



# Council Agenda

Wednesday 03 June 2026, 8:30 am

The meeting will be held at the Manawatū District Council Chambers, 135 Manchester Street, Feilding, and a video recording made available on

[www.mdc.govt.nz](http://www.mdc.govt.nz)

## **MEMBERSHIP**

### **Chairperson**

His Worship the Mayor, Michael Ford

### **Deputy Chairperson**

Councillor Grant Hadfield

### **Members**

Councillor Bridget Bell  
Councillor Shelley Dew-Hopkins  
Councillor Rob Duindam  
Councillor Colin Dyer  
Councillor Sam Hill  
Councillor Raewyn Loader  
Councillor James McKelvie  
Councillor Jerry Pickford  
Councillor Andrew Quarrie  
Councillor Alison Short



Shayne Harris  
**Chief Executive**

# ORDER OF BUSINESS

PAGE

**1. MEETING OPENING**

Jan McGaffin from the Hub Church will open the meeting.

**2. APOLOGIES**

**3. CONFIRMATION OF MINUTES**

6

***Recommendation***

*That the minutes of the Council meeting held 20 May 2026 be adopted as a true and correct record.*

**4. DECLARATIONS OF INTEREST**

Notification from elected members of:

- 4.1 Any interests that may create a conflict with their role as an elected member relating to the items of business for this meeting; and
- 4.2 Any interests in items in which they have a direct or indirect pecuniary interest as provided for in the Local Authorities (Members' Interests) Act 1968

**5. PUBLIC FORUM**

There are no public forum speakers scheduled for this meeting.

**6. PRESENTATIONS**

**6.1 REPRESENTATIVE FUND - REGIONAL U14 BASKETBALL CHAMPIONSHIP**

A video presentation from Piata Atutahi and Arorangi Atutahi will be played for Council.

**7. NOTIFICATION OF LATE ITEMS**

Where an item is not on the agenda for a meeting, that item may be dealt with at that meeting if:

- 7.1 The Council by resolution so decides; and
- 7.2 The Chairperson explains at the meeting at a time when it is open to the public the reason why the item is not on the agenda, and the reason why the discussion of the item cannot be delayed until a subsequent meeting.

**8. RECOMMENDATIONS FROM COMMITTEES**

There are no recommendations from committees.

## 9. NON-COUNCIL MEETINGS – FOR INFORMATION

Minutes of the following Council Committees and Community Committees meetings are uploaded to the Council’s website, as they become available.

Liaison Councillors will have the opportunity to provide a verbal update.

The below meetings took place from 13 May to 2 June 2026:

COMMITTEE MEETINGS	
Manawatū Water Services Committee	• 13 May 2026
<a href="https://www.mdc.govt.nz/about-council/meetings-agendas-and-minutes/agendas-and-minutes">https://www.mdc.govt.nz/about-council/meetings-agendas-and-minutes/agendas-and-minutes</a>	

COMMUNITY COMMITTEE MEETINGS	
Cheltenham Community Committee	• 2 June 2026
Colyton Community Committee	• 21 May 2026
Halcombe Community Committee	• 1 June 2026
Himatangi Beach Community Committee	• 28 May 2026
Rangiwahia Community Committee	• 27 May 2026
Rongotea Community Development Group	• 1 June 2026
<a href="https://www.mdc.govt.nz/about-council/committees-and-organisations/community-committees-and-plans">https://www.mdc.govt.nz/about-council/committees-and-organisations/community-committees-and-plans</a>	

MARAE
Aorangī Marae – Cr Rob Duindam
Parewahawaha Marae – Cr Alison Short
Poupatatē Marae – Cr James McKelvie
Taumata-o-te-rā Marae – Cr Colin Dyer
Te Hiiri Marae – Cr Sam Hill
Te Tikanga Marae – Cr Shelley Dew-Hopkins
Ngāti Te Au – Cr Grant Hadfield

## 10. OFFICER REPORTS

<b>10.1 TANGIMOANA ADAPTATION PLAN</b>	12
Report of the General Manager – Corporate.	
<b>10.2 CENTRAL ECONOMIC DEVELOPMENT AGENCY FINAL STATEMENT OF INTENT 2026_2027 (9.00 AM)</b>	55
Report of the General Manager – Community.	
<b>10.3 COUNCIL CONTROLLED ORGANISATIONS EXEMPTION REPORT</b>	102
Report of the General Manager – Community.	

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<b>10.4 MANAWATU COMMUNITY TRUST FINAL STATEMENT OF INTENT 2026/2027</b>	106
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<b>10.5 SILVER FERN RALLY 2026 ROAD CLOSURE REQUEST</b>	129
Report of the General Manager – Infrastructure.	
<b>10.6 SUBMISSIONS MADE ON BEHALF OF COUNCIL – 12 MARCH TO 14 MAY 2026</b>	137
Report of the General Manager – Corporate.	

**11. CONSIDERATION OF LATE ITEMS**

**12. PUBLIC EXCLUDED BUSINESS**

COUNCIL TO RESOLVE:

That the public be excluded from the following parts of the proceedings of this meeting, namely:

1. Confirmation of Public Excluded Minutes: 20 May 2026

That the general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under Section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Grounds under Section 48(1) for the passing of this resolution
13. Confirmation of Minutes; 20 May 2026	<i>To consider the accuracy of the minutes of the public excluded Council meeting on 20 May 2026.</i>  <i>Any changes to previous minutes may require members to discuss the content of the public excluded session.</i>	s48(1)(a)

This resolution is made in reliance on Section 48(1) of the Local Government Official Information and Meetings Act 1987 and the particular interests protected by Section 6 or Section 7 of the Act which would be prejudiced by the holding of the whole or the relevant part of the proceedings of the meeting in public as specified above.

**15. MEETING CLOSURE**

MEETING MINUTES	
COUNCIL	TIME
WEDNESDAY 20 MAY 2026	8:30 AM

Minutes of a meeting of the Council held on Wednesday 20 May 2026, which commenced at 8.30 am at the Manawātū District Council Chambers, 135 Manchester Street, Feilding.

**PRESENT:**

Mayor Michael Ford	Chairperson
Councillor Bridget Bell	
Councillor Shelley Dew-Hopkins	
Councillor Rob Duindam	
Councillor Colin Dyer	
Councillor Grant Hadfield	
Councillor Sam Hill	
Councillor Raewyn Loader	
Councillor James McKelvie	
Councillor Jerry Pickford	
Councillor Andrew Quarrie	
Councillor Alison Short	

**IN ATTENDANCE:**

Shayne Harris	Chief Executive
Hamish Waugh	General Manager – Infrastructure
Frances Smorti	General Manager – Corporate
Kate Jarvis	General Manager – People
Lyn Daly	General Manager – Community
Joel Richards	Chief Financial Officer
Ash Garstang	Governance and Assurance Manager
Jeena Baines	Data, Insights and Research Analyst
Helen King	Grants Connector

MDC 25-28/251

**MEETING OPENING**

Cr Raewyn Loader opened the meeting.

MDC 25-28/252

**APOLOGIES**

There were no apologies.

MDC 25-28/253

**CONFIRMATION OF MINUTES**

**RESOLVED**

**That the minutes of the Council meeting held 06 May 2026 be adopted as a true and correct record.**

**Moved by: Cr Grant Hadfield**

**Seconded by: Cr James McKelvie**

**CARRIED (12-0)**

MEETING MINUTES	
COUNCIL	TIME
WEDNESDAY 20 MAY 2026	8:30 AM

MDC 25-28/254

DECLARATIONS OF INTEREST

There were no declarations of interest.

MDC 25-28/255

PUBLIC FORUM

There were no requests for public forum.

MDC 25-28/256

REPRESENTATIVE FUND - REGIONAL U14 BASKETBALL TOURNAMENT IN HAWKES BAY

Te Koha Cooper Burton was in attendance speaking to Council. Highlights:

- The competition was very challenging.
- He enjoyed meeting a lot of other great players at the event.

MDC 25-28/257

PRESENTATION – RESIDENT SATISFACTION SURVEY – WAVE 3

Jeena Baines (Data, Insights and Research Analyst) was in attendance speaking to Council. Highlights:

- Overall resident satisfaction remains high and above benchmark levels, with most service areas performing well.
- Key concerns raised by residents included rates and value for money, infrastructure maintenance, and rural service levels.
- Satisfaction with enquiry handling declined this quarter, with improvement actions focused on communication and customer service.

MDC 25-28/258

NOTIFICATION OF LATE ITEMS

A late report titled “Trustee Recruitment – Awahuri Forest Kitchener Park Trust” was notified, for consideration in public excluded session.

**RESOLVED**

**That Council considers the late item “Trustee Recruitment – Awahuri Forest Kitchener Park Trust” in public excluded session.**

**Moved by: Mayor Michael Ford**

<b>MEETING MINUTES</b>	
<b>COUNCIL</b>	
<b>WEDNESDAY 20 MAY 2026</b>	
	<b>TIME</b> <b>8:30 AM</b>

**Seconded by: Cr Bridget Bell**

**CARRIED (12-0)**

MDC 25-28/259

**RECOMMENDATIONS FROM COMMITTEES**

There were no recommendations from committees.

MDC 25-28/260

**COMMITTEE AND GROUP MEETINGS – FOR INFORMATION**

The following Council Committees, Community Committees and Youth Council meetings were notified for information.

<b>COMMUNITY COMMITTEES</b>	
Hiwinui Community Committee	• 19 May 2026
Sanson Community Committee	• 14 May 2026
Tangimoana Community Committee	• 18 May 2026
Waituna West Community Committee	• 13 May 2026

Liaison Councillors provided brief updates on their respective Committees.

- Hiwinui – Cr Raewyn Loader. They have a close relationship with the school committee. They have updated their security and lighting. They would like the speed reduction sign on Watershed Road and Colyton Road returned. There is a fundraiser in November “Gumboots and Glam”.
- Sanson – Cr Alison Short. Good turnout at the committee meeting. They discussed whether a small generator for the hall might be a good use for their project funding. There was a concern raised about theft and vandalism, and the Chair of the Community Committee has contacted the Feilding Police station.
- Tangimoana – Cr James McKelvie. Cr Quarrie has been working with the Committee on the monument to their fallen soldier – they have picked a suitable site. The fence has been completed around the green waste area. They would also be keen for the first little stretch of Scott Ferry Road sealed.
- Waituna West – Cr Sam Hill. The Committee was happy that the hall was due to be painted. They raised several issues around road damage and tree damage (from earlier storms). Cr Hill encouraged Committee members to lodge issues via Antenno. They suggested that a memorial wall could be raised as part of the Waituna West Cemetery upgrade next year.

MDC 25-28/261

**MARAE LIAISON COUNCILLORS**

There were no updates.

<b>MEETING MINUTES</b>	
<b>COUNCIL</b>	<b>TIME</b>
<b>WEDNESDAY 20 MAY 2026</b>	<b>8:30 AM</b>

MDC 25-28/262

**APPOINTMENT OF LIAISON COUNCILLOR TO NGĀTI TE AU MARAE**

Report of the General Manager – Corporate seeking Council approval for the confirmation of a marae liaison appointment to Ngāti Te Au Marae.

**RESOLVED**

**That the Council appoints Deputy Mayor Grant Hadfield to be the Council’s marae liaison to Ngāti Te Au Marae.**

**Moved by: Cr Bridget Bell**

**Seconded by: Cr Alison Short**

**CARRIED (11-0)**

*Cr Grant Hadfield abstained from voting*

MDC 25-28/263

**PUBLIC EXCLUDED BUSINESS**

**RESOLVED**

**That the public be excluded from the following parts of the proceedings of this meeting, namely:**

- 1. Late Report – Trustee Recruitment – Awahuri Forest Kitchener Park Trust**

**That the general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under Section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:**

<b>General subject of each matter to be considered</b>	<b>Reason for passing this resolution in relation to each matter</b>	<b>Grounds under Section 48(1) for the passing of this resolution</b>
13. Late Report – Trustee Recruitment – Awahuri Forest Kitchener Park Trust	<i>s7(2)(a) – privacy  The late report discusses recruitment considerations around private individuals</i>	s48(1)(a)

**This resolution is made in reliance on Section 48(1) of the Local Government Official Information and Meetings Act 1987 and the particular interests protected by Section 6 or Section 7 of the Act which would be prejudiced by the**

MEETING MINUTES	
COUNCIL	TIME
WEDNESDAY 20 MAY 2026	8:30 AM

holding of the whole or the relevant part of the proceedings of the meeting in public as specified above.

