</sub> -e)
	<b>Scope 1</b>	<b>74,012</b>		<b>4,220</b>	<b>2,338</b>	<b>70,194</b>	<b>1,436</b>
Cat 1	Refrigerants	44	0.0%	0.1%	-	-	-
Cat 1	Natural (reticulated) Gas	2,060	2.0%	5.8%	2,055	5	1
Cat 1	Fleet Petrol	167	0.2%	0.5%	281	0	4
Cat 1	Fleet Diesel	285	0.3%	0.8%	-	-	167
Cat 1	Colson Road Landfill Gas	69,792	66.5%	NA	-	69,792	-
Cat 1	LPG	106	0.1%	0.3%	-	106	-
Cat 1	Fertiliser	8	0.0%	0.0%	3	-	5
Cat 1	Waste Water Treatment Plant (WWTP)	1,551	1.5%	4.4%	0	292	1,259
	<b>Scope 2</b>	<b>988</b>		<b>988</b>	<b>960</b>	<b>26</b>	<b>2</b>
Cat 2	Electricity	988	0.9%	2.8%	960	26	2
	<b>Scope 3</b>	<b>30,014</b>		<b>30,014</b>	<b>815</b>	<b>6,257</b>	<b>109</b>
Cat 6	Community Waste to landfill	5,916	5.6%	16.8%	-	5,989	-
Cat 4	Organisational Waste to landfill	90	0.1%	0.3%	-	90	-
Cat 6	Community Food Composting	256	0.2%	0.7%	256	163	93
Cat 4	Organisational Food Composting	22	0.0%	0.1%	22	14	8
Cat 6	Community Mixed recycling	99	0.1%	0.3%	-	-	-
Cat 4	Organisational Mixed recycling	3	0.0%	0.0%	-	-	-
Cat 4	Purchased Goods & Services	14,695	14.0%	41.7%	-	-	-
Cat 4	Capital Goods	6,549	6.2%	18.6%	-	-	-
Cat 4	T&D Loss Electricity & Gas	191	0.2%	0.5%	-	-	-
Cat 4	Upstream Leased Assets	78	0.1%	0.2%	-	-	-
Cat 3	Business Travel (airtravel, taxis and accom)	19	0.0%	0.1%	-	-	-
Cat 3	Employee Commuting	193	0.2%	0.5%	-	-	-
Cat 5	Downstream Leased Assets	1,313	1.3%	3.7%	-	-	-
Cat 3	Upstream transportation and distribution	592	0.6%	1.7%	537	1	9
	<b>Total</b>	<b>105,014</b>	<b>100%</b>	<b>100%</b>	<b>4,113</b>	<b>76,477</b>	<b>1,547</b>
	<b>Total excluding closed landfill</b>	<b>35,223</b>			<b>4,113</b>	<b>6,686</b>	<b>1,547</b>

Table 12: NPDC 21/22 Inventory Summary by gas type

GHG Emissions by Scope		
GHG by scope	Total excluding closed landfill	% TOTAL (excl closed landfill)
Scope 1	4,220	12%
Scope 2	988	3%
Scope 3	30,014	85%
<b>Total</b>	<b>35,223</b>	<b>100%</b>
<b>Emissions per FTE (tCO2e)</b>	56	

Table 13: NPDC 21/22 Inventory Summary by ISO Category

ISO Cat.	Scope 3	tCO2e	% of scope 3 emissions
Cat 6	Community Waste to landfill	5,916	20%
Cat 4	Organisational Waste to landfill	90	0%
Cat 6	Community Food Composting	256	1%
Cat 4	Organisational Food Composting	22	0%
Cat 6	Community Mixed recycling	99	0%
Cat 4	Organisational Mixed recycling	3	0%
Cat 4	Purchased Goods & Services	14,695	49%
Cat 4	Capital Goods	6,549	22%
Cat 4	T&D Loss Electricity & Gas	191	1%
Cat 4	Upstream Leased Assets	78	0%
Cat 3	Business Travel (airtravel, taxis and accom)	19	0%
Cat 3	Employee Commuting	193	1%
Cat 5	Downstream Leased Assets	1,313	4%
Cat 3	Upstream transportation and distribution	592	2%
	<b>Total</b>	<b>30,014</b>	<b>100%</b>

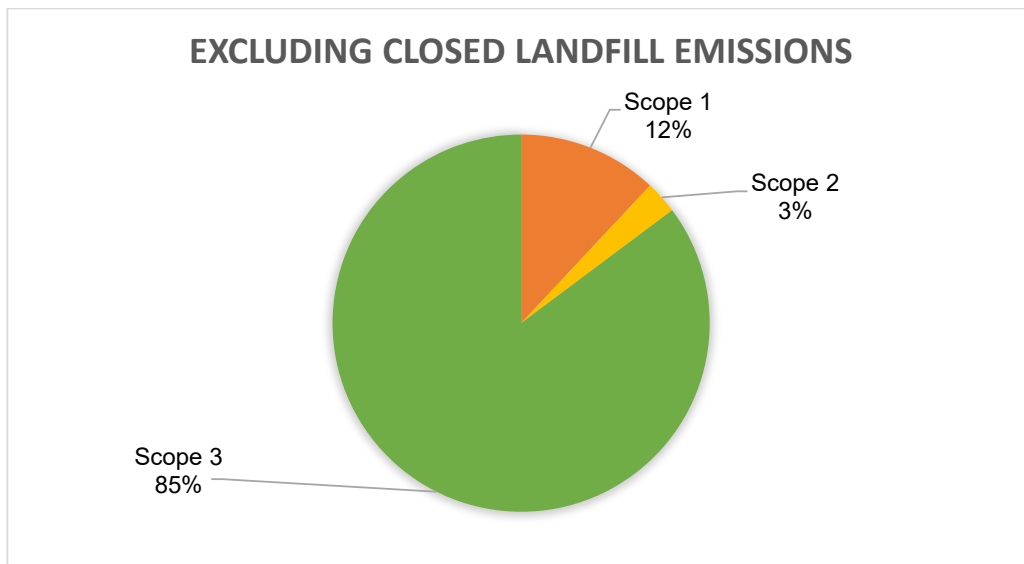


Figure 5 – NPDC 21/22 % Total Emissions by Scope (Excluding Landfill Gas)

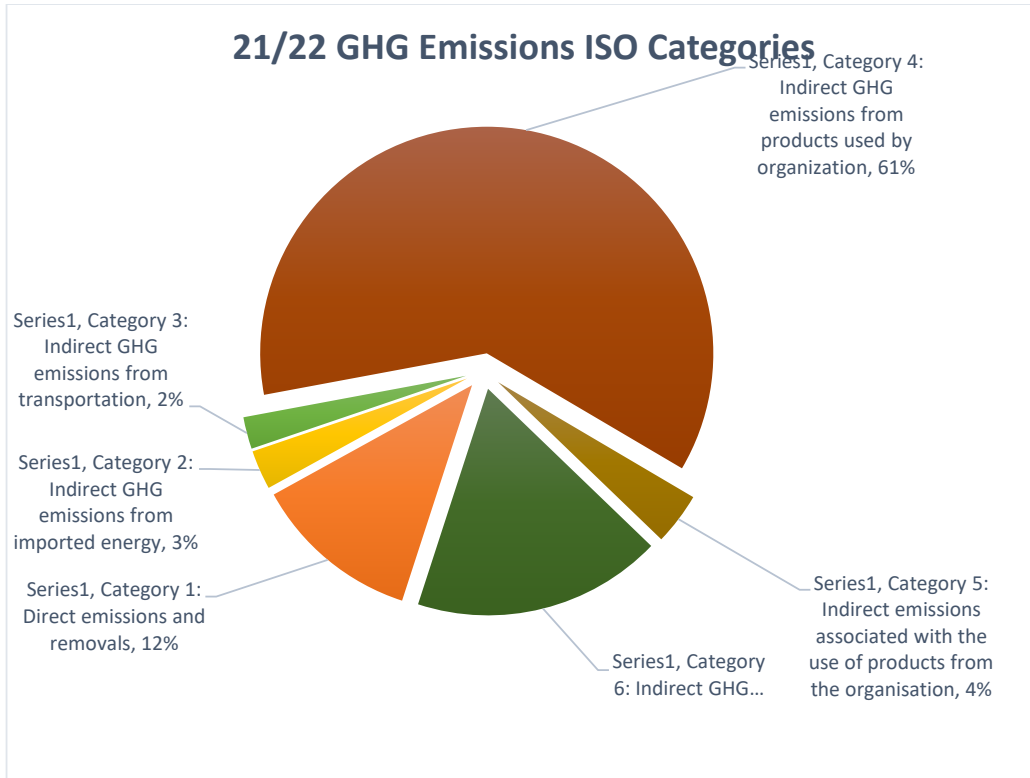


Figure 6b – NPDC 21/22 % Total Emissions by ISO Categories (Excluding Landfill Gas)

### 4.2 Scope 1 / Category 1- Direct Emissions

Scope 1 emissions represent the second largest source of emissions, accounting for 12% of the overall footprint. Most of the emissions come from fossil fuels and the WWTP.

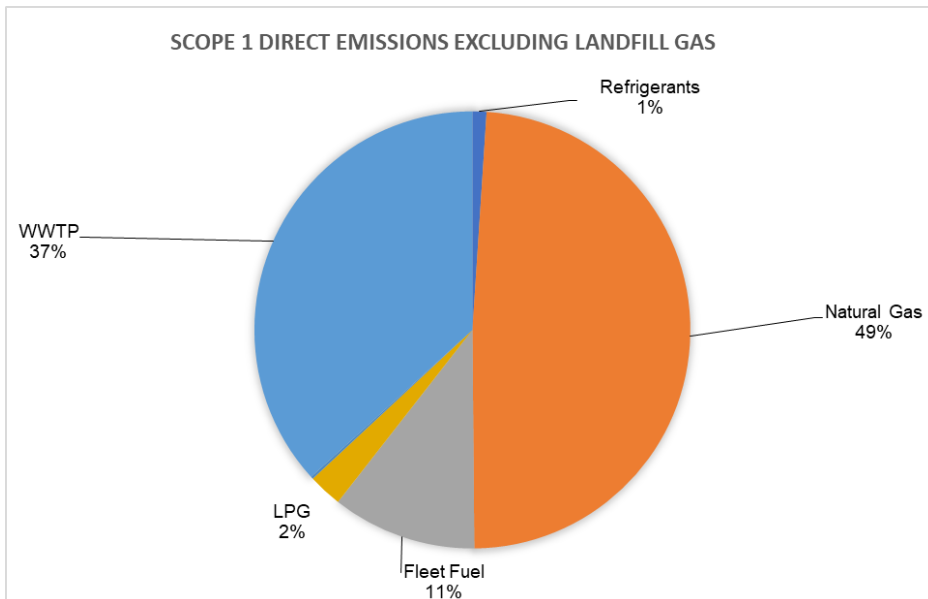


Figure 8 – Scope 1 / Category 1 GHG emissions.



### 4.3 Scope 2 / Category 2 - Emissions

Scope 2 emissions are entirely generated from use of grid supplied electricity, resulting in 988 Te CO<sub>2</sub>e, comprising ~3% of NPDC’s overall emissions. Main sources can be seen in Figure 3, section 2.2.2.

### 4.4 Scope 3 Emissions

Scope 3 (indirect) emissions totalling 30,014 Te CO<sub>2</sub>e (85% of total emissions) are generated from several sources (see Figure 9). The largest contributors are purchase of the goods and services (49%), followed secondly by Capital Goods (21.8%) and thirdly by NPDC’s community waste to landfill (~21.8%).

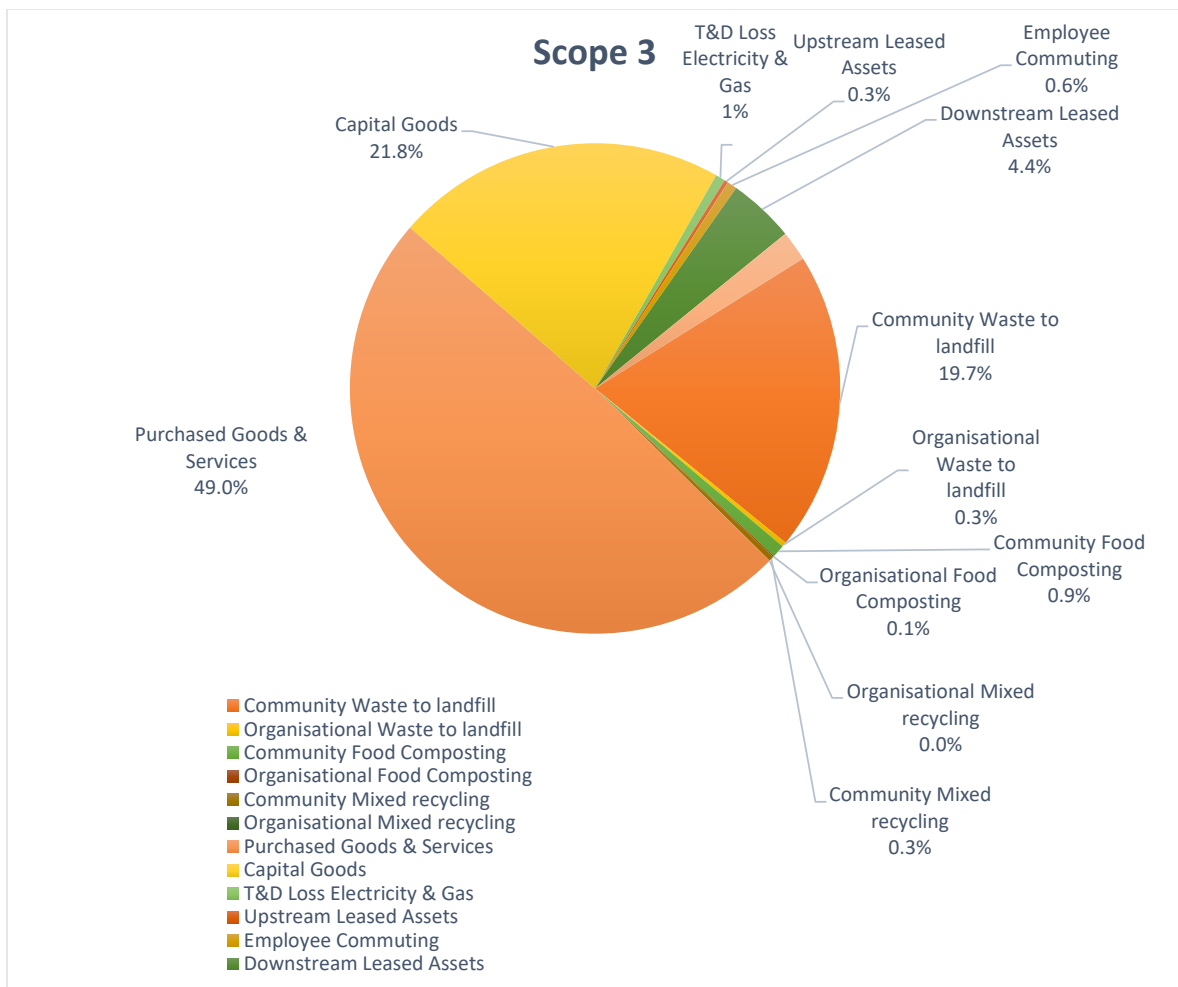


Figure 9 - NPDC 21/22 Scope 3 emissions by source

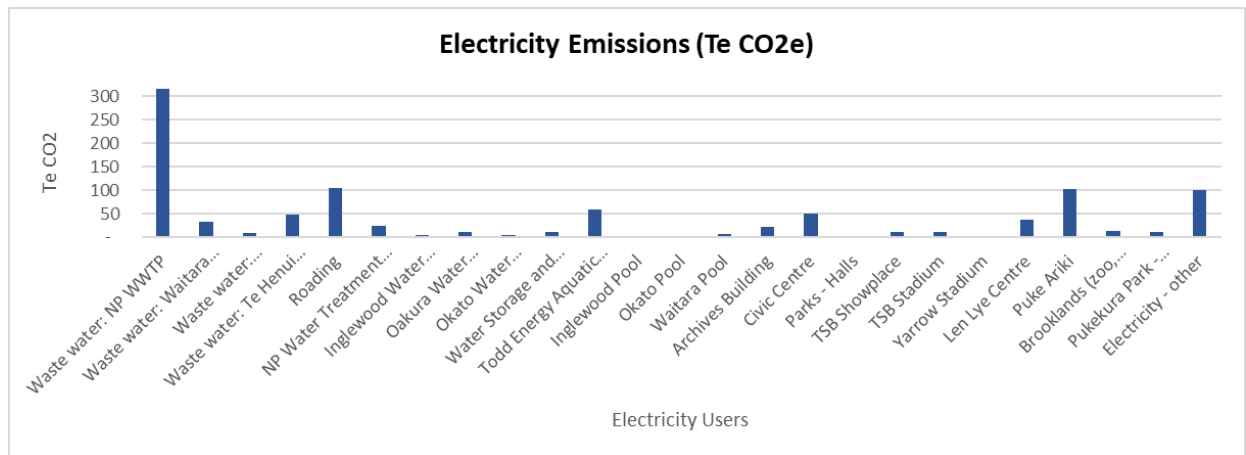
## 4.5 Refrigerants

HFCs, PFCs and SF<sub>6</sub> represent GHGs with high global warming potentials. Their accidental release could result in a large increase in emissions for that year, therefore the stock holdings are reported in Refrigerants Tab within the GHG inventory data and results. Emissions from losses of refrigerant are included in the organisation total and have been estimated based on MFE 2022. Refrigerant holdings were updated by NPDCs Energy Management Team in 2023 and capture the main sources.

## 5.0 Results by Activities and Groups

The following results illustrate the activity-related emissions for NPDC e.g. 'energy type'-related, or transport-related.

### 5.1 Electricity Use



**Figure 10- Electricity Emissions by Source**

Total electricity emissions are calculated to be 988 Te CO<sub>2</sub>e (excluding Transmission & Distribution losses but including CCO electricity sources). The NPDC Wastewater Treatment Plant has the largest electricity use at 32% of total electricity use as per Figure 10. The second largest source is for Puke Ariki and Roding (street lighting), at 10% each of the total electricity use. This includes electricity used for streetlights and substations.

## 5.2 Fossil Gas Usage

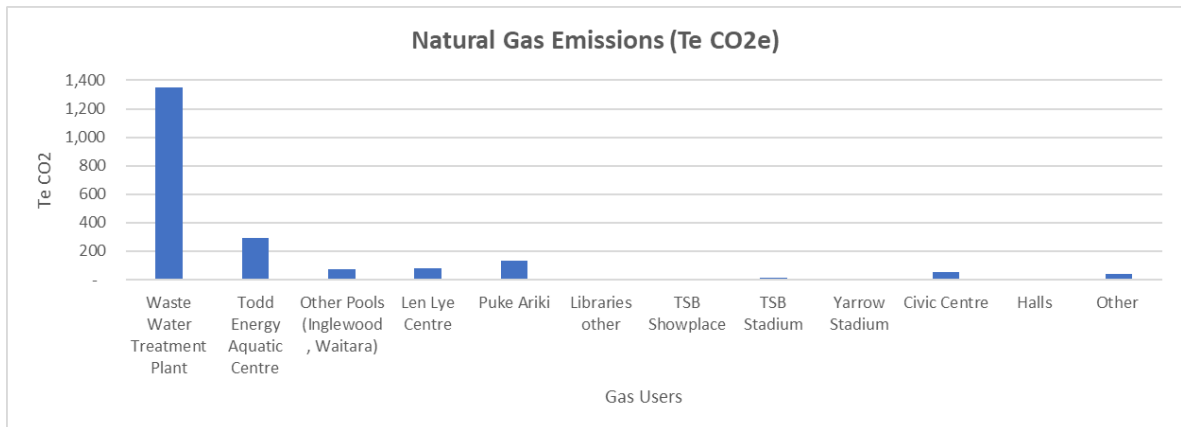


Figure 11 – Natural Gas Emissions by Source

Total natural gas emissions are calculated to be 2,060 Te CO<sub>2e</sub> (excluding Transmission & Distribution losses) with 65% produced by the NPDC Wastewater Treatment Plant TDF site as per Figure 11 and Figure 12.

NPDC Main Sites Gas Consumption - 2021/22  
(kWh/year)

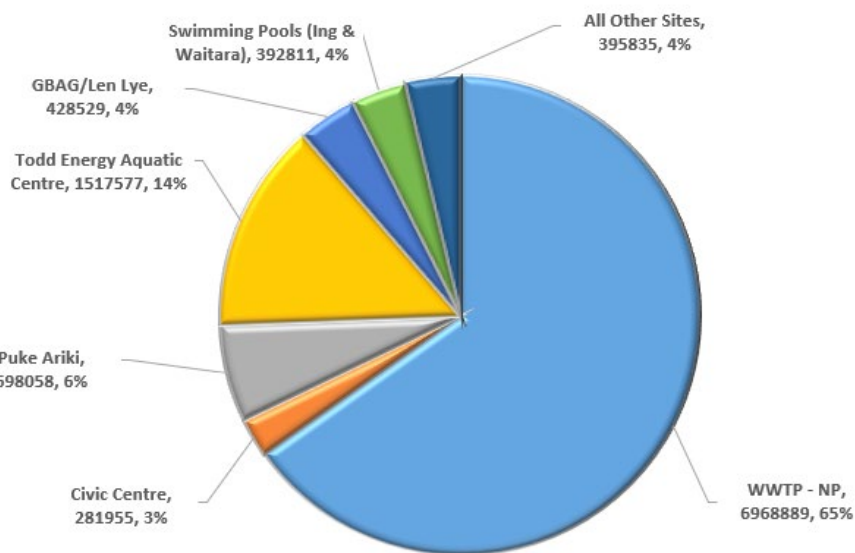


Figure 12: NPDC Main Fossil Gas Sites by % of Total for FY 2021/22

### 5.3 Transport Emissions

Figure 13 below shows that fleet fuel, employee commuting and air travel are responsible for most transport-related emissions.

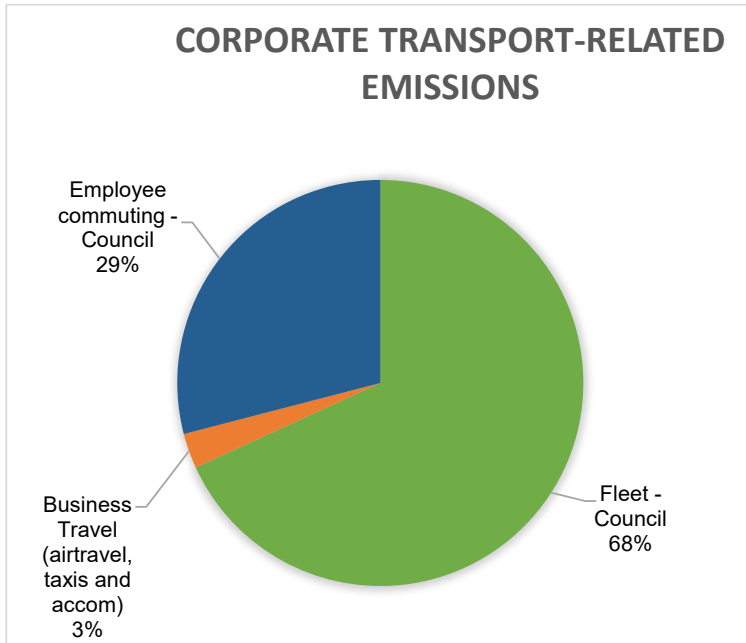


Figure 13-Transport-related Emissions per Transport Mode

Transport emissions include fleet vehicle travel, employee commuting, air travel, rental cars and taxis, and mileage business claims for employee travel (private vehicle). Fleet fuel and employee commuting are the major contributors to transport emissions at 68% and 29% respectively.

Most of the 116 fleet vehicles are fuelled by either petrol or diesel with 2 electric vehicles as of 21/22. The results of an employee commute travel survey in 2023 was used as the foundation to estimate commuting emissions.

## 6.0 References

### Carbon footprint calculations

1. MfE (2023) – Ministry for the Environment, New Zealand, Measuring emissions: A guide for organisations: 2023 emission factors summary & workbook.
2. World Resources Institute and World Business Council for Sustainable Development (2004), The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, Revised Edition, USA.
3. World Resources Institute and World Business Council for Sustainable Development (2011), Corporate Value Chain (Scope 3) Accounting and Reporting Standard, USA.
4. Toitu, July 2023, Capital Carbon Emissions, High Level Spend-based emissions factor recommendations for capital carbon emissions relating to New Zealand Local Government Long-Term Plans.
5. Consumption Emissions Modelling Market Economics, Auckland Council, March-2023
6. WATER NEW ZEALAND (2022) - Standard Methods, Carbon accounting, guidelines for wastewater treatment: CH<sub>4</sub> and N<sub>2</sub>O
7. WATER NEW ZEALAND (2022) - Navigating to Net Zero: Aotearoa's water sector low-carbon journey
8. UK Government Greenhouse gas reporting: conversion factors 2022 , [Greenhouse gas reporting: conversion factors 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022)
9. NPDC Emissions Reduction Technical Report – WSP – 2022

## 7.0 Glossary

<b>Carbon Dioxide Equivalent (CO<sub>2</sub>e)</b>	A standard unit for measuring carbon emissions. The impact of each different GHG is expressed in terms of the global warming potential (GWP) of one unit of CO <sub>2</sub> . Standard ratios are used to convert gases into equivalent amounts of CO <sub>2</sub> ; these are based on each gas' GWP.
<b>Carbon Footprint</b>	A measure of the GHGs emitted by a particular organisation. Typically expressed in terms of CO <sub>2</sub> e, and for a 12-month reporting period.
<b>Emission Factor (EF)</b>	A metric that converts a specific emission source, such as a litre of diesel, into CO <sub>2</sub> e.
<b>Global Warming Potential (GWP)</b>	A measure of a gas' ability to cause radiative forcing in the atmosphere (or global warming) relative to that of CO <sub>2</sub> . For example, sulphur hexafluoride has 23,900 times the GWP of CO <sub>2</sub> , thus is 23,900 times more potent at contributing to global warming than CO <sub>2</sub> .
<b>Greenhouse Gas (GHG)</b>	Greenhouse gases are gases that influence the way in which the Earth's atmosphere traps heat. Increasing levels of GHGs in the atmosphere are causing the phenomenon of climate change.
<b>Greenhouse Gas Protocol</b>	Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, 2004 (GHG Protocol); and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard, 2011 has been used in the preparation of this calculation.  This protocol provides guidance for organisations preparing a GHG emissions inventory. It defines three scopes (or operational boundaries) for accounting and reporting purposes (explained below).
<b>Scope 1 Emissions</b>	Direct greenhouse gas emissions that occur from sources owned or controlled by the organisation, such as emissions from the combustion of diesel in the vehicle fleet.
<b>Scope 2 Emissions</b>	Emissions associated with the purchase of electricity that is consumed by the organisation.
<b>Scope 3 Emissions</b>	An optional reporting category that covers all other indirect emissions. These emissions are a consequence of the organisation's activities but occur from sources it does not own or control. Examples include the embodied carbon in materials and air and taxi travel.
<b>ISO standard 140641:2018 – Greenhouse Gases</b>	This standard details principles and requirements for designing, developing, managing and reporting organization-level GHG inventories. It includes requirements for determining GHG emission and removal boundaries, quantifying an organisation's GHG emissions and removals, and identifying specific company actions or activities aimed at improving GHG management. It also includes requirements and guidance on inventory quality management, reporting, internal auditing and the organization's responsibilities in verification activities.

## 8.0 Appendix A - Calculation of Leased Grazing Land – STDC / EKOS

### Leased grazing land

Emissions associated with STDC's leased grazing land is a new emissions source for 2020/2021. STDC leases out 872.33 hectares of grazing land across 62 different grazing leases. To estimate the emissions associated with these grazing leases, the STDC Environment and Sustainability team's Summer University Student called all farmers with STDC leases over 15 hectares (10 farmers total were reached). While most STDC grazing leases are small, a few farmers hold large (50+ hectare) leases. Consequently, the 10 contacted farmers represent 75.49% of all STDC leased grazing land. The farmers were asked what type of livestock (cattle, sheep, or dairy cows) they have on the leased land, how many livestock they run, how many months of the year their livestock are on the leased STDC land, and what type and quantity of fertilizer they use on the leased land. Most farmers could provide data about the number of livestock they have on the leased land with a fairly high level of certainty. However, it was much harder to get clear and confident replies from farmers regarding the type of quantity of fertilizer used. For this reason, emissions calculations associated with fertilizer application have a high level of uncertainty.

### STDC Emissions Inventory 2020/2021 32

To estimate the total number of livestock on all of STDC's leased land and fertilizer use on all of the STDC's leased land, the total figures provided by interviewed farmers were summed and then multiplied by 1.3247 (since only 75.49% of STDC's leased land was represented by the interviewed farmers).

Grazing emissions consist of enteric fermentation emissions, manure management emissions, agricultural soils emissions, and fertilizer use emissions. The calculations for each of these emission sources is described in the following pages.

### Enteric fermentation

Enteric fermentation is the process by which ruminant animals produce methane through digesting feed. To calculate the emissions associated with enteric fermentation on STDC's leased grazing land, the enteric fermentation emissions factors provided by the MFE 2022 Measuring Emissions: A detailed guide for organisations were utilised.

### Enteric fermentation emissions in tonnes CO<sub>2</sub>-e: (HDC x GWP) + (HC x GWP) + (HS x GWP)

Where:

HDC = Head of dairy cattle

HC = Head of cattle

HS = Head of sheep

GWP = Global Warming Potential (100-year potential)

**Enteric fermentation emissions** = (HDC x GWP) + (HC x GWP) + (HS x GWP) =

(451 x 2,264 kg CO<sub>2</sub>-e) + (1,114 x 1,540 kg CO<sub>2</sub>-e) + (265 x 318 kg CO<sub>2</sub>-e) =

1,021,064 kg CO<sub>2</sub>-e + 1,715,560 kg CO<sub>2</sub>-e + 84,270 kg CO<sub>2</sub>-e =

2,820,894 kg CO<sub>2</sub>-e =

**2,820.89 tonnes CO<sub>2</sub>-e**

### Manure management

To calculate the emissions associated with manure management on STDC's leased grazing land, the manure management emissions factors provided by the MFE 2022 Measuring Emissions: A detailed guide for organisations were utilised. For STDC, manure management emissions are only relevant for dairy cattle.

### Manure management emissions in tonnes CO<sub>2</sub>-e: HDC x GWP

Where:

HDC = Head of dairy cattle



GWP = Global Warming Potential (100-year potential)

**Manure management emissions** = HDC x GWP

451 x 238 kg CO<sub>2</sub>-e = 107,338 kg CO<sub>2</sub>-e =

**107.34 tonnes CO<sub>2</sub>-e**

STDC Emissions Inventory 2020/2021 33

**Agricultural soils emissions**

Agricultural soils emit nitrous oxide due to the addition of nitrogen to soils through manure, dung and urine.

To calculate the emissions associated with agricultural soils emissions on STDC's leased grazing land, the agricultural soils emissions factors provided by the MFE 2022 Measuring Emissions: A detailed guide for organisations were utilised.

**Agricultural soils emissions in tonnes CO<sub>2</sub>-e: (HDC x GWP) + (HC x GWP) + (HS x GWP)**

Where:

HDC = Head of dairy cattle

HC = Head of cattle

HS = Head of sheep

GWP = Global Warming Potential (100-year potential)

**Agricultural soils emissions** = (HDC x GWP) + (HC x GWP) + (HS x GWP) =

(451 x 468 kg CO<sub>2</sub>-e) + (1,114 x 267 kg CO<sub>2</sub>-e) + (265 x 36 kg CO<sub>2</sub>-e) =

211,068 kg CO<sub>2</sub>-e + 297,438 kg CO<sub>2</sub>-e + 9,620 kg CO<sub>2</sub>-e =

518,126 kg CO<sub>2</sub>-e =

**518.13 tonnes CO<sub>2</sub>-e**

**Fertilizer use emissions**

The use of fertilisers produces GHG emissions. Nitrogen fertilisers break down to produce nitrous oxide and carbon dioxide (urea). Limestone and dolomite fertilisers break down to produce carbon dioxide.

