

**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Fees and Charges  
**Date:** Thursday, 9 May 2024 3:09:44 PM  
**Attachments:** [image001.png](#)

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Hey,

Another one came through below.

Regards,  
Eden

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**Eden Sloss** | Communications Coordinator | Kairuruku Whakapā  
Chief Executive's Office | Queenstown Lakes District Council  
P: +64 3 441 3691 M: 027 44 66 570  
E: [eden.sloss@qldc.govt.nz](mailto:eden.sloss@qldc.govt.nz)



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**From:** Dripping Bowl [REDACTED]  
**Sent:** Thursday, May 9, 2024 2:39 PM  
**To:** Let's Talk <[letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)>  
**Subject:** Fees and Charges

Hi there,

I would like to give feedback on your proposed increases for local businesses. You have already implemented a new fee with the Trade Water consent and now you've pushed through doubled fees on outdoor seating, restricted umbrella usage, outdoor heating, etc. and now you want to add another 16% to our food control plan inspection?

I think it's wild that you truly believe us small businesses will be able to survive in this town. Perhaps you should be spending less on redoing road works that don't need it or building a waterfront path worth \$1 million dollars that no one uses?

You are supposed to be representing us as a council and you seem so disconnected from the reality of what business owners have gone through over the last 4 years. Please take a moment before you think of raising any more costs or we will just end up with chain restaurants that are owned by foreign entities soon.

Hope to hear from you soon,

Evelyn



**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Mooring Permit Fee Increase - Submission  
**Date:** Wednesday, 8 May 2024 10:59:28 AM  
**Attachments:** [Mooring Permit Fee Increase - Submission - Maggie Fea - 8 May 24.pdf](#)  
[image001.png](#)

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And this one

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**Eden Sloss** | Communications Coordinator | Kairuruku Whakapā  
Chief Executive's Office | Queenstown Lakes District Council  
P: +64 3 441 3691 M: 027 44 66 570  
E: [eden.sloss@qldc.govt.nz](mailto:eden.sloss@qldc.govt.nz)



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**From:** Maggie Fea [REDACTED]  
**Sent:** Wednesday, May 8, 2024 4:39 AM  
**To:** Let's Talk <[letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)>  
**Subject:** Mooring Permit Fee Increase - Submission

Hi there,

Please see attached my submission in regards to mooring fees.

Thank you,  
Maggie Fea

**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name:** Maggie Fea

**Submitter e-mail:** [REDACTED]

**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

*The reasons do not justify the increase*

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.<sup>1</sup>
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.<sup>2</sup> This involves checking the chain and mooring blocks.<sup>3</sup> QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.<sup>4</sup>
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.<sup>5</sup>
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.<sup>6</sup>

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<sup>1</sup> The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

<sup>2</sup> See QLDC Swing Moorings Booklet, August 2022

<sup>3</sup> This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

<sup>4</sup> Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

<sup>5</sup> Refer QLDC Swing Moorings Booklet, August 2022

<sup>6</sup> Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.<sup>7</sup>
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

**I seek the following outcome:**

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

---

a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

<sup>7</sup> Clause 47.4 of the Bylaw

**Sent:** Tuesday, May 7, 2024 4:17 PM

**To:** Roger Davidson <[roger.davidson@qldc.govt.nz](mailto:roger.davidson@qldc.govt.nz)>; Mike Theelen <[mike.theelen@qldc.govt.nz](mailto:mike.theelen@qldc.govt.nz)>

**Cc:** QLDC Services <[services@qldc.govt.nz](mailto:services@qldc.govt.nz)>

**Subject:** Feedback on proposed charges for lake moorings

Dear Sir/Madam

In response to the proposed fees that QLDC is considering for the year 2024/25 please note the following:

1. The proposed increase for swing moorings is excessive.
2. The annual fees you propose are well in excess of the average rates charged at a number of areas around New Zealand.