**Moved by: Mayor Michael Ford**

**Seconded by: Cr Shelley Dew-Hopkins**

**CARRIED (12-0)**

*The meeting went into public excluded session at 09.09 am. For items MDC 25-28/264 to MDC 25-28/266 refer to public excluded proceedings. The meeting returned to open session at 9.19 am.*

*The meeting was adjourned at 9.19 am and reconvened at 9.32 am.*

MDC 25-28/267

#### PRIORITY SERVICE CONTRACTS – ANNUAL REPORTS

Report of the General Manager – Community seeking Council receive these reports.

#### RESOLVED

**That Council receives all three 12-month Priority Service Contract reports for the period ending 30 June 2025 from:**

- **St Johns Feilding Area Committee**
- **Tenants' Union**
- **Feilding Community Patrol**

**Moved by: Mayor Michael Ford**

**Seconded by: Cr Grant Hadfield**

**CARRIED (12-0)**

MDC 25-28/268

#### CONFIRMATION OF PUBLIC EXCLUDED RESOLUTIONS IN OPEN SESSION

MDC 25-28/265 – Trustee Recruitment – Awahuri Forest Kitchener Park (20 May 2026)

#### RESOLVED

*That Council:*

1. *Accepts Bessie Nicholls' letter dated 15 May 2026 advising that her revised effective resignation date from the Awahuri Forest Kitchener Park Trust is 20 May 2026.*
2. *Approves the appointment of Cr Grant Hadfield as an interim Trustee of the Awahuri Forest Kitchener Park Trust, effective immediately, until the Trust is officially dissolved on 30 June 2026.*

MEETING MINUTES	
COUNCIL	TIME
WEDNESDAY 20 MAY 2026	8:30 AM

3. *Agrees that this resolution can be released to the public.*
4. *Notes that this report has been tabled late due to the timing of the resignation advice.*
5. *Notes that the matter cannot be deferred to the next Council meeting, as the Trust would otherwise be unable to achieve a quorum for its meeting scheduled on 21 May 2026.*

*Moved by: Cr Colin Dyer*

*Seconded by: Cr Shelley Dew-Hopkins*

*CARRIED (11-0)*

*Cr Grant Hadfield abstained from voting*

MDC 25-28/269

#### MEETING CLOSURE

The meeting was declared closed at 10.21 am.

#### Meeting Video

<https://www.mdc.govt.nz/about-council/meetings-agendas-and-minutes/videos-of-council-and-committee-meetings/manawatu-district-council-meeting-videos>

## Council

Meeting of 20 May 2026

Business Unit: Corporate

Date Created: April 28, 2026

## Resilient Tangimoana: Preliminary Adaptation Plan: 2026-35

### Purpose Te Aronga o te Pūrongo

To present the Resilient Tangimoana: Preliminary Adaptation Plan 2026–2035 to Council, outline its development and key findings and to introduce the stormwater modelling now underway to inform future flood-risk decisions.

### Recommendations Ngā Tūtohunga

That Council:

1. Receives the Resilient Tangimoana: Preliminary Adaptation Plan 2026-35.
2. Notes that MDC and Horizons have commissioned stormwater modelling to support future decision-making on flood-risk reduction in Tangimoana.

Report prepared by:

Kemi Hughes

Senior Policy Adviser - Environmental

Approved for submission by:

Frances Smorti

General Manager - Corporate

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## **1 Background Ngā Kōrero o Muri**

- 1.1 Tangimoana was identified in 2022 by the Manawatū–Whanganui Climate Action Joint Committee as one of the most climate-vulnerable communities in the region, facing heightened exposure to natural hazards.
- 1.2 The settlement’s location at the mouth of the Rangitikei River with a high water table makes it especially susceptible to fluvial (river flooding from bank overflow from heavy rainfall) and pluvial (surface flooding from intense and prolonged rainfall) flooding. These risks are projected to intensify with sea-level rise, increasing the threat of coastal inundation and storm surge from mid-century onwards.
- 1.3 In recognition of these risks, Tangimoana was selected as one of two pilot communities in the Deep South National Science Challenge project, Embedding Adaptation, led by Massey University. The research examined how local adaptation practices are shaped by governance, politics, and relationships among communities, tangata whenua, and local authorities. The aim was to better understand the conditions needed to support effective, community-led adaptation.
- 1.4 In early 2025, the Tangimoana Resilience Group was established to fill this gap, comprising representatives from the Tangimoana Community Committee, Horizons Regional Council, and Manawatū District Council. As part of the Embedding Adaptation process, the Tangimoana community entered into collaborative agreements with key stakeholders to co-develop a localised adaptation response.
- 1.5 Building on these collaborative arrangements, the Tangimoana Resilience Group progressed the co-development of a Preliminary Adaptation Plan to provide a structured approach to addressing the community’s climate-related risks.
- 1.6 As a signatory to the Statement of Intent/ Framework Agreement, Manawatū District Council committed to work with Horizons Regional Council and the Tangimoana Community Committee to provide technical input, information, and support where practicable during plan development.
- 1.7 The Preliminary Adaptation Plan identifies a set of priority actions for MDC, HRC and the Tangimoana Community Committee, including strengthening community preparedness and undertaking further technical investigation to improve understanding of flood and drainage risks.

## **2 Strategic Fit Te Tautika ki te Rautaki**

The report aligns with Council’s priorities outlined below:

### **A future planned together**

- 2.1 This report supports collaborative long-term adaptation planning with the Tangimoana community, Horizons Regional Council, and other stakeholders to increase the resilience of this community to extreme weather events.

### **An environment to be proud of**

- 2.2 By addressing localised flood risks and climate-related hazards, the adaptation planning process contributes to the protection and sustainable management of Tangimoana’s natural environment.

#### **Infrastructure fit for future**

- 2.3 The report highlights the need for improved stormwater information to support future infrastructure planning.

#### **Value for money and excellence in local government**

- 2.4 By investing early in stormwater modelling to inform future hazard and risk assessments, the report supports evidence-based planning that can reduce long-term infrastructure and emergency response costs, delivering more sustainable value to the District.

### **3 Discussion and Options for Consideration Ngā Matapakinga me ngā Kōwhiringa i Wānangahia**

- 3.1 There are two options for consideration:

**Option 1** - That Council receives the Preliminary Adaptation Plan for Tangimoana (recommended) or

**Option 2** - That Council does not receive the Preliminary Adaptation Plan.

- 3.2 Option 1 is recommended as it recognises Council’s role as a signatory to the Statement of Intent and its involvement in the development of the Plan. Accepting the plan does not commit Council to any future actions or expenditure. Stormwater modelling has already been commissioned in partnership with Horizons Regional Council, with costs met from existing budgets. The findings of this modelling will inform any future consideration of infrastructure investment to mitigate flood risk in Tangimoana.

- 3.3 Option 2 is not recommended. As a signatory to the Statement of Intent, and with representation on the group that developed the Plan, this option carries reputational risk. Not receiving the Plan may undermine relationships with Horizons Regional Council, the Tangimoana Community Committee, tangata whenua, and other partners involved in the process. A decision not to receive the Plan would not alter that work but may create inconsistency between Council’s actions and its stated commitment to the collaborative process.

- 3.4 Any future commitments would be subject to prioritisation through Council’s LTP or Annual Plan processes, regardless of whether Council receives the Preliminary Adaptation Plan.

### **4 Risk Assessment Te Arotake Tūrarū**

- 4.1 There is a potential reputational risk that Council may face community disappointment or criticism if it chooses not to progress future adaptation actions that fall outside the commitments made in the current Statement of Intent/Framework Agreement. While the Council has current budget to commission stormwater modelling (a priority action outlined in the plan) future recommendations based on findings from that modelling

assessment, particularly those requiring new investment, may raise expectations that exceed Council's current mandate or resourcing.

- 4.2 Council's commitments remain limited to the jointly signed Statement of Intent/Framework Agreement, which focuses on providing technical support during plan development and engaging with the Community Committee on the plan's recommendations. Any future actions not covered by the current plan or beyond existing capacity will be subject to prioritisation through Council's Long-Term Plan or Annual Plan processes, if Council elects to consider them.

## **5 Engagement Te Whakapānga**

### Significance of Decision

- 5.1 The Council's Significance and Engagement Policy is not triggered by matters discussed in this report. No additional engagement is required for the Council decision on this report.

### Māori and Cultural Engagement

- 5.2 There are no known cultural considerations associated with the matters addressed in this report. No specific engagement with Māori or other ethnicity groups is necessary.

### Community Engagement

- 5.3 No additional engagement is required for Council's decision on this report. There is underlying continued engagement with the community through the Tangimoana Community Committee as progress is made with the other priority actions identified in the Preliminary Adaptation Plan.

## **6 Operational Implications Ngā Pānga Whakahaere**

- 6.1 There are no immediate operational implications for Manawatū District Council at this stage. However, future operational implications may arise depending on the findings of the modelling assessment, particularly in relation to infrastructure performance, flood management, and potential adaptation responses. These will be assessed once the technical outputs are available.

## **7 Financial Implications Ngā Pānga Ahumoni**

- 7.1 The total indicative cost of the Tangimoana stormwater modelling is approximately \$72,867.60. Manawatū District Council and Horizons Regional Council have agreed to share the cost equally. MDC's portion of the cost is already provided for within existing budgets, and no additional funding is required at this time.

## **8 Next Steps Te Kokenga**

- 8.1 Once sufficient information to identify and access key actions is gathered, the Preliminary Adaptation Plan would be reviewed and updated, likely in 2027/ 2028.

## **9 Attachments Ngā Āpitihanga**

- Resilient Tangimoana Preliminary Adaptation Plan

# Resilient Tangimoana: *Preliminary Adaptation Plan: 2026-2035*



Community meeting, July 2025. Photo credit: Bruce Glavovic

**By Tangimoana Resilience Group**

***Prepared by Bruce Glavovic***

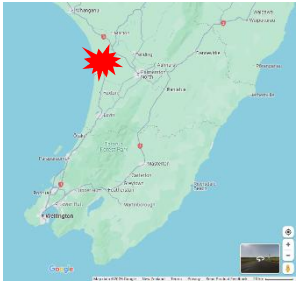
***24 November 2025***



GLAVOVIC  
Consulting  
Services



Community meeting, July 2025.  
Photo credit: Bruce Glavovic



2025 Google terrain maps of Tangimoana and surrounds

**Resilient Tangimoana: Preliminary Adaptation Plan: 2026-2035**  
**Client report:** 2025 Tangimoana Rapid Risk Assessment and Adaptation Pathways Plan Development- CLIMAT001 Contract Extension  
**For:** Horizons Regional Council  
**By:** Bruce C. Glavovic

**Recommended citation of this report:** Glavovic, B.C. (2025). *Resilient Tangimoana: Preliminary Adaptation Plan: 2026-2035*, Report by Tangimoana Resilience Group, Tangimoana.

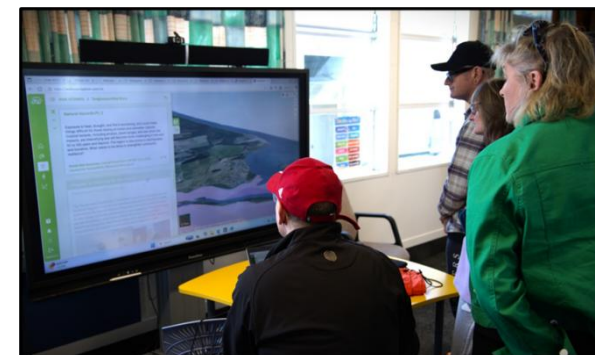
## Acknowledgements

We sincerely appreciate the contributions by many individuals – who are too numerous to name, but are among the following who made this Plan possible, including:

- Residents of Tangimoana, especially Tangimoana Community Committee members,
- The Principal, staff and students of Tangimoana School,
- Tangata whenua,
- Elected members, leadership and staff of the Manawatū District Council,
- Elected members, leadership and staff of the Horizons Regional Council,
- Members of the Manawatū-Whanganui Climate Action Joint Committee.