It was very challenging to obtain clear information from farmer interviews regarding the exact type of fertilizers the farmers use. For this reason, all nitrogen-based fertilizer mentioned by the interviewed farmers has been assumed to be urea nitrogen fertiliser coated with urease inhibitor with an assumed nitrogen content of 46%. Based on these assumptions, STDC lessees applied 36.588 tonnes of nitrogen to leased STDC land.

**Fertilizer use emissions in tonnes CO<sub>2</sub>-e: KGN x GWP**

Where:

KGN = Kgs of nitrogen content of fertilizer applied

GWP = Global Warming Potential (100-year potential)

**Fertilizer use emissions** = KGN x GWP =

36.588 x 4.86 tonnes CO<sub>2</sub>-e = **177.82 kg CO<sub>2</sub>-e**

**Total agricultural lease emissions**

STDC Emissions Inventory 2020/2021 34

Total emissions associated with STDC's 872.33 hectares of leased land are an estimated 3,624.17 tonnes CO<sub>2</sub>-e for the 2020/21 financial year. These emissions are comprised of the following:

- Enteric fermentation emissions = 2,820.89 tonnes CO<sub>2</sub>-e
- Manure management emissions = 107.34 tonnes CO<sub>2</sub>-e
- Agricultural soils emissions = 518.12 tonnes CO<sub>2</sub>-e
- Fertilizer use emissions = 177.82 tonnes CO<sub>2</sub>-e



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31 October 2023

Environment Committee  
Parliament Buildings  
WELLINGTON

Kia ora koutou

### **SUBMISSION TO THE INQUIRY INTO CLIMATE ADAPTATION**

This submission is from New Plymouth District Council. We, like many other councils around the motu, will need to consider how to protect or relocate parts of our community from climate-related hazards over the coming years. We have a large coastline, as well as rivers subject to flooding, localised storm flooding, and other risk factors. We are concerned about the ongoing delays in progressing a Climate Adaptation Bill but do welcome an opportunity to contribute to this important dialogue before policy decisions are made for such a Bill.

We support many of the proposals and positions in the Ministry for the Environment's papers and have primarily focused on points on areas we think need further refinement or consideration.

Our key recommendations are that the Committee explore:

- Finding common ground and political consensus in its process in a timely fashion so that communities can begin adaptation planning
- Whether more holistic adaptation legislation could improve adaptation by ensuring agencies work together with greater clarity of roles and responsibilities across the entire adaptation sphere
- Funding arrangements that provide certainty, sufficiency, suitability and inter-generation equity
- Empowering iwi and hapū to act as kaitiaki throughout the adaptation process
- How guidance and direction-setting can reduce uncertainty and grounds for legal challenge
- Whether processes can adapt to local community needs and issues rather than being prescribed
- Improving the understanding on hazard-information
- Ensuring processes can adapt to new information as it arises, and
- Compensation payments that do not create perverse property market impacts that further inequalities.

We do not wish to make an oral submission to this Inquiry.



***Political consensus will be critical to successfully adapt and keep communities safe***

Relocating communities has the potential to become controversial within communities. There are therefore risks that local or national politicians take divergent views and promote short-term solutions, or doing nothing, for political gain. Such action could create serious risks for communities.

We recommend that the Committee place considerable emphasis on finding common ground into climate adaptation across political parties through this Inquiry process. Having all political parties buy-in to the system will help to reduce the risk of political interference in adaptation processes in the future. In turn, this will reduce risks of poor adaptation decisions being taken due to short-term political expediency and thereby will keep communities safe from changing natural hazard risks.

***Climate adaptation legislation needs to be enacted quickly***

We are seeking to develop a district-wide adaptation plan so that we can begin the process of adapting to climate change. We have been awaiting legislation and national policy to be in place to undertake this work because of how that legislation and policy will impact on our processes. The continual delay in developing this legislation has ongoing implications for us to be able to progress our planning processes as we cannot provide certainty to our community about the future stages we would take. In turn, that creates uncertainty in our community and delays adaptation.

We therefore recommend that the Committee undertake its processes, and for the Government to respond with introducing a bill, as quickly as possible. We favour a standard select committee process, however, to ensure full public input into a bill before it is enacted given the likely powers that the bill will contain.

***A holistic statutory regime for adaptation planning may be preferable***

We are strongly supportive of a legislative regime around community-led relocation. The decisions that communities face will be tough, and legislation that guides good decisions with appropriate powers will help to ensure that communities successfully adapt to the risks associated with climate change. Existing legislation is simply not fit-for-purpose.

However, we are concerned that the wider ambit of adaptation requirements is not being considered together as a holistic approach.

Having significant aspects of adaptation planning contained in other statutes creates complexity. The proposed Climate Adaptation Act will need to interface with the Spatial Planning Act & Natural and Built Environment Act (or legislation that replaces those Acts), Local Government Act, Water Services Entities Act (or legislation that

replaces that Act), Climate Change Response Act, Building Act and Civil Defence Emergency Management Act. Understanding how these Acts work together can be time consuming and could be subject to differing interpretations by different organisations resulting in varied outcomes. This can increase risks of poor or incohesive adaptation, as well as increasing legal disputes.

Similarly, there is also potential for a lack of clarity in the adaptation process around the roles of territorial authorities, regional councils, the new water services entities & regional planning committees (or similar organisations under new legislation), and other infrastructure providers (both public and private sector). Different organisations may take different approaches to adaptation, may perceive different problems or may have different views on where responsibilities lie.

This complexity and lack of clarity could become particularly problematic when dealing with communities that face a multitude of potential climate-related risks (e.g. coastal erosion, river flooding and stormwater flooding) that cut across current institutional responsibilities. There is risk that different organisations take different approaches or seek to adapt to one risk without understanding the flow-on implications for other climate-related risks.

In short, we are concerned that a fragmented legislative regime may result in a fragmented approach to adaptation across the system. Local communities may suffer as a result.

We recommend you investigate whether the Climate Adaptation Bill should be a more comprehensive and holistic legislation to reduce the risk of failing to adapt or maladaptation, rather than focusing primarily on the process and powers for relocating communities.

There are several key parts to a more holistic regime:

- Legislation will need to provide clear and consistent roles in the adaptation process for the various local, regional and national organisations. Legislation must clearly set out who is responsible for each step in the adaptation process and how organisations must work together.
- All relevant public sector agencies (within both central and local government) and other infrastructure providers should be bound by local adaptation plans. These agencies should be required to undertake the relevant actions assigned to them in those plans. This goes beyond relocation of communities such as building or relocating infrastructure and supporting households and communities.
- Other legislation must be clear about the role of local adaptation plans within their frameworks. Having a clear line of sight between statutory regimes reduces the potential for legal disagreement. The Spatial Planning Act 2023, through its consequential amendments, provides a useful example of this and thereby reduces potential for clash of law disagreements.

- Legislation could also provide greater direction for organisations in their planning processes even where local adaptation planning is not required. This can include direction on what scenarios to plan for, risk tolerance, prioritisation and so forth. This can help to ensure that organisations are working on a common even where adaptation planning is not in place.

A more comprehensive Climate Adaptation Act that can bring the relevant provisions together in a coherent manner may provide a more enduring and useable statutory framework for adaptation. Such a framework would enable decisions to be made under clear policy direction and reduce the potential for maladaptive practices due to poor legislative interfaces.

Such an approach could also provide greater certainty to the banking and insurance sectors so that they do not withdraw services from communities in an ad hoc fashion. Having the financial sector work within a broader context would ensure that communities do not face unexpected challenges from withdraw of these services ahead of adaptation planning.

Finally on this issue, we note that there may be other existing natural hazard risks that communities face that are not exacerbated by climate change but that it may be sensible to relocate communities away from, such as earthquake faults and volcanic hazards. Our understanding of the risks these hazards generate is improving and there may be some areas now identified as having intolerable risks. We recommend that the Committee investigate whether the same legislation could be used to address these other natural hazard risks as well.

### ***Funding and financing will be a key challenge***

There is a lack of clarity around central government's role in funding adaptation as noted in the Ministry for the Environment's papers. However, we also raise that there is a lack of clarity in funding responsibilities between territorial authorities, regional councils and, in the future, water services entities (for stormwater) as well. Resolving the institutional responsibilities, as recommended above, would help to alleviate that lack of clarity.

As Committee members will be aware, local government funding is currently under significant strain. Many communities are facing large increases to rates as local authorities undertake to address historic infrastructure under-investment, increasing compliance costs and a wide range of economic and social challenges. We were therefore pleased to see that the Expert Working Group's paper propose that central government provide greater funding support for local authorities throughout the adaptation process.

We recommend that the Committee consider the following objectives when considering funding from central government to local government:

- Certainty – the arrangements on who funds what, where and when must remain consistent and not regularly change. This enables communities to access funding when they are ready, not when the Government-of-the-day decides to make funding available.
- Sufficiency – the funding must be sufficient for all communities to access funding as required, rather than placing limitations on funding that mean some communities may miss out or need to wait until a future fiscal year.
- Suitable – the funding arrangements must be suitable for local government and not be built around the needs of central government. This means avoiding short application timeframes and unrealistic expectations for project delivery which have unfortunately been too common in recent years.
- Inter-generational – the funding sources should acknowledge the benefits that accrue to future generations through adaptation and seek to recover costs from those future generations as well as current generations.

In line with these criteria, we recommend that the Expert Working Group's funding allocation be instituted as a permanent legislative authority under the Public Finance Act 1989. Much of this funding could be done via debt to avoid immediate impacts on the Government's annual budget.

Further, central government funding to local government must cover the full range of adaptation requirements, and not solely be focused on towards relocating communities. There is a risk that having central government funding dedicated to just relocating could create perverse implications for local decision-makers to favour relocation as a means of reducing local funding sources. This would be an unfortunate incentive. All adaptation measures should be equally eligible for funding.

### ***Iwi and hapū need to be able to exercise kaitiakitanga in this process***

While the Ministry for the Environment's papers notes the disproportionate impact of climate change on Māori, our local iwi and hapū have also been able to share with us historic examples of their relocating in the response to environmental and other challenges. These experiences mean that iwi and hapū can be empowered as kaitiaki in the relocation process to the benefit of all communities.

We were pleased to see a strong focus on the Ministry for the Environment's papers around iwi and hapū involvement in the processes. Taking a Te Tiriti-based approach to adaptation is important given that in our District around 0.4 per cent of the land originally held by Māori remains in Māori ownership. We are aware that residents will unfortunately need to relocate from some of that land as well.

We recommend that the Committee explore appropriate mechanisms and funding for iwi and hapū to be involved in managed relocation discussions. We also recommend that the legislation actively incorporate tikanga into decision-making processes. We support the suggests from the Ministry for the Environment to incorporate maturanga Māori into risk assessments and note that tikanga could also be used in the adaptation process – for instance, empowering iwi and hapū to issue rahui to act as land use restrictions on areas once communities have relocated away from those areas.

We support the proposal that Māori land be retained in Māori ownership following relocation. We further consider that there may be opportunities to use the relocation processes to help restore connection to whenua. For instance, there may be opportunities to return land to iwi or hapū post-relocation or as co-governed reserves with the local territorial authority. This may be appropriate in cases whereby risks mean the land is not suitable for residential or business purposes but may be still appropriately used for recreation, agricultural or horticultural purposes.

### ***Guidance and support for local planning will be critical***

We support the development of guidance and technical information to inform local adaptation planning. We support the inclusion of a framework and direction on adaptation and natural hazard risk mitigation.

Direction and guidance for local adaptation planning should aim to minimise avenues for judicial review or other challenge in the process. Adaptation planning will face disagreement and community conflict and there may be considerable legal risks in the process. As such, we recommend that direction should be focused on where otherwise there would be uncertainty and grounds for challenge. We consider the following directions, for instance, would be useful:

- A clear approach to the use of climate change scenarios (RCP/SSP) across a set timeframe would provide greater clarity. There remains a range of advice for climate change scenarios to use in adaptation planning.
- Similarly, clarity on the acceptable level of risk and protection is required. Some communities may argue that they are willing to be located on land subject to, say, a 2% AEP event, whereas this may be seen as an unacceptable risk tolerance to others. This would provide a clear tigger from risk assessments to local adaptation planning.

The direction must also be suitable for the different types of climate risks that communities may face. The approach for a coastal community is likely to differ to the approach of a community on floodplains. There will also be communities that face a multitude of risks.

This direction setting should be consistent across the adaptation eco-system. As noted earlier, we view a holistic approach to adaptation as being important. If a single legislative regime is not considered appropriate for whatever reason, then would recommend that the direction setting apply more broadly across the wider public sector at the very least.

***The processes will need to adapt to local needs and issues***

One issue that concerns us is the potential for a 'one size fits all' approach to local adaptation planning. There are numerous factors that will mean some areas require different approaches to planning than others, including community demographics, the nature of the risk (coastal erosion, river flooding etc.), protective measures already in place and land ownership patterns.

Any statutory regime that outlines a detailed process may therefore mean that the process is not suitable for all communities. We recommend that any processes be kept relatively high-level and principles-based rather than detailed. This enables the right process to be tailored for each community as much as possible, whilst still ensuring good public processes and procedures are in place. One option to consider is a regulatory 'safe harbour' process so that agencies following that process cannot be challenged for that process but it does not limit the use of other processes where appropriate to the local circumstance.

***There needs to be more emphasis on understanding hazard risks***

We have recently made decisions on our Proposed District Plan (PDP). For new development the PDP takes a risk reduction (including avoidance where appropriate) approach within identified hazard areas. There are restrictions on the establishment of and additions to habitable buildings in areas of existing development which are located within hazard areas.

For hazard information to be included in a District Plan the information requirements are substantial as they need a robust evidence base that is identifiable at a property scale. Our PDP only addresses risks with flooding, earthquake faults, volcanic and coastal hazards. There is a lack of detailed information on certain hazards, including landslides and riverbank erosion, meaning those risk cannot be addressed.

There needs to be greater emphasis on centrally developing risk information that is defensible within both the adaptation and District Plan processes. There needs to be a cost-efficient framework for hazard information that reduces the need for each region or district to separately research and assess different hazards.



Further, at the same time as this Inquiry is seeking submissions, so too is the Ministry for the Environment seeking submissions on a proposed National Policy Statement for Natural Hazard Decision-making. That NPS would help to address some of the issues with building in areas prone to natural hazards. While that NPS is broader than just climate-related hazards, it strongly overlaps with climate adaptation planning. We recommend you consider how to link these two regulatory documents to ensure that they can work together successfully.

***Processes will also need to adapt as we learn new information***

The understanding of climate change risks will change over time because of greenhouse gas emission levels, improved scientific forecasting on how the climate is changing and improved knowledge of local environments. As such, we support the proposal that risk assessments be reviewed on a relatively regular basis but in a cost-effective manner. Doing so will ensure that local adaptation planning is triggered early enough before communities face imminent risks.

We view that there are two main triggers for a review:

- Risks should be reviewed after a significant weather event or when new or more up-to-date local hazard risk information is available. In a local case, a storm and high tides in May 2023 dramatically progressed erosion beyond what had been forecast. This has resulted in a change of approach for that community and may have implications for future risks. This should be a firm trigger for a review.
- It would also be logical to consider reviewing local risk assessments following either the National Climate Change Risk Assessment's review or the National Adaptation Plan's review. This would enable one or both of those documents to also provide direction setting into local risk assessments, such as if some forecasts have changed or there have been other changes to the understanding of risk. For this trigger, it would be appropriate for local risk assessments to be subject to an initial high-level review following one of these documents to determine whether a more substantive review is warranted.

This approach would get the balance right between regularly reviewing risk assessments and the implications of doing so (including cost and potentially unnecessary community concerns). It may be the case that a mandatory backstop review timeframe may also be required (e.g. every ten years).

We also believe that it will be important to make these risk assessments publicly available. This would include proactively releasing them as well as placing information onto LIMs.

***Compensation and relocation payments need to be equitable and promote good outcomes***

We agree with the Expert Working Group paper that maintaining existing wealth inequalities should not be a primary purpose of relocation compensation payments.

We would be concerned, however, about an approach that is too limiting in compensation as the Expert Working Group proposes. Any cap or limit will result in some property owners facing additional reasons to object to relocation. This may increase resistance to relocation and increase the likelihood of litigation. Any cost savings in compensation may well be lost through litigation instead.

We also caution that providing different compensation to different owners (based on occupancy status) could result in perverse market outcomes in the years leading up to adaptation decisions. The Expert Working Group's approach could result in first-home buyers being bid out of the market in places not subject to relocation and thereby ending up concentrated in areas that will be subject to relocation. This could create further inequities and social issues.

Further, we are concerned that a model based on current valuation as of the time of relocation may not always be fair. The processes outlined to get to relocation are likely to stretch over several years. The property market is likely to factor in the potential for relocation, thereby impacting on prices and valuations. There may be some running down of properties by community members in that time that could also impact prices and valuations. There is risk that some property owners end up with mortgage debt larger than the valuation price (i.e. they are negatively geared) and receive compensation less than the mortgage amount. Some degree of latitude in compensation may be required in these cases where it can be demonstrated that the adaptation process and timeframes have led to decreasing valuations by the time compensation is considered.

In saying this, we do believe that there is strong justification for not making compensation payments for any non-essential investment undertaken in properties during the process. The compensation regime should clearly disincentivise investment once the risks are known.

We also have strong concerns around vulnerable communities with a high level of deprivation and marginalisation in the adaptation process. These communities are likely to require more significant support and other funding arrangements. There is a risk that, if not done properly, residents may refuse to move or may return because of a lack of viable alternative options. This may exacerbate vulnerability, particularly if services are removed or emergency management services are not aware that there are still residents in the area during a severe weather event. To prevent this will require agencies to work together to provide long-term affordable, warm and health housing outside of the hazard areas – however, this may exacerbate the existing public housing shortfall and waiting lists which will need to be rectified as part of the broader adaptation process. While many members of these communities will not lose financial wealth in the process as they do not own the property they live in, some form of compensation payment may also help to incentivise relocation and provide greater security.

**Concluding remarks**

New Plymouth District Council strongly supports the development of a Climate Adaptation Bill to empower local communities to remain safe in the face of the significant changes to natural hazards arising from climate change. We reiterate that political consensus will be critical to the long-term success of keeping communities safe, and trust that the Inquiry process will help to achieve this.

Ngā mihi



Neil Holdom  
Mayor New Plymouth District



Cr Bali Haque  
Chair, Strategy and Operations Committee

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## **HEALTH, SAFETY & WELLBEING QUARTERLY REPORT – PERIOD ENDING DECEMBER 2023 (Q2) – DUE DILIGENCE OBLIGATIONS**

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### **PURPOSE/ TE WHĀINGA**

1. This report presents the Health, Safety and Wellbeing Quarterly Report for the period 1 October 2023 – 31 December 2023.

### **RECOMMENDATION / NGĀ WHAIKUPU**

**That, having considered all matters raised in the report, the report be noted by Council.**

### **FINANCE, AUDIT AND RISK COMMITTEE RECOMMENDATION**

2. The Finance, Audit and Risk Committee endorsed the officer's recommendation.

### **SIGNIFICANCE AND ENGAGEMENT / TOHUTOHU KAI WHAKAHAERE**

3. This report is provided for information purposes only and has been assessed as being of some importance. The material presented in this report assists the elected members, as Officers, exercise their duty of due diligence to meet their statutory obligations under the Health and Safety at Work Act 2015.
4. The matters discussed in this report do not have implications for the Council's level of service or the financial costs for the community. Public interest in these matters is unlikely to be high.

### **EXECUTIVE SUMMARY / WHAKARĀPOPOTOTANGA MATUA**

5. Quarter two sees an overall decrease in incident reporting and proactive safety conversations held, with one ICAM investigation (Incident Causation Analysis Method) being undertaken. The main factor contributing to the lost time injuries sustained this quarter is slips and trips, however we are seeing several strains and sprains as a result of normal work. In Summary:
  - a) 1 recordable event to Worksafe that resulted in an ICAM and no further follow up from Worksafe.
  - b) 3 lost time injuries.
  - c) 11 new medical treatment/restricted work injuries.
  - d) 1 critical risk deep dive.
  - e) Upward trend in Employee Assistance Programme use

6. This quarter the HSW team have conducted the proactive confined spaces review at the NPDC treatment plant sites and raised the call to all staff to close the loop on incident reports and corrective actions outstanding from 2023.

*Recordable Events*<sup>1</sup>

7. There was one incident reported to Worksafe New Zealand resulting in an ICAM (incident causation analysis method), there was no further action required from WorkSafe. A planned task of depressurising the fire gas suppressant system at the NPDC Hobson Street archives building was released by the Contractor without communication to the workers involved. This, exposing Workers to pressurised gas, noise above 80dB and a falling light fixture. No one was harmed in this event, and both NPDC and the contractor undertook investigations to learn from this event and corrective actions include:
- a) Contractor management training for NPDC Facilities Maintenance officer.
  - b) SSSP (site specific safety plan) development and training for the Fire Division safety leaders of the contracting company.
  - c) The person in control of the worksite to ensure all parties follow the Job Safety Analysis (JSA) and develop an SOP (standard operating procedure) that documents lessons learnt and protocols for the task. This task is undertaken every 10 years.
8. There were 3 Lost time injuries for quarter two. These were:
- a) Knee strain whilst undertaking routine Parks and Open spaces work, resulting in internal meniscus tear of right knee. Worker requires surgery to repair. Total lost time: 16 days. Is currently fully unfit to work until March 2024.
  - b) Employee tripped and fell towards a chair, kicking the chair in the process, resulting in a foot sprain. Lost time of 7 days as was unable to weight bear. Worker was referred for follow up physio treatment.
  - c) Employee sprained elbow and right forearm after excessive force when using a hand tool. Due to the limited alternate duties available, this person was fully unfit to work for 35 days followed by an additional 36 days rehabilitation and return to work programme. Employee will be back to full duties in January 2024.

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<sup>1</sup> A Recordable Event is one which requires medical treatment (above first aid), or results in restricted duties or lost time workdays. Recordable events where a NPDC staff member has been injured and is managed by WorkAon and NPDC's Health, Safety and Wellbeing Lead, alongside the employee and manager, with a return-to-work program implemented.

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### Restricted work/medical treatment injury<sup>2</sup>

9. There were 11 new injuries this quarter, three requiring medical treatment, all that could have been prevented if persons involved were alert and observant to their surroundings, they were:
  - a) An employee tripped over a foam roller, landing on hip/glute causing hip/lumbar sprain. Employee was referred to Osteopath for treatment and continues with normal duties.
  - b) Employee tripped over, sustaining an injury to their knee whilst breaking the fall. Employee was referred to physio for treatment. There were no hazards evident that contributed to this event occurring.
  - c) Employee strained shoulder, turning to grab a heavy item off the back seat of the vehicle. Was referred to physio for treatment and request for MRI. Employee continues normal duties.

### *Critical Risk*

10. This quarter sees vehicle movements and personal security events trending with 6 events each, a decline in number of critical risk events compared to previous quarter.

### **HEALTH AND SAFETY TEAM**

11. The HSW team has been adjusting to the new ways of working as a smaller team and trying to find efficiencies. This will include moving to accept third party accredited contractor pre-qualification certificates only, this will drastically reduce the administration time for the team in reviewing and accepting a contractor's application to work for Council.
12. As agreed, the HSW team in collaboration with Infrastructure projects has identified 6 proactive safety visits/workshops over the calendar year 24/25 for Elected Members and Leadership.
13. The confined spaces review was undertaken at both Water and Wastewater treatment plants, and an update on this can be seen below in Critical risk section.
14. Work continues to 'refresh' safety documents to increase engagement in a changing organisation and shift the dial on our safety culture.

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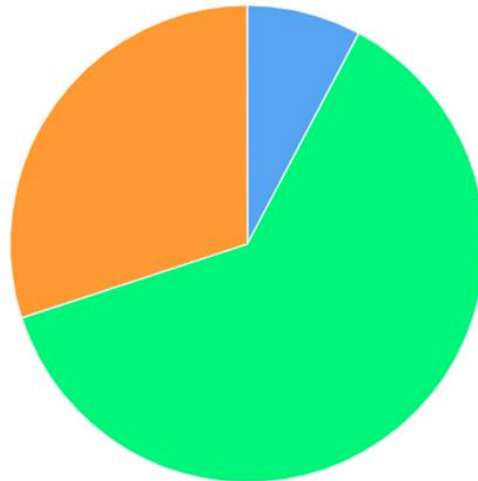
<sup>2</sup> Restricted work/ medical treatment injury is a work-related illness or injury resulting in the medical practitioner administering special expertise in the management of care of a patient and includes prescribing of any medication.

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**TOTAL NPDC HEALTH, SAFETY & WELLBEING EVENTS**

15. This quarter saw a decrease in reporting, 56 compared to previous quarter of 80. The decrease could be due to the Christmas, New Year period where majority of staff were able to take holidays.

**Event reporting – includes contractors.**

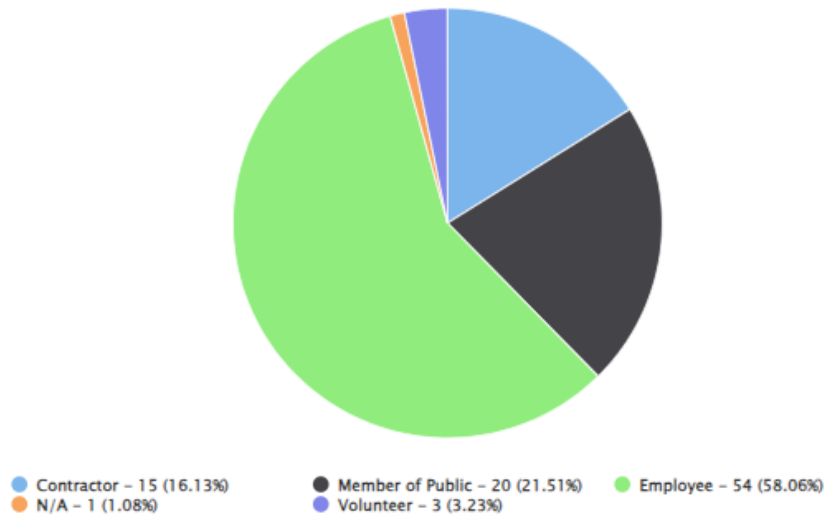


● Ergonomic Pain and Discomfort – 7 (7.78%)  
 ● Incident – 56 (62.22%)  
 ● Near Miss – 27 (30%)

<b>Event Type</b>	<b>Q2</b>	<b>Q1</b>	<b>Q4</b>	<b>Q3</b>
Injury	37	43	15	33
Illness	6	7	2	1
Security	7	13	6	8
Asset damage	6	17	8	9
<b>Total</b>	<b>56</b>	<b>80</b>	<b>31</b>	<b>51</b>

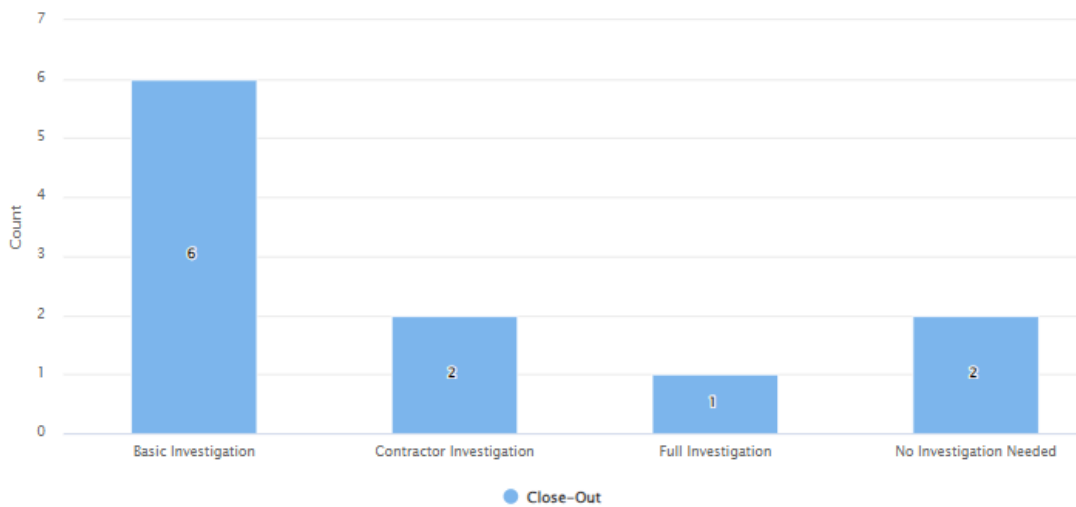
**N.B count can be higher in table due to two categories being selected in event category.**

**People involved in health and safety events.**



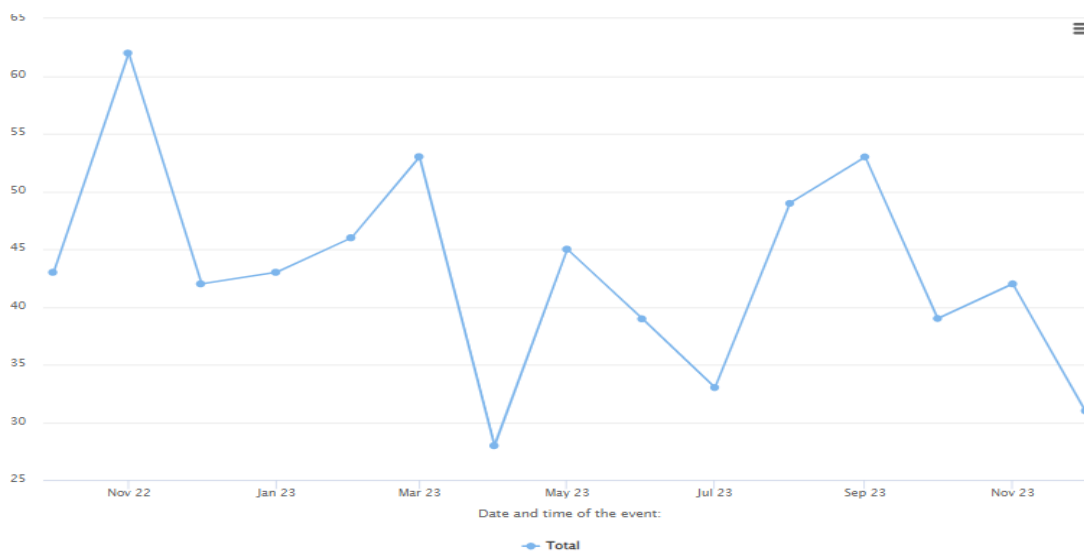
- A high number of the events reported are from Parks and Open Spaces and Cultural Experiences and involved members of the public. This can be attributed to the increase of visitors to Library, Gallery and Pukekura Park over the quarter. Of these incidents all are in the close out phase or completed as indicated below.

**Event Report Active Stage**





### EVENT REPORTING TREND 12 MONTHS



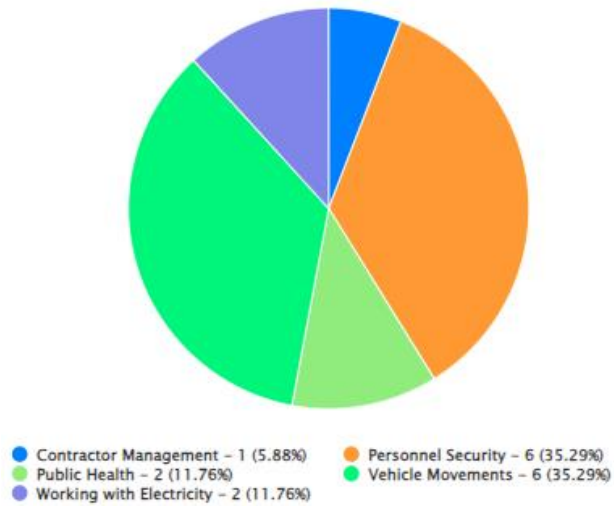
### CRITICAL RISK EVENTS

17. Critical risks are things that can seriously harm or fatally injure people in the workplace. Critical risk reporting data enables the Council to identify trends and increase the focus on mitigating these risks to as low as reasonably practicable through investigation and implementation of corrective actions. One incident can associate to more than one risk.
  