We suggest that you reconsider fees based on fair average market rate, noting the following points of reference for swing moorings are:

Auckland Regional Council \$341

Taupo \$232

Waikato \$359

Bay of Plenty \$241

Canterbury \$230

Wellington \$360

We propose a fair average as being \$350 per annum and that this change from the previous fee is considered a reset of the fair rate and that any further increases are linked to national CPI changes.

Whilst we appreciate that QLDC has strained finances there is no reason for the proposed fees to be implemented in this area as they would be the highest (by far) charges for moorings in New Zealand and nor should the extraordinary percentage increase you propose be deemed appropriate. Anything other than fair and reasonable comparison with the national average is simply unfair.

**Matt Hollyer**

[REDACTED]

[REDACTED]

## **Disclaimer**

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**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Mooring submission  
**Date:** Monday, 13 May 2024 1:20:20 PM  
**Attachments:** [Maxine and Grahame Inglis - LTP24-34.pdf](#)

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This one has just come through too...

Cheers  
Rebecca

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**From:** Maxine Inglis [REDACTED]  
**Sent:** Monday, May 13, 2024 1:06 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Mooring submission

This is late as inadvertent ly was sent to Christchurch Council

Sent from my iPhone

Submission to proposed changes to user fees and charges contained in QLDC Statement  
of Proposal dated 5 April 2024

To: QLDC by e-mail [letstalk@qlde.govt.nz](mailto:letstalk@qlde.govt.nz)

Submitter name:

Maxine and Grahame Inglis

Submitter e-mail:

Subject matter of submission:

This submission relates to the proposal to increase fees for moorings.

Reasons for my submission:

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some \$73,913.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

*The reasons do not justify the increase*

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*. This involves checking the chain and mooring blocks. QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates are provided for inclusion in the GIS



mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

**I seek the following outcome:**

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I ~~do~~/do not (delete one) wish to appear and speak in support of my submission at the hearing.

A handwritten signature in black ink, appearing to read 'S. King', with a long vertical line extending downwards from the end of the signature.

**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Mooring Fee Increase - Submission  
**Date:** Thursday, 9 May 2024 1:54:46 PM  
**Attachments:** [QLDC Mooring permit fee increase - submission.docx](#)  
[image001.png](#)

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Hey,

Another late one has come through, he does not wish to speak.

Regards,  
Eden

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**Eden Sloss** | Communications Coordinator | Kairuruku Whakapā  
Chief Executive's Office | Queenstown Lakes District Council  
P: +64 3 441 3691 M: 027 44 66 570  
E: [eden.sloss@qldc.govt.nz](mailto:eden.sloss@qldc.govt.nz)



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**From:** Roger McRae [REDACTED]  
**Sent:** Thursday, May 9, 2024 10:39 AM  
**To:** Let's Talk <[letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)>  
**Subject:** Mooring Fee Increase - Submission

Hi there.

Please find attached my submission in respect of the proposed mooring fee increase.

Kind Regards

Roger McRae  
17 Mincher Road, Kelvin Heights  
Ph 021 801 391  
Email: [REDACTED]

**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name: Roger McRae**



**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

*The reasons do not justify the increase*

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.<sup>1</sup>
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.<sup>2</sup> This involves checking the chain and mooring blocks.<sup>3</sup> QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.<sup>4</sup>
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.<sup>5</sup>
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.<sup>6</sup>

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<sup>1</sup> The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

<sup>2</sup> See QLDC Swing Moorings Booklet, August 2022

<sup>3</sup> This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

<sup>4</sup> Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

<sup>5</sup> Refer QLDC Swing Moorings Booklet, August 2022

<sup>6</sup> Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

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**I seek the following outcome:**

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---

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<sup>7</sup> Clause 47.4 of the Bylaw

**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Submission re jetty  
**Date:** Monday, 13 May 2024 10:27:05 AM  
**Attachments:** [image001.png](#)  
[Submission to proposed changes to user fees and charges contained in QLDC Statement of Proposal dated 5 April 2024.docx](#)  
**Importance:** High

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Hi – just saw this one in the inbox – has it been captured?