## Executive Summary

- The **Manawatū-Whanganui Climate Action Joint Committee** identified **Tangimoana** and **Pūtiki** as communities facing severe climate-compounded risk and **priority Deep South National Science Challenge (2022-2024) case studies** to understand how communities can reduce risk and adapt.
- A **Statement of Intent** was co-signed by Horizons Regional Council (HRC), Manawatū District Council (MDC) and the Tangimoana Community Committee (TCC) (November 2023) to work together. This **Preliminary Adaptation Plan (2026-2035)** results from this agreement, supported by **Deep South Reports** and additional reports on **Resilient Tangimoana** and a **Risk Assessment Report**.
- Tangimoana residents have a **shared vision to build a thriving, resilient community**.
- **Tangimoana faces many natural hazards**. River flooding from inland is the greatest immediate peril. Extreme weather events are projected to become more severe with climate change, increasing riverine flooding and localised ponding. Tangimoana's **natural hazard risk profile** will change over time with projected sea-level rise and land subsidence likely to significantly **increase flood risk beyond ~2050**.
- Many **resilience building actions** can be taken to address risk in the short- (1-10 years) to medium-term (10-50 years). Sea-level rise will increase storm surge risk and possibly inundation flooding and is a key factor shaping longer term risk (50-100+ years). **Key adaptation strategies** include: (i) **Protect:** Measures that provide protection, like seawalls, stopbanks and nature-based solutions; (ii) **Accommodate:** Measures that reduce hazard impacts, like raising buildings; and (iii) **Retreat:** Measures to move out of harm's way, like planned relocation to higher ground.
- **This Plan lists how to:** (i) Build community resilience; (ii) Raise awareness, develop shared understanding, and work together better; (iii) Adopt tailor-made early warnings, and emergency



**Community meeting at Tangimoana School (27 July 2025)**

Photo credit: Bruce Glavovic



**Figure 1: Scenario ~ 2100: 1% Annual Exceedance Probability; 0.9m sea-level rise + vertical land movement (2000 base)**

response and post-disaster recovery plans; and (iv) Initiate priority adaptation actions (2026- 2035).

**Priority actions include:**

- MDC to work with the TCC to **review and update the existing Tangimoana and Surrounding Area Community Response and Recovery Plan**, ensuring it reflects emerging community needs, incorporates lived experience and local knowledge, and aligns council flood predictions and warnings with community understanding. **(MDC and TCC; Target: End 2026)**
- MDC to work with TCC to **prepare an updated Community Plan**, building on and extending the 2017 plan. **(MDC and TCC; Target: End 2026)**
- **Improve understanding about flood risk and ponding, and plausible options for integrated flood protection and managing stormwater:** New technical analysis is necessary to provide a robust estimate of likely costs and rates implications for options to improve protection works given projected sea-level rise and flood risk. Residents will only then be able to consider the feasibility and affordability of protection options. **HRC and MDC are requested to scope and fund an investigation to better understand projected localised flood risk accounting for interactions between flood protection options and ponding** after heavy downpours and stormwater drainage and sewage system implications in extreme events given projected sea-level rise and land subsidence. The scope should include identifying and costing solutions to inform future adaptation planning, as was done for Pūtiki – the other community prioritised by the Climate Action Joint Committee. Solutions could include assessment of viable property protection measures. **(HRC, MDC: Target completion: end 2026 to mid-2027)**
- Based on insights gained from above priority actions, **review and update this Preliminary Adaptation Plan.** **(TCC, HRC, MDC: Target completion: 2028)**

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DRAFT

# 1. Introduction

This plan builds on the **Deep South-Horizons project** which (i) established a long-term partnership between the village, the Manawatū District Council (MDC) and Horizons Regional Council (HRC); (ii) helped understand the risk Tangimoana faces; and (iii) identified urgent actions, together recorded in a co-signed **Statement of Intent** to work together (see Appendix 1).

The plan has been prepared by the **Tangimoana Resilience Group** (TRG) which is made up of three representatives nominated by the **Tangimoana Community Committee** (TCC), and one representative each from the MDC and HRC. Bruce Glavovic, who co-led the Deep South-Horizons project, facilitated the TRG through 2025.

Residents want Tangimoana to be a **thriving, resilient community**. For the last year, the TRG has looked at how to achieve this through the actions of residents with support by the MDC and HRC. This plan focuses on short-term (next 1-10 years) priorities because more technical analysis is needed before medium- (10-50 years) to long-term (50-100+ years) resilience can be planned for and built.

A **thriving, resilient Tangimoana** has a shared **vision** for the future, with clear **goals** for building community resilience. Tangimoana better understands the **risks** faced and agrees on **options** to address these risks over time through **pathways for action** that help realise community goals, with scheduled **monitoring, evaluation, plan revision, and learning** to track progress, and adapt over time.

*I like Tangimoana  
because it is peaceful*

*(Kid, Tangimoana School)*

*... we can all work together*

*(Resident)*

## 2. Vision & goals for a thriving, resilient Tangimoana

The **2017 Tangimoana Community Plan** records the community vision as: ***“Retain and improve the special natural character and environment that makes us an iconic Kiwiana village”***.

The 2017 Community Plan will be **updated in 2025-2026** and residents look forward to reconsidering their vision and resilience goals for the future.

Residents are inspired by the children at **Tangimoana School** who shared their artwork on what they love about the village at a community hui in July 2025.



*I like Tangimoana because  
it has a park*

*(Kid, Tangimoana School)*



### 3. Tangimoana risk profile

The **Tangimoana Resilience Group** summarised the risk profile in a series of 2025 reports. HRC contracted specialists to prepare a **Resilience Explorer tool** to show how risk might evolve over time.

The key finding of the Risk Assessment work is that, like many other communities, **Tangimoana faces many natural hazards** from flooding of the Rangitikei River to severe ponding in heavy rainfall events due in part to a high water table, tsunami, wildfires and seismic events.

**Riverine flooding from inland is the most immediate peril**, as the 2004 floods demonstrated. Peak flow was estimated to be about 2% Annual Exceedance Probability (AEP) or a 50-year Return Period event. The stopbanks performed below the intended 2% AEP design standard in 2004, and the stopbank was breached. 41 homes were declared uninhabitable. **Through the HRC 2006-2016 Long Term Plan, protection was improved beyond the community's agreed 2% AEP design standard** to account for riverbed build up or aggradation over about 25 years. Further investigation is necessary to accurately determine current and projected levels of protection, but it is likely between 1-2% AEP at present.

**How might the riverbed have changed in recent years?** HRC investigations over at least the last 6 years have looked at how the Rangitikei River channel and riverbed have changed, and how much gravel has been moved or deposited, with a focus on much gravel can sustainably be removed. HRC has not assessed the impacts of these changes on flood protection structures, and these investigations cannot be used to judge how well stopbanks or other flood assets would perform in a flood.





**Tangimoana during February 2004 floods.**

Photo credit: Horizons Regional Council & NZDF

**Assessing how flood protection assets would perform in a flood requires far more than just understanding localised changes in the riverbed.** Historical flooding of the Rangitikei River has mainly occurred due to intense rainfall in the upper catchment; in the mountains and hill country. As flood water travels down the river, any changes in the riverbed will affect how much water reaches the lower river and when. To understand how much protection is provided by stopbanks and other flood protection structures requires assessing what will happen upstream along with other factors such as rainfall patterns. HRC have commissioned a **regional flood vulnerability assessment** that may provide some of this information for Tangimoana in the near future.

HRC work to date indicates that **the riverbed in lower reaches of the Rangitikei River is not aggrading** (being raised). Studies have used laser mapping and other advanced mapping methods and compared findings with historic data and photographs.

**Key points from recent investigations include:**

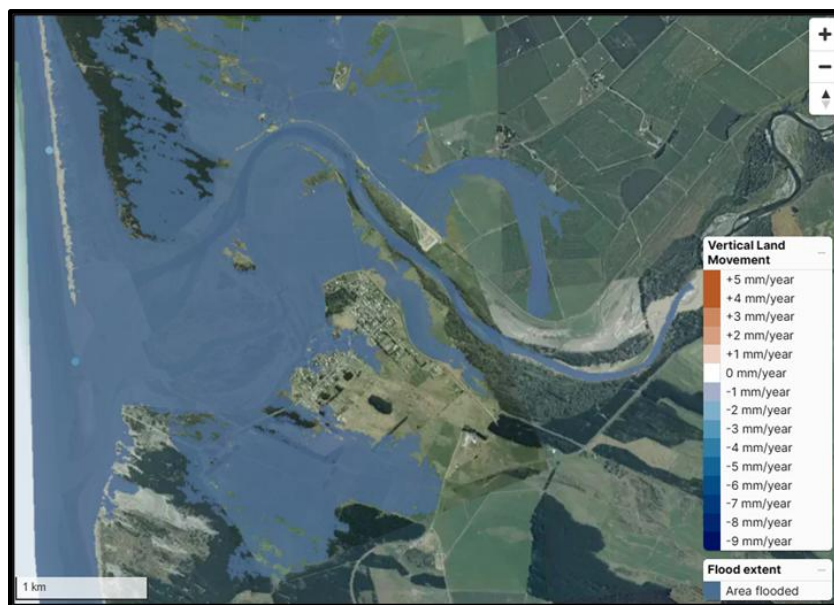
- **Overall, the riverbed from Bulls to the river mouth is gradually lowering (degrading).** There are small local increases in the lower 5 km near the mouth, but these are temporary and should not be interpreted as long-term trends.
- Not enough sediment/gravel is coming from upstream to build up the river mouth. Gravel that does settle there is usually washed away in high flows.
- **Between 2004 and 2017, the lower 5.42 km shows a small increase in riverbed level, while upstream sections show a clear decline.**

- Downstream from about 15 km to the mouth, the active channel (where water flows at normal levels) has deepened because the river has formed a narrower single channel.
- **The river's shape makes it difficult to directly link gravel increases to long-term build-up in the active channel, so HRC recommendations about gravel extraction are cautious.**

Importantly, Tangimoana's **risk profile** will change over time with projected sea-level rise and land subsidence likely to **significantly increase coastal and riverine flood risk from ~2070-2080 onwards.**



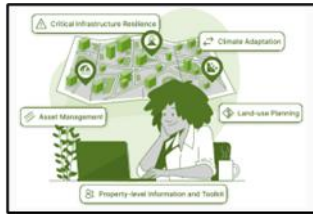
**Tangimoana stopbank.**  
Source: Deep South Living with Uncertainty Project



**Figure 1: Scenario ~ 2100: 1% Annual Exceedance Probability; 0.9m sea-level rise + vertical land movement (2000 base)**

*I don't think people realise the actual crisis  
that is literally knocking on our door*

*(Tangata whenua)*



## 4. Two scenarios: Coastal flood extent with no sea-level rise (present day) and with 1m sea-level rise (plausible ~2100) based on Resilience Explorer tool

The influence of projected sea-level rise is shown in the two scenarios below.