18. Council has 12 critical areas of focus in terms of risk, these are:
  - a) **Personnel Security** – staff facing aggression from customers.
  - b) **Driving & Vehicle movements** - use of Council Vehicles
  - c) **Psychological harm<sup>3</sup>**– psychosocial risk (the environmental, relational, and operational hazards at work that may affect a person’s psychological and physical health e.g., high workloads, tight deadlines, lack of autonomy, lack of role clarity, harassment, and workplace conflicts).
  - d) **Contractor high risk activities** i.e., lifting and rigging, Asbestos removal, excavation, tree felling etc.
  - e) **Water** Working in, above or over bodies of water.
  - f) **Working at height** – falls from height (people and materials)

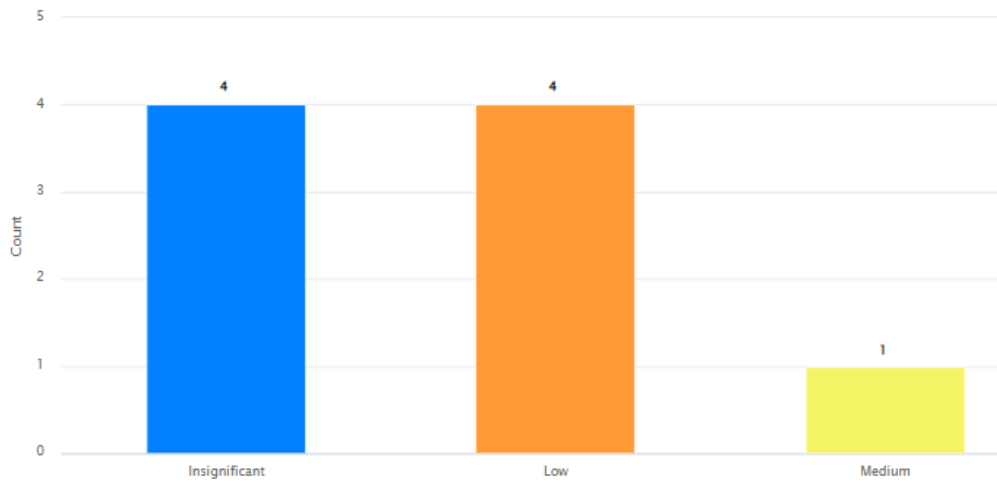
<sup>3</sup> Psychological harm will be added as a separate event reporting category in Pinnacle once education and training has taken place.

- g) **Confined space entry**
  - h) **Hazardous substances** i.e., certain high-risk substances such as chlorine gas
  - i) **Working on road corridor**
  - j) **Animal handling** i.e., livestock, aggressive dogs
  - k) **Working with electricity** i.e., exposure to live electrical wires etc
  - l) **Machinery and equipment** i.e., mechanical entanglement, crushing, being hit by moving vehicles etc.
19. All critical risks will be available in the event reporting template by next quarter.
20. Confined spaces review:
- a) WorkSafe New Zealand defines a confined space as an enclosed or partially enclosed space that:
    - i) Is not intended or primarily designed for human occupancy,
    - ii) May present a risk from one or more of the following at any time.
      - Unsafe concentration of harmful airborne contaminants
      - Unsafe concentration of flammable substances
      - Unsafe levels of oxygen
      - Substances that can cause engulfment.
    - iii) May have restricted means for entry and exit.
  - b) 28 Confined space assessments at Wastewater Treatment plant have been completed, the addition of 2 new spaces were identified. The confined space map documentation has been completed.
  - c) 15 confined space assessments have been completed at Water treatment plant with a remainder of 15 yet to be assessed. Clarification of the mapped spaces has delayed this process due to some confined spaces not showing correctly in the documentation.
  - d) The continuation of assessment will continue and be completed in Q3 with a summary of findings to be provided in the Q3 report.
-

### Critical Risk Events



### Critical Risk Event Actual Severity



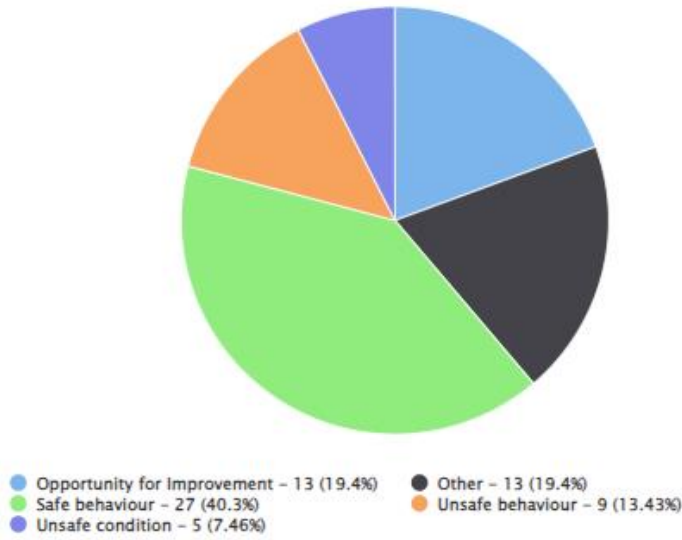
21. The above graph shows that whilst a critical risk was involved in the incident, the actual severity outcome was insignificant or low. The one medium severity incident was:
- a) A sub-contractor to NPDC partnership Contractor Downer, was using their truck to spread chip on a reseal site, when, with the hoist up the truck hit an overhead active/low voltage powerline. Downer responded promptly and investigated the incident finding the following:

- i) Whilst there was a close proximity permit on site, the identification of overhead lines needs to be clearer – bright cone sleeves have been ordered to identify powerlines on site before conducting work.
- ii) The workers involved were inexperienced in spotting for trucks.
- iii) The workers involved were found to be impaired, providing non-negative drug and alcohol tests.
- iv) Corrective actions identified by the Contractor include: Cone sleeves are now in place for road cones on site to indicate overhead utilities. Labour hire staff are not to be included in positions of responsibility, random drug/alcohol testing protocols now in place.
- v) There was significant delay of 7 days in NPDC staff logging this event in Pinnacle and reporting to responsible manager. A meeting was held with Contract leadership to discuss timely reporting of incidents in Pinnacle.

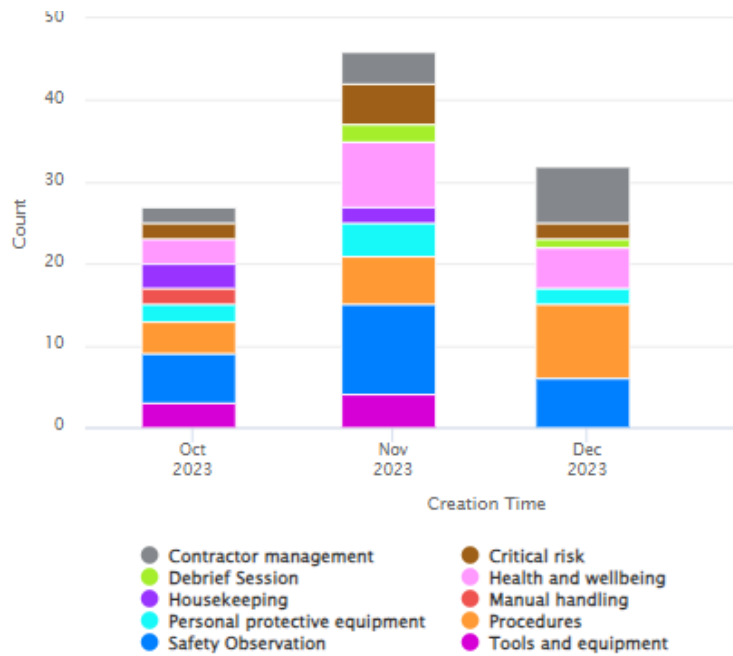
#### **SAFETY CONVERSATIONS**

- 22. Safety conversations capture both safe and unsafe behaviour or conditions which then require us to praise or correct what we see and identify opportunities for improvement. Having meaningful safety conversations assists in creating a positive safety culture and reporting across the organisation.
- 23. This quarter shows a high number of positive safe behaviour conversations taking place with a strong focus on physical safety observations and procedural improvements.

### Safety Conversations Held

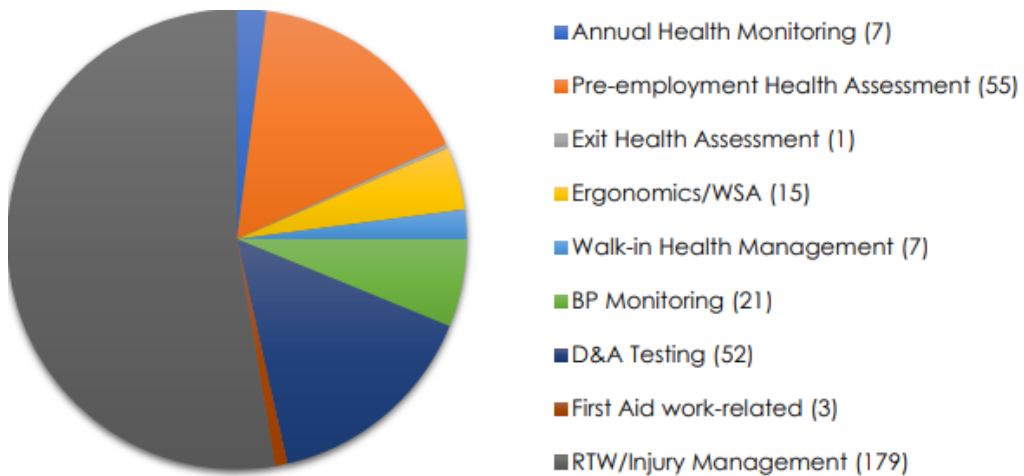


### Safety Conversation Topics



## OCCUPATIONAL HEALTH SERVICES

24. Council provides a range of occupational health services, this includes but is not limited to, pre-employment medicals, annual medicals, injury management, blood pressure monitoring, vaccinations, workstation assessments etc.
25. In the graph below we see the total OHN encounters this quarter, there is a decrease in annual health monitoring to allow time for pre-employment medical assessments for casual and summer staff.

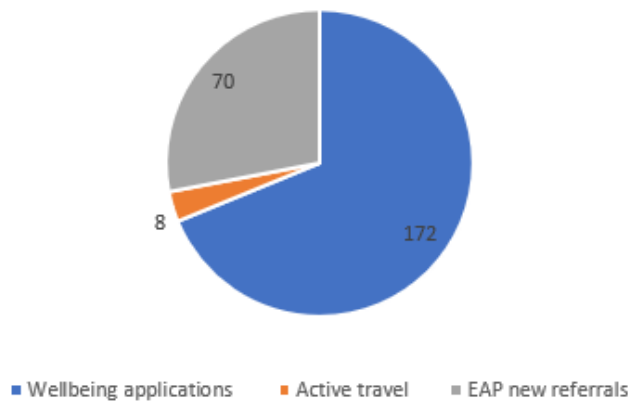


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## WELLBEING PROGRAMME

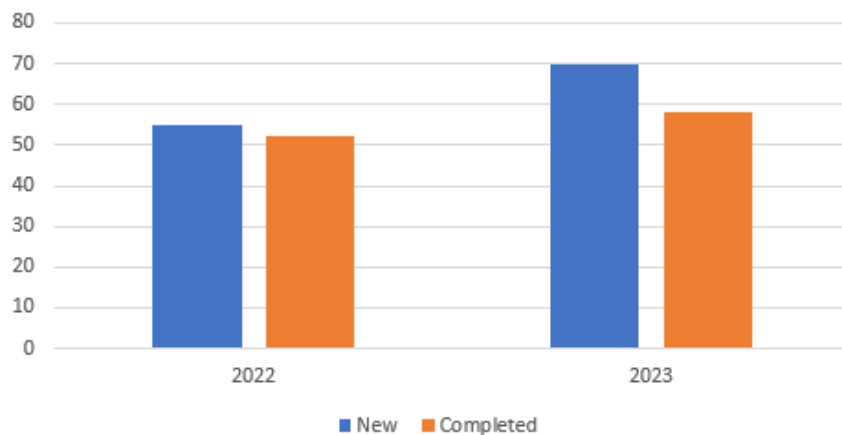
26. Council offers Health initiatives through the People Package and Wellbeing programme, this includes Active Travel, team sports registration, gym membership subsidy etc as well as offering of EAP (Employee Assistance Programme). There were 70 new referrals to EAP between July and December 2023, with 58 completed during the same period. Primary reasons for accessing EAP were personal relationships, depression, anxiety, and work stress.

Wellbeing programme



27. Below we see an increase in the number of new EAP referrals for July through to December, compared to that of the same period in 2022.

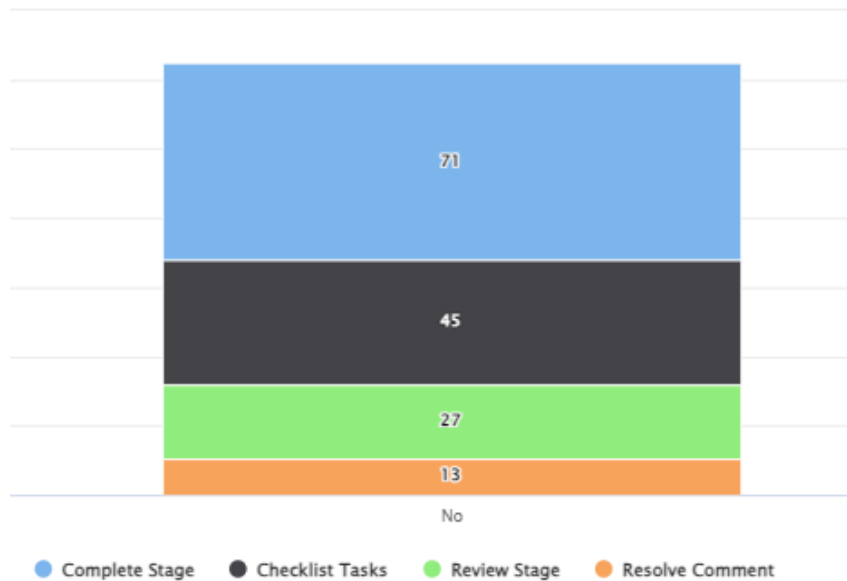
EAP referrals July - December



**ACTIONS**

- 28. Corrective actions resulting from an event is the best way to prevent recurrence and a way to provide continuous improvement opportunities.
- 29. Where areas of improvement are identified, actions are assigned to relevant personnel (including contractors) within the online health and safety solution Pinnacle. Assigned actions are completed within a specified time frame and generally require evidence to ensure completion.
- 30. The below graph is showing there is a total of 98 corrective actions related to an event yet to be filled in, reviewed, and closed out (this is events overall at NPDC not specifically for the reporting period).

**Event Corrective Action Stage**



**AUDITS COMPLETED**

- 31. Audits are a proactive way to identify areas of improvement or success across the organisation, covering several topics as identified below.
- 32. Where areas of improvement are identified, actions are assigned to relevant personnel (including contractors) within the online health and safety solution Pinnacle. Assigned actions are completed within a specified time frame and generally require evidence to ensure completion.
- 33. Of the 63 actions created as the result of an audit, fifty-seven have been completed and only six actions as the result of a house keeping audit remain incomplete and have been followed up.



<b>KEY METRIC</b>	<b>Q2</b>	<b>Q1</b>	<b>Q4</b>	<b>Q3</b>
Better work conversation	22	17	20	0
Contractor/staff H&S Audit	22	25	25	22
Housekeeping	18	8	19	21
Permit to work quality audit	5	3	20	16
Hazardous substances in the workplace	0	0	0	0
Emergency exercise	0	0	0	0

### **FINANCIAL AND RESOURCING IMPLICATIONS / NGĀ HĪRAUNGA Ā-PŪTEA, Ā-RAUEMI**

34. There are no financial or resourcing implications relating to the report. However, failure to meet due diligence obligations could result in fines and improvement notices.

### **IMPLICATIONS ASSESSMENT / HĪRANGA AROMATAWAI**

35. This report confirms that the matter concerned has no implications and has been dealt with in accordance with the Local Government Act 2002. Specifically:

- Council staff have delegated authority for any decisions made.
- Council staff have identified and assessed all reasonably practicable options for addressing the matter and considered the views and preferences of any interested or affected persons (including Māori), in proportion to the significance of the matter.
- Council staff have considered how the matter will promote the social, economic, environmental, and cultural well-being of communities in the present and the future.
- Unless stated above, any decisions made can be addressed through current funding under the Long-Term Plan and Annual Plan.
- Any decisions made are consistent with the Council's plans and policies; and
- No decisions have been made that would significantly alter the intended level of service provision for any significant activity undertaken by or on behalf of the Council or would transfer the ownership or control of a strategic asset to or from the Council.

#### **Report Details**

Prepared By: Fleur Corlett (Manager Health, Safety & Wellbeing)  
 Team: Health, Safety and Wellbeing  
 Approved By: Jacqueline Baker (Group Manager Corporate Innovation)  
 Ward/Community: District Wide  
 Date: 14 February 2024  
 File Reference: ECM 9191653

-----End of Report -----

## **ADOPTION OF THE STATEMENT OF PROPOSAL FOR SPECIAL CONSULTATIVE PROCEDURE ON THE CLASS 4 GAMBLING VENUES AND TAB VENUES POLICY REVIEWS**

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### **MATTER / TE WHĀINGA**

1. The matter for consideration by the Council is the adoption of the Statement of Proposal for consultation using the special consultative procedure for the proposed amendments to the Class 4 Gambling Venues Policy and the TAB Venues Policy, which have both been reviewed.

### **RECOMMENDATION FOR CONSIDERATION / NGĀ WHAIKUPU**

**That having considered all matters raised in the report, Council:**

- a) **Note that the number of Class 4 gambling machines reduced during the previous policy review period and that, despite submitter concerns regarding ensuring there was capacity for machine availability, the number of machines has remained the same since the policy was last adopted in 2020 with a reduced cap.**
  - b) **Note that following review of the Class 4 Gambling Venues Policy it was recommended that the Council consider further reducing the cap on Class 4 gambling machine numbers based on the Social Impact Assessment (SIA).**
  - c) **Note at the 31 October 2023 Council Meeting it was resolved that the option of a district wide sinking lid policy be included in the Class 4 Gambling Venues Policy and TAB Venues Policy Statement of Proposal for consultation.**
  - d) **Adopts the Statement of Proposal 2 for consultation, using the special consultative procedure, on the proposed amendments to the Class 4 Gambling Venues Policy (P17-005) and the TAB Venues Policy (P17-004), following their review.**
  - e) **Consultation will run from Wednesday 10 April to Friday 10 May 2024.**
-

<b>COMPLIANCE / TŪTOHU</b>	
Significance	This matter is assessed as being of some importance.
Options	<p>This report identifies and assesses the following reasonably practicable options for addressing the matter:</p> <ol style="list-style-type: none"> <li>1. Adopt Statement of Proposal 1 for the proposed Class 4 Gambling Venues Policy (including the gaming machine number cap) and proposed TAB Venues Policy for consultation using the special consultative procedure.</li> <li>2. Adopt Statement of Proposal 2 for the proposed Class 4 Gambling Venues Policy (including the district wide sinking lid) and the proposed TAB Venues Policy for consultation using the special consultative procedure (recommended option).</li> <li>3. Adopt an amended Statement of Proposal for the proposed Class 4 Gambling Venues Policy and proposed TAB Venues Policy for consultation using the special consultative procedure.</li> </ol>
Affected persons	The persons who are affected by or interested in this matter are Class 4 venue licence holders, TAB venue licence holders, gambling societies, community grant recipients, care providers for problem gambling, the wider New Plymouth Community.
Recommendation	This report recommends option two for addressing the matter.
Long-Term Plan / Annual Plan Implications	No.
Significant Policy and Plan Inconsistencies	No.

## **EXECUTIVE SUMMARY / WHAKARĀPOPOTOTANGA MATUA**

2. Officers recommended that Council adopt Statement of Proposal 1 (SOP1) (Appendix one) for consultation, using the special consultative procedure, on the proposed Class 4 Gambling Venues Policy and proposed TAB Venues Policy reviews based on the Social Impact Assessment (SIA). Based on discussion at the 31 October 2023 Council meeting it was resolved to include the option of a district wide sinking lid within the Class 4 Gambling Venues Policy. Therefore, Statement of Proposal 2 (SOP2) (Appendix four) is now recommended for adoption reflecting the 31 October Council resolution.
  3. Every territorial authority is required to adopt a Class 4 gambling venue and TAB venue policy, and under section 102 of the Gambling Act 2003 and section 97 of the Racing Industry Act 2020, these policies must be reviewed using the special consultative procedure every three years.
  4. The special consultative procedure will allow the public to consider and express their views on the proposed amendments to the policies.
  5. Taking this approach will ensure that Council meets legislative requirements for reviewing and consulting on the Class 4 Gambling Venues Policy and TAB Venues Policy.
  6. SOP2 proposes a district wide sinking lid. It is noted that a district wide sinking lid is inconsistent with the SIA raising risk of industry challenge.
  7. SOP2 also provides for the consideration of keeping and/or reducing the cap (along with the Waitara sinking lid) as an alternative to the proposed district wide sinking lid.
  8. Also proposed, is to update the location restrictions to align with the Proposed New Plymouth District Plan – Appeals Version as released on 14 September 2023.
  9. It is proposed to retain the TAB Venues Policy unchanged, with the exception of updating the location restrictions, to align with the Proposed New Plymouth District Plan – Appeals Version as released on 14 September 2023.
  10. Following the adoption of the Statement of Proposal, consultation will run from Wednesday 10 April to Friday 10 May. Submissions will then be analysed and reported back to Council along with a recommended Class 4 Gambling Venues Policy and TAB Venues Policy for consideration and adoption by Council.
-

## **BACKGROUND / WHAKAPAPA**

### *Class 4 Gambling Venues Policy*

11. Gambling in New Zealand is primarily regulated through the Gambling Act 2003. Under section 101 of the Gambling Act, every territorial authority must adopt a policy on class 4 venues. The territorial authority must have regard to the social impact of gambling within the district when adopting the policy. To meet this requirement a Social Impact Assessment (SIA) has been completed for New Plymouth District, see appendix two for the full SIA.
12. Additionally, the class 4 venues policy must state:
  - a) Whether or not class 4 venues may be established in the district, and if so, where they may be located,
  - b) Any restrictions on the maximum number of class 4 gaming machines a venue may operate, and
  - c) May include a relocation policy.
13. Under section 101 of the Gambling Act a class 4 venues policy must be adopted in accordance with the special consultative procedure, as prescribed by section 83 of the Local Government Act 2002. Additionally, a territorial authority must review its class 4 venues policy every three years. The New Plymouth District Council Class 4 Gambling Venues Policy was last reviewed and readopted in December 2020, and is therefore due for review.

### *Social Impact Assessment*

14. The SIA looked at the demographics of the district as well as factors such as gaming machine numbers, spending on EGMs and grants received from gaming societies. It found that within New Plymouth District some areas scored higher for certain risk factors which increase the likelihood of harm from gambling. This is consistent with previous assessments of the district, and therefore, suggests that the provisions in the current Class 4 Gambling Venues Policy are still relevant.
  15. Māori and people who live in high deprivation areas suffer the greatest impacts from problem gambling. Table one, below, outlines the areas within New Plymouth District which have EGM's. It looks at the percentage of Māori population, as well as social deprivation of these areas and the number of EGMs / density of EGMs. It was found that outside of the New Plymouth CBD area, Waitara West has the highest deprivation index score, the highest density of EGMs and the highest percentage of Māori population. These factors may put the residents of Waitara at higher risk of the effects of problem gambling as noted in appendix two.
-

16. The current Class 4 Gambling Venues Policy has a sinking lid policy for Waitara, until the number of gaming machines that may be operated in this area is reduced to 25. The current number of EGMs licenced for in Waitara is 38. Because of the risk factors identified, it is considered that a sinking lid policy is still relevant for this area – whether this be a specific sinking lid for the Waitara area, or a district wide sinking lid.
17. Table: Class 4 Gambling venue and machine numbers across New Plymouth District as at 11 December 2023

	% Maori Population*	% Pacific Peoples*	Social Dep index score**	Population*	# of licenced EGM***	# of venues***	EGM density per 1000ppl
New Plymouth District	17.8	2.2		80,679	298	20	3.7
Oakura	10.3	1.4	2	1,539	9	1	5.2
New Plymouth Central	15.9	0.5	8	1,110	106	6	94.6
Bell Block West	18.9	3.8	6	4,242	14	1	3.3
Waitara West	42.5	3.4	10	4,011	38	3	9.5
Inglewood	14.4	2.3	6	3,543	14	1	4.0
Aotearoa New Zealand	16.5	8.1		4,699,755	1,023	14,464	3.1

\* Statistics New Zealand 2018 Census information [NZ.Stat \(stats.govt.nz\)](https://stats.govt.nz)

\*\* New Zealand Deprivation Index for 2018 [New Zealand Index of Deprivation, 2018 \(NZDep2018\) \(arcgis.com\)](https://arcgis.com)

\*\*\* Territorial Authority quarterly dashboard for Class 4 gaming machine data [gmp-quarterly-dashboard-march-2023.xlsx \(live.com\)](#)

- There is no overall deprivation index score for New Plymouth or for New Zealand, as the deprivation index is calculated and reported at a statistical area and meshblock level
- Density calculated by: #of EGM operating / population \* 1,000
- Note: there are an additional 8 venues located across various suburbs in New Plymouth – Westown (2 venues), Moturoa (2 venues), Fitzroy (3 venues), Merrilands (1 venue).
- It is noted that a new venue has applied for 9 EGMs in New Plymouth CBD area

*Class 4 Gambling in New Plymouth District*

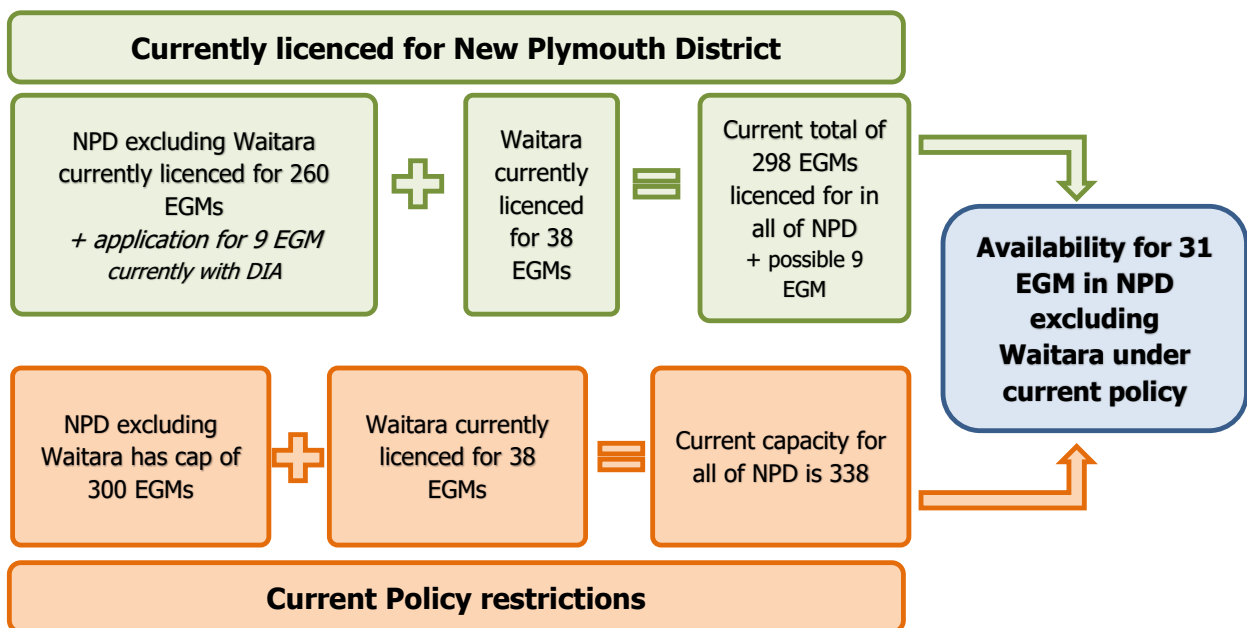
18. The current figures (as at 11 December 2023) for gaming machines and venues in New Plymouth District are:
  - a) 20 Venues (three of which are in Waitara)
  - b) 298 licenced EGMs (38 of which are in Waitara)
  - c) 291 operating EGMs (38 of which are in Waitara).
  - d) 9 potential EGMs – applied for by a new venue in the New Plymouth CBD
19. The seven EGMs that are licenced for, but not operating are called 'sleeping machines' and can be pulled into operation at any time. The number of EGMs operating in the district has decreased slightly since the last Class 4 Gambling Venues Policy was adopted in December 2020 when there were 21 venues operating 294 EGMs. However, it is noted that a venue in New Plymouth CBD area has applied for 9 EGMs.
20. For the year ending September 2023 \$20million was spent on EGMs within New Plymouth District, this equates to about \$54,000 per day.
21. For the year ending December 2022, \$6.4million was returned to New Plymouth District by way of grants (this is the most recent full year of data available when writing this report). It is noted that this figure does not include regional or national grants, which also benefit the people of New Plymouth District, for example, grants to the Starship Foundation, Breast Cancer Foundation New Zealand, or Basketball New Zealand.
22. These grants provide financial support to community groups and clubs. The table below outlines the grants received by category across the district for 2022. It is noted that sporting organisations were the largest receivers of grants – receiving 78 per cent of the total.

<b>Category</b>	<b>Amount granted</b>
Sport	\$4,350,218
Community	\$998,698
Arts and Culture	\$181,882
Health / Welfare / Rescue Services	\$503,761
Research and Education	\$356,716
Environment and Animals	\$22,980

23. The Consents and Regulatory Team received one application for a Class 4 Gambling venue licence in the last 12 months. The application is for nine EGMS at a venue within the New Plymouth CBD area. The application is still going through the approval process with the Department of Internal Affairs and the NPDC Consents and Regulatory Team.

*Options going forward*

24. Council must consult on the Class 4 Gambling Venues Policy. It was considered that there are two options going forward:
- a) To consult on retaining the current policy with no changes,
  - b) To consult on amending the current policy.
25. Information from the SIA and the Compliance Team indicate that the current policy is still fit for purpose with the key consideration for change being the gaming machine number cap for the district.
26. The current Class 4 Gambling Venues Policy has a gaming machine number cap for the district (excluding Waitara) of 300 EGMS, this is in addition to the sinking lid policy for Waitara – which has a sinking lid policy until the number of class 4 gaming machines that may operate in the area is reduced to 25.
27. The below figure outlines the current policy restrictions versus the current number of licenced EGMS in the district.





