

LTCCP 2006-16 SUBMISSION

Submissions close on 5 May 2006

I wish to talk to the main points in my submission at the hearings to be held between Thursday 25 May and Wednesday 7 June 2006.

I am completing this submission:
For yourself

Number of people you represent:

My submission refers to:
Full Version of the LTCCP

Page Number:
291-295

I also want to respond to:

Name:	Michael de Hamel
Organisation:	
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Email:	michael@akaroamail.co.nz
Address:	PO Box 84 KAIAPOI
Your Submission:	<p>Do you have any comments on the major projects in our Draft Community Plan?</p> <p>Do you have any comments on groups of activities (The activities and services the Council provides?)</p> <p>Do you have any other comments or suggestions you want to make?</p> <p>PO Box 84 Kaiapoi May 1 2006</p> <p>A 'Significant' Submission to the LTCCP</p> <p>Right at the end of Volume 1 of "Our Community Plan" a few pages are devoted to the Council's "Policy on Significance". (Pages 291-295)</p> <p>What is not at all obvious from reading the draft Plan is that significant changes have been made in the wording of the Significance Policy itself. Two small changes (operating expenditure limits for significance and Red Bus and City Care) have been flagged on Page 22 of the Draft Plan, but there are major underlying changes which have not been emphasised.</p> <p>I have two main areas of concern, which in fact overlap.</p> <p>1) The first is that the list of Strategic Assets has been changed so that rather than the Council's "equity" in its subsidiary companies being the factor that brings a consultation process into play, the wording has been changed to "its controlling interest".</p> <p>In effect this means that a future Council could, if it so wished, sell up to 49.99% of the Council's holdings in Christchurch City Holdings or Jade Stadium without further consultation with the community.</p>

**Your Submission
(Cont'd):**

The deletion of City Care Ltd and Red Bus Ltd from the list of Strategic Assets means that the current Council or a future one could sell them entirely, without further consultation. While I agree that their level of strategic importance to the City has probably declined, they nevertheless represent the accumulated input of generations of staff and ratepayers into core City infrastructure and council function. A future council should not be able to dispose of them without further specific consultation, and I believe that they should be retained on the list of strategic assets in the meantime. If a decision on possible sale has already been made, then that decision in itself would have been against the provisions of the current Policy on Significance.

On the positive side I note that the Mobile Library Service and the suburban swimming pools are still listed as a Strategic Assets, meaning that further consultation (beyond this round) would be required before they could be significantly changed. Likewise a further round of consultation would be needed before the Bus Exchange is constructed or replaced.

Also positive are the appearance on the list of Harbour structures and the waste management system.

2) At the bottom of the second column on Page 294 there is a space of about 4cm depth. That's odd. And where is the section in the current policy that notes that any changes to the "Policy on Significance" is in itself a Significant matter?

The answer can be found by referring to the current version of the Policy - where there is a paragraph printed quoting Section 90 of the Local Government Act which deals with the requirements for a policy on significance and how it can be changed.

Discussion

The council has, and the Local Government Act envisages what is in effect a decision-making tree. One decision follows another. This is highlighted in the Significance Policy itself (in both the current version and the proposed one) when the consequences of one already-made significant decision heads the list of criteria which will be considered in determining the significance of subsequent decision.

This step-by-step logical decision-making process would be upset if, in this current round of consultation over the LTCCP, both the preliminary decision required (the change to the Significance Policy) and any decisions that were consequential or could be made as a result of those changes in the Policy were to be made at the same time.

A further consideration for Significance in both the current and proposed Significance Policy is whether the matter is controversial in the community. Some of the Council's proposals in the LTCCP (eg Port Company holding, mobile libraries, suburban pools) are both undoubtably controversial and also affected by the proposed changes to the Significance Policy. Further down the list of significance criteria are others which ask for consideration of reversability, and emphasise a precautionary principle. It would not be in conformity with the present Policy on Significance to make changes to these matters and to the Significance Policy in this one consultation round.

Recommendation

That to retain a proper sequence of decisions:-

1) No decisions on change are made which are not in accord with the Council's CURRENT Policy on Significance. This includes decisions to be made in the current consideration of the 2006-2016 LTCCP.

**Your Submission
(Cont'd):**

2) That, if the Council considers that changes are required in the current Policy on Significance then, given their significance, these should be treated separately from the LTCCP process, as envisaged in Section 90(1) of the Local Government Act.

Michael de Hamel
May 1 2006