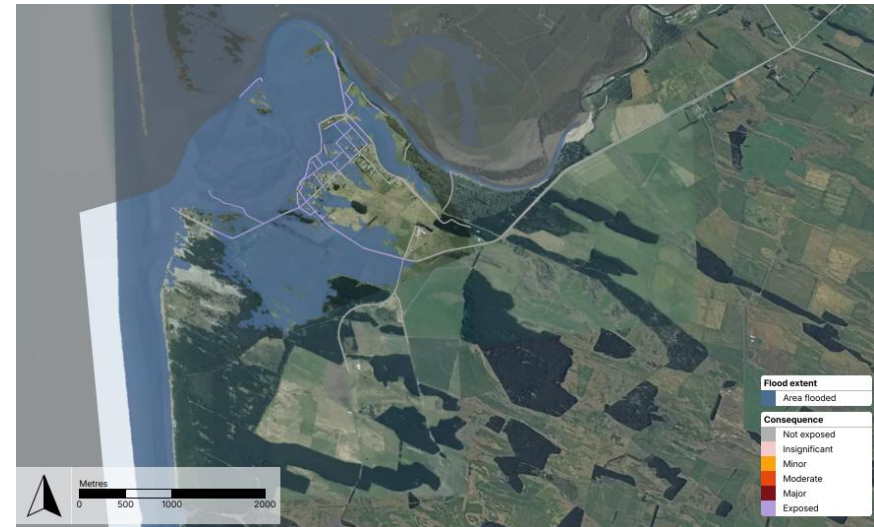
**Scenario 1: Coastal flood (1% AEP, 0.0m sea-level rise)**



Map showing Bridges, Roads (Manawatū), Roads (New Zealand), Drainage Channels, Bank Protection Structures, and Flood Protection Structures at risk from:

- Coastal Flood Extent (1% AEP, 0.0 m SLR)

**Scenario 2: Coastal flood extent (1% AEP, 1.0m sea-level rise)**



Map showing Bridges, Roads (Manawatū), Roads (New Zealand), Drainage Channels, Bank Protection Structures, and Flood Protection Structures at risk from:

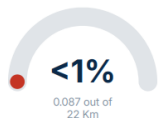
- Coastal Flood Extent (1% AEP, 1.0 m SLR)

### RISK SUMMARY - Roads (Manawatū)

Coastal Flood Extent (1% AEP, 0.0 m SLR)

For this scenario approximately **0.09** km of Roads (Manawatū) are threatened.

Percentage Exposed



### RISK SUMMARY - Bank Protection Structures

Coastal Flood Extent (1% AEP, 0.0 m SLR)

For this scenario approximately **0.3** km of Bank Protection Structures are threatened.

Percentage Exposed



### RISK SUMMARY - Roads (Manawatū)

Coastal Flood Extent (1% AEP, 1.0 m SLR)

For this scenario approximately **5.09** km of Roads (Manawatū) are threatened.

Percentage Exposed



### RISK SUMMARY - Bank Protection Structures

Coastal Flood Extent (1% AEP, 1.0 m SLR)

For this scenario approximately **0.49** km of Bank Protection Structures are threatened.

Percentage Exposed



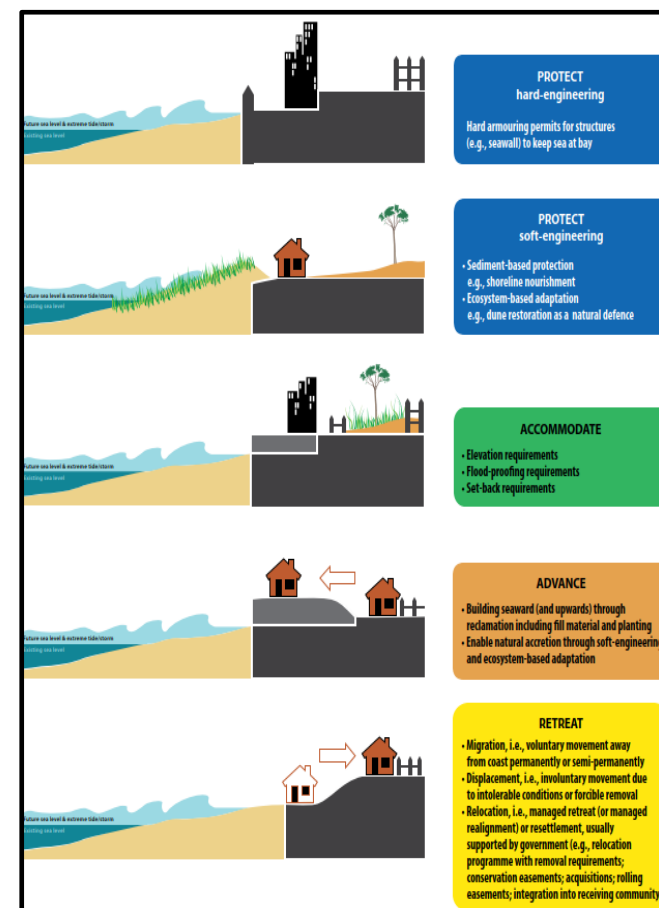
## 5. A thriving, resilient Tangimoana

The above scenarios highlight the need to build resilience in the face of escalating risk. Coastal communities like Tangimoana can use different measures to reduce risk and adapt over time, including individual and collective efforts involving a mix of behavioural, institutional, infrastructural, and nature-based responses. Examples include insurance innovations, new regulations to manage risk, ecosystem restoration to protect against coastal storms, etc. Many resilience building actions can be taken by individual households and communities to address risk in the short- (1-10 years) to medium-term (10-50 years). Sea-level rise is the key factor shaping long-term risk (50-100+ years), and key adaptation strategies to build enduring resilience include:

- **Protect:** Measures that provide protection, like seawalls, stopbanks and nature-based solutions;
- **Accommodate:** Measures that reduce hazard impacts, like raising buildings, back-up generators;
- **Advance:** Measures only possible in limited circumstances, like extending port infrastructure; and
- **Retreat:** Measures to move out of harm's way, like planned relocation to higher ground (Figure 2).

These strategies can be **very technical and costly** and are often **unaffordable**. But action can still be taken in the short- to medium-term. This **Plan** outlines ways to:

1. **Build community resilience;**
2. **Raise awareness, develop shared understanding, and work together better;**
3. **Adopt tailor-made early warnings, emergency response and post-disaster recovery plans;** and
4. **Initiate priority adaptation actions (2026- 2035).**



IOC-UNESCO. 2021. *Community Guide for community members interested in risk reduction efforts. How to reduce coastal hazard risk in your community: A step-by-step approach.* IOC Manuals and Guides No. 85 Vol.2 (English). Paris, UNESCO.

**Figure 2: Strategies to reduce the impact of sea-level rise**

## 6. Build community resilience

Key elements and examples of **resilience** previously identified are outlined in Appendix 4 Table 1. **Tangimoana residents** play crucial roles in **building the resilience of their households and community assets** like the beach, natural environment and Ellison Park; community hall; school; fire station; angling club; campgrounds; dairy; and village way of life. **With partner backing, residents can support Tangimoana resilience in many ways, for example:**

### School resilience:

- **Help improve drainage** through creative landscaping, possibly using fill to create a mound over the drain field so that rainwater flows away and, not toward it
- **Redirect downspouts and other sources of runoff** away from the septic system
- **Help install a raised all-weather running/walking/cycling track on the field** to divert water away from neighbouring farmland to protect the school and neighbouring houses, including septic tanks
- **Involve school children in brainstorming new ideas to improve School resilience**

### Environmental resilience

- Look into creative ways to **improve the resilience of the beach, dune and wetland systems**
- **Investigate and identify actions to protect and improve whitebait breeding habitat** in the estuary.
- **Plant native species** (like putaputāwētā); **establish ‘rain gardens’** (specially designed planted areas that capture and absorb stormwater, and filter out pollutants before the water seeps away)



Photo credit: Stuff Limited (David Unwin). Students from Tangimoana School are carrying out a scientific study on climate change adaptability in their village.



Photo credit: Bruce Glavovic

### Contribute ideas for building Tangimoana resilience

- **Strengthen networks with residents and community groups to grow and share food**
- **Work with mana whenua** to build resilience.
- **Find out how HRC and MDC can support local resilience building**, e.g., could local government install temporary / portable flood barriers and environmental resilience building measures?

### Household resilience

There is a range of actions homeowners can take to lessen flood damage, some options are:

- **Landscaping:** E.g., divert water by creating 'SandBag' gardens
- **Stockpile sandbags:** Have individual supply ready for a "Quick Dam"
- **Temporary defences / flood barriers:** Keep sandbags, plastic sheeting, and wooden planks on hand to create temporary barriers around openings before and during a flood; use removable gates or panels to seal doorways, windows, and other openings when a flood is expected
- **Waterproof walls:** E.g., liquid membranes, cement coatings, or water-resistant coatings to prevent water penetration of exterior and interior walls
- **Elevate utilities:** Move electrical sockets, air conditioning units, and service entry points above predicted flood level
- **Install backflow valves:** Fit non-return valves to drains, sewers / septic tanks, and toilet systems to prevent floodwater and sewage from entering your property

*... our geographical situation  
... bounded by ... rivers ...  
our sea ... if you're talking  
about ... weather impacts,  
we're kind of sitting ducks.  
... we need to do this  
together... while we do stuff  
at local and regional levels  
and at national level, you  
also have a responsibility  
with you and your family to  
... take care of yourself  
(MDC Councillor)*

*the community can  
support itself. ... we know  
when it floods, we protect  
each other  
(Resident)*

In addition to the above practical resilience building measures, there are many ways that residents can help one another, including for example:

- **Strengthen neighbourly relationships:** Based on informal day-to-day interactions that might include sharing meals and resources, or checking up on folk who are struggling, or supporting one another in an emergency. Such relationships can also help to build shared understanding about the risks faced and adaptation and resilience building options.
- **Establish self-help groups:** Such groups can form to share food, health support, or emergency aid after an extreme event.
- **Crowd funding:** Securing crowd-sourced funding and / or material support can meet local needs in the aftermath of an extreme event or to meet a particular community need in 'peacetime'.
- **Mutual lending:** Reducing vulnerability to displacement and strengthening resilience can be achieved by residents pooling funding and providing loans to each other. This operates outside the formal banking system and is founded on community participation and trust.
- **Mutual aid agreements:** These are more formal agreements between organisations, including councils, to support one another in emergency circumstances. This might involve sharing personnel, equipment, facilities and other resources.
- **Cooperative societies:** Such cooperatives can be formed by organisations that pool resources for shared goals such as housing and food provision. Profits can be distributed or re-invested to progress cooperative society goals.

These and other forms of **mutual aid can support and enable community resilience building**, with different strategies being used in different circumstances and evolving over time.

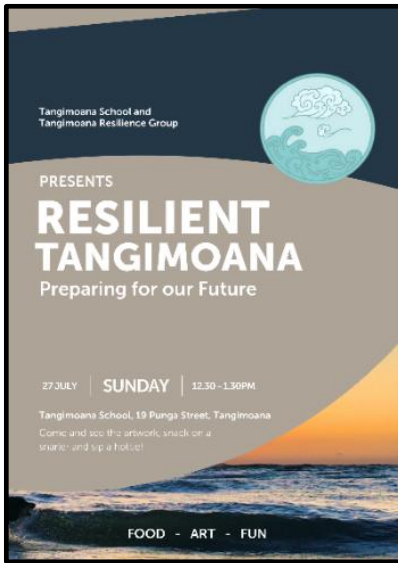
## 7. Raise awareness, develop shared understanding, and work together better

The TRG has worked hard to raise community awareness about the work underway to understand the risks faced and ways to build community resilience. It has been difficult to mobilise residents. A community meeting held at the Tangimoana School in July 2025 was well-supported and provided a good opportunity for residents to find out about the TRG work and hear firsthand from students about their hopes, dreams and creative ideas about how to make Tangimoana more resilient. Priority actions include:

- **Share Tangimoana resilience mahi with mana whenua.** (HRC, MDC: TRG; ongoing)
- **Update elected members of HRC and MDC**, and seek endorsement for key actions requiring council support noted in this Plan (HRC, MDC; Target: before mid-2026)
- **Raise resident awareness and understanding about insurance**, and how insurance access and premiums might be affected by climate-related risk (see overview in Appendix 2; additional work to be determined, e.g., request ICNZ for list of priority actions that local communities can take to contain insurance premium increases and withdrawal)
- **What other steps could be taken by residents?**

*... knowledge is power ...  
putting your head in the  
sand is not going to work*

*(Resident)*

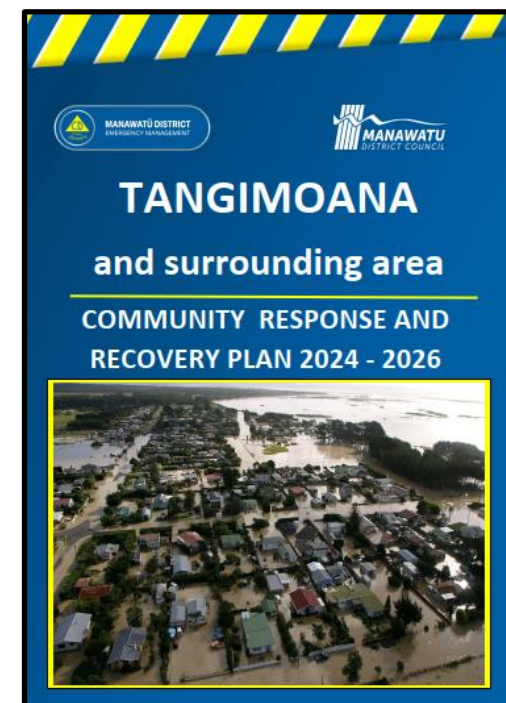


Community meeting at Tangimoana School (27 July 2025) Photo credit: Bruce Glavovic