28. Looking at the EGM numbers versus the policy numbers, there is capacity for 31 additional EGMs (this figure takes into account the current application for nine EGMs) within the New Plymouth District (excluding Waitara, where there is no capacity for additional EGMs). Therefore, the options for consultation on this matter include:
- a) Retaining the current cap of 300 EGMs, excluding Waitara (status quo, this would allow for 31 additional EGMs),
  - b) Reducing the cap to 269 EGMs, excluding Waitara (current number licenced for, this would not allow for any growth in EGM numbers),
  - c) Reducing the cap to 285 EGMs, excluding Waitara (a number between the current number of EGMs and the cap, this would allow for 16 additional EGMs).
29. When the policy was last reviewed Council consulted on reducing the gaming machine number cap for New Plymouth District to 278, which was the number of machines licenced for at that time. Council adopted the policy with a gaming machine number cap of 300, which was a figure between the previous cap (320) and the number of licenced machines (278). This was in response to submissions asking to provide for the potential for future additional capacity (taking into account projected population growth among other matters). Since the adoption of the current policy in December 2020 there has been one application for a new Class 4 gambling venue / new EGMs, and one venue close (Urenui Bay Hotel), which removed nine EGMs from the district.
30. At the 31 October Council Meeting, it was therefore recommended to propose a further reduction to the class 4 gaming machine number cap from 300 to 269 – the current number of EGMs licenced for in New Plymouth District (excluding Waitara). The proposal aligned with the downward trend in gaming machine numbers across the district and with Council's previous stance toward reducing the number of gaming machines. In addition, there has been little interest from venues in picking up the gaming machines that have been available in the district over the last three years. Consulting on the proposed cap reduction would allow Council, in considering any submissions, to either reduce the cap or maintain the current cap. This is a similar consultation approach to that undertaken in the previous review.
31. It is also noted that the policy will need to be updated to incorporate the Proposed New Plymouth District Plan zones under *section 3 – Location of Class 4 Gambling Venues and section 4 – Relocation Policy*. These updates are proposed to align with the Proposed District Plan Appeals Version as released on 14 September 2023. See below for more details.
-

32. In addition, Te Whatu Ora and Tui Ora were contacted in relation to the Class 4 Gambling Venues Policy. Te Whatu Ora noted that when developing their policies, Council should consider factors which contribute to the inequities associated with gambling harm, such as social deprivation and the demographic characteristics of the community. In addition, it was noted that Council Policy objectives should emphasise harm reduction / minimisation. The full correspondence can be seen in appendix three.
33. In response to the matters raised it is noted that The Class 4 Gambling Venues Policy has several measures which do address the inequalities and aim to protect the community and reduce harm from gambling:
- a) Locational restrictions for new and relocating venues, with the aim of keeping gambling venues away from residential zones and community hubs such as schools, churches, sports clubs,
  - b) Sinking lid policy for Waitara, reducing gambling opportunities in this area over time,
  - c) Gaming machine number cap for New Plymouth District (excluding Waitara), reduces the opportunity of growth in EGM numbers.
34. Tui Ora noted support for Council's approach to the Class 4 Gambling Venues Policy but did not think the policy went far enough to support bigger and better health outcomes for Māori and to increase protective factors against gambling harm in the community. It was also noted that the NPDC Sustainable Lifestyle Capital Vision is not being delivered by the ongoing availability of the large number of gaming venues and gaming machines available in our communities. Tui Ora supported a sinking lid policy for Waitara (until there are no more than ten gaming machines that may be operated in this area) and introducing a sinking lid policy for New Plymouth District (excluding Waitara).
35. In relation to the comments from Te Whatu Ora and Tui Ora it is noted that the proposed changes (from SOP1) to the Class 4 Gambling Venues Policy are consistent with their positions apart from further additional restrictions. Council could consider lowering the sinking lid figure for Waitara (there are 38 licenced gaming machines in this area), however the current sinking lid policy to 25 EGMs for this area is considered sufficient at present, the lower sinking lid policy could be considered in three years' time when the policy is next reviewed.
36. The sinking lid policy was not recommended by officers for the whole of New Plymouth District at this time as it was identified that there was not the combination of risk factors for gambling related harm across the wider district, as demonstrated in Waitara (high percentage of Māori population, high deprivation, high density of gaming machines). Therefore, further additional restrictions were not considered by officers to be required within the current policy and legislative framework.
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*District wide sinking lid requested at the 31 October Council Meeting*

37. SOP1 and its associated report were tabled at the Strategy and Operations Committee, the Community Boards, and Te Huinga Taumatua before going to Council on 31 October 2023.

38. The Clifton Community Board and Puketapu-Bell Block Community Board both made the following recommendation:

*Council adopts the Statement of Proposal for consultation, amended to introduce a sinking lid policy for the whole of the New Plymouth District (rather than the proposed gaming machine number cap/sinking lid policy for Waitara) using the special consultative procedure, on the proposed amendments to the Class 4 Gambling Venues Policy (P17-005) and the TAB Venues Policy (P17-004), following their review.*

39. In addition, at the Council meeting on 31 October Council resolved to include the option of a sinking lid policy for the whole of New Plymouth District within the Statement of Proposal for consultation. Therefore, appendix four has been added to this report - a Statement of Proposal with an amended Class 4 Gambling Venues Policy, including a sinking lid for the whole of New Plymouth District. Specifically, the draft policy states that:

- a) *Council will not grant consent for any new Class 4 Gambling venues in the District, and*
- b) *Council will not grant consent for any new Class 4 gaming machines in any existing Class 4 venue in the District.*

40. A sinking lid policy would mean that no new Class 4 gambling venues or gaming machines can be established in the district, even if an existing venue closes. Over time, this will lead to a decrease in the number of gaming machines and venues in our district.

41. For the purposes of consultation, it is recommended to retain the relocation policy which allows venues to relocate under certain circumstances. However, the proposed relocation still recognises that the Waitara community is at greater risk of harm from gambling, so the policy has specific relocation provisions aiming to protect the Waitara community. These are: venues located in Waitara may relocate to the Waitara Town Centre Zone or other Town Centre or Local Centre Zones, or the City Centre Zone within New Plymouth District. However, venues outside of Waitara may not relocate to the Waitara Town Centre Zone and may only relocate to other Town Centre Zones, Local Centre Zones or the City Centre Zone – this prevents any venues from relocating in to Waitara, so prevents any additional EGMs entering the Waitara area. Consultation would then provide the opportunity to either include relocation or exclude it, should it determine to adopt a district wide sinking lid.

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42. The policy also proposes to retain the club merger policy, allowing two clubs to merge.
43. The SIA did not find the combination of risk factors for gambling harm across the district (which are present in Waitara), that is, high density of gambling venues in areas of high deprivation and high proportion of Māori population. Therefore, if Council does take this approach, there may be increased risk of challenge from the gambling industry. However, it is noted that a Problem Gambling Foundation stocktake found that approximately half of New Zealand Territorial Authorities have a sinking lid policy for Class 4 gambling venues / gaming machines.
44. The other risk to Council of the proposed district wide sinking lid is the potential reduction of external funding for the Council over time. Although this is a risk, it is also noted, that despite the decrease in gaming machine numbers over recent years, gaming machine expenditure has increased. For New Plymouth district in the year ending September 2019 there were 25 venues operating 335 EGMs and gaming machine profit was \$17.9m, while the year ending September 2023 there were 20 venues operating 291 EGMs and gaming machine profit was \$20.3m. Therefore, it is anticipated that the decrease in community funding from society grants would be very gradual.
45. It is also noted that gaming machine numbers and venues in New Plymouth District have been declining. In September 2019 there were 335 operating EGMs across 25 venues (now 291 EGMs across 20 venues). This reduction in numbers is maintained through the current policy's gaming machine number cap and the consideration of reducing the cap to reflect declining numbers over time.
46. SOP2 proposes a district wide sinking lid in accordance with the 31 October Council resolution. This would then allow Council, following the consideration of submissions, to consider either retaining a cap on the number of gaming machines (and determining the appropriate cap number) or implementing a district wide sinking lid. Should Council determine to adopt a sinking lid it accepts the risk of legal challenge given that a sinking lid position is not supported by the SIA.

#### *TAB Venues Policy*

47. Section 96 of the Racing Industry Act 2020 (RIA) requires territorial authorities to adopt a policy on TAB Venues, in adopting the policy regard must be given to the social impact of gambling within the district. The policy must state whether new TAB venues may be established in the territorial authority, and if so, where they may be located.
-

48. Under section 97 of the RIA, the TAB venues policy must be adopted in accordance with the special consultative procedure as set out in section 83 of the Local Government Act 2002. The TAB venues policy must be reviewed every three years. The New Plymouth District TAB Venues Policy was last reviewed in December 2020, so is now due for review.

*TAB Venues in New Plymouth District*

49. The current policy has locational restrictions which regulate where new TAB venues may establish in the district. It is noted that the policy will need to be updated to incorporate the Proposed New Plymouth District Plan zones under *section 2 – Location of Venues*. These updates are proposed to align with the Proposed District Plan Appeals Version as released on 14 September 2023. See below for more details.

*Location of Class 4 Gambling Venues and TAB Venues.*

50. The New Plymouth District Plan has been updated since the Class 4 Gambling Venues Policy and the TAB Venues Policy were last reviewed in December 2020. Therefore, it is proposed to update the location restrictions within the two policies to align with the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.
51. A key consideration is the introduction of Mixed-Use zoning in the Proposed New Plymouth District Plan. The zone provides for a compatible mixture of commercial services, recreational, residential and community activities. The general philosophy of both the Class 4 Gambling Venues and TAB Venues policies is that of location restrictions in relation to residential zones – that is, that venues cannot establish within residential zones.
52. The proposed approach for aligning both policies to the Proposed New Plymouth District Plan is to not include the Mixed-Use Zones within the location restrictions where new venues can establish. With the exception of the Mixed-Use Zone of the Treehouse Bar and Bistro, there are no significant implications of the District Plan zoning changes to the smaller neighbourhood business areas. The Treehouse Bar and Bistro venue may continue to operate class 4 gambling machines provided their licence does not lapse. If the license were to lapse greater than the six-month transition time, then class 4 machines could no longer establish at this venue. Similar to the Treehouse the Fitz is now in a Mixed-Use Zone, allowing for the continuation of Class 4 machines provided the transitional lapse period does not elapse.
53. While Cobb and Co is also in the Mixed Use Zone it is noted that they were not within the NP CBD Area for Class 4 Gambling under the existing Policy. All other existing Class 4 gambling and TAB venues are located within areas provided for within the proposed policy.
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54. The changes to the policies include updating the environment area zone names in the location clauses of the policies and updating the maps. The current policies have maps for Inglewood, Waitara, and the New Plymouth CBD Area. These maps outline where new venues may establish within these areas (and where existing class 4 gambling venues may relocate to).
55. The Proposed New Plymouth District Plan has updated the Fitzroy Business Area to Fitzroy Town Centre Zone, so it is proposed to add this map to the two policies as it is in the same zone hierarchy as Inglewood and Waitara.
56. The options for consultation regarding these maps / location restrictions include (see appendix one for maps):
  - a) Retaining the current map boundaries for Inglewood, Waitara, New Plymouth CBD Area (no map for Fitzroy Business Environment Area B).
  - b) Updating the map boundaries to reflect the Town Centre Zones and the City Centre Zone:
    - i) The Town Centre Zones would be reduced compared to the current map boundaries,
    - ii) The map boundary for New Plymouth CBD area would increase compared to the current map boundary.
  - c) Updating the map boundaries to include the Town Centre Zones and the surrounding Mixed Use Zones:
    - i) The map boundaries would be more closely aligned to the current policies' map boundaries,
    - ii) The map boundary for New Plymouth CBD area would increase to a greater extent than the option above.
57. It is recommended to propose to update the map boundaries to align with the Town Centre Zones and the City Centre Zone. This option is recommended to reduce gambling related harm through reducing access to EGMs (problem gambling behaviour is associated with living near gambling venues).
58. In addition, it is recommended that the remaining location restrictions be updated to align with the District Plan<sup>1</sup>.

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<sup>1</sup> Proposed District Plan Appeals Version as released on 14 September 2023

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## **CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA ĀHUARANGI**

59. There are no climate change implications from the Class 4 Gambling Venues Policy or TAB Venues Policy. However, it is noted that grants to the community from gambling societies may benefit organisations working in the climate change space. As the policies are largely remaining unchanged, it is not anticipated that there will be any implications to the amount of funding available for these grants.

## **REFORM IMPLICATIONS**

60. There are no reform implications from the Class 4 Gambling Venues Policy or the TAB Venues Policy.

## **NEXT STEPS / HĪKOI I MURI MAI**

61. Following the approval and adoption of the Statement of Proposal for consultation the Council will notify the public of the consultation and run the consultation process. Public notification will take place on Wednesday 10 April, and the consultation process will run from Wednesday 10 April to Friday 10 May 2024.
62. Submissions will then be analysed and reported on, and the final Class 4 Gambling Venues Policy and TAB Venues Policy will be reported up to the Council for adoption. Additionally, there will be opportunity for submitters who wish to be heard to speak to Council.

## **SIGNIFICANCE AND ENGAGEMENT / KAUPAPA WHAKAHIRAHIRA**

63. In accordance with the Council's Significance and Engagement Policy, this matter has been assessed as being of some importance. The two policies are due for review; however, they do not cease to have effect if they are not reviewed within the three year timeframe. Reviewing the policies has little financial cost for the community and has no implications on Council plans. Key stakeholders will be notified of the consultation process, and Council is required to run the special consultative process for the two policies, so the public will have opportunity to submit their views and preferences on the policies.

## **OPTIONS**

### *Financial and Resourcing Implications / Ngā Hiraunga ā-pūtea, ā-rauemi*

64. There is a small cost of running the special consultative procedure – this will be covered within existing budgets and includes the cost of public notification and contacting key stakeholders / submitters.
-

*Risk Analysis / Tātaritanga o Ngā Mōrearea*

65. There is no risk in adopting a statement of proposal for special consultative procedure. This process will allow the community the opportunity to present their views and preferences on the two policies.

*Statutory Responsibilities / Ngā Haepapa ā-ture*

66. Council is required to have a Class 4 Gambling Venues Policy under section 101 of the Gambling Act 2003 and a TAB Venues Policy under section 96 of the Racing Industry Act 2020. Additionally, these policies must be reviewed every three years and done so in accordance with the special consultative procedure, as prescribed in section 83 of the Local Government Act, Section 102 of the Gambling Act 2003 and section 97 of the Racing Industry Act 2020. All options being considered in this report will meet these requirements.

*Participation by Māori / Te Urunga o Ngāi Māori*

67. Local Iwi and hapū will be notified of the proposed policies for consultation. Māori ethnicity is one of the risk factors associated with problem gambling, therefore, Iwi and hapū may be interested in the policies and any restrictions which aim to reduce problem gambling opportunities.

*Community Views and Preferences / Ngā tirohanga me Ngā Mariu ā-hāpori*

68. Section 102 of the Gambling Act and section 97 of the Racing Industry Act require Council to use the special consultative procedure. This will allow the community the opportunity to submit their views and preferences on the Class 4 Gambling Venues Policy and the TAB Venues Policy. In addition, under section 102 of the Gambling Act Council must notify all corporate societies that hold a licence for class 4 venues in the district, as well as organisations representing Māori in the district.
69. Local iwi and hapū, corporate societies operating within the district and the Class 4 gambling venues and TAB venues in the district will be notified of the consultation.

**Option 1 Adopt Statement of Proposal 1 for the proposed Class 4 Gambling Venues Policy (including gaming machine number cap) and the proposed TAB Venues Policy for consultation using the special consultative procedure**

*Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori*

70. Option one contributes to the Community Outcomes of Thriving Communities and Culture – it aims to achieve wellbeing for the community by regulating the number of Class 4 EGMs in the community and where they are located.
-



*Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere*

71. The location restrictions within the two policies are consistent with the Council's Proposed District Plan Appeals Version as released on 14 September 2023. However, the policies may need amendments to the terminology once the District Plan is adopted as operative.

*Advantages and Disadvantages / Ngā Huanga me Ngā Taumahatanga*

72. The advantage of this option is that legislative requirements will be met, and the community will have the opportunity to submit on the proposed policies. The policies have been reviewed and the statement of proposal developed in response to the SIA for New Plymouth District. Therefore, the policies are considered relevant and appropriate in terms of their restrictions for gambling within the district.

73. There are no perceived disadvantages of this option.

**Option 2 Adopt Statement of Proposal 2 for the proposed Class 4 Gambling Venues Policy (including the sinking lid) and the proposed TAB Venues Policy for consultation using the special consultative procedure.**

*Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori*

74. Option two contributes to the Community Outcomes of Thriving Communities and Culture – it aims to achieve wellbeing for the community by restricting the number of Class 4 EGMs in the community and where venues may relocate to.

*Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere*

75. The location restrictions within the two policies are consistent with the Council's Proposed District Plan Appeals Version as released on 14 September 2023. However, the policies may need amendments to the terminology once the District Plan is adopted as operative.

*Advantages and Disadvantages / Ngā Huanga me Ngā Taumahatanga*

76. The advantage of this option is that legislative requirements will be met, and the community will have the opportunity to submit on the proposed policies.

77. The proposed policy for Class 4 Gambling Venues has been amended to include a sinking lid – meaning no new Class 4 gambling venues or EGMs can establish in the whole of New Plymouth district.

**Option 3 Adopt an amended Statement of Proposal for the proposed Class 4 Gambling Venues Policy and proposed TAB Venues Policy for consultation using the special consultative procedure.**

*Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori*

78. The promotion of Community Outcomes will be dependent on the form that the amended policies take. However, it is likely the amended policies would still promote the Community Outcome of Thriving Communities and Culture, through the regulation of class 4 gambling venues and TAB venues.

*Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere*

79. Consistency with policies and plans will depend on the amended policies adopted for consultation.

*Advantages and Disadvantages / Ngā Huanga me Ngā Taumahatanga*

80. A disadvantage of this option is that redrafting of the Statement of Proposal and proposed policies may delay the process.

**Recommended Option**

This report recommends option two Adopt the Statement of Proposal 2 for the proposed Class 4 Gambling Venues Policy (including the district wide sinking lid) and the proposed TAB Venues Policy for special consultative procedure for addressing the matter.

**APPENDICES / NGĀ ĀPITI HANGA**

- Appendix 1 Statement of Proposal 1 for the draft Class 4 Gambling Venues Policy and the draft TAB Venues Policy (ECM 9167509)
- Appendix 2 New Plymouth District Council Social Impact Assessment (ECM9058514)
- Appendix 3 Te Whatu Ora and Tui Ora Correspondence (ECM9058876)
- Appendix 4 Statement of Proposal 2 for the proposed Class 4 Gambling Venues Policy and the proposed TAB Venues Policy (ECM 9167489)
-

**Report Details**

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Reviewed By: Mitchell Dyer (Corporate Policy and Planning Team Lead)  
Approved By: Renee Davies (Manager Strategic Planning)  
Ward/Community: New Plymouth District  
Date: 16 January 2024  
File Reference: ECM 9165288

-----*End of Report*-----

Appendix 1: Statement of Proposal 1



Have your say

# Proposed Class 4 Gambling Venues Policy and TAB Venues Policy



## Background

### **NPDC has reviewed its Class 4 Gambling Venues Policy and TAB Venues Policy and wants your feedback before finalising it.**

#### **Class 4 Gambling Venues Policy**

The Gambling Act 2003 requires the Council to adopt a Class 4 Gambling Venues Policy and that this policy be reviewed every three years.

Class 4 Gambling refers to gambling on gaming machines hosted in pubs, hotels and clubs.

The New Plymouth District Council Class 4 Gambling Venues Policy was last reviewed in December 2020, so is now due for review.

The Class 4 Gambling Venues Policy must state whether or not Class 4 venues can be established in the district, and if so where. In addition, the policy can restrict the maximum number of gaming machines that may be operated.

We must consider the social impact of gambling within the district when developing the policy.

#### **TAB Venues Policy**

The Racing Industry Act 2020 requires us to adopt a TAB Venues Policy. The policy must state whether or not new TAB venues can be established in the district and, if so, where.

We must consider the social impact of gambling within the district when developing the policy.



#### ***Where can I get more information?***

For more information visit the NPDC website: [npdc.govt.nz/HaveYourSay](https://npdc.govt.nz/HaveYourSay)

Or phone us on 06-759 6060.

The proposed Class 4 Gambling Venues Policy and TAB Venues Policy can be found at the back of this document.

A copy of this document is available for viewing at the Civic Centre, Liardet Street, New Plymouth or library and service centres at Bell Block, Inglewood and Waitara.

# Proposed changes to the policies

## Class 4 Gambling Venues Policy

The current policy has:

- A gaming machine cap of 300 for New Plymouth District (excluding Waitara).
- A sinking lid for Waitara until the number of gaming machines that may be operated in Class 4 gambling venues is reduced to 25.

There are currently 269 licenced gaming machines in New Plymouth District (excluding Waitara). This means there is capacity for 31 additional machines to be picked up by new/existing venues in New Plymouth District (there is no capacity for new gaming machines in Waitara). The number of licenced gaming machines in New Plymouth District has remained the same since the policy was last reviewed in 2020.

The current provisions for Waitara are still considered fit for purpose and no changes are proposed.

### Our options for amending the Class 4 Gambling Venues Policy on gaming machine numbers for New Plymouth District (excluding Waitara)

1

Reduce the gaming machine cap from 300 to **269** (current number licenced).

This option would allow for no gaming machine growth.

2

Reduce the gaming machine cap from 300 to **285**.

This is between the current number of licenced gaming machines and the current cap.

This option would allow for 16 additional gaming machines.

3

Status quo.

Retain the current gaming machine cap of **300**.

This option would allow for 31 additional gaming machines.

**The Council's preferred option is Option 1 - reducing the gaming machine cap for New Plymouth District (excluding Waitara) from 300 to 269 (current number licenced).**

This option is preferred as there has been no demand for new Class 4 gaming machines since the last review in 2020, despite the available capacity. This option also reduces the potential for harm from gambling.

## TAB Venues Policy

The current TAB Venues Policy is considered to be mostly fit for purpose. However, an update to the 'location of venues' clause is proposed. See next page for more details.



# Location of Venues

## Class 4 Gambling Venues Policy and TAB Venues Policy

Since the Class 4 Gambling Venues and TAB Venues policies were last reviewed in 2020 the New Plymouth District Plan has been updated. Therefore, the location clauses in both policies and the relocation clause in the Class 4 Gambling Venues Policy need amending to align with the Proposed New Plymouth District Plan<sup>1</sup>.

A key consideration is the introduction of Mixed Use zoning in the Proposed New Plymouth District Plan. This zone provides for a compatible mixture of commercial services, recreational, residential and community activities. The general philosophy of both the Class 4 Gambling Venues and TAB Venues policies is to prohibit gambling venues in residential zones. Therefore, the proposed approach for aligning both policies to the New Plymouth District Plan is to exclude the Mixed Use Zones from the location restrictions where new venues can establish.

The current policies have maps for New Plymouth CBD Area, Inglewood and Waitara which indicate where new venues may establish within these areas (and existing Class 4 gambling venues may relocate to).

The Proposed New Plymouth District Plan has now included Fitzroy as a Town Centre Zone, so this map will be added to the policies and the options below will apply for this area too.

### Our options for location of Class 4 Gambling and TAB venues within New Plymouth CBD Area, Inglewood, Waitara and Fitzroy.

1

Status quo.

Retain the location restrictions for venues (based on the 2005 District Plan) for New Plymouth CBD Area, Inglewood, Waitara and Fitzroy.

2

Update the location restrictions for venues to reflect the Town Centre Zones and the City Centre Zone.

*The Town Centre Zones would be reduced compared to the current map boundaries.*

*The map boundary for the New Plymouth City Centre would increase compared to the current map boundary.*

3

Update the location restrictions for venues to include the Town Centre Zones and the surrounding Mixed Use Zones.

*The map boundaries for the Town Centre Zones would be more closely aligned to the current policies' map boundaries.*

*The map boundary for the New Plymouth City Centre would increase to a greater extent than Option 2.*

**The Council's preferred option is Option 2 - updating the locational clauses in the Class 4 Gambling Venues Policy and TAB Venues Policy to align with the Town Centre Zones (Inglewood, Waitara and Fitzroy) and the City Centre Zone. The updated map boundaries would outline where new venues may establish and existing Class 4 gambling venues may relocate to.**

This option is preferred as it ensures new venues can only be established within business zones and also aligns the policies' rules with the operational rules of the Proposed New Plymouth District Plan<sup>1</sup>. In addition, this proposal aims to reduce the potential for harm from gambling. A map of each location is provided on the following page.

<sup>1</sup> Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.



**New Plymouth City Centre**



**Legend**

- Current Class 4 Gambling Venues
- Boundary in current policy
- Proposed District Plan City Centre Zone
- Proposed District Plan Mixed Use Zone
- Proposed District Plan Town Centre Zone

**Inglewood**



**Fitzroy**



**Waitara**





## Have your say

The proposed Class 4 Gambling Venues Policy and TAB Venues Policy are now open for public consultation. This is your chance to tell us your views and preferences about these policies, so please take the time to have your say.

There are several ways you can have your say. You can submit the submission form on the next page or you can fill in your submission online.

To get your submission to us, either:

Do it online: [npdc.govt.nz/HaveYourSay](https://npdc.govt.nz/HaveYourSay)

Email it to: [submissions@npdc.govt.nz](mailto:submissions@npdc.govt.nz)

Post it to: NPDC Gambling Policies Submissions, Reply Paid DX, DX Box NX10026, New Plymouth 4342

Deliver it to: Civic Centre, Liardet Street, New Plymouth or to a library and service centre in Bell Block, Inglewood or Waitara

**Submissions close at 5pm, Friday 10 May 2024**

**Late submissions will not be accepted.**





**Location of Class 4 gambling venues**

**3. Where do you think new and relocating Class 4 gambling venues should be restricted to in the New Plymouth City Centre, Inglewood, Waitara and Fitzroy? (please tick one)**

- Current policy boundaries - status quo
- Town Centre Zones and City Centre Zone only
- Town Centre Zones, City Centre Zone and their surrounding Mixed Use Zones

**4. Do you have any comments on the location restrictions of the Class 4 Gambling Venues Policy?**

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**5. Do you have any comments on the proposed Class 4 Gambling Venues Policy?**

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**TAB VENUES POLICY**

**Location of TAB venues**

**6. Where do you think new TAB venues should be restricted to in the New Plymouth City Centre, Inglewood, Waitara and Fitzroy? (please tick one)**

- Current policy boundaries - status quo
- Town Centre Zones and City Centre Zone only
- Town Centre Zones, City Centre Zone and their surrounding Mixed Use Zones

**7. Do you have any comments on the location restrictions of the TAB Venues Policy?**

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**8. Do you have any comments on the proposed TAB Venues Policy?**

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Thank you for your submission

## **P17-005 New Plymouth District Class 4 Gambling Venues Policy**

*Approved by the Council on 14 November 2017. Reviewed and amended 22 December 2020.*

The Council is required to adopt a class 4 gambling venues policy under the Gambling Act 2003. This policy supports the purpose and intent of the Gambling Act 2003 with regard to the regulation and management of class 4 gambling venue premises. Class 4 Gambling refers to gambling on gaming machines hosted in pubs, hotels and clubs.

### **Policy Purpose**

To minimise the harm caused by gambling in the New Plymouth District and to control the location of Class 4 gambling venues and the number of gaming machines.

### **Class 4 Gambling Venues Policy**

#### **1.0 Establishment of Class 4 Gambling Venues**

- 1.1 Class 4 Gambling Venues may be established in the District provided that:
  - a) The primary activity of the venue is:
    - (i) for the sale of alcohol or, the sale of alcohol and food and the venue is subject to a valid on licence or club licence; or
    - (ii) for sporting or club activities and the venue is subject to a valid on licence or club licence and is not associated with family or children's activities; or
    - (iii) TAB venue as defined by the Racing Industry Act 2020;and
  - b) The venue is permitted under the New Plymouth District's current operative District Plan and/or holds all necessary resource consents and/or is otherwise lawfully established.
- 1.2 For the avoidance of doubt, a Class 4 Gambling Venue is not permitted in the District if Class 4 Gambling is the primary activity carried out at the venue.
- 1.3 There is no cap on the number of Class 4 Gambling Venues that may operate in the District.

#### **2.0 Number of gaming machines**

- 2.1 The total number of gaming machines that may be operated in Class 4 Gambling Venues in the District, excluding Waitara, is ~~300~~ 269.
- 2.2 A sinking lid policy will apply in Waitara, until the total number of gaming machines that may be operated in Class 4 Gambling Venues in Waitara is reduced to 25. Once there are no more than 25 gaming machines permitted to operate in Waitara, the maximum number that may be operated in Waitara will be capped at 25.

- 2.3 For the avoidance of doubt both the cap and sinking lid referred to in clauses 2.1 and 2.2 are calculated by adding both operative and sleeping machine numbers.

New venues

- 2.4 The maximum number of gaming machines that will be permitted at new venues is 9, provided the maximum number permitted in the District is not exceeded.

Existing venues

- 2.5 The maximum number of gaming machines permitted at existing venues are as follows:

- a) For venues that held a gaming machine licence on 17 October 2001, which have not been without a licence for six months or more since that date: 18 machines or the number of machines lawfully operated on that date, whichever is the lesser;
- b) For all other existing venues: 9 machines or the number of gaming machines approved previously by the Minister under section 96 of the Act.

Merged clubs

- 2.6 The maximum number of gaming machines that will be permitted in a merged club venue is the lesser of: 18 machines or the sum of the number of gaming machines specified in each of the clubs' class 4 venue licences at the time of the merge.

Relocated clubs

- 2.7 The maximum number of gaming machines that will be permitted to operate in a relocated club at the time when the new class 4 venue licence takes effect for the new venue is the same as the maximum number of gaming machines permitted to operate at the old venue immediately before the licence relating to the old venue is cancelled.

### 3.0 Location of Class 4 Gambling Venues<sup>1</sup>

- 3.1 New Class 4 Gambling Venues may be established in:

- a) the ~~New Plymouth CBD Area~~ City Centre Zone; Waitara Town Centre Area Zone, Fitzroy Town Centre Zone and Inglewood Town Centre Area Zone; or
- b) areas zoned as ~~Business Environment Areas (A, B, C or D)~~ Local Centre Zone in the Proposed New Plymouth District Plan, provided the venue is not:
  - (i) within 50 metres of any land that is zoned as ~~Residential (A, B or C) Environment Area or Rural Environment Area~~ Low Density Residential Zone, General Residential Zone, Medium Density Residential Zone, Rural Production Zone or Rural Lifestyle Zone in the Proposed New Plymouth District Plan; and/or
  - (ii) within 100 metres of a Sensitive Site.

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<sup>1</sup> ~~Note: The locational restrictions for this policy relate to the current operative District Plan (as at the date this policy is adopted), once the Proposed District Plan is adopted this policy will be reviewed with respect to the new zonings.~~ Note: the locational restrictions for this policy relate to the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023

- 3.2 For the purposes of clause 3.1, distances are measured along the shortest possible publicly accessible route from the site boundary of the venue to:
- (a) in the case of a ~~zone or area~~: the boundary of the ~~zone or area~~; and
  - (b) in the case of a sensitive site: to the site boundary of the sensitive site.
- 3.3 The Council will not grant consents for Class 4 Gambling Venues to establish in any locations other than those referred to in clause 3.1.
- 3.4 Clause 3.3 does not apply to:
- a) An existing Class 4 Gambling Venue, which is subject to an application to renew the venue's Class 4 Gambling Venue licence where there is no change in the venue's location and the renewal application has not been refused; or
  - b) An existing Class 4 Gambling Venue that holds a current Class 4 Gambling licence, which is subject to an application to merge with another club and is the proposed venue for two or more merged clubs to operate from; or
  - c) An existing Class 4 Gambling Venue, where the venue is unable to continue to be used as a Class 4 Gambling Venue due to a natural disaster or fire and an application for territorial consent is received in respect of the same site within 12 months of the previous venue's licence having lapsed or been cancelled.