Cheers  
Rebecca

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**From:** Kaye Parker <kaye.parker@holidayhomesqueenstown.co.nz>  
**Sent:** Thursday, May 9, 2024 5:00 PM  
**To:** Let's Talk <letstalk@qldc.govt.nz>  
**Subject:** Submission re jetty  
**Importance:** High

Please find my submission attached. Thank you. Regards Kaye Parker



LAKE VIEW RETREAT / QUEENSTOWN HILL / NZ

Kaye Parker, Owner/Manager  
Mob: +64 (0) 27 626 7448  
[kaye.parker@holidayhomesqueenstown.co.nz](mailto:kaye.parker@holidayhomesqueenstown.co.nz)

**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name Michael and Kaye Parker**

**Submitter e-mail: [kaye.parker@holidayhomesqueenstown.co.nz](mailto:kaye.parker@holidayhomesqueenstown.co.nz)**

**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

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<sup>2</sup> See QLDC Swing Moorings Booklet, August 2022

<sup>3</sup> This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

<sup>4</sup> Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

<sup>5</sup> Refer QLDC Swing Moorings Booklet, August 2022

<sup>6</sup> Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel



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- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I do not wish to appear and speak in support of my submission at the hearing.

Kaye Parker





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size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

<sup>7</sup> Clause 47.4 of the Bylaw

**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Submission to proposed changes to user fees and charges contained in QLDC Statement of Proposal dated 5 April 2024  
**Date:** Monday, 6 May 2024 2:44:42 PM  
**Attachments:** [Submission Mooring permit fee increase MJO 3 May 2024.docx](#)  
[image001.png](#)

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Late submission attached

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**Eden Sloss** | Communications Coordinator | Kairuruku Whakapā  
Chief Executive's Office | Queenstown Lakes District Council  
P: +64 3 441 3691 M: 027 44 66 570  
E: [eden.sloss@qldc.govt.nz](mailto:eden.sloss@qldc.govt.nz)



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**From:** Mark Quickfall [REDACTED]  
**Sent:** Monday, May 6, 2024 1:24 PM  
**To:** Let's Talk <[letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)>  
**Subject:** Submission to proposed changes to user fees and charges contained in QLDC Statement of Proposal dated 5 April 2024

Good afternoon

Please find attached our submission regarding proposed changes to user fees and charges contained in QLDC Statement of Proposal dated 5 April 2024.

??Regards

Mark

Mark Quickfall  
Queenstown

Mobile [REDACTED]

**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name: Mark and Jackie Quickfall**

**Submitter e-mail:** [REDACTED]

**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

*The reasons do not justify the increase*

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.<sup>1</sup>
3. The Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring. However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.<sup>2</sup> This involves checking the chain and mooring blocks.<sup>3</sup> QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.<sup>4</sup>
4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.<sup>5</sup>
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.<sup>6</sup>

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<sup>1</sup> The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

<sup>2</sup> See QLDC Swing Moorings Booklet, August 2022

<sup>3</sup> This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

<sup>4</sup> Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

<sup>5</sup> Refer QLDC Swing Moorings Booklet, August 2022

<sup>6</sup> Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is

7. The Council's claim that inspections are necessary to ensure moorings are fit for purpose is also problematic. It is the responsibility of mooring owners to maintain their moorings. Use of moorings is at the risk of permit holders.<sup>7</sup>
8. The lack of evidence or financial information provided by the Council to support the proposed increase is concerning. Council staff have merely estimated potential costs without any concrete data or analysis. This lack of transparency and thoroughness undermines the legitimacy of the proposed increase and the rationale for it.
9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

**I seek the following outcome:**

- It is reasonable for there to some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I ~~do~~/do not (delete one) wish to appear and speak in support of my submission at the hearing.