## 8. Adopt tailor-made early warnings, and emergency response and post-disaster recovery plans

Tangimoana needs a tailor-made, dedicated early warning system as well as community-specific emergency response and post-disaster recovery plans. Priority actions include:

- MDC to work with the TCC to **review and update the existing Tangimoana and Surrounding Area Community Response and Recovery Plan**, ensuring it reflects emerging community needs, incorporates lived experience and local knowledge, and aligns council flood predictions and warnings with community understanding as part of the ongoing Tangimoana resilience planning and action **(MDC and TCC; Target: End 2026)**
- MDC to work closely with TCC to **prepare an updated Community Plan** for Tangimoana, to be approved by the TCC working with MDC, building on and extending the 2017 plan **(MDC and TCC; Target: End 2026)**
- MDC to work with PowerCo and relevant partners to **assess and progress alternative energy resilience options for Tangimoana** to facilitate suitable standby or renewable energy capability that supports critical community functions during emergencies **(MDC, TCC and PowerCo; Target: End 2026)**



*Drive away so we do not get hurt, we will know it's coming because we have time. You can move your home on a trailer and go somewhere and then come back*

*(Kid, Tangimoana School)*

## 9. Priority adaptation actions (2026-2035)

Further investigation is necessary to better understand medium- to long-term adaptation strategies (see Table 2) from both a technical and affordability standpoint, and consequently what mix of risk reduction and resilience building actions might be best to realise the vision for Tangimoana.

### 9.1 Protect

- **Improve understanding about flood risk and ponding, and plausible options for integrated flood protection and managing stormwater:** New technical analysis is necessary to provide a robust estimate of likely costs and rates implications for options to improve protection works given projected sea-level rise and flood risk. Residents will only then be able to consider the feasibility and affordability of protection options. **HRC and MDC are requested to scope and fund an investigation to better understand projected localised flood risk accounting for interactions between flood protection options and ponding** after heavy downpours and stormwater drainage and sewage system implications in extreme events given projected sea-level rise and land subsidence. The scope should include identifying and costing solutions to inform future adaptation planning, as was done for Pūtiki – the other community prioritised by the Climate Action Joint Committee. Solutions could include assessment of viable property protection measures. **(HRC, MDC: Target completion: end 2026 to mid-2027)**
- **Integrate local knowledge and experience** into joined up HRC-MDC flood risk modelling and overview of plausible responses and associated potential rates / cost-sharing implications. Account

*Have a big metal wall along  
the beach with a concrete  
pole. Leave a gate like on a  
big castle so we can still go  
to the beach*

*(Kid, Tangimoana School)*

for impact of land-use changes affecting drainage of farmland on boundaries of village. (TCC, HRC, MDC: Work underway; Target completion: end 2026 to mid-2027)

## 9.2 Accommodate

- **Improve understanding about the technical and financial implications of options to raise flood-prone houses in Tangimoana.** Various studies have been done on raising houses in flood-prone locations. Should investigation of stormwater/ flood indicate house raising is a viable option for some properties, and should sufficient homeowners request it, Councils could investigate Tangimoana-specific options and costs given locality-specific factors influencing feasibility and affordability. Such analysis should be scoped for a range of house types at Tangimoana where house raising is identified as a viable option but also indicate the likely range of costs given different housing types, liquefaction susceptibility, and implications for maintaining basic services (like potable water, sewage disposal, etc.), among other things. Past investigations in places like Anzac Parade on the Whanganui River indicate that raising houses is likely to be very expensive. At present, homeowners would likely bear all the costs, as there does not appear to be any available government or other support. Haphazard and inequitable outcomes would likely result if left to individual homeowner choice. (TCC, MDC, HRC work underway; Target completion within 6 months of solutions from ‘protect’ investigations being completed).

*I have a bunker to go into if there is a tsunami or flood*

*(Kid, Tangimoana School)*

*I want to build a house with titanium stilts that won't rust and won't break down.*

*... We need to put all houses on stilts*

*(Kid, Tangimoana School)*

*Where the ocean line is, I  
am going to make a massive  
wall of bricks and titanium  
... Don't move Tangi ... We  
should move the town only  
if in 20 years there are more  
flash floods  
(Kid, Tangimoana School)*

### **9.3 Planned relocation**

- It is possible that sea-level rise compounded **risk could become intolerable in the next 4-7 decades**. For some residents, retreat might appeal. Improve understanding about managed retreat. Options include **migration**, i.e., voluntary movement away from exposed locations on a permanent or semi-permanent basis; **displacement**, i.e., involuntary movement or forcible displacement because of intolerable risk; and **planned relocation or managed retreat** to voluntarily move to higher ground with some government support. The availability of government support and / or possible insurance considerations is briefly outlined in Appendices. **Ad hoc retreat invariably results in unjust and inequitable outcomes born mostly by the most vulnerable people.** Tangimoana residents currently have no interest or appetite to relocate. This sentiment might change if there is another major flood event, like the 2004 flood, or if Government policy provisions on managed retreat change significantly. Investigating planned relocation options might be appropriate under such circumstances, or when this preliminary plan is reviewed. **(TCC, HRC, MDC, Target date: To be determined).**

## 9.4 Towards an adaptation pathways plan

Better understanding the technical, administrative and affordability implications of the above options will enable the TCC and Tangimoana residents to decide what combination of adaptation strategies and resilience building measures are best for the community, and how they might be sequenced over time.

Major interventions may be necessary for enduring risk reduction and community resilience; but the cost of such interventions might be unaffordable without Crown contributions. Pending legislation on an adaptation framework for the country may shed some light on this prospect.

A key consideration is understanding when existing measures might reach their 'sell-by' date because residents believe that the measure(s) are no longer effective in achieving their intended risk reduction purpose. For example, the current level of stopbank protection is considered acceptable for now. But with rising sea level, the level of protection will be reduced in coming decades. At what point might residents believe the protection provided is no longer adequate? Residents will only be able to answer this question when more detailed, up-to-date information is available about the technical feasibility and affordability of the above protect, accommodate and planned relocation strategies, as well as the viability of resilience building measures.

The 16-17 February 2004 floods provide a useful reference point. Flooding resulted from direct outflows from the Rangitīkei River and, subsequently, from flood flows due to a stopbank breach. The flood was assessed by NIWA as having a 40-50 year return period (2-2.5% Annual Exceedance Probability [AEP]). After the severe 2004 floods that made 41 homes uninhabitable, HRC consulted the community about



2015 Horizons Regional Council chairman Bruce Gordon speaks at the unveiling of a Rangitīkei River stone monument to commemorate a significant Treaty of Waitangi signing site. The unveiling took place exactly 175 years after three Ngā Wairiki Ngāti Apa chiefs signed the Treaty at Tāwhirihoē - a riverside site near the village. The memorial was unveiled by two direct descendants of signatory Te Hākeke, and two local school students.

Source: [Whanganui Chronicle](#), 27 May 2015.

Photo credit: photo supplied  
26052015WCSUPBRUCE/

*our people have actually  
been adapting to the  
movement of our awa for a  
long time (Tangata whenua)*

*We are quite a  
passionate small team,  
and we really care about  
our community and we  
really want to share  
whatever information  
and the best information  
we've got at that time to  
help people  
(HRC Staff)*

stopbank improvements. Tangimoana considered 1% AEP, or a 100 year return period, to be unaffordable. The community requested a design standard of 2% AEP, which was implemented through the HRC 2006-2016 Long Term Plan with stopbank improvements to the 2% AEP design standard plus provision for ~25 years aggradation and an additional 600 cm freeboard as a safety margin. It was expected that this level of protection would initially approximate 1% AEP. Recent HRC investigations indicate that the riverbed from Bulls to the river mouth is gradually lowering (degrading). But HRC has not assessed the impacts of river channel and riverbed changes on flood protection for Tangimoana. Further investigation is therefore necessary to accurately determine current and projected levels of protection.

The costs of stopbank improvements, and other protection works and / accommodation measures, have increased significantly over the last two decades. Hence the necessity to reassess these options to determine the adequacy of existing provisions and to determine at what point new measures might need to be taken, accounting for technical feasibility and affordability, and cost-sharing options.

## 10. Monitoring, evaluation, plan-revision and joint-learning

Adaptation and resilience building efforts need to be monitored, evaluated and actions taken to revise the plan and adjust actions through a process of joint learning from experience. To make continual improvements in adaptation planning and resilience building, ongoing collaboration and cooperation is needed by key partners, including residents, the TCC, MDC, HRC, tangata whenua and stakeholders.

The TRG proposes that this preliminary plan be reviewed and updated after the priority short-term actions identified above have been advanced, say in 2-3 years. Consideration should be given to a mid-term review based on a partnership-based process to enable continual improvements and action.

- Based on insights gained from the above priority actions, **review and update this Preliminary Adaptation Plan. (TCC, HRC, MDC: Target completion: 2028)**



**Community meeting, 27 July 2025.**

Photo credit: Bruce Glavovic

*... yes there's work to do with communities and yes that's important but I think there's also work to do in that council space and then across the councils ...*

*building that high trust environment*

*(MDC Staff)*

# Appendix 1: Statement of Intent



**Signing the Statement of Intent (1 Nov 2023)** (left to right): Michael McCartney (Horizons Regional Council), Shayne Harris (Manawatū District Council), Jennifer Moss (Tangimoana Community Committee), and Bruce Glavovic (Massey University).



**Signing Priority Actions (25 June 2024)** (left to right): Helen Worboys (Manawatū District Council), Michael McCartney (Horizons Regional Council), Jennifer Moss Joy (Tangimoana Community Committee), and Huhana Smith (Massey University).

**Statement of Intent**

**TANGIMOANA VILLAGE CLIMATE ADAPTATION PROJECT**

This document sets out the commitment of key partners to work with the Tangimoana community to produce an adaptation pathways plan. Climate change presents a risk to Tangimoana now that increases into the future. Beginning to plan now to adapt will avoid a reactive, ad-hoc response with better outcomes for reducing risk and building community resilience.

**What does the Massey University Deep South adaptation project aim to achieve?**

- The project will support Tangimoana community to understand and to begin to adapt to climate change.
- The project will bring together institutions, organisations, and resources that can support adaptation planning.
- We will learn from this project and share the lessons for the benefit of other communities in Aotearoa-New Zealand that face similar challenges.
- There are five steps in the adaptation planning process with due dates because this is a publicly funded research contract, and the Massey team is accountable to the community and our funders.
- The adaptation plan must be written by 31<sup>st</sup> March 2024 because Massey University's support will end 30<sup>th</sup> May 2024.

**Key Partners and their commitment**

- This project is led by the Tangimoana Community through the Community Committee. The Community Committee agree to work with the support of the Massey team to produce Tangimoana's adaptation plan.
- Manawatū District Council and Horizons Regional Council agree to:
  - Provide information, technical expertise and other support where practicable, as requested by the Community Committee, to support development of the adaptation plan.<sup>1</sup>
  - Discuss the Tangimoana adaptation plan with the Community Committee once it is published. This will include discussion on the capacity of Council to implement recommended short-term and mid-term actions.

**Mana Whenua**

The Parties acknowledge mana whenua's link to Tangimoana through whakapapa and their place as a partner if they wish to become actively involved in adaption plan development or implementation.

**Stakeholders and Other Parties**

- Stakeholders have a less direct but still a strong interest in the implementation of the adaptation plan. These might include central government agencies. Other parties may be interested in or affected indirectly by the adaptation plan. The plan will be available to stakeholders and interested Parties

<sup>1</sup> Technical expertise includes an understanding of climate policy and regulations, risk assessment and management, sustainable planning, water resource management, Geographic Information Systems and environmental engineering. Support includes Council representation at Tangimoana community committee meetings when practicable, facilitation of public engagement in the planning process through Council's social media platforms and advocacy support.