#### 4.0 Relocation Policy

- 4.1 The Council may grant territorial consent for an existing venue to re-establish at a new venue (the replacement venue) where the replacement venue is intended to replace the existing venue if it is satisfied that:
- a) The existing venue has ceased to operate, is unable to continue to be used as a Class 4 Gambling venue, or the nature of the Class 4 Venue has changed;
  - b) The Class 4 Gambling Licence held for the current venue has been / will be surrendered;
  - c) The replacement venue will be operated by the same corporate society which operated the existing venue;
  - d) The replacement venue holds a current Class 4 Gambling venue licence and will operate the same number of machines (or less) as the existing venue, subject to any restrictions applicable under the Act;
  - e) The replacement venue is in the ~~New Plymouth CBD Area~~ City Centre Zone, or in the same ~~Town Centre Area or suburb~~ Town Centre Zone or Local Centre Zone as the existing venue;
  - f) The replacement venue is not located within 100m of a Sensitive Site; and
  - g) The replacement venue meets the other relevant requirements of this Policy and the Act and is consistent with the objectives of each.
- 4.2 For the avoidance of doubt, the merging of existing venue conditions and replacement venue conditions is not permitted.

## 5.0 Application for Territorial Consent

5.1 Territorial consent is required:

- a) For a new class 4 gambling venue;
- b) To increase the number of gaming machines at a class 4 gambling venue, including for a merged club venue; and
- c) To relocate a class 4 gambling venue.

5.2 An application for territorial consent must be made on the prescribed form and be accompanied with all information required by the Council, to enable it to properly consider the application. The application form can be found at the link at the bottom of this page.

5.3 The Council will assess, consider and determine the application in accordance with the requirements of this policy and the Act.

5.4 The Council may set a non-refundable application fee for the cost of processing any applications for territorial consent, in accordance with the Local Government Act 2002.

## Definitions

This policy has the following definitions:

**Act** means the Gambling Act 2003.

**City Centre Zone** means the area delineated in Map 1, Schedule 1 that is zoned as City Centre Zone in the Proposed New Plymouth District Plan.

**Class 4 Gambling** has the same meaning as set out in section 30 of the Act, which is:

“Gambling that satisfies the following criteria:

- (a) the net proceeds from the gambling are applied to, or distributed for, authorised purposes; and
- (b) either –
  - (i) no commission is paid to or received by a person for conducting the gambling; or
  - (ii) the only commission that is paid to or received by a person for conducting the gambling is a commission payment to a venue operator that complies with regulations made under section 371(1)(dd) of the Act; and
- (c) there are game rules for the gambling; and
- (d) the gambling, and the conduct of the gambling satisfies relevant game rules; and
- (e) either –
  - (i) the Secretary has categorised the gambling as class 4 gambling and not as another class of gambling; or

- (ii) the gambling utilises or involves a gaming machine.

**Class 4 Venue** has the same meaning as given in section 4 of the Act, which is:

“a place used to operate Class 4 Gambling”.

**Club** has the same meaning as given in section 4 of the Act, which is:

“a voluntary association of persons combined for a purpose other than personal gain”.

**Corporate Society** has the same meaning as given in section 4 of the Act, which is:

“A society that is:

- a) incorporated under the Incorporated Societies Act 1908; or
- b) incorporated as Board under the Charitable Trusts Act 1957; or
- c) a company incorporated under the Companies Act 1993 that;
  - (i) does not have the capacity or power to make a profit; and
  - (ii) is incorporated and conducted solely for authorised purposes; or
- d) a working men’s club registered under the Friendly Societies and Credit Unions Act 1982.”

**Council** means the New Plymouth District Council.

**District** means the New Plymouth District.

~~**Environment Area** has the same meaning as given in the New Plymouth District Plan, which is:~~

~~“An area having a different character from another area and an existing level of amenity. Each may be considered to be similar to a “zone” and includes those areas identified on the planning maps in the New Plymouth District Plan, which include Residential, Rural, Industrial, Business, and Open Space Environment Areas.”~~

~~**Fitzroy Town Centre Zone** means the area delineated in map 2, schedule 1 that is zoned as Town Centre Zone in the Proposed New Plymouth District Plan.~~

**Gaming Machine** has the same meaning as given in section 4 of the Act. It is commonly known as a “*Pokie Machine*”.

~~**Inglewood Town Centre Area** means the land within the area that is delineated by a red line on Map 1, Schedule 1 that is zoned as Business Environment Area (A, B, C or D) under the New Plymouth District Plan.~~

~~**Inglewood Town Centre Zone** means the area delineated in Map 3, Schedule 1 that is zoned Town Centre Zone under the Proposed New Plymouth District Plan.~~



**Local Centre Zone** means the area zoned as Local Centre Zone under the Proposed New Plymouth District Plan.

**Merged club venue** where two or more clubs, each with a significant history of operating as a club and holding a class 4 venue licence merge into a single club operating at a single class 4 venue pursuant to section 95 of the Act

~~**New Plymouth CBD Area** means the area delineated by a red line in Map 3 Schedule 1 and contained by:~~

- ~~— St Aubyn Street between Liardet Street to Queen Street,~~
- ~~— Queen Street;~~
- ~~— Devon Street West between Queen Street and Robe Street;~~
- ~~— Robe Street between Devon Street West and Powderham Street,~~
- ~~— Powderham Street and Courtney Street between Robe Street and Gover Street,~~
- ~~— Gover Street between Courtney Street and Molesworth Street, and~~
- ~~— Molesworth Street between Gover Street to Liardet Street.~~

~~**Proposed New Plymouth District Plan** means the operative district plan in effect for the New Plymouth District at the date this Policy is adopted~~ **means the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.**

**Sensitive site(s)** means:

- a) An early childhood centre, kindergarten, child care facility, a primary school and a secondary school (but excluding residential dwellings which are used for the provision of in-home early childcare services);
- b) A recreational facility or open space where facilities have been designed to attract the public, and in particular young people under the legal purchase age (e.g. play grounds, parks, skateboard parks and so on) (but excluding recreational facilities which are administered, managed or funded by privately owned entities for commercial gain);
- c) A community centre or hall where members of a community tend to gather for group activities, social support and related activities, public information, and other meetings and gatherings;
- d) Places of worship; and/or
- e) A hospital, addiction treatment facility, or Well Child / Tamariki Ora programme provider's centre

**Site boundary** means the boundary of the allotment or legally defined parcel of land upon which a venue or sensitive site is located.

**Society** has the same meaning as given in section 4 of the Act, which is:

“An association of persons established and conducted entirely for purposes other than commercial purposes”.

~~**Waitara Town Centre Area** means the land within the area delineated by a red line and shown on Map 2, Schedule 1 that is zoned Business Environment Area (A, B, C or D) under the New Plymouth District Plan.~~

**Waitara Town Centre Zone** means the area delineated in Map 4, Schedule 1 that is zoned Town Centre Zone under the Proposed New Plymouth District Plan.

**Zone** means a zone or environment area as defined in the New Plymouth District Plan, spatially identifies and manages an area with common environmental characteristics or where particular environmental outcomes are sought. The entire district is zoned and all land is identified as part of a 'zone' on the planning maps, with rules which manage activities in that particular zone.

### Review of Policy

This Policy shall be reviewed every three years, as required under the Act.

This Policy was adopted on 8 April 2004. Subsequent reviews of this Policy were adopted on 22 May 2007, 6 May 2010, 14 May 2013, 14 November 2017 and 22 December 2020.

### Additional Information

The Gambling Act 2003

## SCHEDULE 1

**Map 1 – Inglewood Town Centre Area**



Red line outlines Inglewood Town Centre Area and Business Environment Area A, B, C or D— where new class 4 gambling venues may be established

**Map 2— Waitara Town Centre Area**



Red line outlines Waitara Town Centre Area and Business Environment Area A, B, C or D where new class 4 gambling venues may be established

**Map 3— New Plymouth CBD Area**



Red line outlines New Plymouth CBD Area where new class 4 gambling venues may be established


**Map 1 City Centre Zone**



 Outlines the City Centre Zone where new Class 4 gambling venues may be established


**Map 2 Fitzroy Town Centre Zone**



 Outlines the Fitzroy Town Centre Zone where new Class 4 gambling venues may be established


**Map 3 Inglewood Town Centre Zone**



 Outlines the Inglewood Town Centre Zone where new Class 4 gambling venues may be established

**Map 4 Waitara Town Centre Zone**



 Outlines the Waitara Town Centre Zone where new Class 4 gambling venues may be established



## **P17-004 New Plymouth District TAB Venues Policy**

*Approved by the Council on 14 November 2017. Reviewed and amended 22 December 2020.*

The Council is required to adopt a TAB venues policy under the Racing Industry Act 2020. This policy supports the purpose and intent of the Racing Industry Act 2020 with regard to the regulation and management of TAB venues.

### **Policy Purpose**

To minimise the harm caused by gambling in the New Plymouth District and to control the location of new TAB venues.

### **Policy Statements**

#### **1.0 Establishment of venues**

- 1.1 The primary activity of the TAB Venue shall be for race and sports betting.
- 1.2 If a TAB Venue wishes to also host gaming machines a separate application must be made under Council's Class 4 Gambling Venues Policy, and the TAB Venue must also meet the additional criteria set out in that policy.

#### **2.0 Location of venues<sup>1</sup>**

- 2.1 New TAB Venues may be established in:
  - a) the ~~New Plymouth CBD Area~~ City Centre Zone; Waitara Town Centre Area Zone, Fitzroy Town Centre Zone and Inglewood Town Centre Area Zone; or
  - b) areas zoned as ~~Business Environment Areas (A, B, C or D)~~ Local Centre Zone in the Proposed New Plymouth District Plan, provided the venue is not:
    - i. within 50 metres of any land that is zoned as ~~Residential (A, B or C) Environment Area or Rural Environment Area~~ Low Density Residential Zone, General Residential Zone, Medium Density Residential Zone, Rural Production Zone or Rural Lifestyle Zone in the Proposed New Plymouth District Plan; and/or
    - ii. within 100 metres of a Sensitive Site.
- 2.2 For the purposes of clause 2.1, distances are measured along the shortest possible publicly accessible route from the site boundary of the venue to:
  - (a) in the case of a zone ~~or area~~: the boundary of the zone ~~or area~~; and
  - (b) in the case of a sensitive site: to the site boundary of the sensitive site.
- 2.3 The Council will not grant consent for new TAB Venues to establish in any locations other than those referred to in clause 2.1.

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<sup>1</sup> ~~Note: The locational restrictions for this policy relate to the current operative District Plan (as at the date this policy is adopted), once the Proposed District Plan is adopted this policy will be reviewed with respect to the new zonings.~~ Note: the locational restrictions for this policy relate to the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.

### 3.0 Application for Territorial Consent

- 3.1 Territorial consent is required when TAB New Zealand proposes to establish a TAB Venue in the New Plymouth District.
- 3.2 An application for territorial consent must be made on the prescribed form and be accompanied with all information required by the Council, to enable it to properly consider the application. The application form can be found at the link at the bottom of this page. The Council will assess the application and issue consent if the application meets the requirements of this policy and the Act.
- 3.3 The Council may set a non-refundable application fee for the cost of processing any applications for territorial consent, in accordance with the Local Government Act 2002.

### 4.0 Definitions

This policy has the following definitions:

**Act** means the Racing Industry Act 2020.

**City Centre Zone** means the area delineated in Map 1, Schedule 1 that is zoned as City Centre Zone in the Proposed New Plymouth District Plan.

**Council** means the New Plymouth District Council.

**District** means the New Plymouth District.

**Fitzroy Town Centre Zone** means the area delineated in Map 2, Schedule 1 that is zoned as Town Centre Zone in the Proposed New Plymouth District Plan.

**Environment Area** has the same meaning as given in the New Plymouth District Plan, which is:

“An area having a different character from another area and an existing level of amenity. Each may be considered to be similar to a “zone” and includes those areas identified on the planning maps in the New Plymouth District Plan, which include Residential, Rural, Industrial, Business, and Open Space Environment Areas.”

**~~Inglewood Town Centre Area~~** means the land within the area that is delineated by a red line on Map 1, Schedule 1 that is zoned as Business Environment Area (A, B, C or D) under the New Plymouth District Plan.

**Inglewood Town Centre Zone** means the land within the area delineated in Map 3, Schedule 1 that is zoned as Town Centre Zone under the Proposed New Plymouth District Plan.

**~~New Plymouth CBD Area~~** means the area delineated by a red line in Map 3 Schedule 1 and contained by:

- ~~— St Aubyn Street between Liardet Street to Queen Street,~~
- ~~— Queen Street;~~
- ~~— Devon Street West between Queen Street and Robe Street;~~
- ~~— Robe Street between Devon Street West and Powderham Street,~~
- ~~— Powderham Street and Courtney Street between Robe Street and Gover Street,~~
- ~~— Gover Street between Courtney Street and Molesworth Street, and~~
- ~~— Molesworth Street between Gover Street to Liardet Street.~~

**Proposed New Plymouth District Plan** ~~means the operative district plan in effect for the New Plymouth District at the date this Policy is adopted.~~ means the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.

**TAB New Zealand or TAB NZ** means the body established by section 54 of the Act to conduct racing betting, sports betting, or other racing or sports betting under the Act.

**TAB Venue** has the same meaning given in the Act, which is:

“premises owned or leased by TAB NZ and where the main business carried on at the premises is providing racing betting, sports betting, or other racing or sports betting services under this Act”

**Council** means the New Plymouth District Council.

**District** means the New Plymouth District.

**Sensitive site(s)** means:

- a) An early childhood centre, kindergarten, child care facility, a primary school and a secondary school (but excluding residential dwellings which are used for the provision of in-home early childcare services);
- b) A recreational facility or open space where facilities have been designed to attract the public, and in particular young people under the legal purchase age (e.g. play grounds, parks, skateboard parks and so on) (but excluding recreational facilities which are administered, managed or funded by privately owned entities for commercial gain);
- c) A community centre or hall where members of a community tend to gather for group activities, social support and related activities, public information, and other meetings and gatherings;
- d) Places of worship; and/or
- e) A hospital, addiction treatment facility, or Well Child / Tamariki Ora programme provider's centre

**Site boundary** means the boundary of the allotment or legally defined parcel of land upon which a venue or sensitive site is located.

~~**Waitara Town Centre Area** means the land within the area delineated by a red line and shown on Map 2, Schedule 1 that is zoned Business Environment Area (A, B, C or D) under the New Plymouth District Plan.~~

**Waitara Town Centre Zone** means the area delineated in Map 4, Schedule 1 that is zoned Town Centre Zone under the Proposed New Plymouth District Plan.

**Zone** means a zone or Environment Area as defined in the operative New Plymouth District Plan. spatially identifies and manages an area with common environmental characteristics or where particular environmental outcomes are sought. The entire district is zoned and all land is identified as part of a 'zone' on the planning maps, with rules which manage activities in that particular zone.

**SCHEDULE 1**

**Map 1—Inglewood Town Centre Area**



Red line outlines Inglewood Town Centre Area and Business Environment Area A, B, C or D—where new TAB venues may be established

**Map 2 – Waitara Town Centre Area**



Red line outlines Waitara Town Centre Area and Business Environment Area A, B, C or D where new TAB venues may be established

**Map 3—New Plymouth CBD Area**



Red line outlines New Plymouth CBD Area where new TAB venues may be established


**Map 1 City Centre Zone**



Outlines the City Centre Zone where new TAB venues may be established

**Map 2 Fitzroy Town Centre Zone**




 Outlines the Fitzroy Town Centre Zone where new TAB venues may be established




**Map 3 Inglewood Town Centre Zone**



 Outlines the Inglewood Town Centre Zone where new TAB venues may be established

**Map 4 Waitara Town Centre Zone**



 Outlines the Waitara Town Centre Zone where new TAB venues may be established



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# New Plymouth District Social Impact Assessment 2023

## Class 4 Gambling and TAB Gambling

### **1. Introduction**

Gambling in New Zealand is regulated through the Gambling Act 2003 and the Racing Industry Act 2020.

The legislation is primarily enforced by the Department of Internal Affairs, however, Territorial Authorities have a regulatory role in relation to gambling at:

- Class 4 venues – venues with non-casino electronic gaming machines (EGMs)
- Racing Industry Transition Agency TAB venues

The Gambling Act 2003 and the Racing Industry Act 2020 require every territorial authority to adopt a class 4 venues policy and a TAB venues policy. These policies must be reviewed every three years using the special consultative procedure as outlined in Section 83 of the Local Government Act 2002. The New Plymouth District Council Class 4 Gambling Venues Policy and TAB Venues Policy are now due for review.

Additionally, when adopting these policies, a territorial authority must have regard to the social impact of gambling within the territorial authority district. There is no guidance as to how this requirement is to be met, therefore, New Plymouth District Council has developed this Social Impact Assessment to provide an overview of gambling in New Zealand and the New Plymouth District, particularly focusing on class 4 gambling.

## **2. Class 4 gambling and TAB gambling**

### *Class 4 gambling*

Class 4 gambling involves gaming machines in pubs, clubs and hotels (that is, non-casino gaming machines). Class 4 gambling is classed as high risk, high turnover gambling. It may only be conducted by a corporate society, who pay venues a fee to host their machines. Money raised from class 4 gambling must be used for authorised purposes (community and non-commercial).

Territorial authorities must adopt a Class 4 Gambling Venue policy, through this policy, the Council is able to regulate whether or not class 4 venues may be established in the district, and if so, where they may be located, as well as the number of class 4 gaming machines that may be operated at a venue and whether a venue is able to relocate within the district.

The Gambling Act limits the number of gaming machines permitted at a venue. Venues that held a class 4 venue licence on 17 October 2001 are permitted to operate up to 18 EGMs, however, venues with a class 4 venue licence issued after 17 October 2001, but before the commencement of the Gambling Act 2003 are able to operate up to nine machines, as long as the Council venue policy allows this.

The Department of Internal Affairs is the regulator of class 4 gambling and are responsible for

- Licencing operators and venues
- Ensuring licenced operators maximise the return to the community
- Encouraging best practice
- Deterring fraudulent activity in the gambling sector
- Minimising harm caused by gambling.

### *TAB Venue*

TAB Venues are owned and operated by the Racing Industry Transition Agency. TAB Venues provide betting services for racing and other sporting events. The Agency uses the proceeds from gambling to support its business operations and the remaining proceeds are distributed to sporting organisations. TAB venues can also get a licence to operate class 4 gambling machines.

Under the Racing Industry Act every council must adopt a TAB venue policy in relation to race and sports betting services in their district. These were previously referred to as Board policies or TAB policies.

The Racing Industry Act specifies that a council's TAB venue policy covers whether or not new TAB venues may be established in the area, and if so, where.

In developing their TAB venue policy, councils must also have regard to the social impact of gambling within their district.

### 3. Gambling in New Zealand

#### *Participation*

Gambling is a relatively common and normalised activity in New Zealand, and there are a wide range of gambling activities available. Research from Te Hīringa Hauora (the Health Promotion Agency) shows that in 2020 69 per cent of New Zealanders had participated in at least one gambling activity in the past 12 months<sup>1</sup>. The table below shows participation in various modes of gambling between 2006 and 2020, the data indicates that participation in lotto products is the most common form of gambling in New Zealand.

Table: Percentage of the population that participated in gambling activity

	2006	2008	2010	2012	2014	2016	2018	2020
Any gambling activity	82.7	77.4	81.3	69.7	70.2	70.2	67.2	69.3
Pokies at pub / club / casino	21.5	22.8	20.2	16.5	14.7	11.9	13.0	10.9
Any Lotto products	67.1	63.8	65.6	59.7	59.5	60.8	55.1	59.1
Online gambling – overseas websites	-	-	0.2	1.4	3.5	3.2	2.2	2.6
Any horse / dog races / sports events (NZ)	17.7	13.8	17.3	15.7	14.4	12.2	11.3	10.9
Online gambling – any	-	-	-	-	-	-	13.2	26.7

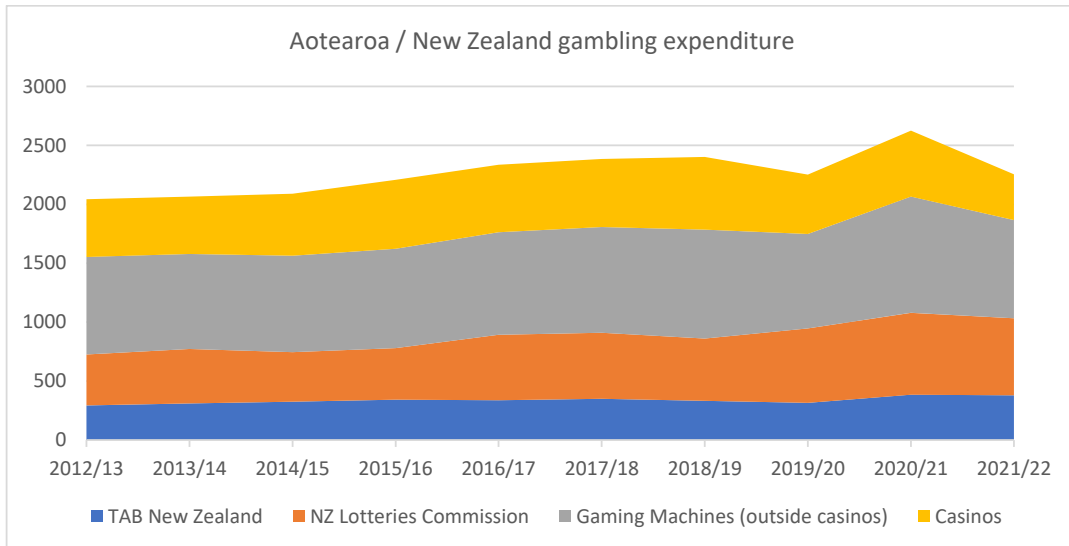
This data aligns with the 2015 National Gambling Study which breaks down these categories further – it was found that the most popular gambling activity in New Zealand was Lotto (56 per cent of participants had gambled on lotto in the past year), this was followed by raffles or lotteries (45 per cent), Instant Kiwi or other scratch tickets (30 per cent), and bets with friends or workmates (13 per cent). 3.7 per cent of participants had played club EGMs in the past year, and 8.2 percent had played pub EGMs. It also noted that 9.2 per cent of participants had participated in horse / dog race betting and 3.1 per cent had participated in sports betting.

#### *Expenditure*

Gambling expenditure in New Zealand has remained relatively stable since the introduction of the Gambling Act in 2003 – the below table outlines gambling expenditure over the last ten years in New Zealand for the four main types of gambling in New Zealand. The data shows that EGMs outside of casinos have the largest expenditure<sup>2</sup>.

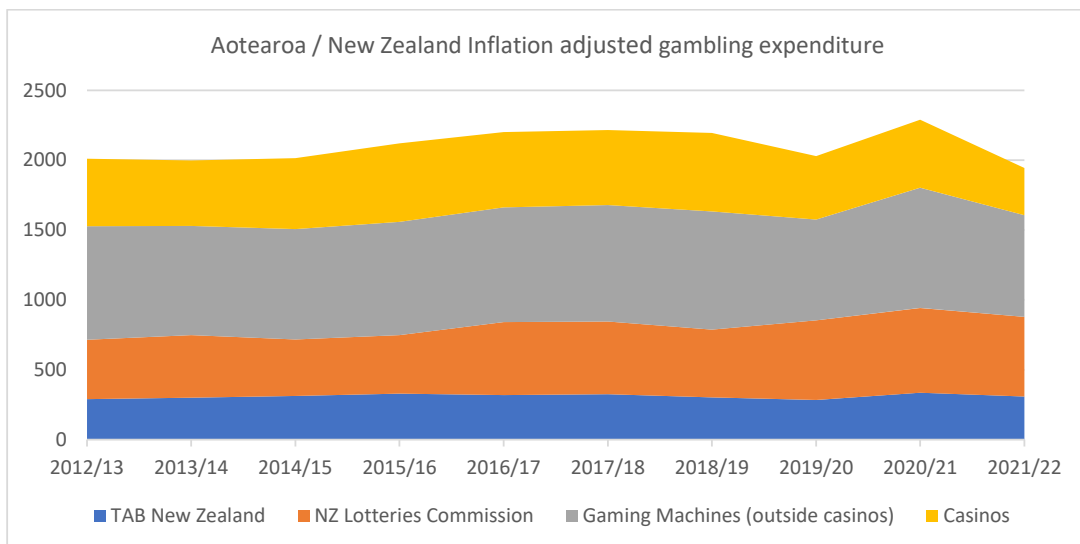
<sup>1</sup> [Kupe - Data Explorer \(hpa.org.nz\)](https://kupe.org.nz/data-explorer)

<sup>2</sup> [Annual Gambling Expenditure Statistics - Gambling Expenditure Statistics Report - data.govt.nz - discover and use data](https://data.govt.nz/discover-and-use-data)



Note: figures are rounded to the nearest million and are GST inclusive

The next graph outlines inflation adjusted gambling expenditure in Aotearoa/New Zealand. Again, this remains relatively stable over time. There is a dip in expenditure in 2019/2020, which would align with the Covid-19 lockdown, where access to some types of gambling would have been limited (e.g. EGMs, casino). However, this is followed by a peak in expenditure in 2020/2021 when there were also ongoing lockdowns in Aotearoa/New Zealand.



Note: figures are rounded to the nearest million and are GST inclusive

*People assisted for problem gambling in Aotearoa/New Zealand*

The total number of clients assisted in Aotearoa/New Zealand across all modes of gambling for the 2021/22 year was 9,683<sup>3</sup>. Of these, 4,652 clients had Non-Casino Gaming Machines as their primary gambling mode and 980 had primary gambling mode of TAB New Zealand. These figures include family members / affected others assisted, as well as problem gamblers.

For the primary gambling mode of non-Casino Gaming Machines 368 family or affected others were assisted, this figure was 93 for TAB New Zealand.

Below is a graph outlining the total number of clients and family members / affected others who were helped for problem gambling in 2021/22. Non-casino gaming machines was, by far, the gambling type with the largest number of people presenting for problem gambling in Aotearoa/New Zealand.



<sup>3</sup> [intervention-client-datatable-11-updated-010223.xlsx \(live.com\)](#)



The below table shows that the number of people presenting for assistance for problem gambling has decreased across the last ten years.

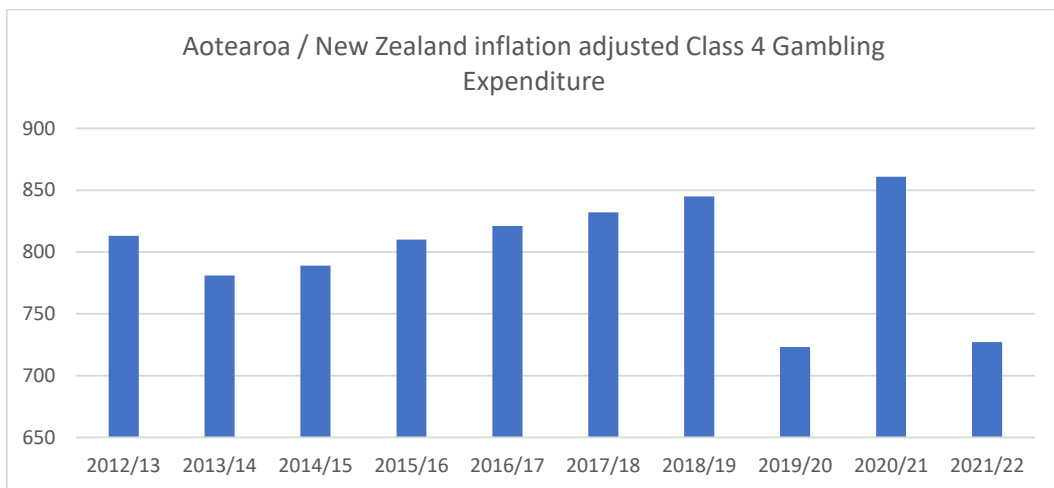
	2011/12		2021/22	
	Total clients assisted	Family / affected other assisted	Total clients assisted	Family / affected other assisted
Non Casino Gaming Machines	6,636	919	4,652	368
Casino EGM	942	139	778	79
Casino Table <sup>7</sup>	744	123	595	66
Lotteries Commission Products	1,384	72	1,207	230
TAB New Zealand (TAB NZ)	1,030	142	980	93
Cards	266	13	109	3
Housie	443	72	180	15
Other	402	82	1,182	140
NZ Other (subset of Other)			356	49
Overseas (subset of Other)			826	91
<b>Total*</b>	<b>11,847</b>	<b>1561</b>	<b>9,683</b>	<b>995</b>

#### 4. Class 4 Gambling in Aotearoa / New Zealand

The number of class 4 gambling venues and machines has been gradually declining since 2003. The main reason for the decline is related to territorial authority policies regarding numbers of venues and gaming machines<sup>4</sup>.

As at March 2023 there were 1,023 class 4 gambling venues in Aotearoa/New Zealand with 14,464 EGMs – these figures have decreased from December 2015 when the number of venues was 1,238 with 16,393 EGMs.

The graph below shows inflation adjusted class 4 gambling expenditure over the last 12 years. With the exception of the last three years, where expenditure was disrupted due to Covid 19 lockdowns, inflation adjusted expenditure has been gradually increasing since 2013/14<sup>5</sup>.



For the year ending December 2021 \$858m was spent on class 4 gaming machines in Aotearoa/New Zealand, from this, \$269.28m was returned to the community through pokie grants. These grants benefitted a wide range of sporting, community, health, arts and culture, educational, environmental, and other organisations.

<sup>4</sup> [NEW ZEALAND NATIONAL GAMBLING STUDY: WAVE 4 \(2015\) \(health.govt.nz\)](https://www.health.govt.nz/our-work/health-research/new-zealand-national-gambling-study-wave-4-2015)

<sup>5</sup> [gmp-quarterly-dashboard-december-2022.xlsx \(live.com\)](https://www.gmp.govt.nz/quarterly-dashboards/gmp-quarterly-dashboard-december-2022.xlsx)

## 5. Gambling related harm

Harm is defined in the Gambling Act 2003 as harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and, includes personal, social or economic harm suffered – by the person, or the person's partner (spouse, civil union partner, de facto partner), their family, whanau or wider community or in the workplace, or by society at large.

Gambling harm is a result of excessive time and / or money spent on gambling and the impacts that this has on important aspects of one's life. Harm from gambling is most commonly from occasional gambling to excess, but may also be the result of problem gambling. Therefore, a large amount of harm is distributed widely in the population.<sup>6</sup>

Problematic gambling creates shame, stigma, damage to self-esteem and increased stress. These feelings can then negatively impact other domains of one's life – employment, relationships, education. In addition, problematic gambling has been linked to a decline in physical health and coexisting issues such as mental health conditions, substance and alcohol use disorders<sup>7</sup>.

It is estimated that one in five people in Aotearoa/New Zealand will experience harm from either their own or someone else's gambling<sup>8</sup>. In addition, gambling disproportionately affects particular population groups - Māori, Pacific peoples, some Asian communities, young people / rangatahi, and people on lower incomes. Per capita density of EGMs and living in close proximity to gambling venues is also associated with higher incidence of problem gambling<sup>9</sup>. In the 2015 National Gambling Study 0.2 per cent of participants were problem gamblers, 1.8 per cent were moderate-risk gamblers and 4.6 per cent were low risk gamblers<sup>10</sup>.

The National Gambling Study also found that many of the high-risk population groups live in high deprivation neighbourhoods – which typically have high concentrations of gambling venues and outlets, this further contributes to the recurrent pattern of harm experienced by Māori and Pacific people<sup>11</sup>.

This rings true in New Plymouth District where 14 of the 21 venues (about 67 per cent) are located in the most deprived communities (medium high – high deprivation areas), see graph below. A consequence of this distribution of gaming machines in high deprivation areas is a regressive tax – this is when the collection of revenue comes from a higher portion of people who have lower incomes / experience higher deprivation than those who do not, with the profits being redistributed toward groups living in less deprived areas.

