

Verbal submission to the WCC on proposed encroachments policy 29 July 2010

Thank you to our elected representatives for taking the time to listen to the views from those who they represent.

I don't have time to go into detail on the matters I have covered in my submission, so find I must summarise. I urge councillors to follow Mr McKinnon's example and read the full submission.

Firstly, I oppose the draft policy in its entirety.

Secondly, I consider that the consultation process is fundamentally flawed and that the analysis and process must start again.

To start with the process itself. I have major concerns:

- The consultation process is inadequate.
- Required information is not disclosed.
- By splitting the policy and fee change processes the Council is making it impossible for the public to have a meaningful input:
 - o Appropriate information is not being provided at the appropriate time.
 - o Decisions on this first stage will limit the potential for meaningful consultation on the later part of the process.
- The proposed future consultation on future fees changes is inadequate. Such consultation should be direct with licence holders, not buried in the annual plan process.
- Is this just enhanced revenue generation by stealth? Council needs to make its overall intentions clear and put its cards on the table.

To summarise my observations on the draft policy:

- The policy is inadequate and incomplete. It does not deal with public-good discounting or other encroachments such as utilities. While purporting to address all encroachments, no mention is made of utilities' use of the road reserve. We are not provided with information about their financial contribution.
- The Council has a strong vested interest in passing these policy changes and making later fee adjustments through a potential increase of fees of over \$11 million.