Tangimoana Village Community-led Climate Adaptation Planning Project 1 of 2

**SIGNATORIES**

For Tangimoana Community Committee

*Jennifer Moss*

For Manawatū District Council

*Shayne Harris*

For Horizons Regional Council

*Michael McCartney*

For Massey University Deep South

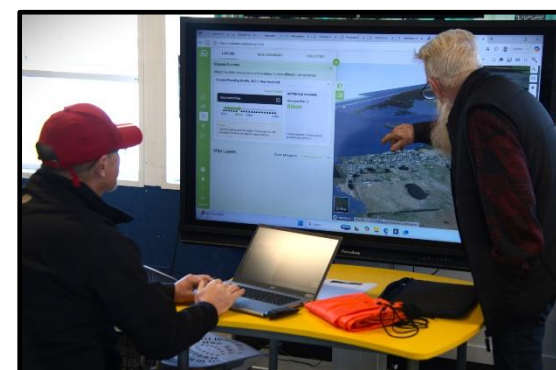
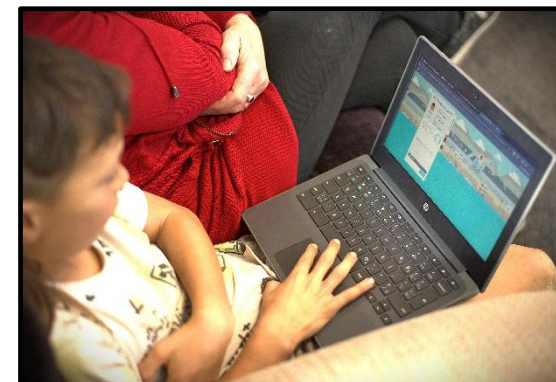
*Huhana Smith*

Tangimoana Village Community-led Climate Adaptation Planning Project 2 of 2

## Appendix 2: TRG priority short-term actions in 2025

Priority short-term actions were identified through the Deep South-Horizons project with additional priorities identified by the **Tangimoana Resilience Group** in early 2025. This Appendix summarises TRG actions undertaken in 2025:

- **Community leadership to get better outcomes for Tangimoana:** The Tangimoana Community Committee (TCC) established the Tangimoana Resilience Group which completed a Rapid Risk Appraisal and this Preliminary Adaptation Plan, with HRC and MDC staff involvement. Findings shared with residents via mail drops and community hui. ***ACTIONED & FINDINGS SHARED AT JULY 2025 COMMUNITY HUI; TRG reported back to the TCC; ONGOING***
- **Develop stronger community relationships with HRC and MDC and work better together for Tangimoana:** Working on: (i) joined-up HRC-MDC understanding and options for managing flood, storm, drinking and waste waters; (ii) lobbying government; (iii) accessing credible property-level data for risk management. ***ACTIONED & FINDINGS SHARED AT JULY 2025 COMMUNITY HUI; ONGOING***
- **Develop better shared understanding about how climate change could affect households and the community, including local knowledge about risk:** The Resilience Explorer tool and adaptation and resilience planning carried out in 2025 improves understanding and identifies priority actions to address identified risks. MDC and HRC are working closely with the TRG. Concerted effort to share information with residents, especially new residents. ***ACTIONED & FINDINGS SHARED AT JULY 2025 COMMUNITY HUI; ONGOING***



**Community meeting, 27 July 2025.**

Photo credit: Bruce Glavovic



**Community meeting, 27 July 2025.**

Photo credit: Bruce Glavovic

- **Better shared understanding about coastal and riverine flood risk, and ponding:** Building on above, need to better understand interactions between flood protection and ponding after heavy downpours and limits of stormwater drainage and impacts on sewage system in extreme events. Build local knowledge and experience into joined up HRC-MDC flood risk modelling and management. Include impact of land-use changes and works affecting drainage of farmland on boundaries of village. Could the low point in park be used for stormwater storage to mitigate surface flooding? How could floodwater be pumped back over stop bank if the village floods? ***ACTIONED & FINDINGS SHARED AT JULY 2025 COMMUNITY HUI; AND HRC & MDC EXPERTS DEVELOPING SCOPE OF WORK TO BETTER UNDERSTAND INTEGRATED SOLUTIONS FOR FLOOD PROTECTION & STORMWATER MANAGEMENT; ONGOING***
- **Customise Tangimoana response and recovery planning so warnings, evacuation and emergency responses reflect Tangimoana’s unique ability to react and response to emergency events and its risk profile. Ensure the community is adequately resourced for emergency response:** MDC is revising the *Tangimoana and Surrounding Area Community Response and Recovery Plan* and will tailor the plan through more focused resident input. Work underway to assess and progress alternative energy resilience options for Tangimoana that enable suitable standby or renewable energy capability that can support critical community functions during emergencies. Better align Council flood predictions and warnings with local knowledge and lived experience. ***ACTIONED & WORK UNDERWAY***
- **Raise awareness and understanding about insurance,** and how insurance access and premiums could be affected by climate-related risk. ***INITIAL FINDINGS OUTLINED IN THIS REPORT***

- Build networks with community groups that are growing and sharing food. *ONGOING: CONTACTS HAVE BEEN PROVIDED FOR THE MANAWATŪ FOOD ACTION NETWORK WHO WOULD WELCOME ANY TANGIMOANA KAI RESILIENCE GROUPS INTO THAT COLLECTIVE.*
- Identify and assess environmental projects that can protect and improve biodiversity and potentially water quality with a focus on the Rangitikei estuary. Whitebait spawning habitat is an area of particular interest for the community and is priority. *TO BE ACTIONED.*



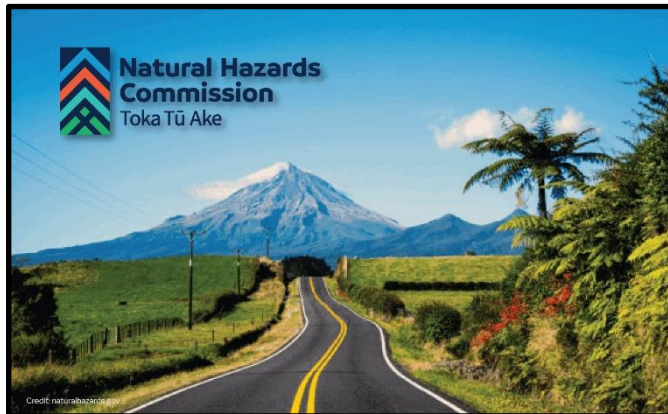
Community meeting, 27 July 2025.

Photo credit: Bruce Glavovic



## Appendix 3: Some insurance implications

Climate-compounded **extreme events (e.g., river flooding) and disruptive change (e.g., sea-level rise) are increasing in intensity and frequency. Insured losses have already increased sharply** in recent years. Insurance **premiums have increased significantly**. In some high-risk locations, **‘insurance retreat’** has occurred, making it difficult if not impossible to get a new private insurance cover and secure a bank mortgage. This situation could become much worse in coming decades.



If a natural hazard impacts your home, your **private insurer** and the [Natural Hazards Commission \(NHC\)](#) provide cover. **After an earthquake, landslide, volcanic or hydrothermal activity, or tsunami, the NHC covers the first \$300,000 of damage to your home** (including structures used for daily living, like a shed or garage, and some essential services, like electricity). Your **private insurance company covers the rest** according to your insurance policy. The NHC also **contributes to repairs for damage to your land**: under and up to 8m around your home related to buildings and structures; and under or supporting the main access way up to 60m from your home.

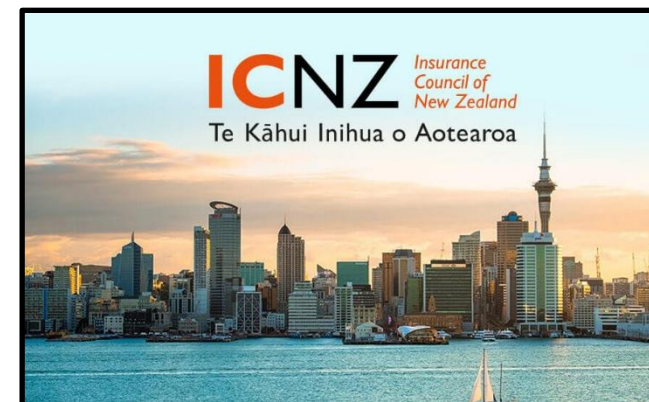
**Your private insurance company covers storm and flood damage** according to your policy. The **NHC can contribute to the cost of cleaning up the insured parts of your land** (it does not cover work you do yourself), including removing silt 15mm or deeper; debris removal; and repairing the surface of land that has been washed away.

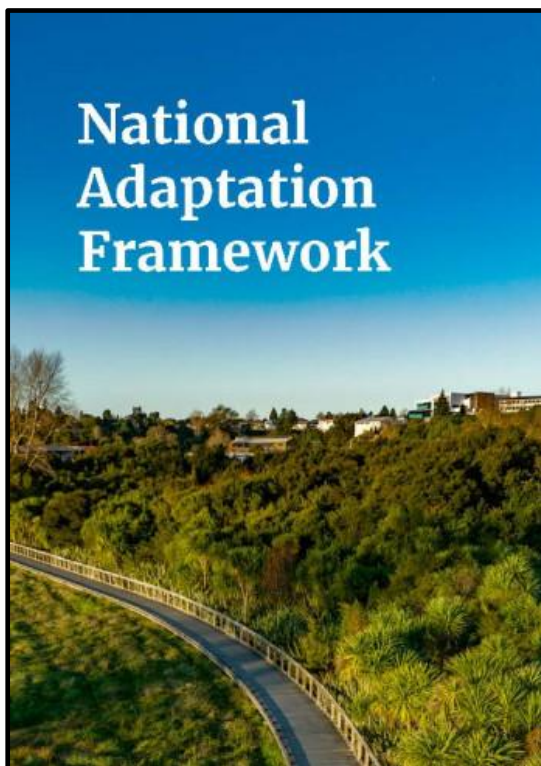
The **NHC** also covers some costs for damaged **retaining walls, bridges and culverts**. **Private insurers might provide additional cover** for some parts of your property, like retaining walls, that will be detailed in your insurance policy.

The **insurance industry understands the risks facing Tangimoana**, the region, and Aotearoa New Zealand. Private insurance companies have property-specific contracts with insured property/homeowners that is proprietary information that is not shared publicly.

The **Insurance Council of New Zealand (ICNZ)** represents the insurance industry but is not allowed to share proprietary information. The ICNZ can provide guidance on how local government, tangata whenua and at-risk residents can prepare for future disruptions, including steps that homeowners and residents can take to safeguard their home and property, and contain premiums increases and insurance retreat. Examples include:

- Know your risk
- Build partnerships in your community, with tangata whenua, and your district and regional councils, and other relevant stakeholders
- Take proactive steps to reduce household and community risk, including options to pool risk through a collective / cooperative insurance scheme for Tangimoana
- Have a community-based plan to adapt and build resilience over time
- Invite the ICNZ to brief HRC and the MDC, with information provided to Tangimoana residents
- Other?





## Appendix 4: Possible regulatory (policy) implications

The Government provides **guidance** on ways that Local Government can support local adaptation. But there is **no nationally consistent regulation (policy or law)** about how local communities should **adapt, and how to allocate costs** between home- and business-owners, tangata whenua, local government and the Crown. **Government contributions to adaptation and post-disaster recovery efforts have varied widely and those impacted have experienced wide ranging costs and benefits.**

The Government released its **National Adaptation Framework** on 16 October 2025, based on four pillars: First, prioritise better climate risk information. Second, clarify adaptation roles and responsibilities. Third, invest in risk reduction. Finally, resolve cost-sharing and Crown contributions. The Government promised a **Climate Adaptation Bill in 2026.**

**The Government has signalled that Crown assistance for adaptation and post-disaster property buy-outs could be phased out in two decades. The costs of post-disaster buy-outs and adaptation strategies like planned relocation will fall on communities, tangata whenua, and local government.** This approach sharply contrasts with the policy approach explored towards the end of the last Labour-led government, which indicated openness to Crown contributions to such costs to enable more just and equitable outcomes. **Cross-party agreement needs to be reached on Crown contributions** to adaptation and post-disaster buy-outs, especially for low-lying communities along rivers and the coast.