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<sup>6</sup> [final-legacy-harms-report-180821.pdf \(health.govt.nz\)](#)

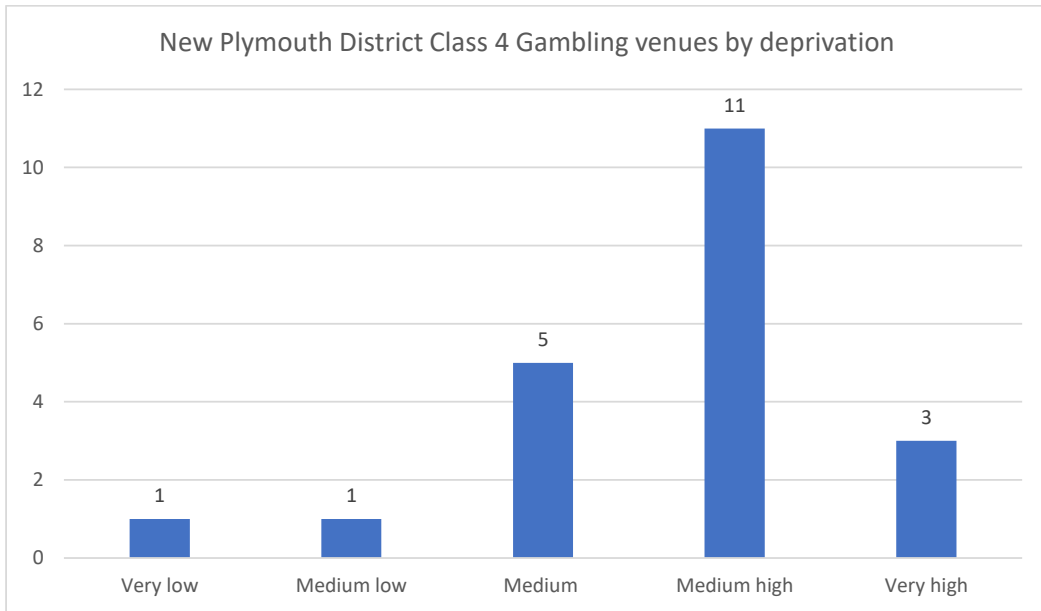
<sup>7</sup> [final-legacy-harms-report-180821.pdf \(health.govt.nz\)](#)

<sup>8</sup> [Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 \(health.govt.nz\)](#)

<sup>9</sup> [Full article: The geographic distribution of gaming machine proceeds in New Zealand \(tandfonline.com\)](#)

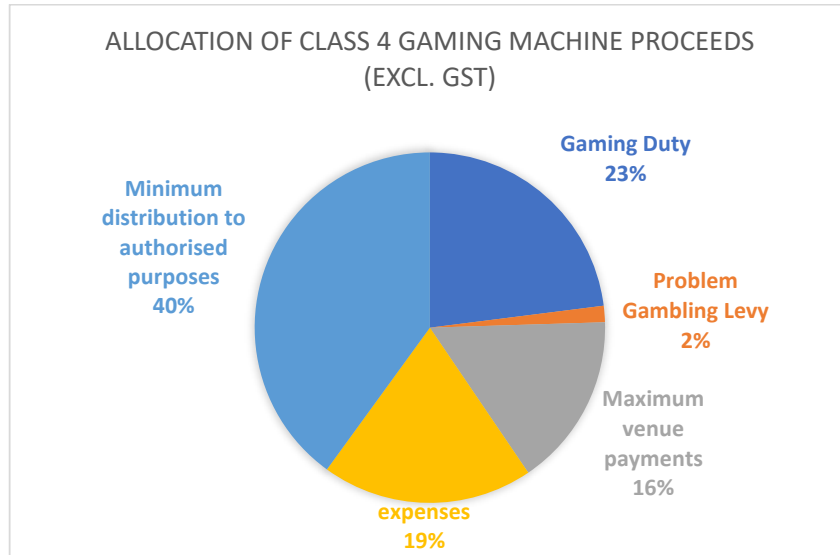
<sup>10</sup> [NEW ZEALAND NATIONAL GAMBLING STUDY: WAVE 4 \(2015\) \(health.govt.nz\)](#)

<sup>11</sup> [final-legacy-harms-report-180821.pdf \(health.govt.nz\)](#)



## 6. Benefits from Class 4 gambling / TAB venues

The below figure shows how class 4 gaming machine proceeds must be distributed:



Forty per cent of class 4 gambling proceeds must be distributed to authorised purposes. Authorised purposes are charitable purposes, non-commercial purposes that have community benefits and promoting, controlling and conducting race meetings.

Nationally, money returned to authorised purposes through grants varies each year, but is more than \$200m annually. In 2021 in Aotearoa/New Zealand \$269.28 million was distributed to 9,052 organisations across 19,148 grants.

As well as the distribution of grants to community groups class 4 gambling and TAB venues provide some economic and social benefits to the community. Economically, there are employment opportunities, some earnings from tourism and some important substitutions from on-line gambling with overseas sites.

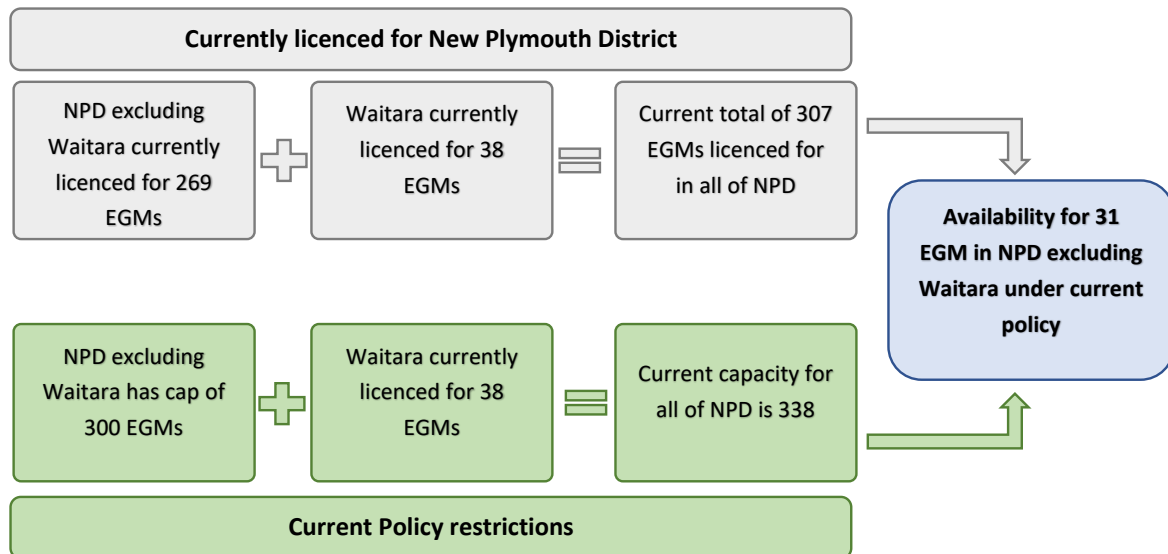
Socially, class 4 gambling and race and sports betting provide enjoyment (as long as it is not addictive and remains rational), and social and community cohesion in venues.

### 7. Gambling in New Plymouth District

There are currently 307 EGMs licenced for across 21 class 4 gambling venues in New Plymouth District – 297 of these EGMs are in operation and ten of the EGMs are ‘sleeping’. A sleeping machine is a machine that is licenced for, but not currently in operation.

Of the 307 licenced EGMs in New Plymouth District, there are 38 EGMs licenced for in the Waitara area – under the current policy there is a sinking lid policy for Waitara until the total number of gaming machines is reduced to 25. This policy was implemented due to the risk factors identified for the Waitara area – specifically the high percentage of population identifying as Māori (43 per cent), and the high deprivation index (9.5 across Waitara East and Waitara West). As mentioned above, Māori are more likely to be problem gamblers, as are those living in higher deprivation areas.

Summary of the number of EGMs across New Plymouth District:



Under the current policy, there is capacity for 31 additional / new EGMs to be picked up in New Plymouth District (excluding Waitara, where there is no capacity for new EGMs).

The table below outlines the distribution of gaming machines across different areas of the district, along with the area's deprivation score, Māori and Pacific population and gaming machine density of the area.

	% Maori Population	% Pacific Peoples	Social Deprivation index score	Population	# of EGMs licenced for	# of venues	EGM density* per 1000 ppl
New Plymouth District	17.8	2.2		80,679	307	21	3.7
Oakura	10.3	1.4	2	1,539	9	1	5.2
New Plymouth Central	15.9	0.5	8	1,110	106	6	94.6
Bell Block West	18.9	3.8	6	4,242	14	1	3.3
Waitara West	42.5	3.4	10	4,011	38	3	9.5
Tikorangi	18.3	0.9	4	1,902	9	1	3.2
Inglewood	14.4	2.3	6	3,543	14	1	4.0
Aotearoa/New Zealand	16.5	8.1		4,699,755	1,023	14,464	3.1

\*Calculated by: number of gaming machines operating / population X 1000.

Note: there are an additional 8 venues located across various suburbs in New Plymouth – Westown (2 venues), Moturoa (2 venues), Fitzroy (3 venues), Merrilands (1 venue).

In addition to the restrictions on EGMs within the district the New Plymouth District Class 4 Gambling Venues Policy and TAB Venues Policy have locational restrictions as to where new venues may operate. New venues may be established in the New Plymouth CBD, Town Centre Areas, Business Environment Areas, but must not be within 50 metres of land zoned Residential or Rural Environment Areas and must not be within 100m of a Sensitive Site (sites such as a kindergarten, schools, sports clubs, places of worship).

For the year ending December 2022 the gaming machine expenditure in New Plymouth District was \$18.7million (this figure was up from \$17.5million for the year ending December 2021), this equates to about \$51,000 being spent on EGMs each day in New Plymouth District.

Another interesting comparison is the average income of New Plymouth District versus the average income of an EGM in New Plymouth District – Census 2018 data shows that New Plymouth District had a median income of \$30,400 in 2018, while the average income of an EGM in New Plymouth District for 2022 was \$63,158.

Adult loss per head of population in New Plymouth District was calculated by dividing the annual expenditure on EGMs in New Plymouth by the adult population – this was calculated to be \$306.96 for the year ending 2022.

For the 2021 year \$4.9million was returned to New Plymouth District by way of grants, it is noted that this figure does not include national or regional grants which would also benefit the people of

New Plymouth District, some examples of national and regional grants include: to Basketball New Zealand, the Starship Foundation, Breast Cancer Foundation New Zealand, Taranaki Women’s Refuge Charitable Trust.

Sports was the largest receiver of grants in New Plymouth District, as outlined in the table below:

Category	Amount granted
Sport	\$3,901,334.50
Community	\$517,425.45
Arts and Culture	\$281,968.47
Health / Welfare / Rescue Services	\$136,794.22
Research and Education	\$130,629.25

These grants were distributed to New Plymouth District community from the following societies:

Society	Amount granted
New Zealand Community Trust	\$3,418,905
Aotearoa Gaming Trust	\$735,000
The Lion Foundation	\$354,280
Pelorus Trust	\$281,670
Kiwi Gaming Foundation	\$80,452
TAB New Zealand	\$51,102
Pub Charity	\$26,348
The Trusts Community Foundation	\$15,950
Grassroots Trusts Central	\$4,445

Grants received ranged in amount from \$340,000 (Kaitake Community Sports Hub) to \$345 (Taranaki Multiple Sclerosis Society)<sup>12</sup>. This range in grants demonstrates the varying scale and the breadth of community organisations which benefit from receiving these grants.

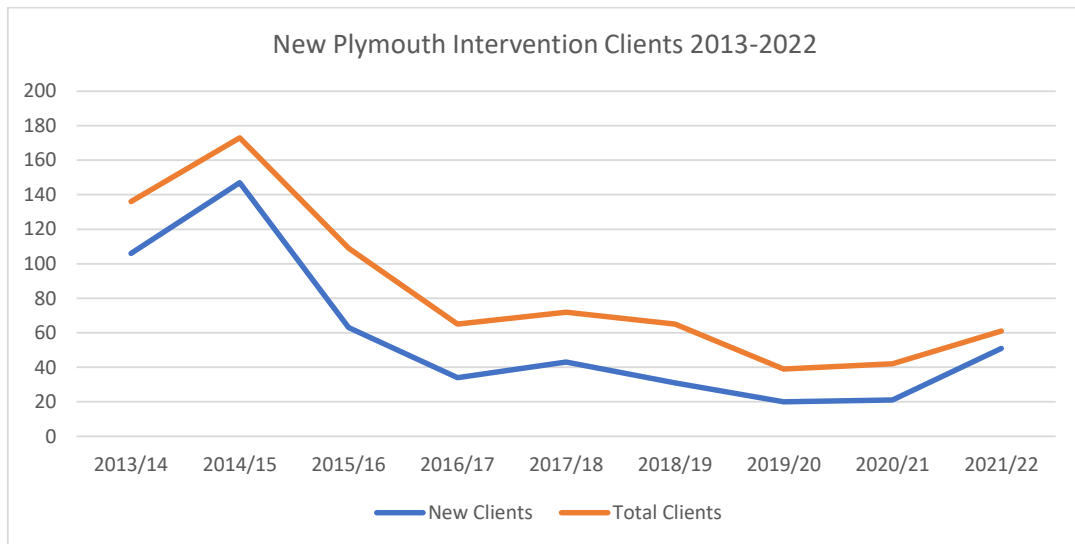
There is currently 1 TAB Venue in New Plymouth District, this venue also has 9 EGMs. There are an additional 8 venues which offer TAB services across the district.

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<sup>12</sup> [Granted - Digital tool](#)



From July 2021 to June 2022 61 clients were assisted for gambling in New Plymouth District, this was 0.63 per cent of all clients assisted across Aotearoa/New Zealand. Of the 61 clients assisted, 51 were new clients. The below graph shows that the number of intervention clients assisted in New Plymouth District has been decreasing, over time, but in the last year there has been a slight increase again. These figures represent those who have reached out for assistance, so it is likely the actual number of people experiencing gambling harm is greater than those seeking assistance.



Nationally, 0.2% of the adult population are estimated to be problem gamblers; applied to New Plymouth District's population, this is 122 people. This is slightly over double the number of people presenting for intervention services.

## **8. In summary**

Gambling is a popular activity within Aotearoa/New Zealand, with large proportions of the population participating in at least some form of gambling every year. Gambling can provide entertainment, employment and social opportunities for people and businesses. In addition, a wide range of community organisations benefit from the proceeds of gambling by way of grants. This provides much needed funding for these organisations which give back to the community of New Plymouth District.

Problem gambling significantly affects individuals and the wider community, it consumes valuable resources such as time and money, however, at the same time community organisations are dependent on the grants they receive from trusts for developing and operating social, sporting, health and cultural services.

Although the number of class 4 gambling venues and EGMs has been steadily decreasing since 2003, the expenditure on this activity (when adjusted for inflation) has been increasing. In New Plymouth District \$18 million was spent on EGMs in the year ending 2022.

The Social Impact Assessment demonstrates that New Plymouth District is relatively average in terms of where Class 4 Gambling Venues are located and other risk factors. However, the Waitara area has a large percentage of the population identifying as Māori, and a high deprivation score, this indicates that people in this area may be more likely to experience or be subject to harm from problem gambling.

Looking at this information and the current Class 4 Gambling Venues Policy and TAB Venues Policy it is considered that the policies offer some good protective measures in preventing new venues from opening too close to residential zones and sensitive sites, in addition the gaming machine caps and sinking lid for Waitara mean that the number of gaming machines is restricted. At present there is capacity under the current Class 4 Gambling Venues Policy for new venues to operate additional machines in the district, so it is recommended that the Council consider reducing the New Plymouth District (excluding Waitara) cap for two reasons – there does not appear to be an appetite for new machines / venues, and to control the number of gaming machines permitted in the district.

14 August 2023

Corporate Planning and Policy Team  
New Plymouth District Council

Tēnā koe

### **Policy Guidance – Class 4 Gambling Venues and TAB Venues Policy**

The National Public Health Service – Taranaki is pleased to provide the following policy guidance for consideration.

It is estimated that one in five people in Aotearoa/New Zealand will experience harm from either their own or someone else's gambling.<sup>1</sup> Research indicates that approximately 5% of the population gambles at a level where they will experience some amount of harm; this figure has remained relatively steady since 2012.<sup>2</sup>

There is an unfair and unjust distribution of gambling harm, where people on lower incomes or living in areas of high deprivation are more likely to experience harm from gambling. Gambling harm is also experienced inequitably, affecting Māori, Pacific peoples, and Asian peoples as well as young people/rangatahi more often than other groups. Problem gambling behaviour is also associated with living near gambling venues. Reducing the normalisation of gambling behaviour has also been identified as a way to minimise harm.<sup>3</sup>

Research commissioned by the Ministry of Health<sup>4</sup> showed that the three main Class 4 Gambling policy interventions used by Territorial Authorities, absolute cap, per capita cap, and sinking lid are all likely to reduce the number of Electronic Gaming Machines (EGM) in an area. One of the report's key findings was that, where Territorial Authorities have policies in place, reduction in access to EGM's is associated with a reduction in gambling expenditure on EGM's.<sup>5</sup>

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<sup>1</sup> Ministry of Health. (2022). Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25. Wellington: Ministry of Health.

<sup>2</sup> Ministry of Health (2019). Progress on Gambling Harm Reduction 2010 to 2017. Wellington, New Zealand.

<sup>3</sup> Ministry of Health. (2022). Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25. Wellington: Ministry of Health.

<sup>4</sup> New Zealand Work Research Institute & Sense Partners (2020). Capping Gambling in NZ: The effectiveness of Local Government Policy Intervention. [CAPPING-GAMBLING-IN-NZ1.pdf \(aut.ac.nz\)](#)

<sup>5</sup> New Zealand Work Research Institute & Sense Partners (2020). Capping Gambling in NZ: The effectiveness of Local Government Policy Intervention. [CAPPING-GAMBLING-IN-NZ1.pdf \(aut.ac.nz\)](#)

## Te Whatu Ora Health New Zealand

Class 4 Gambling Venues and TAB Venues Policy reviews are an opportunity to reduce the unfair and unjust differences associated with gambling harm. This should include considering those factors that contribute to the inequities associated with gambling related harm, such as social deprivation and the demographic characteristics of the community, when developing and implementing gambling policy.

Gambling policy objectives should emphasise harm reduction/minimisation. Reducing access to gambling opportunities and reducing the normalisation of gambling behaviour can help minimise gambling related harm. Ways to do this include not allowing the establishment of new gambling venues, reducing the number of gambling venues and gaming machines within the community, and not allowing relocation of existing venues. If new venues or machines are allowed for, criteria to be considered when assessing any applications should have a harm minimisation focus and include social deprivation in the proposed location.

To further reduce the harm associated with gambling, and in particular the inequitable distribution of this harm the National Public Health Service – Taranaki suggests identifying opportunities to work in partnership with Te Punanga Ora (Iwi Māori Partnership Board), iwi, hapū and other agencies such as Tui Ora, when developing or implementing gambling policy and to further support other gambling harm reduction initiatives.

Gambling policy development should also include broad consultation and engagement with communities that will be affected by the policies.

Ngā mihi,



### Dr Neil de Wet

Medical Officer of Health  
National Public Health Service | Taranaki



### Sarah Butler

Public Health Advisor (Policy)  
National Public Health Service | Taranaki

[TeWhatuOra.govt.nz](https://www.TeWhatuOra.govt.nz)

Private Bag 2016, New Plymouth 4340  
Waea/phone: 06 753 6139

**Te Kāwanatanga o Aotearoa**  
New Zealand Government

New Plymouth District Council

Although we support the intent of the change we do not consider it enough of an impact change model of care that can be directed back to Councils.

Submitter details:

Tui Ora Oranga Hapori (Health Promotion) Team

Contact Details: Te Haupai Korewha  
[tehaupai.korewha@tuiora.co.nz](mailto:tehaupai.korewha@tuiora.co.nz)  
0275341599

Tui Ora: 36 Maratahu Street,  
Westown  
NEW PLYMOUTH

Response to the Adoption of the Statement of Proposal for Special Consultative Procedure on the Class 4 Gambling Venues and TAB Venues Policy and Social Impact Assessment.

*Ehara i te aurukōwhao, he takerehāia!*  
*Not a minor mishap, but a major catastrophe!*

*Ehara i te aurukōwhao – it is not a leak at the top-strake lashing*  
*He takerehāia! – but an open rent in the bottom of a canoe. Like a major leak in a boat, this whakatauki (proverb) speaks to the misfortune of something particularly being major rather than minor. It brings to light the significance of an event or situation in which one can not turn a blind eye to.*

On behalf of the Oranga Hapori Team we submit that while the proposed changes are a step towards reducing the cap of the gaming machines in the Waitara area, it does not go far enough to support bigger and better health outcomes for Maori and to increase protective factors against gambling harm in the community. As consequence, the proposal continues to support the disparity and negative outcomes for Maori in the district and continues to implement colonized tools that adversely affect Māori health and those most vulnerable.

The NPDC Sustainable Lifestyle Capital Vision is not being delivered by the ongoing availability of the large number of gaming venues and gaming machines available in our communities.

The NPDC Mission statement of 'Ensuring Taranaki is a place of opportunity where people want to live, learn, work, play and invest now and into the future, with a focus on kaitiakitanga', is not aligned with the availability and access to harmful activities such as gaming machines.

The use of 'kaitiakitanga' is dishonoured when the council does not take seriously the intent and value of the 'word'. The council has a duty of care to uphold the mana of the word kaitiakitanga, upholding tika and pono (holding true) to its use and implementation. Kaitiakitanga is a responsibility, and should be respected in that manner, to the people and communities of the New Plymouth district, including Waitara.

NPDC Goals outline the following:

*TRUSTED: Strengthen Te Tiriti partnerships with Hapū and Iwi to improve well-being.*

We question the value of this statement. We ask:

Have Iwi and hapu partnerships collaborated in deciding what best fits in their community, regarding excessive access to gaming venues and the negative health and cultural impact of gambling harm?

Could the council please explain the authentic Te Tiriti o Waitangi partnership with the Iwi and hapu within the Waitara community in this instance? And furthermore the New Plymouth district.

Have the council actively worked to provide a process that engages iwi and hapū when making decisions regarding their communities?

Electronic gaming machines are an introduced activity that directly strips from the most deprived communities, this does not support a Te Ao Māori worldview. To honour a Te Tiriti partnership and to strengthen Te Tiriti partnerships with Hapū and Iwi to improve well-being, means to adopt a system that supports and uplifts the culture, practices and traditions of Māori, of hapū and iwi of the district, in the first instance.

*TRUSTED: Strengthening leadership and striving for operational excellence.*

We ask that the councilors display excellent leadership by making a decision that is more aligned to supporting improved health outcomes for Maori by placing the sinking lid cap to 10 gaming machines in Waitara. We also ask the council to adopt a sinking lid policy for the district of New Plymouth with a cap of \_\_\_ gaming machines. Electronic gaming machines are the most addictive form of gambling and by design, are targeted to those most vulnerable, this is further outlined in the Social Impact Assessment and the Statement of Proposal showing that of the 21 venues in New Plymouth, 14 are distributed in communities that are most vulnerable. A sinking lid policy will demonstrate an ongoing commitment to the wellbeing of the community, especially those who are adversely affected by gaming machines. We urge the council to be brave and think of the wellbeing of people first and foremost, as a commitment to strengthening leadership and striving for operational excellence.

*PROSPERITY: Developing and supporting initiatives to achieve a diversified high performing economy.*

The proposal will do little if anything to support this goal. With the money spent by whanau engaging and more importantly addicted, to Class 4 gaming machines, the economy is not serviced.

*"Census 2018 data shows that New Plymouth District had a median income of \$30,400 in 2018, while the average income of an EGM in New Plymouth District for 2022 was \$63,158".* The expenditure from gaming machines, which came from Māori whānau and those most vulnerable, is soaked up and put back into the wider community. We ask:

What are the initiatives that have served in developing the Māori economy from gaming venues?

What are the high performance outcomes that serve the economic growth of the Waitara community?

It is displayed in the Social Impact Assessment that the proceeds from gaming machines is mostly distributed to authorized purposes, yet does not indicate whether those purposes best serve Māori communities and their demands, particularly for health and well-being. Furthermore, proceeds for the year 2021 displayed that sporting were the largest receivers of grants, with health welfare and rescue services being the second lowest receivers. It is unclear how initiatives are supported or developed to achieve a diversified high performing economy.

*THRIVING COMMUNITIES AND CULTURE: Connected and engaged communities.*

Those most vulnerable are directly affected by gambling activities. As stated in the Social Impact Statement 'problem gambling significantly affects individuals and the wider community, it consumes valuable resources such as time and money'. This directly affects individuals and therefore

communities and does not support positive connection or engagement of individuals, whānau and largely hapū and iwi. The weight of harm from gaming machines overwhelmingly impacts on a persons wellbeing (physical, emotional, spiritual and social) and does not support a community or culture to thrive.

The state of an individuals wellbeing is interdependent, this is clearly outlined in the determinants of health. Te Whare Tapa Whā directly speaks to an individuals state of wellbeing, from a Te Ao Māori perspective. The statistics of health for Maori in the New Plymouth and Waitara communities are a long way from good. NPDC have a responsibility to work to improve the disparities that exist through the impact of colonized tools and influences that deter from being connected, being well, and having economic stability for the needs and priorities for better lifestyle. To have a focus on kaitiakitanga, thriving communities and culture, prosperity and trust, as mentioned in your mission statement, means to be intentional with the actions and measures taken to achieve this.

The NPDC, have a duty of care to ensure that its decisions are in the best interest of the community and align to improved health and wellbeing outcomes for the community they serve, especially Māori. The council needs to show leadership and intentional action to the vision, values and mission they claim to uphold. NPDC we urge you take on the challenge, take seriously the 'duty of care' for Māori in the Waitara community and for Māori in New Plymouth communities.

*Ehara i te aurukōwhao, he takerehāia!  
Not a minor mishap, but a major catastrophe!*

Appendix 4: Statement of Proposal 2



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Have your say

# Proposed Class 4 Gambling Venues Policy and TAB Venues Policy





## Background

### **NPDC has reviewed its Class 4 Gambling Venues Policy and TAB Venues Policy and wants your feedback before finalising it.**

#### **Class 4 Gambling Venues Policy**

The Gambling Act 2003 requires the Council to adopt a Class 4 Gambling Venues Policy and that this policy be reviewed every three years.

Class 4 Gambling refers to gambling on gaming machines hosted in pubs, hotels and clubs.

The New Plymouth District Council Class 4 Gambling Venues Policy was last reviewed in December 2020, so is now due for review.

The Class 4 Gambling Venues Policy must state whether or not Class 4 venues can be established in the district, and if so where. In addition, the policy can restrict the maximum number of gaming machines that may be operated.

We must consider the social impact of gambling within the district when developing the policy.

#### **TAB Venues Policy**

The Racing Industry Act 2020 requires us to adopt a TAB Venues Policy. The policy must state whether or not new TAB venues can be established in the district and, if so, where.

When adopting the policy, we must consider the social impact of gambling within the district.



#### ***Where can I get more information?***

For more information visit the NPDC website: [npdc.govt.nz/HaveYourSay](https://npdc.govt.nz/HaveYourSay)

Or phone us on 06-759 6060.

The proposed Class 4 Gambling Venues Policy and TAB Venues Policy can be found at the back of this document.

A copy of this document is available for viewing at the Civic Centre, Liardet Street, New Plymouth or library and service centres at Bell Block, Inglewood and Waitara.

## Proposed changes to the policies

### Class 4 Gambling Venues Policy

The current policy has:

- A gaming machine cap of 300 for New Plymouth District (excluding Waitara).
- A sinking lid for Waitara until the number of gaming machines that may be operated in Class 4 gambling venues is reduced to 25.

NPDC would like to see what the community thinks of a new policy approach for the Class 4 Gambling Venues Policy. That is, to introduce a district-wide sinking lid for New Plymouth District. This would mean that NPDC would not grant consent for any new Class 4 gambling venues, or for any new Class 4 gaming machines in the district. Over time, this will lead to a decrease in the number of venues and gaming machines in our district.

### The options for amending the Class 4 Gambling Venues Policy in relation to gaming machine numbers/venues.

1

Introduce a district-wide sinking lid. NPDC will not grant consent for any new Class 4 gambling venues or Class 4 gaming machines.

This option would allow for no gaming machine growth.

2

Retain the current policy approach, with a cap on the number of gaming machines for New Plymouth District excluding Waitara, and a sinking lid policy for Waitara. Under this option Council could:

- a) Reduce the gaming machine cap from 300 to 269 (current number licenced). This option would allow for no gaming machine growth.
- b) Reduce the gaming machine cap from 300 to 285. This is between the current number of licenced gaming machines and the current cap. This option would allow for 16 additional gaming machines.
- c) Status quo – retain the current gaming machine cap of 300. This option would allow for 31 additional gaming machines.

**The Council's preferred option is Option 1 - introducing a district-wide sinking lid. This option does not allow for any growth in Class 4 gaming machines.**

This option is preferred as it is the most effective approach for reducing harm from Class 4 gambling over time.

### TAB Venues Policy

The current TAB Venues Policy is considered to be mostly fit for purpose. However, an update to the 'location of venues' clause is proposed. See next page for more details.



# Location restrictions

## Class 4 Gambling Venues Policy and TAB Venues Policy

The current Class 4 Gambling Venues Policy has location restrictions for new venues. These restrictions will not apply if a district-wide sinking lid policy is approved. They will apply if the district-wide sinking lid is rejected and the existing cap approach is retained. The location restrictions will apply for new TAB venues.

The New Plymouth District Plan has been updated since the Class 4 Gambling Venues and TAB Venues policies were last reviewed. It is proposed to update the location restrictions in both policies to align with the updated Proposed New Plymouth District Plan<sup>1</sup>.

The District Plan has introduced Mixed Use Zones. These zones provide for a compatible mixture of commercial services, recreational, residential and community activities. The general philosophy of both the Class 4 Gambling Venues and TAB Venues policies is to prohibit gambling venues in residential zones.

Therefore, the proposed approach for aligning both policies to the District Plan is to exclude the Mixed Use Zones from the location restrictions where new venues can establish.

In addition, the District Plan has included Fitzroy as a Town Centre Zone, so this map will be included in the policies and the options below will apply for this area too.

### The options for amending the location clauses for New Plymouth City Centre, Inglewood, Waitara and Fitzroy Town Centres.

1

Status quo.

Retain the location restrictions for venues (based on the 2005 District Plan) for New Plymouth CBD Area, Inglewood, Waitara and Fitzroy.

2

Update the location restrictions for venues to include the Town Centre Zones and the City Centre Zone plus the surrounding Mixed Use Zones.

*The map boundaries for the Town Centre Zones would be more closely aligned to the current policies' map boundaries. The map boundary for the New Plymouth City Centre would increase to a greater extent than Option 3.*

3

Update the location restrictions for venues to reflect the Town Centre Zones and the City Centre Zone.

*The Town Centre Zone would be reduced compared to the current map boundaries.*

*The map boundary for the New Plymouth City Centre would increase compared to the current map boundary.*

**The Council's preferred option is Option 3 - updating the location clauses in the Class 4 Gambling Venues Policy and TAB Venues Policy to align with the Town Centre Zones (Inglewood, Waitara and Fitzroy) and the City Centre Zone. The updated map boundaries would outline where new Class 4 venues and new TAB venues may establish.**

This option is preferred as it ensures venues can only be established within business zones and also aligns the policies' rules with the operational rules of the Proposed New Plymouth District Plan<sup>1</sup>. In addition, this proposal aims to reduce the potential for harm from gambling. A map of each location is provided on the following page.

<sup>1</sup> Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.



## Relocation clause

### Class 4 Gambling Venues Policy

If the sinking lid approach is approved for the Class 4 Gambling Venues Policy, it is proposed to update the relocation clause to prevent additional Class 4 gaming machines from entering Waitara. This is proposed as there are a range of risk factors which can increase the incidence of harm from problem gambling in this area.

The following restrictions are proposed for relocating Class 4 gambling venues.