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a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

<sup>7</sup> Clause 47.4 of the Bylaw

**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name:** Brian and Diane Ramsey

[REDACTED]

**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

The table provided with the statement of proposal forecasts a revenue of \$147,826 based on the proposed fee increase, with the increase being some **\$73,913**.

Stated reasons given for the increase include the following:

1. Fees have not been reviewed since 2011 and administration costs have increased over time.
2. Recovery of costs to QLDC for a biennial inspection for each mooring to confirm location, occupancy, vessel size, visual inspection of mooring chain.
3. Good management of the mooring permits.

*The reasons do not justify the increase*

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.
2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.<sup>1</sup>
3. Far from "Good management" the Council's methodology for the increase is primarily based on cost recovery for council inspections and monitoring.

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<sup>1</sup> The same funding principal is reinforced in the QLDC Navigation Safety Bylaw 2018 ("Bylaw") at clause 53.2 where the Council may recover its actual and reasonable costs from the applicant *where the actual costs exceed the specified fee*.

However, this reasoning overlooks critical aspects of mooring ownership and regulation. Mooring owners are already required to conduct and supply their own mooring inspections every two years. These inspections must cover the *entire mooring system*.<sup>2</sup> This involves checking the chain and mooring blocks.<sup>3</sup> QLDC's proposal is therefore an unnecessary and an unjustified duplication of cost and resources – i.e. mooring owners will have to pay for the same inspection report twice.<sup>4</sup>

4. Concerns that moorings may have shifted or been moved are unfounded and misplaced given the substantial weight (minimum 1000kg) and stability of mooring blocks.<sup>5</sup>
5. Costs associated with investigating unconsented and/or illegal moorings are not a matter that can justify a fee increase for mooring permits. Rather, those costs fall to be public funded as part of QLDC's greater regulatory and compliance functions.
6. Details of mooring location, and maximum vessel size are typical resource consent conditions imposed on mooring consents. Monitoring costs associated with these matters fall under the purview of the Resource Management Act 1991 (RMA), and do not provide justification for increased costs to be borne by mooring owners. For example, it is a common condition of mooring resource consents that the exact co-ordinates or mooring blocks are to be provided to the Council for inclusion in the GIS mapping. Conditions also commonly prescribe maximum vessel length and require payment of an initial monitoring fee and monitoring fees thereafter, as applicable.<sup>6</sup>
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9. The 'option' (albeit not favoured by the Council) to *retain the current administration fee* (adjusted for inflation) was to be included in the statement of

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<sup>2</sup> See QLDC Swing Moorings Booklet, August 2022

<sup>3</sup> This is to be compared to contradictory advice given by the Council's CEO at the council meeting on 4 April 2024. The advice given was that QLDC inspections would be 'different' from those carried out by mooring owners, because mooring owners needed to provide an inspection of the chain only.

<sup>4</sup> Note, QLDC retains the ability to undertake its own inspection if a mooring owner fails to do so and to recover the costs from the mooring owner. The Council has a number of enforcement options open to it under the Bylaw for non-compliance with permit terms and conditions, including non-payment of fees.

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<sup>6</sup> Advice at the Council meeting on 4 April 2024, from its planning manager was that QLDC does not monitor mooring consents. QLDC is duty bound under the RMA to monitor the exercise of resource consents. Furthermore, it is collecting fees to do so. Notwithstanding, monitoring of mooring locations and vessel size is a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

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proposal. The figure that was provided for this 'current administration fee' at the Council meeting on 4 April 2024 was in the order of \$350. There is no explanation why this option has been omitted from the proposal as notified.

**I seek the following outcome:**

- It is reasonable for there to be some adjustment to the fee to account for inflation and increased administration costs given the time that has lapsed since the fees were last reviewed. The current fee structure (adjusted for inflation) of **\$350 should be maintained for the coming year.**
- Any further proposal to increase fees should not be made until there has been a comprehensive and competent review of all waterways charges, including mooring permits and associated obligations.