## Appendix 5: Building community resilience

The Deep South-Horizons project identified the following resilience elements and examples.

**Table 1: Elements and examples of community resilience in Tangimoana**

Elements of community resilience	Examples of community resilience in Tangimoana
<b>Human:</b> Individual capacity to cope and thrive in adversity	Physically capable, rural folk who are tough and care for each other. Access to 4x4, quad bikes, boats, etc. Self-reliant with local knowledge. Starlink.
<b>Social:</b> Strong interpersonal networks, trust, and belonging	Village isolation creates “sense of community”. Independent but connected. Worked together through tough times. Long-term residents.
<b>Cultural:</b> Maintain distinct identity, values, knowledge and practices in face of disruption	Culture and heritage are valued and preserved. Tāngata whenua maintain knowledge and care of important sites. Treaty signing commemoration memorial. Colonial history documented.
<b>Economic:</b> Capacity of economy to withstand and bounce back from shocks and stresses	Rural and outdoor lifestyle celebrated. Barter system provides access to meat, kaimoana, firewood, rainwater / bore / springwater. Incomes from work in neighbouring towns helps village improvements. Local store.
<b>Built:</b> Capacity of buildings, roads and infrastructure to function after extreme events	Stormwater upgrades by MDC. Stopbank improvements to 1:50 year protection. Warning system provides evacuation notice of 8-11 hours. Pumping system. Single road access backup through forestry and farmland away from river.
<b>Natural / environmental:</b> Ecosystem ability to absorb impacts and recover structure, function and adaptability	Mild climate and ability to grow food locally. Estuary and wetland = buffer against storm surge. Ellison Reserve = sump in floods. Coastcare projects improve ecosystem function. Crown-owned land could be location for planned relocation some time in future.
<b>Governance / institutional:</b> Effectiveness of laws and policies and capacity to support communities in face of adversity	National MfE adaptation guidance useful but need national policy and legislation. Need to complement iwi and hapū adaptation efforts. Regional Climate Action Joint Committee is showing national leadership in adaptation planning and action. Commitment to work together is promising.



Photo credit: 2017 Tangimoana Community Plan.



Community meeting, 27 July 2025.

Photo credit: Bruce Glavovic

## Appendix 6: Participation in resilience building & adaptation planning & action



**Community meeting, 27 July 2025.**





















Photo credit: Bruce Glavovic

Residents cannot become resilient on their own given the ‘forever’ nature of climate-compounded risk. At-risk residents, tangata whenua, local government, government and other stakeholders need to work together. Nonetheless, residents can work to improve household resilience, as well as the resilience of their community, with partner support.

**HRC and MDC provide enabling support for community-based resilience planning and action. Local government provides critical support** as well as **essential services** that include building and health and safety regulations; roads; infrastructure for drinking water, stormwater and sewage; rubbish collection; flood protection; and environmental and emergency management. **Rates cover the costs of providing these essential services.**

**Tangata whenua are custodians** of many aspects of the **cultural legacy** of Tangimoana and surrounds and play **crucial kaitiakitanga (guardian) roles in environmental stewardship** across the region. Tangata whenua are often vital **first responders** after a disaster and **help community recovery.**

# Appendix 7: Creating a flood resilient home – Auckland

External solutions – or dry proofing	Internal solutions – or wet proofing
<p><b>Key:</b> The colour of the circle indicates the type of approach the solution uses.            ○ Dry proofing    ○ Wet proofing</p>	
<p> Replace solid fences or carport screens with permeable fencing or screening and /or raise them to allow water to flow through and under. Solid fences and screens can cause ponding and divert water into your house. A solid fence can collapse under the weight of water and cause damage to neighbouring properties downstream.</p>	<p> Consider installing more water resilient internal wall linings (like plywood).</p>
<p> Install more water resilient stairs with an open design that allows water to flow through. Solid stairs restrict water flow.</p>	<p> Replace hollow core doors with solid core doors, which are more resilient to damage and the force of flood water.</p>
<p> Replace hard surfaces (like concrete) with permeable materials such as permeable paving, gravel or grass to help slow, filter and absorb water.</p>	<p> Raise cabinetry. Higher, wall hung cabinets and storage shelves will reduce the risk of water damage.</p>
<p> Install a water tank to collect rainwater and ensure it is secured to the ground. Building and planning regulations apply.</p>	<p> Replace cabinets with units made from flood resilient materials and make kick boards removable so cleaning and drying is easier after a flood.</p>
<p> Landscape or contour the ground and driveways to direct water away from doorways and buildings. Any works must not alter the flow, location or characteristics of the water as it passes a property boundary.</p>	<p> Use an open design and flood resilient materials for internal stairs.</p>
<p> Install or upgrade catch pits and channel / slot drains near entrance ways to reduce low level flows into your home. Check with your design professional or Auckland Council's building helpdesk to confirm whether building consent may be required.</p>	<p> Replace cavity sliding doors with swing or wall sliding doors to help minimise water getting into the wall cavity.</p>
<p> Keep overland flow paths on your property clear of items, structures and rubbish to maintain water flow.</p>	<p> Hang plaster board horizontally so the lower panel can be removed and replaced easily if damaged by water.</p>
<p> Raise or move doorways, windows and other openings to parts of the building that are less susceptible to flooding.</p>	<p> Use flood resilient flooring options like tiles, stone or brushed concrete</p>
<p> Raise outdoor electrical features like heat pump and air conditioning compressors, water tank pumps, switchboards and hot water units to reduce the chance of water damage and outages.</p>	<p> Install circuit breakers for lower floor electrical circuits to maintain electricity on upper floors if the ground floor floods.</p>
	<p> Install laundry appliances such as washing machines and dryers onto benches or wall brackets and raise kitchen appliances like ovens and microwaves to reduce the risk of flood damage.</p>
	<p> Raise data and electrical points (including multi-boxes and extension leads) to reduce the risk of power outages during a flood.</p>



# Appendix 8: Auckland City Guide

## Dry-proofing solutions for your home

**Raise or move doorways and windows to where they are less vulnerable to flooding.**

**Raise outside pumps and electrical services.**

**Landscape or contour the ground and driveways to direct water away from doorways and buildings.**

**Install and secure a water tank to collect rainwater.**

**Install or upgrade catch pits and channel / slot drains near entrance ways.**

**Replace hard surfaces (like concrete) with permeable materials.**

**Keep overland flow paths on your property clear.**

**Lift or add gaps to fencing so water can flow through and underneath.**

**Replace solid stairs with an open design.**

8 Creating a flood resilient home

Creating a flood resilient home 9

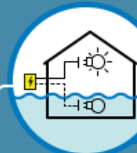
# Wet-proofing solutions for your home



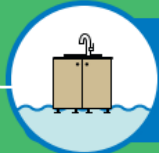
Replace cavity sliding doors with swing or wall sliding doors.



Replace hollow core doors with solid core doors.



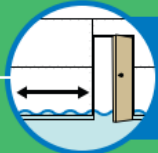
Install circuit breakers to separate power supply.



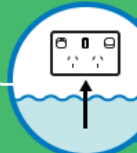
Install cabinets made from flood resilient materials with removable kick boards.



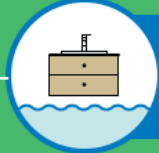
Use flood resilient flooring materials like tiles or polished concrete.



Hang plaster board horizontally.



Raise data and electrical points.



Raise or install wall hung cabinets.



Raise appliances like microwaves, ovens, washing machines and dryers.



Consider installing more water resilient internal wall linings (like plywood).



Use an open design and flood resilient materials for internal stairs.



## Find out more

Tangimoana Village: <https://www.facebook.com/groups/272951064631084/>

Email: [tangiresilience@gmail.com](mailto:tangiresilience@gmail.com)

**Resilient Tangimoana:  
Report for Tangimoana Village**

Part of the Living with Uncertainty Report Series for the Deep South National Science Challenge (DSC2-CIE-0) and Horizons Regional Council (CLIMAT001)

April 2025

Photos © Jessifer Moss Joy. Used with permission

**Resilient Tangimoana:  
Risk Assessment Report (Updated)**

Tangimoana School student artwork.  
Photo credit: Bruce Glavovic

**Tangimoana Resilience Group Report**

Prepared by Bruce Glavovic

July 2025

Enjoy  
Learn  
Play  
Share  
Snack



## Council

Meeting of 03 June 2026

Business Unit: Community  
Date Created: 26 May 2026

## Central Economic Development Agency Final Statement of Intent 2026/2027

### Purpose Te Aronga o te Pūrongo

To present the Central Economic Development Agency (CEDA) final Statement of Intent for 2026 to 2027.

### Recommendations Ngā Tūtohinga

That Council agrees with the final Statement of Intent 2026 to 2027 submitted by the Central Economic Development Agency (Attachment 1).

Report prepared by:  
Karyn Crawley  
Community Operations Advisor

Approved for submission by:  
Lyn Daly  
General Manager - Community

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## 1 Background Ngā Kōrero o Muri

- 1.1 CEDA provided its draft Statement of Intent (SOI) for 2026/27. The draft was considered by Council on 1 April 2026, with the proposed direction and content supported. As a shareholding partner, Council did not seek any significant changes to the draft SOI.
- 1.2 Similarly, during presentation of the draft SOI to Palmerston North City Council on 1 April 2026, no formal requests for amendments were made.
- 1.3 As joint shareholders, Manawatū District Council (MDC) and Palmerston North City Council (PNCC) are required to jointly agree to the SOI.

## 2 Strategic Fit Te Tautika ki te Rautaki

- 2.1 This is a legislative / operational item and aligns with the priorities of Council as 'A place to belong and grow' and 'A prosperous resilient economy'.

## 3 Discussion and Options Considered Ngā Matapakinga me ngā Kōwhiringa i Wānangahia

- 3.1 The final version of the SOI is attached (ref: attachment 2) for Council's consideration and will also be presented to PNCC for its consideration today.
- 3.2 The Local Government Act requires that the final version of SOIs adopted by the Boards of council-controlled organisations be delivered to the shareholder by 30 June 2026. CEDA has met that requirement.
- 3.3 CEDA will be in attendance at the meeting to answer any questions on the final SOI.

## 4 Risk Assessment Te Arotake Tūraru

- 4.1 Not applicable, an administrative item.

## 5 Engagement Te Whakapānga

### Significance of Decision

- 5.1 The Council's Significance and Engagement Policy is not triggered by matters discussed in this report. No stakeholder engagement is required.

### Māori and Cultural Engagement

- 5.2 There are no known cultural considerations associated with the matters addressed in this report. No specific engagement with Māori or other ethnicity groups is necessary.

### Community Engagement

5.3 There are no consultation requirements as a result of this report. CEDA have been consulted in the development of the Statement of Expectations and the draft Statement of Intent was discussed together.

## 6 Operational Implications Ngā Pānga Whakahaere

6.1 CEDA uses the Statement of Expectations as a key input into the development of its Statement of Intent. The Statement of Expectations 2024 – 2027 is attached as Attachment 1.

6.2 Both Councils have had the opportunity to comment on the draft Statement of Intent.

## 7 Financial Implications Ngā Pānga Ahumoni

7.1 There are no financial implications as a result of this report. MDC and PNCC have both made financial provision for the service contract with CEDA.

## 8 Statutory Requirements Ngā Here ā-Ture

8.1 The Local Government Act 2002 Schedule 8 Part 1 requires that:

### **3. Final statement of intent**

‘The board must deliver the completed statement of intent to the shareholders before the commencement of the financial year to which it pertains.’

## 9 Next Steps Te Kokenga

9.1 PNCC will be advised of Council’s decision. Subject to agreement by both parties, the SOI will then be published on the websites of both Councils and CEDA.

## 10 Attachments Ngā Āpitihanga

- CEDA Statement of Expectations 2024 – 2027
- CEDA Statement of Intent 2026 - 2027



22 December 2023

Bobbie O'Fee  
Chair  
Central Economic Development Agency Ltd  
Level 1/1-19 Fitzherbert Avenue  
**PALMERSTON NORTH 4410**

Dear Bobbie,

### **CEDA Statement of Expectations 2024/25 to 2026/27 (2024/34 Long Term Plan)**

This Statement of Expectations (SOE) covers the period 1 July 2024 to 30 June 2027, which is years 1-3 of the Shareholders' 2024/34 Long Term Plan. Amendments to the Statement of Expectations may be sought during this period.