- **Venues within Waitara** may relocate to within Waitara Town Centre or another Local Centre Zone, Town Centre Zone or the City Centre Zone.
- **Venues outside of Waitara** may relocate to Local Centre Zones, Town Centre Zones – excluding Waitara, or the City Centre Zone, i.e. venues outside of Waitara may not relocate to Waitara.

This approach is proposed to prevent additional gaming machines from entering the Waitara Town Centre Zone, an area identified as having a number of factors that can increase the risk of harm from gambling.

### The options for amending the relocation clause for the Class 4 Gambling Venues Policy.

1

Allow Class 4 gambling venues to relocate within the areas specified in the policy's location restrictions.

2

Do not allow for the relocation of Class 4 gambling venues.

**The Council's preferred option is Option 1 - allow Class 4 gambling venues to relocate within the areas specified in the policy's location restrictions: preventing additional Class 4 gambling venues from entering Waitara.**

This option is preferred as it prevents additional gaming machines from entering the Waitara Town Centre Zone, an area identified as having a number of factors that can increase the risk of harm from gambling.

### New Plymouth City Centre



### Legend

- Current Class 4 Gambling Venues
- ▬ Boundary in current policy
- Proposed District Plan City Centre Zone
- Proposed District Plan Mixed Use Zone
- Proposed District Plan Town Centre Zone

### Inglewood



### Fitzroy



### Waitara





## Have your say

The proposed Class 4 Gambling Venues Policy and TAB Venues Policy are now open for public consultation. This is your chance to tell us your views and preferences about these policies, so please take the time to have your say.

There are several ways you can have your say. You can submit the submission form on the next page or you can fill in your submission online.

To get your submission to us, either:

Do it online: [npdc.govt.nz/HaveYourSay](https://npdc.govt.nz/HaveYourSay)

Email it to: [submissions@npdc.govt.nz](mailto:submissions@npdc.govt.nz)

Post it to: NPDC Gambling Policies Submissions, Reply Paid DX, DX Box NX10026, New Plymouth 4342

Deliver it to: Civic Centre, Liardet Street, New Plymouth or to a library and service centre in Bell Block, Inglewood or Waitara

**Submissions close at 5pm, Friday 10 May 2024**

**Late submissions will not be accepted.**





# Class 4 Gambling Venues Policy and TAB Venues Policy

## Submission Form

Name: .....

Organisation: .....

Address:\* .....

Email:\* .....

Phone (Day):\* .....

\* we require either an address, email or phone to inform you about hearing times and decisions

Do you want to speak to the Council in support of your submission?  Yes  No

If one of the boxes is not ticked, we'll assume you don't want to be heard.

### CLASS 4 GAMBLING VENUES POLICY

#### Number of gaming machines

1. Which policy approach do you support for regulating Class 4 Gambling Venues and gaming machines in New Plymouth District? (please tick one)

- District-wide sinking lid - Council will not grant consent for any new Class 4 venues or machines
- Status quo - gaming machine cap and a sinking lid for Waitara

2. If New Plymouth District (excluding Waitara) does have a gaming machine cap, what do you think the cap should be? (please tick one)

- 269 - allows for no additional gaming machines
- 285 - allows for 16 additional gaming machines
- 300 (status quo) - allows for 31 additional gaming machines

3. Do you have any comments on how NPDC regulates the number of Class 4 gambling venues and gaming machines for New Plymouth District?

.....

.....

.....

.....

.....

All submissions (including your name, address and contact details) are provided to Council officers and elected members for the purpose of analysing feedback. Your personal information will also be used for the administration of the engagement and decision-making process. Submissions (with individuals names only) will be available online. If requested, submitter details may be released under the Local Government Official Information and Meetings Act 1987. If there are good reasons why your details and/or submission should be kept confidential please contact our Privacy Officer on 06-759 5688 or through enquiries@npdc.govt.nz

**Location of Class 4 gambling venues**

4. **Where do you think new Class 4 gambling venues should be restricted to in the New Plymouth City Centre, Inglewood, Waitara and Fitzroy?** *(please tick one)*

- Current policy boundaries - status quo
- Town Centre Zones, City Centre Zone and their surrounding Mixed Use Zones
- Town Centre Zones and City Centre Zone only

**Relocation of Class 4 gambling venues**

5. **If NPDC has a district-wide sinking lid policy, should Class 4 gambling venues be allowed to relocate?** *(please tick one)*

- Yes
- No

6. **Do you have any comments on the location restrictions of the Class 4 Gambling Venues Policy?**

.....  
.....  
.....

7. **Do you have any comments on the proposed Class 4 Gambling Venues Policy?**

.....  
.....  
.....

**TAB VENUES POLICY**

**Location of TAB venues**

8. **Where do you think new TAB venues should be restricted to in the New Plymouth City Centre, Inglewood, Waitara and Fitzroy?** *(please tick one)*

- Current policy boundaries - status quo
- Town Centre Zones, City Centre Zone and their surrounding Mixed Use Zones
- Town Centre Zones and City Centre Zone only

9. **Do you have any comments on the location restrictions of the TAB Venues Policy?**

.....  
.....  
.....

10. **Do you have any comments on the proposed TAB Venues Policy?**

.....  
.....  
.....

Thank you for your submission



## **P17-005 New Plymouth District Class 4 Gambling Venues Policy**

*Approved by the Council on 14 November 2017. Reviewed and amended 22 December 2020.*

The Council is required to adopt a class 4 gambling venues policy under the Gambling Act 2003. This policy supports the purpose and intent of the Gambling Act 2003 with regard to the regulation and management of class 4 gambling venue premises. Class 4 Gambling refers to gambling on gaming machines hosted in pubs, hotels and clubs.

### **Policy Purpose**

To minimise the harm caused by gambling in the New Plymouth District and to control the location of Class 4 gambling venues and the number of gaming machines.

### **Class 4 Gambling Venues Policy**

#### **1.0 Establishment of Class 4 Gambling Venues**

1.1 A sinking lid is applied by this policy. This means Council will not grant consent for any new Class 4 gambling venues in the District. Council will also not grant consent for any new Class 4 gaming machines in any existing Class 4 venue in the District.

~~1.2 Class 4 Gambling Venues may be established in the District provided that:~~

~~a) The primary activity of the venue is:~~

~~(i) for the sale of alcohol or, the sale of alcohol and food and the venue is subject to a valid on licence or club licence; or~~

~~(ii) for sporting or club activities and the venue is subject to a valid on licence or club licence and is not associated with family or children's activities; or~~

~~(iii) TAB venue as defined by the Racing Industry Act 2020;~~

~~and~~

~~b) The venue is permitted under the New Plymouth District's current operative District Plan and/or holds all necessary resource consents and/or is otherwise lawfully established.~~

~~1.3 For the avoidance of doubt, a Class 4 Gambling Venue is not permitted in the District if Class 4 Gambling is the primary activity carried out at the venue.~~

~~1.4 There is no cap on the number of Class 4 Gambling Venues that may operate in the District.~~

#### **~~2.0 Number of gaming machines~~**

~~2.1 The total number of gaming machines that may be operated in Class 4 Gambling Venues in the District, excluding Waitara, is 300-269.~~

~~2.2 A sinking lid policy will apply in Waitara, until the total number of gaming machines that may be operated in Class 4 Gambling Venues in Waitara is reduced to 25. Once~~

~~there are no more than 25 gaming machines permitted to operate in Waitara, the maximum number that may be operated in Waitara will be capped at 25.~~

~~2.3 For the avoidance of doubt both the cap and sinking lid referred to in clauses 2.1 and 2.2 are calculated by adding both operative and sleeping machine numbers.~~

~~New venues~~

~~2.4 The maximum number of gaming machines that will be permitted at new venues is 9, provided the maximum number permitted in the District is not exceeded.~~

~~Existing venues~~

~~2.5 The maximum number of gaming machines permitted at existing venues are as follows:~~

- ~~a) For venues that held a gaming machine licence on 17 October 2001, which have not been without a licence for six months or more since that date: 18 machines or the number of machines lawfully operated on that date, whichever is the lesser;~~
- ~~b) For all other existing venues: 9 machines or the number of gaming machines approved previously by the Minister under section 96 of the Act.~~

~~Merged clubs~~

~~2.6 The maximum number of gaming machines that will be permitted in a merged club venue is the lesser of: 18 machines or the sum of the number of gaming machines specified in each of the clubs' class 4 venue licences at the time of the merge.~~

~~Relocated clubs~~

~~2.7 The maximum number of gaming machines that will be permitted to operate in a relocated club at the time when the new class 4 venue licence takes effect for the new venue is the same as the maximum number of gaming machines permitted to operate at the old venue immediately before the licence relating to the old venue is cancelled.~~

**~~3.0 Location of Class 4 Gambling Venues<sup>1</sup>~~**

~~3.1 New Class 4 Gambling Venues may be established in:~~

- ~~a) the New Plymouth CBD Area; Waitara Town Centre and Inglewood Town Centre Area; or~~
- ~~b) areas zoned as Business Environment Areas (A, B, C or D) in the New Plymouth District Plan, provided the venue is not:
  - ~~(i) within 50 metres of any land that is zoned as Residential (A, B or C) Environment Area or Rural Environment Area in the New Plymouth District Plan; and/or~~
  - ~~(ii) within 100 metres of a Sensitive Site.~~~~

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<sup>1</sup>~~Note: The locational restrictions for this policy relate to the current operative District Plan (as at the date this policy is adopted), once the Proposed District Plan is adopted this policy will be reviewed with respect to the new zonings.~~

- ~~3.2 For the purposes of clause 3.1, distances are measured along the shortest possible publicly accessible route from the site boundary of the venue to:~~
- ~~(a) in the case of a zone or area: the boundary of the zone or area; and~~
  - ~~(b) in the case of a sensitive site: to the site boundary of the sensitive site.~~
- ~~3.3 The Council will not grant consents for Class 4 Gambling Venues to establish in any locations other than those referred to in clause 3.1.~~
- ~~3.4 Clause 3.3 does not apply to:~~
- ~~a) An existing Class 4 Gambling Venue, which is subject to an application to renew the venue's Class 4 Gambling Venue licence where there is no change in the venue's location and the renewal application has not been refused; or~~
  - ~~b) An existing Class 4 Gambling Venue that holds a current Class 4 Gambling licence, which is subject to an application to merge with another club and is the proposed venue for two or more merged clubs to operate from; or~~
  - ~~c) An existing Class 4 Gambling Venue, where the venue is unable to continue to be used as a Class 4 Gambling Venue due to a natural disaster or fire and an application for territorial consent is received in respect of the same site within 12 months of the previous venue's licence having lapsed or been cancelled.~~

#### **4.0 Relocation Policy**

- 4.1 The Council may grant territorial consent for an existing venue to re-establish at a new venue (the replacement venue) where the replacement venue is intended to replace the existing venue if it is satisfied that:
- a) The existing venue has ceased to operate, is unable to continue to be used as a Class 4 Gambling venue, or the nature of the Class 4 Venue has changed;
  - b) The Class 4 Gambling Licence held for the current venue has been / will be surrendered;
  - c) The replacement venue will be operated by the same corporate society which operated the existing venue;
  - d) The replacement venue holds a current Class 4 Gambling venue licence and will operate the same number of machines (or less) as the existing venue, subject to any restrictions applicable under the Act;
  - e) The replacement venue meets the other relevant requirements of this Policy and the Act and is consistent with the objectives of each;
- 4.2 For the avoidance of doubt, the merging of existing venue conditions and replacement venue conditions is not permitted.
- 4.3 The maximum number of gaming machines that will be permitted to operate in a relocated club at the time when the new Class 4 venue licence takes effect for the replacement venue is the same as the maximum number of gaming machines permitted to operate at the old venue immediately before the licence relating to the old venue is cancelled.

Location<sup>2</sup> of relocating Class 4 Gambling Venues

Class 4 Gambling venue within the Waitara Town Centre Zone

- 4.4 The Replacement venue for venues located in the Waitara Town Centre Zone may only be established in the Waitara Town Centre Zone, or locations referred to in clause 4.5a) and clause 4.5b) below.

Class 4 Gambling venue outside of Waitara Town Centre Zone

- 4.5 The replacement venue for venues located in the District, excluding Waitara Town Centre Zone, is may only be established in: ~~New Plymouth CBD Area, or in the same Town Centre Area or suburb as the existing venue;~~
- a) The City Centre Zone, Fitzroy Town Centre Zone or Inglewood Town Centre Zone;  
or
  - b) Areas zoned as Local Centre Zone in the Proposed New Plymouth District Plan, provided the replacement venue is not:
    - i. Within 50 metres of land that is zoned Low Density Residential Zone, General Residential Zone, Medium Density Residential Zone, Rural Production Zone or Rural Lifestyle Zone in the Proposed New Plymouth District Plan; and / or
    - ii. The replacement venue is not located Within 100m of a Sensitive Site
- 4.6 For the purposes of 4.5.b), distances are measured along the shortest possible publicly accessible route from the site boundary of the venue to:
- a) In the case of a zone: the boundary of the zone; and
  - b) In the case of a sensitive site: to the site boundary of the sensitive site.
- ~~4.7 The replacement venue meets the other relevant requirements of this Policy and the Act and is consistent with the objectives of each.~~
- ~~4.8 For the avoidance of doubt, the merging of existing venue conditions and replacement venue conditions is not permitted.~~

**5.0 Application for Territorial Consent**

5.1 Territorial consent is required:

- ~~a) For a new class 4 gambling venue;~~
- ~~b) To increase the number of gaming machines at a class 4 gambling venue, including for a merged club venue; and~~
- a) To relocate a class 4 gambling venue;
- b) For a merged club venue.

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<sup>2</sup> Note: the locational restrictions for this policy relate to the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.

- 5.2 An application for territorial consent must be made on the prescribed form and be accompanied with all information required by the Council, to enable it to properly consider the application. The application form can be found at the link at the bottom of this page.
- 5.3 The Council will assess, consider and determine the application in accordance with the requirements of this policy and the Act.
- 5.4 The Council may set a non-refundable application fee for the cost of processing any applications for territorial consent, in accordance with the Local Government Act 2002.

#### **6.0 Merger of clubs which hold Class 4 venue licences**

- 6.1 The Council may grant consent for the merger of two or more clubs which hold class 4 venue licences. The maximum number of gaming machines that will be permitted in a merged club venue is the lesser of: 18 machines or the sum of the number of gaming machines specified in each of the clubs' class 4 venue licences at the time of the merge.
- 6.2 The Council will only grant consent once proof has been provided that the original class 4 venue licences have been cancelled pursuant to section 95 of the Act.

#### **Definitions**

This policy has the following definitions:

**Act** means the Gambling Act 2003.

**City Centre Zone** means the area delineated in Map 1, Schedule 1 that is zoned as City Centre Zone in the Proposed New Plymouth District Plan.

**Class 4 Gambling** has the same meaning as set out in section 30 of the Act, which is:

“Gambling that satisfies the following criteria:

- (a) the net proceeds from the gambling are applied to, or distributed for, authorised purposes; and
- (b) either –
  - (i) no commission is paid to or received by a person for conducting the gambling; or
  - (ii) the only commission that is paid to or received by a person for conducting the gambling is a commission payment to a venue operator that complies with regulations made under section 371(1)(dd) of the Act; and
- (c) there are game rules for the gambling; and
- (d) the gambling, and the conduct of the gambling satisfies relevant game rules; and
- (e) either –

- (i) the Secretary has categorised the gambling as class 4 gambling and not as another class of gambling; or
- (ii) the gambling utilises or involves a gaming machine.

**Class 4 Venue** has the same meaning as given in section 4 of the Act, which is:

“a place used to operate Class 4 Gambling”.

**Club** has the same meaning as given in section 4 of the Act, which is:

“a voluntary association of persons combined for a purpose other than personal gain”.

**Corporate Society** has the same meaning as given in section 4 of the Act, which is:

“A society that is:

- a) incorporated under the Incorporated Societies Act 1908; or
- b) incorporated as Board under the Charitable Trusts Act 1957; or
- c) a company incorporated under the Companies Act 1993 that;
  - (i) does not have the capacity or power to make a profit; and
  - (ii) is incorporated and conducted solely for authorised purposes; or
- d) a working men’s club registered under the Friendly Societies and Credit Unions Act 1982.”

**Council** means the New Plymouth District Council.

**District** means the New Plymouth District.

~~**Environment Area** has the same meaning as given in the New Plymouth District Plan, which is:~~

~~“An area having a different character from another area and an existing level of amenity. Each may be considered to be similar to a “zone” and includes those areas identified on the planning maps in the New Plymouth District Plan, which include Residential, Rural, Industrial, Business, and Open Space Environment Areas.”~~

~~**Fitzroy Town Centre Zone** means the area delineated in map 2, schedule 1 that is zoned as Town Centre Zone in the Proposed New Plymouth District Plan.~~

**Gaming Machine** has the same meaning as given in section 4 of the Act. It is commonly known as a “*Pokie Machine*”.

~~**Inglewood Town Centre Area** means the land within the area that is delineated by a red line on Map 1, Schedule 1 that is zoned as Business Environment Area (A, B, C or D) under the New Plymouth District Plan.~~

**Inglewood Town Centre Zone** means the area delineated in Map 3, Schedule 1 that is zoned Town Centre Zone under the Proposed New Plymouth District Plan.

**Local Centre Zone** means the area zoned as Local Centre Zone under the Proposed New Plymouth District Plan.

**Merged club venue** where two or more clubs, each with a significant history of operating as a club and holding a class 4 venue licence merge into a single club operating at a single class 4 venue pursuant to section 95 of the Act

**~~New Plymouth CBD Area~~** means the area delineated by a red line in Map 3 Schedule 1 and contained by:

- ~~— St Aubyn Street between Liardet Street to Queen Street,~~
- ~~— Queen Street;~~
- ~~— Devon Street West between Queen Street and Robe Street;~~
- ~~— Robe Street between Devon Street West and Powderham Street,~~
- ~~— Powderham Street and Courtney Street between Robe Street and Gover Street,~~
- ~~— Gover Street between Courtney Street and Molesworth Street, and~~
- ~~— Molesworth Street between Gover Street to Liardet Street.~~

**~~Proposed New Plymouth District Plan~~** means the operative district plan in effect for the ~~New Plymouth District at the date this Policy is adopted~~ **means the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.**

**Sensitive site(s)** means:

- a) An early childhood centre, kindergarten, child care facility, a primary school and a secondary school (but excluding residential dwellings which are used for the provision of in-home early childcare services);
- b) A recreational facility or open space where facilities have been designed to attract the public, and in particular young people under the legal purchase age (e.g. play grounds, parks, skateboard parks and so on) (but excluding recreational facilities which are administered, managed or funded by privately owned entities for commercial gain);
- c) A community centre or hall where members of a community tend to gather for group activities, social support and related activities, public information, and other meetings and gatherings;
- d) Places of worship; and/or
- e) A hospital, addiction treatment facility, or Well Child / Tamariki Ora programme provider's centre

**Site boundary** means the boundary of the allotment or legally defined parcel of land upon which a venue or sensitive site is located.

**Society** has the same meaning as given in section 4 of the Act, which is:

“An association of persons established and conducted entirely for purposes other than commercial purposes”.

~~**Waitara Town Centre Area** means the land within the area delineated by a red line and shown on Map 2, Schedule 1 that is zoned Business Environment Area (A, B, C or D) under the New Plymouth District Plan.~~

**Waitara Town Centre Zone** means the area delineated in Map 4, Schedule 1 that is zoned Town Centre Zone under the Proposed New Plymouth District Plan.

~~**Zone** means a zone or environment area as defined in the New Plymouth District Plan, spatially identifies and manages an area with common environmental characteristics or where particular environmental outcomes are sought. The entire district is zoned and all land is identified as part of a 'zone' on the planning maps, with rules which manage activities in that particular zone.~~

### **Review of Policy**

This Policy shall be reviewed every three years, as required under the Act.

This Policy was adopted on 8 April 2004. Subsequent reviews of this Policy were adopted on 22 May 2007, 6 May 2010, 14 May 2013, 14 November 2017 and 22 December 2020.

### **Additional Information**

The Gambling Act 2003

## **SCHEDULE 1**

### **Map 1 — Inglewood Town Centre Area**





Red line outlines Inglewood Town Centre Area and Business Environment Area A, B, C or D— where new class 4 gambling venues may be established

**Map 2— Waitara Town Centre Area**



Red line outlines Waitara Town Centre Area and Business Environment Area A, B, C or D where new class 4 gambling venues may be established


**Map 3 — New Plymouth CBD Area**



Red line outlines New Plymouth CBD Area where new class 4 gambling venues may be established


**Map 1 City Centre Zone**



 Outlines the City Centre Zone where Class 4 gambling venues may relocate to


**Map 2 Fitzroy Town Centre Zone**



 Outlines the Fitzroy Town Centre Zone where Class 4 gambling venues may relocate to


**Map 3 Inglewood Town Centre Zone**



 Outlines the Inglewood Town Centre Zone where Class 4 gambling venues may relocate to

**Map 4 Waitara Town Centre Zone**



 Outlines the Waitara Town Centre Zone where Class 4 gambling venues may relocate to

## **P17-004 New Plymouth District TAB Venues Policy**

*Approved by the Council on 14 November 2017. Reviewed and amended 22 December 2020.*

The Council is required to adopt a TAB venues policy under the Racing Industry Act 2020. This policy supports the purpose and intent of the Racing Industry Act 2020 with regard to the regulation and management of TAB venues.

### **Policy Purpose**

To minimise the harm caused by gambling in the New Plymouth District and to control the location of new TAB venues.

### **Policy Statements**

#### **1.0 Establishment of venues**

- 1.1 The primary activity of the TAB Venue shall be for race and sports betting.
- 1.2 If a TAB Venue wishes to also host gaming machines a separate application must be made under Council's Class 4 Gambling Venues Policy, and the TAB Venue must also meet the additional criteria set out in that policy.

#### **2.0 Location of venues<sup>1</sup>**

- 2.1 New TAB Venues may be established in:
  - a) the ~~New Plymouth CBD Area~~ City Centre Zone; Waitara Town Centre Area Zone, Fitzroy Town Centre Zone and Inglewood Town Centre Area Zone; or
  - b) areas zoned as ~~Business Environment Areas (A, B, C or D)~~ Local Centre Zone in the Proposed New Plymouth District Plan, provided the venue is not:
    - i. within 50 metres of any land that is zoned as ~~Residential (A, B or C) Environment Area or Rural Environment Area~~ Low Density Residential Zone, General Residential Zone, Medium Density Residential Zone, Rural Production Zone or Rural Lifestyle Zone in the Proposed New Plymouth District Plan; and/or
    - ii. within 100 metres of a Sensitive Site.
- 2.2 For the purposes of clause 2.1, distances are measured along the shortest possible publicly accessible route from the site boundary of the venue to:
  - (a) in the case of a zone ~~or area~~: the boundary of the zone ~~or area~~; and
  - (b) in the case of a sensitive site: to the site boundary of the sensitive site.
- 2.3 The Council will not grant consent for new TAB Venues to establish in any locations other than those referred to in clause 2.1.

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<sup>1</sup> ~~Note: The locational restrictions for this policy relate to the current operative District Plan (as at the date this policy is adopted), once the Proposed District Plan is adopted this policy will be reviewed with respect to the new zonings.~~ Note: the locational restrictions for this policy relate to the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.



### 3.0 Application for Territorial Consent

- 3.1 Territorial consent is required when TAB New Zealand proposes to establish a TAB Venue in the New Plymouth District.
- 3.2 An application for territorial consent must be made on the prescribed form and be accompanied with all information required by the Council, to enable it to properly consider the application. The application form can be found at the link at the bottom of this page. The Council will assess the application and issue consent if the application meets the requirements of this policy and the Act.
- 3.3 The Council may set a non-refundable application fee for the cost of processing any applications for territorial consent, in accordance with the Local Government Act 2002.

### 4.0 Definitions

This policy has the following definitions:

**Act** means the Racing Industry Act 2020.

**City Centre Zone** means the area delineated in Map 1, Schedule 1 that is zoned as City Centre Zone in the Proposed New Plymouth District Plan.

**Council** means the New Plymouth District Council.

**District** means the New Plymouth District.

**Fitzroy Town Centre Zone** means the area delineated in Map 2, Schedule 1 that is zoned as Town Centre Zone in the Proposed New Plymouth District Plan.

**Environment Area** has the same meaning as given in the New Plymouth District Plan, which is:

“An area having a different character from another area and an existing level of amenity. Each may be considered to be similar to a “zone” and includes those areas identified on the planning maps in the New Plymouth District Plan, which include Residential, Rural, Industrial, Business, and Open Space Environment Areas.”

**~~Inglewood Town Centre Area~~** means the land within the area that is delineated by a red line on Map 1, Schedule 1 that is zoned as Business Environment Area (A, B, C or D) under the New Plymouth District Plan.

**Inglewood Town Centre Zone** means the land within the area delineated in Map 3, Schedule 1 that is zoned as Town Centre Zone under the Proposed New Plymouth District Plan.

**~~New Plymouth CBD Area~~** means the area delineated by a red line in Map 3 Schedule 1 and contained by:

- ~~— St Aubyn Street between Liardet Street to Queen Street,~~
- ~~— Queen Street;~~
- ~~— Devon Street West between Queen Street and Robe Street;~~
- ~~— Robe Street between Devon Street West and Powderham Street,~~
- ~~— Powderham Street and Courtney Street between Robe Street and Gover Street,~~
- ~~— Gover Street between Courtney Street and Molesworth Street, and~~
- ~~— Molesworth Street between Gover Street to Liardet Street.~~

**Proposed New Plymouth District Plan** ~~means the operative district plan in effect for the New Plymouth District at the date this Policy is adopted.~~ means the Proposed New Plymouth District Plan Appeals Version as released on 14 September 2023.

**TAB New Zealand or TAB NZ** means the body established by section 54 of the Act to conduct racing betting, sports betting, or other racing or sports betting under the Act.

**TAB Venue** has the same meaning given in the Act, which is:

“premises owned or leased by TAB NZ and where the main business carried on at the premises is providing racing betting, sports betting, or other racing or sports betting services under this Act”

**Council** means the New Plymouth District Council.

**District** means the New Plymouth District.

**Sensitive site(s)** means:

- a) An early childhood centre, kindergarten, child care facility, a primary school and a secondary school (but excluding residential dwellings which are used for the provision of in-home early childcare services);
- b) A recreational facility or open space where facilities have been designed to attract the public, and in particular young people under the legal purchase age (e.g. play grounds, parks, skateboard parks and so on) (but excluding recreational facilities which are administered, managed or funded by privately owned entities for commercial gain);
- c) A community centre or hall where members of a community tend to gather for group activities, social support and related activities, public information, and other meetings and gatherings;
- d) Places of worship; and/or
- e) A hospital, addiction treatment facility, or Well Child / Tamariki Ora programme provider's centre

**Site boundary** means the boundary of the allotment or legally defined parcel of land upon which a venue or sensitive site is located.

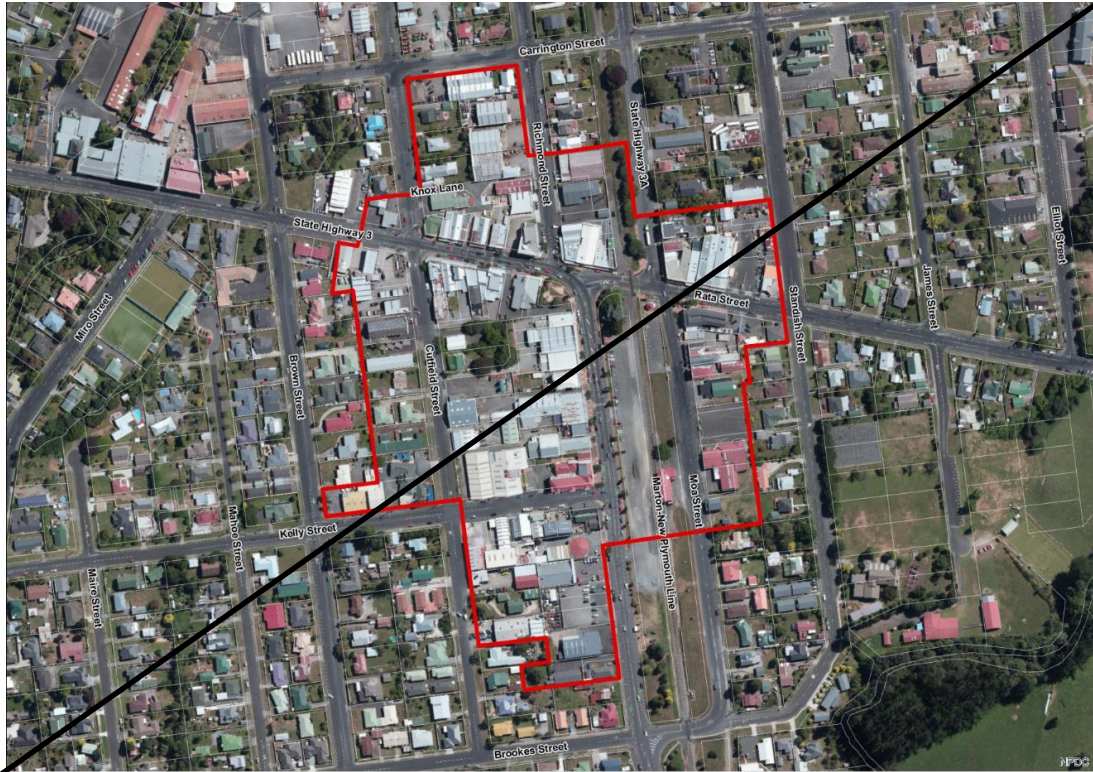
~~**Waitara Town Centre Area** means the land within the area delineated by a red line and shown on Map 2, Schedule 1 that is zoned Business Environment Area (A, B, C or D) under the New Plymouth District Plan.~~

**Waitara Town Centre Zone** means the area delineated in Map 4, Schedule 1 that is zoned Town Centre Zone under the Proposed New Plymouth District Plan.

**Zone** means a zone or Environment Area as defined in the operative New Plymouth District Plan. spatially identifies and manages an area with common environmental characteristics or where particular environmental outcomes are sought. The entire district is zoned and all land is identified as part of a 'zone' on the planning maps, with rules which manage activities in that particular zone.

**SCHEDULE 1**

**Map 1—Inglewood Town Centre Area**



Red line outlines Inglewood Town Centre Area and Business Environment Area A, B, C or D—where new TAB venues may be established

**Map 2 — Waitara Town Centre Area**



Red line outlines Waitara Town Centre Area and Business Environment Area A, B, C or D where new TAB venues may be established

**Map 3 — New Plymouth CBD Area**



Red line outlines New Plymouth CBD Area where new TAB venues may be established


**Map 1 City Centre Zone**



Outlines the City Centre Zone where new TAB venues may be established


**Map 2 Fitzroy Town Centre Zone**



 Outlines the Fitzroy Town Centre Zone where new TAB venues may be established

**Map 3 Inglewood Town Centre Zone**




 Outlines the Inglewood Town Centre Zone where new TAB venues may be established



**Map 4 Waitara Town Centre Zone**



 Outlines the Waitara Town Centre Zone where new TAB venues may be established



Contact NPDC

P: 06-759 6060 E: enquiries@npdc.govt.nz

More information:



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## TE TAI PARI BOARD – TERMS OF REFERENCE REVIEW

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### MATTER / TE WHĀINGA

1. The matter for consideration by the Council is a draft Terms of Reference for Te Tai Pari Board (previously Te Tai Pari Trust) a statutory board established under the New Plymouth District (Waitara Lands) Act 2018.