I **do not** wish to appear and speak in support of my submission at the hearing.



**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: moorings  
**Date:** Thursday, 9 May 2024 9:35:10 AM  
**Attachments:** [mooring.docx](#)  
[JEM-326142-11-720-1 Submission Template Mooring permit fee increase.docx](#)  
[image001.png](#)

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Another one came through late, just a normal response to Harry?

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**Eden Sloss** | Communications Coordinator | Kairuruku Whakapā  
Chief Executive's Office | Queenstown Lakes District Council  
P: +64 3 441 3691 M: 027 44 66 570  
E: [eden.sloss@qldc.govt.nz](mailto:eden.sloss@qldc.govt.nz)



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**From:** harry taylor [REDACTED] >  
**Sent:** Thursday, May 9, 2024 5:27 AM  
**To:** Let's Talk <[letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)>  
**Subject:** Fw: moorings

Please find moorings submission..

Kind regards

Harry Taylor  
[REDACTED]

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**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name Harry Taylor**

**Submitter e-mail:** [REDACTED]

**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

The statement of proposal identifies that the 'Revenue and Financing Policy' is the tool used to determine how each Council activity is funded. The policy sets a target for how much should be directly recovered by those who receive a private benefit of a service or activity, which varies depending on the type of activity or service. With respect to Waterways control, 6% is to be privately funded and 95% public.

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3. Good management of the mooring permits.

*The reasons do not justify the increase*

1. The rationale is flawed and fails to align with the Council's Revenue and Finance Policy.

2. The proposed increase does not reflect user pay charges or actual cost recovery by the Council. There is no financial information provided with the statement of proposal at all to support to fee increase.<sup>1</sup>
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**I seek the following outcome:**

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I do not wish to appear and speak in support of my submission at the hearing.

Harry Taylor



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a matter for QLDC in its regulatory role under the RMA, and does not provide any justification for an increase in mooring fees. Once again there is a duplication in cost to mooring owners.

<sup>7</sup> Clause 47.4 of the Bylaw

**From:** [Let's Talk](#)  
**To:** [Charlotte Wallis](#)  
**Subject:** FW: Submission...proposed Mooring fee increase  
**Date:** Tuesday, 7 May 2024 8:57:21 AM  
**Attachments:** [Farry Clear\\_20240506\\_161718.pdf](#)

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Hey,


Here is another late submission from yesterday afternoon.

What would you like me to respond to the 3 submissions that came through yesterday please?

Thank you,  
Eden

Eden Sloss | Communications Coordinator | Kairuruku Whakapā  
Chief Executive's Office | Queenstown Lakes District Council  
P: +64 3 441 3691 M: 027 44 66 570  
E: eden.sloss@qldc.govt.nz

-----Original Message-----

From:   
Sent: Monday, May 6, 2024 4:23 PM  
To: Let's Talk <letstalk@qldc.govt.nz>  
Subject: Submission...proposed Mooring fee increase

Please find attached my submission.  
Thank you  
Geoff Thomas

**Submission to proposed changes to user fees and charges contained in QLDC  
Statement of Proposal dated 5 April 2024**

**To:** QLDC by e-mail [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

**Submitter name:** GEOFFREY READ THOMAS

**Submitter e-mail:** [REDACTED]

**Subject matter of submission:**

This submission relates to the proposal to increase fees for moorings.

**Reasons for my submission:**

*Statement of proposal and rationale for increase*

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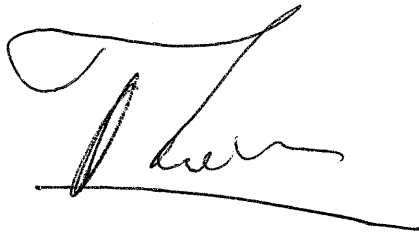
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I ~~do~~/do not (delete one) wish to appear and speak in support of my submission at the hearing.



6/5/2024

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<sup>7</sup> Clause 47.4 of the Bylaw