### RECOMMENDATION FOR CONSIDERATION / NGĀ WHAIKUPU

**That having considered all matters raised in the report Council approve the Terms of Reference recommended by Te Tai Pari Board (ECM9152190).**

### STRATEGY AND OPERATIONS COMMITTEE RECOMMENDATION

2. The Strategy and Operations Committee endorsed the officer's recommendation.

### WAITARA COMMUNITY BOARD RECOMMENDATION

3. The Waitara Community Board endorsed the officer's recommendation.

### TE HUINGA TAUMATUA RECOMMENDATION

4. Te Huinga Taumatua endorsed the officer's recommendation.

COMPLIANCE / TŪTOHU	
Significance	This matter is assessed as being administrative.
Options	<p>This report identifies and assesses the following reasonably practicable options for addressing the matter:</p> <ol style="list-style-type: none"> <li>1. Approve the amended the Te Tai Pari Board Terms of Reference.</li> <li>2. Not approve the amended Te Tai Pari Board Terms of Reference.</li> </ol>
Affected persons	The persons who are affected by or interested in this matter are the members of Te Tai Pari Board.
Recommendation	This report recommends option 1 for addressing the matter.
Long-Term Plan / Annual Plan Implications	No
Significant Policy and Plan Inconsistencies	No

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## **EXECUTIVE SUMMARY / WHAKARĀPOPOTOTANGA MATUA**

5. Te Tai Pari Board (the Board) is a statutory board established by The New Plymouth District Council (Waitara Lands) Act 2018.
6. The primary purpose of the Board is to distribute funds from the Waitara Perpetual Community Fund (the Fund).
7. Te Kōwhatu Tū Moana (an incorporated charitable trust representing Ōtaraua and Manukōrihi hapū) jointly with Council have authority to approve a Terms of Reference for the Board. This report presents a recommended draft prepared by the Board. Te Kōwhatu Tū Moana have supported the draft.
8. The Council must consider the draft Terms of Reference and either adopt without amendment or refer proposed amendments back to Te Kōwhatu Tū Moana and/or the Board.

## **BACKGROUND / WHAKAPAPA**

9. The New Plymouth District Council (Waitara Lands) Act 2018 (the Act) came in to force on 17 March 2019.
10. The Act enabled the sale of Waitara endowment land with the revenue from sales used to:
  - a) establish a Hapū Land Fund, with decisions on its use made by Te Kōwhatu Tū Moana Trust, which will manage and administer the interests of Manukōrihi and Ōtaraua Hapū;
  - b) establish a Waitara Perpetual Community Fund to help support community projects in Waitara, with funds allocated through Te Tai Pari Board; and
  - c) support Waitara River and environmental projects, to be managed by iwi and hapū with interests in the river, and the Taranaki Regional Council.
11. NPDC and Te Kōwhatu Tū Moana are progressing the co-management and administration arrangements for the reserve lands listed in the Act.

### *Establishment of the Fund*

12. The purposes of the Act relate to the Waitara Endowment Land and include the creation of a Waitara Perpetual Community Fund (the Fund) to improve the social, economic, cultural and environmental wellbeing of Waitara.
-

13. The Fund comprises:
- a) All accumulated and future income allocated to the Council from the Waitara Endowment Land<sup>1</sup>:
  - b) All accumulations derived from any such income (after the deduction of Council costs<sup>2</sup> relating to administration of the fund and costs associated with the sale of Waitara Endowment Land including legal and valuation costs).

*Establishment of Te Tai Pari Board*

14. The Act established a statutory board (Te Tai Pari Board) with the purposes of:
- a) Providing recommendations to the Council in relation to investment and annual release of funds from the Fund; and
  - b) Determining distributions from the annual release (from the Waitara Perpetual Fund) for each financial year.
15. The Board is comprised of six members (three appointed by Te Kōwhatu Tū Moana and three appointed by the Council). Alternate members may also be appointed. The Board is not a committee of Council or a Council Organisation.
16. In May 2022, the Council and Te Kōwhatu Tū Moana made the following appointments to the Board. The appointments were for a three year term:
- Graham Armstrong (Council appointee)
  - Pat Bodger (Te Kōwhatu Tū Moana appointee)
  - Donna Eriwata (Te Kōwhatu Tū Moana appointee)
  - Marion James (Council appointee)
  - Darrel Nicholas (Council appointee)
  - Mawhaturia White (Te Kōwhatu Tū Moana appointee)
17. The current Board members have requested Council consider staggering the terms of office (when the next appointments are due) to ensure there is a regular turnover of members.

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<sup>1</sup> Subpart 2 New Plymouth District Council (Waitara Lands) Act 2018

<sup>2</sup> Defined in s30(4) of the New Plymouth District Council (Waitara Lands) Act 2018

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*Adopting a Terms of Reference*

18. The Council and Te Kōwhatu Tū Moana must adopt a Terms of Reference for the Board<sup>3</sup>. The Terms of Reference set out the purpose and scope of the Board, the limits of its authority and the reporting requirements to New Plymouth District Council and Te Kōwhatu Tū Moana.
19. Section 42 of the Act sets out the matters which must be included in the Terms of Reference. The Act also sets out a range of administrative obligations and procedural matters and these have been included in the draft Terms of Reference to guide the Board on more practical administrative matters.
20. The Board have recently reviewed their current Terms of Reference (Appendix 1). The review filled in gaps in the current Terms of Reference which had been waiting for completion of actions (such as the adoption of a Funding Policy). Te Kōwhatu Tū Moana considered the Board's recommendation on 20 December 2023 and have "received and approved the proposed updated Terms of Reference".

**CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA ĀHUARANGI**

21. There are no climate change impacts relating to the adoption of a Terms of Reference.

**REFORM IMPLICATIONS**

22. There are no reform implications relating to the adoption of a Terms of Reference.

**NEXT STEPS / HĪKOI I MURI MAI**

23. The Council must decide whether to adopt the draft Terms of Reference.
24. If the Council does not support the Terms of Reference, the Terms of Reference, with or without proposed amendments, will be forwarded back to Te Kōwhatu Tū Moana and/or the Board for further consideration.
25. Once adopted, the Council must ensure that the Terms of Reference are:
  - a) Published on the Council's website; and
  - b) Available for inspection at premises of the Council in Waitara. This will be by viewing the Council's website at the publicly available computers at the Waitara Library and Service Centre.

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<sup>3</sup> S42 New Plymouth District Council (Waitara Lands) Act 2018

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## **SIGNIFICANCE AND ENGAGEMENT / KAUPAPA WHAKAHIRAHIRA**

26. In accordance with the Council's Significance and Engagement Policy, this matter has been assessed as being administrative. The Board's Terms of Reference are of a directional nature with many of the terms being set out in legislation. There is likely to be some public interest in the level of remuneration, however no amendment to remuneration has been proposed and public consultation is not considered necessary.

## **OPTIONS / KŌWHIRINGA**

27. There are two reasonably practicable options and these have been assessed together below.

**Option 1 Approve the amended the Te Tai Pari Board Terms of Reference.**

**Option 2 Not approve the amended the Te Tai Pari Board Terms of Reference.**

### *Financial and Resourcing Implications / Ngā Hīraunga ā-pūtea, ā-rauemi*

28. There are no financial or resourcing implications arising from the proposed Terms of Reference. No increase in remuneration has been sought by Board members.

### *Risk Analysis / Tātaritanga o Ngā Mōrearea*

29. There are no perceived risks around the Terms of Reference.
30. The Act explicitly states that members are entitled to receive remuneration, and that remuneration must come from the Fund. Because remuneration is paid from the fund, there may be some negative commentary about using any of the fund for remuneration of Board members.

### *Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori*

31. Adoption of the draft Terms of Reference is an administrative matter. The matters contained in the draft are consistent with the New Plymouth District Council (Waitara Lands) Act 2018. The Council's community outcomes are not applicable.

### *Statutory Responsibilities / Ngā Haepapa ā-ture*

32. S42 of the Act requires Council and Te Kōwhatu Tū Moana adopt Terms of Reference for the Board and sets out the matters that must be provided for. The proposed Terms of Reference meet the requirements of the Act.
-

*Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere*

33. Adoption of the draft Terms of Reference is an administrative matter. The matters contained in the draft are consistent with the New Plymouth District Council (Waitara Lands) Act 2018. Council's policies and plans are not applicable.

*Participation by Māori / Te Urunga o Ngāi Māori*

34. Te Kōwhatu Tū Moana represent Ōtarua and Manukōrihi hapū. Te Kōwhatu Tū Moana, through their appointed board members, have been involved in reviewing the draft Terms of Reference and remuneration recommendation.
35. Te Kōwhatu Tū Moana have received and adopted the draft Terms of Reference.

*Community Views and Preferences / Ngā tirohanga me Ngā Mariu ā-hāpori*

36. Adoption of the draft Terms of Reference is an administrative matter affecting Board members. The Board resolved their recommendation at a public meeting. No public comment was received.

**Recommended Option**

This report recommends option 1 – approved the amended Te Tai Pari Board Terms of Reference for addressing the matter.

**APPENDICES / NGĀ ĀPITI HANGA**

Appendix 1 Proposed Terms of Reference (changes tracked) (ECM9152190)

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**Report Details**

Prepared By: Julie Straka (Manager Governance)  
Team: Governance  
Approved By: Gareth Green (Chief Executive)  
Ward/Community: North Ward, Waitara Community  
Date: 17 January 2024  
File Reference: ECM 9134508

-----End of Report -----

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## TERMS OF REFERENCE

### TE TAI PARI ~~TRUST~~BOARD

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<b>Tumuaki:</b>	<b>Chairperson:</b>	XXXX (XXXX appointee – elected to Chairperson role by the Members)
<b>Hūanga:</b>	<b>Members:</b>	XX (Te Kōwhatu Tū Moana appointee) XX (Te Kōwhatu Tū Moana appointee) XX (Te Kōwhatu Tū Moana appointee) XX (New Plymouth District Council appointee) XX (New Plymouth District Council appointee) XX (New Plymouth District Council appointee)

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The New Plymouth District Council (Waitara Lands) Act 2018 creates an enduring fund for the benefit of the Waitara community, including the Waitara hapū. The purpose of the Waitara Perpetual Community Fund is to improve the social, economic, cultural and environmental well-being of Waitara.

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#### **Kaupapa: Purpose**

The purpose of Te Tai Pari ~~Trust~~Board is:

- a) To make recommendations to the Council concerning –
    - i) The Council's investment policy for the Waitara Perpetual Community Fund (including recommendations about addressing the matters specified in section 105 of the Local Government Act 2002 for the purposes of section 50(1)(b)); and
    - ii) The policy for determining the amount of annual releases from the Waitara Perpetual Community Fund.
  - b) To determine the distributions from the annual release from the Waitara Perpetual Community Fund for each financial year.
  - c) To perform any other functions that may be conferred on it by the New Plymouth District Council (Waitara Lands) Act 2018.
-

## **STATUTORY POWERS**

Te Tai Pari ~~Trust Board~~ has all the powers necessary to enable it to perform its functions but must not –

- a) Acquire, hold, or dispose of money or property; or
- b) Borrow any money; or
- c) Purport to lend money or provide any other financial accommodation, indemnity, or guarantee; or
- d) Enter into contracts; or
- e) Employ any person; or
- f) Willingly be a party to any legal proceedings.

### **Specific matters within the delegated authority of Te Tai Pari Trust:**

1. Renaming of Te Tai Pari ~~Trust Board~~ at any time
  2. Election of a Chairperson
  3. Providing to the Council its determinations of the distribution from the annual release from the Waitara Perpetual Community Fund for that financial year. This must be provided before the day that is nine months after the end of each financial year of the Council.
- 

## **Procedural matters**

### **1. Board Structure**

#### **1.1 Chairperson**

- a) The Chairperson is elected by Te Tai Pari ~~Trust Board~~ members as set out in clause 1.2 of these Terms of Reference.
- b) Te Tai Pari ~~Trust Board~~ may change the Chairperson at any time.
- c) Each Chairperson has a term of one year

- d) Te Tai Pari ~~TrustBoard~~ may not reappoint the existing Chairperson unless all the members of Te Tai Pari ~~Trust-Board~~ agree.
- e) A Chairperson who is reappointed may not hold that office for more than three years.

### **1.2 Voting system for electing a Chairperson**

The candidate will be elected if he or she receives more votes than any other candidate. This voting system has the following characteristics:

- a) There is only one round of voting; and
- b) If two or more candidates tie for the most votes, the tie is resolved by lot.

### **1.3 Membership**

Te Tai Pari ~~Trust-Board~~ comprises –

- a) Three members appointed by Te Kōwhatu Tū Moana (who may, but need not be trustees or employees of Te Kōwhatu Tū Moana); and
- b) Three members appointed by the Council. The Council has resolved that elected members, including community board members, and staff are not eligible for appointment to Te Tai Pari ~~TrustBoard~~.

## **2. Quorum**

- a) Te Tai Pari ~~Trust-Board~~ may not make any decision unless there is present a minimum of two members appointed by Te Kōwhatu Tū Moana and two members appointed by New Plymouth District Council.
- b) An appointed alternate member may participate, with voting rights, in place of a ~~regular~~ member who cannot participate in a meeting due to:
  - A vacancy existing on Te Tai Pari ~~TrustBoard~~; or
  - A ~~regular~~ member being unable to attend an individual meeting and having tendered an apology.

When attending in this capacity, an alternate member is considered to be a member for the purposes of the quorum.

- c) A meeting may only convene, or continue, when a quorum of members is present, whether or not they are all voting.

- d) A meeting must lapse, and the Chairperson vacate the chair, if a quorum is not present within 10 minutes of the advertised start of the meeting. Where members are known to be travelling to the meeting, but are delayed due to extraordinary circumstance, the Chairperson has discretion to wait for a longer period.
- e) No business may be conducted while waiting for the quorum to be reached.
- f) An alternate member who is not required to participate in place of a regular member or a vacancy:
  - i) May attend meetings of Te Tai Pari Trust-Board but may not vote on any matter at that meeting.
  - ii) May, with the leave of the Chairperson take part in the meeting's discussions.
  - iii) Is not a member of the public for the purpose of s.48 of the Local Government Official Information and Meetings Act (1987) (LGOIMA). Consequently, if the meeting resolves to exclude the public, they may remain unless they are lawfully excluded.

### **3. Apologies**

Apologies must be lodged with the Chairperson and Secretary no less than 24 hours prior to a meeting. This will enable sufficient notice being provided to the relevant alternate member.

### **4. Term of office**

- a) The Council and Te Kōwhatu Tū Moana may appoint their representative members for a term not exceeding three years.
- b) Any member of Te Tai Pari Trust-Board is eligible for reappointment.

### **5. Decision-making**

- a) A consensus approach to decision-making must be used whenever possible.
- b) If necessary the Chairperson may determine that a decision may be made by vote.
- c) A member has the right to abstain from voting.

## 6. Casting Vote

- a) The Chairperson has a deliberative vote
- b) In the event of an equality of vote:
  - i) The chairperson does not have a casting vote; and
  - ii) The motion is deemed to have failed.

## 7. Conflict of Interest

- a) Each member of Te Tai Pari ~~Trust Board~~ must disclose any actual or potential conflict of interest to Te Tai Pari ~~TrustBoard~~.
- b) Te Tai Pari ~~TrustBoard~~ must maintain an interests register.
- c) A member of Te Tai Pari ~~Trust Board~~ is not precluded from discussing or voting on a matter merely because the member has an actual or potential conflict of interest, so long as the conflict has been disclosed before consideration of the matter.
- d) A member may abstain from discussing or voting on an issue because of an actual or potential conflict of interest.

## 8. Local Government Official Information and Meetings Act 1987 and Public Records Act 2005.

Te Tai Pari ~~Trust Board~~ is subject to the Local Government Official Information and Meetings Act 1987 (LGOIMA) and the Public Records Act 2005, but Te Tai Pari ~~Trust Board~~ is not a committee of the Council or a ~~council-Council~~ ~~e~~Organisation.

## 9. Calling of meetings

### 9.1 Public Notice

Meetings will be called, and publicly notified, in accordance with s46 of the LGOIMA.

For the purposes of this requirement, the meeting notice may be included with other meeting notices issued by the Council.

## 10. Whakamahi: Operation

The Council will provide adequate administrative support and operating services to Te Tai Pari ~~TrustBoard~~.

## 11. Consultation with the Waitara community

As a minimum, consulting with the community will involve:

- a) Gathering and reviewing existing documents (such as iwi, hapū and marae planning documents and the Waitara Community Board Plan)
- b) Seeking ideas and suggestions on the issues of importance from the community via public notice, community networks and/or social media.
- c) Following preparation of a draft assessment, seeking comment on the draft assessment via public notice, community networks and/or social media.
- d) Holding at least one public meeting, workshop or open day in the Waitara community to discuss the draft assessment.
- e) Holding at least one hui at Ōwae Marae to discuss the draft assessment.

Te Tai Pari Trust Board may determine additional consultation methods for each assessment.

## 12. Expenses

All costs of the Te Tai Pari Board including remuneration and the provision of administrative and operating services (whether by Council staff or third parties contracted by Council) will be met from the Waitara Perpetual Community Fund.

### 12.1 Meeting and workshop fees

- a) The Chairperson and members of Te Tai Pari Trust Board will be remunerated for attendance at formal meetings and workshops.
- b) A meeting allowance will be paid for each meeting or workshop of Te Tai Pari Trust Board at the rate set below

Chairperson	\$400
Member	\$280
- c) Alternate members will be paid:
  - i) A meeting allowance of \$280 for attendance at any workshop
  - ii) A meeting allowance of \$280 for attendance at a meeting where they are covering a member's absence.

## 12.2 Reimbursement of expenses

- a) The Chairperson and members of Te Tai Pari ~~TrustBoard~~ will be reimbursed in accordance with the rates sets out in the current New Plymouth District Council's Rules for the Recovery of Expenses for the following expenses:
  - Vehicle mileage
  - Taxis
  - Travel, accommodation and attendance at conferences / seminars / training programmes
  - Contribution toward broadband costs
- b) The New Plymouth District Council Chief Executive or their nominee must pre-approve any other expenses before they are incurred.

## 12.3 General

- a) No meeting fees are paid without deduction of withholding tax.
- b) All claims must be lodged no later than one month after the close of the financial year in which the expense was incurred.

## 12.4 Approval of Costs

- a) Remuneration and expense claims are approved by the New Plymouth District Council ~~Governance—Lead Manager~~ Governance. Receipts for expenses are required.
- b) The New Plymouth District Council Chief Executive (or their nominee) must pre-approve expenditure prior to Te Tai Pari ~~TrustBoard~~ commissioning advice from an external party, including, but not limited to, the New Plymouth District Council, Te Kotahitanga o Te Ātiawa Trust, Te Kōwhatu Tū Moana, Otaraua Hapū and Manukorihi Hapū.

## 13. Administration

The Council will provide administrative and operating services to Te Tai Pari ~~TrustBoard~~. Provision of support services may be provided by third parties engaged by the Council. -This includes, but is not limited to:

- Secretarial support
- Policy drafting support
- \_\_\_\_\_ Funding application analysis

#### 14. Calling for funding applications

~~[this section to be completed following assessment of issues of importance to the Waitara community or a part of the Waitara community]~~

~~The funding parameters including eligibility, exclusions and frequency of determinations are set out in the adopted Te Tai Pari Board Funding Policy. The Te Tai Pari Board may amend the Policy, by resolution, as they deem necessary, provided the Policy is consistent with the New Plymouth District Council (Waitara Lands) Act 2018.~~

#### 15. Amendment to Terms of Reference

The terms of reference may be amended by agreement between the Council and Te Kōwhatu Tū Moana.

#### INTERPRETATION

**Alternate Member** Means a person appointed by either the New Plymouth District Council or Te Kōwhatu Tū Moana to replace a member of Te Tai Pari ~~TrustBoard~~ where a vacancy exists, or an apology has been received from a member.

**Chairperson** Means the person elected by Te Tai Pari ~~TrustBoard~~ to be the presiding member.

**Internet site** In relation to Te Tai Pari ~~TrustBoard~~, means an Internet site that is maintained by, or on behalf of, the New Plymouth District Council and to which the public has free access

**Member** Means any person appointed to Te Tai Pari ~~TrustBoard~~.

For the purposes of an individual meeting it includes an alternate member when that person is participating due to a vacancy on Te Tai Pari ~~TrustBoard~~ or an apology being received from a member.

**Publicly notified** has the same meaning as defined in the Local Government Official Information and Meetings Act 1987

means made known by means of a notice that—

- (a) is made publicly available, until any opportunity for review or appeal in relation to the matter notified has lapsed, on the local authority's Internet site; and



- (b) is published in at least—
  - (i) One daily newspaper circulating in the region or district of the local authority; or
  - (ii) One or more other newspapers that have a combined circulation in that region or district at least equivalent to that of a daily newspaper circulating in that region or district

DRAFT

## **CITIZENS' AWARDS POLICY REVIEW**

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### **MATTER / TE WHĀINGA**

1. The matter for consideration by the Council is a review of the New Plymouth District Citizens' Awards Policy.

### **RECOMMENDATION FOR CONSIDERATION / NGĀ WHAIKUPU**

**That having considered all matters raised in the report Council approve the amended Citizens' Awards Policy as outlined in Appendix 1.**

### **STRATEGY AND OPERATIONS COMMITTEE RECOMMENDATION**

2. The Strategy and Operations Committee endorsed the officer's recommendation subject to implementing a general category (up to twelve recipients per annum), and a youth category (up to three recipients per annum).

#### Governance Advisors Note

This recommendation will result in consequential amendments to clause 13 in the proposed policy.

### **COMMUNITY BOARD RECOMMENDATIONS**

3. The Inglewood, Waitara and Puketapu - Bell Block Community Boards endorsed the Strategy and Operations Committee recommendation.
4. The Clifton Community Board endorsed the Strategy and Operations Committee recommendation and sought Council ensure a robust process for reference checking of candidates.
5. The Kaitake Community Board endorsed the Strategy and Operations Committee recommendation and sought Council ensure that any youth recipients are not precluded from receiving an award in the general category at a later time.

### **TE HUINGA TAUMATUA RECOMMENDATION**

6. That having considered all matters raised in the report Te Huinga Taumatua:
  - a) Approve the amended Citizens' Awards Policy as outlined in Appendix 1 subject to:
    - i) Implementing a general category (up to 12 recipients per year)
    - ii) Implementing a youth category (up to three recipients per year)

- iii) Ensuring recipients of a youth category award are eligible to receive a subsequent general category award based on a future nomination.
- b) Implement a robust process for reference checking nominees.

<b>COMPLIANCE / TŪTOHU</b>	
Significance	This matter is assessed as being of some importance.
Options	This report identifies and assesses the following reasonably practicable options for addressing the matter: <ol style="list-style-type: none"> <li>1. Amend the Citizens' Award Policy.</li> <li>2. Retain the existing policy.</li> </ol>
Affected persons	The persons who are affected by or interested in this matter are recipients of the award, families of nominees and elected members.
Recommendation	This report recommends option 1 for addressing the matter.
Long-Term Plan / Annual Plan Implications	No
Significant Policy and Plan Inconsistencies	No

### **EXECUTIVE SUMMARY / WHAKARĀPOPOTOTANGA MATUA**

7. Officers recommend Council amend the Citizens' Award Policy to allow nominations from family members, increase (from two to six) the number of recipients awarded from elected member nominations and introduce a youth category.
8. The proposed changes maximise the opportunity to acknowledge individuals for their contribution to the community.
9. Adopting these changes the policy will enable an increase in nominations.

### **BACKGROUND / WHAKAPAPA**

10. New Plymouth District Citizens' Awards recognise citizens for significant contributions to the district and/or its citizens. The policy sets out how Council will provide, deliver and manage the annual awards with a maximum of 12 awards being granted in any year.

11. Council last reviewed the policy in 2021. At that time Council amended the policy to enable awards to be given to multiple members of an organisation in any one year.
12. The current policy prohibits nominations from family members and restricts the number of recipients selected from elected member nominations. This has resulted in some nominations not being accepted and, for the last two years, Council decision-making being inconsistent with the policy.
13. The proposed amendments seek to maximise the number of nominations received and to ensure that Council operates within the scope of the Policy.

#### *Introduction of Youth Category*

14. Council acknowledges young people (aged between 12 and 24) use their skills and talents to build and strengthen local communities but may not have the same longevity of service of other candidates.
15. Officers propose to include specific criteria for youth to recognise the contribution young people make to New Plymouth District.
16. Council would determine the number of recipients coming from general or youth nominees, with the total awards given remaining at 12 in each year.

#### **CLIMATE CHANGE IMPACT AND CONSIDERATIONS / HURINGA ĀHUARANGI**

17. There are no climate change impacts or considerations in relation to this policy review.

#### **REFORM IMPLICATIONS**

18. There are no reform implications in relation to this policy review.

#### **NEXT STEPS / HĪKOI I MURI MAI**

19. Officers will update the policy in line with the approved amendments and call for nominations for the 2024 awards.

#### **SIGNIFICANCE AND ENGAGEMENT / KAUPAPA WHAKAHIRAHIRA**

20. In accordance with the Council's Significance and Engagement Policy, this matter has been assessed as being of some importance.
  21. There are no impacts to levels of service or financial implications as the Citizens' Awards are allowed for within existing policies, procedures and budgets.
-

## **OPTIONS / KŌWHIRINGA**

### **Option 1 Amend the Citizens' Awards Policy**

### **Option 2 Retain the existing policy**

22. These options are assessed together below.

#### *Financial and Resourcing Implications / Ngā Hīraunga ā-pūtea, ā-rauemi*

23. Amending the policy will have no financial or resourcing implications.

24. The Awards ceremony is well attended and includes a pōwhiri and formal presentation, light catering and socialising. The Awards cost approximately \$13,000 per annum.

#### *Risk Analysis / Tātaritanga o Ngā Mōrearea*

25. If the status quo remains, there is a risk that the contribution of worthy citizens will not be acknowledged as fewer eligible nominations are likely to be received.

26. Declining nominations from family members provides a reputational risk as nominator(s) may feel their family member is not being recognised for their contribution.

#### *Promotion or Achievement of Community Outcomes / Hāpaitia / Te Tutuki o Ngā Whāinga ā-hāpori*

27. The Citizens' Awards promote a trusted, thriving community and culture within the district. Maximising the number of nominations received supports this community outcome.

#### *Statutory Responsibilities / Ngā Haepapa ā-ture*

28. There are no statutory responsibilities relating to the Citizens' Awards.

#### *Consistency with Policies and Plans / Te Paria i ngā Kaupapa Here me ngā Mahere*

29. The Citizens' Awards support Council's vision and strategic framework.

30. In 2022 and 2023 Councillors have operated outside the policy by accepting and considering nominations from immediate family members, and selecting more than two recipients from elected members nominations in one year.

31. In 2023 there was one nomination declined due to the nominee and seconder both being immediate family members.

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*Participation by Māori / Te Urunga o Ngāi Māori*

32. There has been no participation by Māori in this policy review due to its administrative nature.
33. The policy does not impact on relationships with ancestral land, water, sites, waahi tapu, or valued flora. The Council engages with local kura and hapū to provide a pōwhiri at the Awards ceremony.

*Community Views and Preferences / Ngā tirohanga me Ngā Mariu ā-hāpori*

34. It is unlikely the wider community are aware of the limitations of the current policy.
35. The community who may be interested in this review are potential award recipients who are currently not able to be nominated due to current policy limitations.
36. Amending the policy will widen the scope of potential awardees, by increasing the nomination pool.
37. To facilitate the nomination process Officers are simplifying the nomination form for the 2024 awards.

*Advantages and Disadvantages / Ngā Huanga me Ngā Taumahatanga.*

38. Approving the proposed amendments is likely to increase the number of eligible nominations.

**Recommended Option**

This report recommends Option 1 – Amend the Citizens' Awards Policy for addressing the matter.

**APPENDICES / NGĀ ĀPITIHINGA**

Appendix 1 Proposed Policy (with tracked changes) (ECM9154430)

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**Report Details**

Prepared By: Lisa Lowe (Executive Assistant to the Mayor) and Jane Hickmott (Governance Advisor)  
Team: Governance  
Approved By: Julie Straka, (Governance Manager)  
Ward/Community: District Wide  
Date: 11 January 2024  
File Reference: ECM 9154434

-----End of Report -----

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**P11-005 Citizens' Awards Policy**

*Approved by the Council on 5 July 2011. Reviewed and amended 7 July 2021.*

**POLICY PURPOSE**

New Plymouth District Citizens' Awards recognise citizens for significant contributions to the district and/or its citizens. This policy sets out how the Council will provide, deliver and manage the New Plymouth District Citizens' Awards.

**POLICY STATEMENTS**

The following statements apply to the provision, delivery and management of New Plymouth District Citizens' Awards, which for the purposes of this policy shall be referred to as "Citizens' Awards":

**Nominations are called for**

1. Nominations are called for on an annual basis.
2. Nominations are called for on the understanding that they are confidential between the nominator/seconder and the Council.
3. Nominations must be submitted on an official New Plymouth District Citizens' Awards Nomination Form.
4. Nominations received after the nomination closing date will not be considered.
5. Nominations must be for named individuals and cannot be lodged for groups.

**Nominations are received**

*Nominee criteria (general)*

6. Nominees must have made a significant contribution to the well-being of the district and/or its citizens:
  - a) Over a significant period of time; and/or
  - b) Through exceptional actions; and/or
  - c) By other means.
7. Nominees must normally be resident in New Plymouth District. However, if a nominee from outside the district boundaries meets one of the criteria, then they can be deemed eligible for receipt of an award at the discretion of the Council.
8. Current serving political figures, including District Councillors and Community Board Members, are ineligible for receipt of a Citizen's Award.

*Nominee criteria (youth)*

9. Council acknowledges young people (aged between 12 and 24) use their skills and talents to build and strengthen local communities but may not have the same longevity of service of other candidates.

10. Nominees in the Youth Category must meet one or more of the following criteria:

- a) Have undertaken outstanding voluntary community service
- b) Demonstrated active engagement in their communities
- c) Demonstrated personal leadership, inspiration, sacrifice or devotion to a cause which has made a significant and positive contribution to the well-being of the district and its citizens.

11. Nominations by immediate family members of the nominee will ~~not~~ be considered.

12. District Councillors and Community Board Members may make nominations for the Citizens' Awards, with the restriction that no more than ~~two~~six recipients come from these nominations annually.

#### **Nominations are considered**

13. No more than 12 awards (whether general or youth) are given in any one year.

14. If the nominee has received payment or other remuneration then the Council shall determine whether, in its view, the nominee's contribution was sufficiently beyond the call of duty to warrant special recognition.

15. Unless there are exceptional circumstances, a nominee that has previously received a Citizen's Award will not be eligible for another Citizen's Award.

#### **Awards Ceremony is held**

16. The awards are presented to the recipients at a Citizens' Awards Ceremony.

17. The ceremony will be guided by procedures for the planning and management of the ceremony.

18. A media release naming recipients is prepared and embargoed until the Citizens' Awards Ceremony.

#### **Following the Awards Ceremony**

19. The names of the recipients are published on the Citizens' Awards honours board following the Citizens' Awards Ceremony.

20. If a recipient is subsequently found guilty of an offence punishable by a term of imprisonment of two years or more, that person will be notified immediately that their name will be removed from the Citizens' Awards honours board without delay.

#### **POLICY REVIEW**

This policy shall be reviewed six yearly from the date the policy was adopted unless required at an earlier date.



## **CLOSING KARAKIA**

### **TE WHAKAEATANGA**

Te whakaeatanga e,	It is completed, it is done,
Tēnei te kaupapa ka ea,	We have achieved our purpose,
Tēnei te wānanga ka ea,	Completed our forum,
Te mauri o te kaupapa ka whakamoea,	Let the purpose of our gathering rest for now,
Te mauri o te wānanga ka whakamoea,	Let the vitality of our discussions replenish,
Koa ki runga,	We depart with fulfilled hearts and minds,
Koa ki raro,	Bonded in our common goal and unity.
Haumi e, hui e, tāiki e.	

This karakia is recited to close a hui or event. It takes us from a place of focus and releases us to be clear of all the issues or tensions that may have arisen during the hui. We are now free to get on with other things.