The purpose of this SOE is to provide CEDA with the Shareholders' focus and priorities for delivery, against its purpose of driving and facilitating the creation and growth of economic wealth in the Manawatū region and beyond.

When working beyond the Manawatū, there must be a causal link of the outcomes or benefits back to the Manawatū region based on the core functions and measures of success outlined below.

It is also expected that CEDA will use this SOE to guide the development of an annual Statement of Intent (SOI) for 2024/25, 2025/26 and 2026/27.

### **Strategic Relationships**

Taking a leadership position and building strategic relationships in the Manawatū region and beyond, is fundamental for CEDA to achieve its purpose. CEDA must be relationship-driven at all levels and we appreciate your commitment to this. From our perspective (both as shareholders and partners), this means CEDA developing a deep understanding of the roles of its strategic partner organisations, what their priorities and strengths are, and how CEDA can add value to the relationship (and vice versa) to achieve better economic outcomes for the region.

CEDA formalising these strategic relationships, is important to us as shareholders, to ensure we have cohesion in the region around economic development activities. We would like this to be driven further by CEDA through mutually agreed partnership agreements or similar, to ensure everyone is on the same page and provide the basis for a consistent and collective approach with measurable outcomes.

Ongoing review of the existing strategic partnership agreements already in place is expected.

The shareholders have identified the following key partners for CEDA: Palmerston North City Council, Manawatū District Council, Horizons Regional Council, Iwi, Manawatū Chamber of Commerce, NZ Defence Force, Federated Farmers, Accelerate 25, KiwiRail, FoodHQ, Massey University, The Factory, Palmy BID, Feilding & District Promotions, and key Government agencies.

The Shareholders and CEDA will continue to work together to update the existing list of strategic partners.

### **Key Agreed Functions and Outcomes**

We understand that to be effective, CEDA must be able to focus on key outcomes within a well-defined mandate. We also recognize this is a challenge given there can be differing stakeholder expectations.

This means CEDA focusing on the delivery of its core functions and outcomes in:

- Stimulate inward investment (both national and international), retention and expansion of business in the Manawatū region.
- Developing a talent pipeline.
- Support domestic visitation and tourism.

Top priorities are:

- Te Utanganui, Central New Zealand Distribution Hub.
- Strategic oversight and coordination of the Manawatū Food Strategy.
- Promotion and development of key tourism and visitor destinations.
- Inward investment in the Feilding town centre and Palmerston North city centre.

Action plans to deliver on these core functions should identify KPIs based on clear intervention logic. The SOI should include specific KPIs for the new top priority regarding inward investment in the Feilding town centre and Palmerston North city centre.

It is expected that CEDA will work very closely with key stakeholders of the regions strengths of food production and research, distribution and logistics, defence, health, visitor, education (domestic and international), digital and technology, and a growing Māori economy.

CEDA is expected to scan for new opportunities, whether or not it is a key strength, where this can benefit the region.

CEDA's success will be measured by the shareholders using the following indicators of the health of the regional economy:

- Job growth.
- Increase in median household income.
- Number of investment leads and deals secured.
- Strength of the relationship with strategic partners.

The Shareholders acknowledge that the first two measures are not directly under CEDA's control. Significant changes in international and national economic factors will be taken into account when the Shareholders measure CEDA's performance.

Understanding the strategic drivers of the Shareholders and aligning CEDA's core functions to those drivers is critical to the partnership between the Councils and CEDA.

The Shareholders have a key role in setting the economic environment for business to flourish and CEDA acts on the Councils behalf in facilitating opportunities for improved economic outcomes. CEDA is the Councils' agency for the delivery of economic development across the region.

Therefore, it is expected that CEDA will engage with the Councils in the development and implementation of their strategies and plans. These strategies and plans are expected to demonstrate active engagement with other strategic partners in their development.

The Councils are obliged to ensure that our services are delivered effectively and efficiently. As a Council-Controlled Organisation (CCO), this expectation extends to CEDA. The Shareholders require CEDA to provide an activity-based budget so the Councils can effectively communicate levels of service and value for money to their ratepayers. In addition, there are many opportunities where shared resourcing, expertise and services should be explored and we would like to discuss these opportunities from both a short-term and long-term perspective.

To ensure the Shareholders and CEDA are on the same page, the focus, scope of activity, and priorities will be set through the Statement of Intent (SOI), and delivery managed through any relationship agreement that is put in place.

The Shareholders expect that where CEDA is marketing the Manawatū region and this requires differentiating between the Manawatu, Feilding and Palmerston North, that this will continue to be delivered by CEDA in close collaboration with both Shareholders.

The Shareholders would like to continue the bi-monthly team meeting between the Mayors, Council CE's and relationship managers with the CEDA Chair and CE.

The Shareholders will invite CEDA to formally report to each Shareholder twice per year, being the 6-month report and Annual Report.

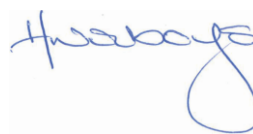
CEDA will host two informal meetings with the Shareholders together to share progress on key priorities and connect outside of the formal reporting processes.

We look forward to working with CEDA to develop an economic development model that successfully delivers. We thank the Board, CEDA CE, and CEDA staff for their continued commitment to economic growth in the Manawatū region.

Yours sincerely



Grant Smith  
**Mayor**  
**PALMERSTON NORTH CITY COUNCIL**



Helen Worboys  
**Mayor**  
**MANAWATŪ DISTRICT COUNCIL**

# Te Tauākī Takuine Statement of Intent

**2026-27**

1 March 2026

# Te Tauākī Takune

## Statement of Intent

### 2026–27

## Company Directory

### Central Economic Development Agency Limited

Level 1, 5 Broadway Avenue  
Palmerston North 4410

Phone: 06 350 1830

Website: CEDA.nz

### Chief Executive

Jeremy Shearman

### Directors

Robyn O'Fee (Bobbie) (Chairperson)

Kathleen Brosnahan (Katie)

Margharita Mare (Margy)

David Norman

Antony Heywood

Colin McFadzean

### Registered Office

Morrison Creed Advisory  
236 Broadway Avenue  
Palmerston North 4410

### Bankers

Westpac New Zealand Limited

### Auditors

Grant Thornton Audit New Zealand Limited  
(on behalf of the Office of the Auditor General)

### Legal Status

Central Economic Development Agency Limited ("CEDA") was incorporated in New Zealand on 15 October 2015 under the Companies Act 1993 (NZBN 9429042001096). As the shareholders of CEDA are Palmerston North City Council (50%) and Manawatū District Council (50%) CEDA is a Council Controlled Organisation as defined in section 6 of the Local Government Act 2002.

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# He matawhānui tiritahi, he rautaki tiritahi mā te katoa

## Foreword

Tēnā koutou katoa

We are pleased to present our Statement of Intent for 2026-27.

The Manawatū region is defined by its innovation, resilience, and forward momentum. As economic conditions begin to stabilise, there is reason for cautious optimism in the year ahead. Yet we know continued success depends on staying proactive and adaptable. With a diverse economy and a strong pipeline of long-term projects, Manawatū is well positioned to embrace new opportunities and build on the progress we've made.

CEDA's focus for the year ahead centres on advancing key regional priorities – from strengthening the visitor sector to remaining agile in identifying new economic opportunities. As the region's economic development agency, we are committed to attracting new business, showcasing Manawatū to draw in talent, investment, and visitors, and supporting the ongoing growth of our local enterprises. Our long-term priorities endure: to grow the region and create a vibrant, sustainable economic future.

Among the cornerstone projects driving our focus are Te Utanganui – the Central New Zealand Distribution Hub, the Manawatū Regional Food Strategy, the Manawatū Destination Management Plan, and initiatives that attract investment into the central business districts of Feilding and Palmerston North.

Te Utanganui continues to stand out as a catalyst for economic growth, offering wide-reaching benefits for both Manawatū and New Zealand. Recent strategic refinements have positioned Te Utanganui as a national leader in distribution and logistics. Progress on enabling infrastructure, including the planned Regional Freight Hub at Bunnythorpe and the Manawatū Regional Freight Ring Road, remains a strong focus, as does our ongoing advocacy at a regional national and global level. Together, these projects will unlock significant central government investment and attract new business activity to the region.

The Manawatū Regional Food Strategy has matured into a well-established framework that guides collaborative action across industry, iwi, and key partners. Through a project-based approach centred on sustainable nutrition, the strategy focuses on three core themes, five workstreams, and a roadmap of 13 priority actions that continue to drive the sector's growth and innovation.

With Manawatū Destination Management Plan into its fourth year of implementation, we're seeing significant strides in our work as the regional tourism organisation, including product development, industry capability, marketing and brand, and access to trade markets.

CEDA remains firmly focused on showcasing the region's identity by sharing the stories, people, and achievements that define Manawatū. Through strategic marketing

initiatives, compelling content, public relations, media engagement, and the continued enhancement of regional platforms such as ManawatuNZ.co.nz, we're inspiring others to see Manawatū as we do – a place where potential thrives.

Collaboration and partnership sit at the heart of everything we do. CEDA deeply values the support and shared vision of our regional partners, including Manawatū District and Palmerston North City Councils, Rangitāne o Manawatū, Ngāti Kauwhata, Ngāti Raukawa, The Factory, Sprout Agritech, Manawatū Business Chamber, and Feilding and District Promotion. We also acknowledge Massey University, UCOL, IPU, Horizons Regional Council, Federated Farmers, and Accelerate35 whose collective commitment continues to shape the region's success. Together, we drive innovation, attract investment and talent, strengthen local business, and welcome more people and visitors to experience all that Manawatū has to offer.

Working closely with other Economic Development Agencies in our wider region ensures collective opportunities that enable growth for our region are also identified and supported. And our connections with national organisations like Air New Zealand, KiwiRail, Waka Kotahi, Tourism New Zealand, Regional Tourism New Zealand, and the Ministry of Business, Innovation and Employment, enable us to bring a broader perspective,

## FOREWORD

influence policy settings, champion key regional projects, and help shape policy that benefits the future of Manawatū.

As we look ahead to the coming year, we're energised by the opportunities before us and confident that our collaborative efforts will continue to position Manawatū as an essential contributor to both the regional and national economy. Working with our board we will be reviewing CEDA's Vision and the regional goals and how CEDA delivers on these with a view to ensure we are delivering the best high impact outcomes for the region.

CEDA extends our sincere thanks to our shareholders, board, team, iwi and mana whenua, partners, and stakeholders for their unwavering support and shared belief in the region's vision. Your guidance and collaboration empower us to support and champion Manawatū – its people, businesses, and communities – as together we continue to grow a thriving, resilient regional economy.

Ngā mihi nui ki a koutou katoua,



Bobbie O'Fee  
**Heamana** Chairperson



## Purpose of the Statement of Intent

This Statement of Intent is presented by Central Economic Development Agency Limited (CEDA) in accordance with the requirements of Section 64(1) of the Local Government Act 2002 (LGA 2002).

In accordance with the Local Government Act 2002, this annual Statement of Intent publicly states the activities and intentions of CEDA for the next three years, and the objectives to which those activities will contribute.

This Statement of Intent takes the shareholder Statement of Expectations comments into consideration and includes performance measures and targets as the basis of organisational accountability, through the Statement of Service Performance and financial forecasting.

AI was used in the production of this report.

## Monitoring Indicators

In addition to CEDAs performance measures, the shareholders have identified a further set of monitoring indicators. These indicators reflect outcomes at the regional level which are impacted by a range of factors outside of our control, for example: exchange rates, natural disasters, government policy. As the region's economic development agency, we have a role in monitoring and influencing these indicators where we can, however we do not measure the performance of our organisation against them. CEDAs shareholder councils have the responsibility to report on these indicators.

As per the 2024-2027 Statement of Expectations from the shareholders have identified the following additional monitoring indicators:

- Job growth
- Increase in median household income

These are represented by the following economic data collated by Palmerston North City Council, and will be reported in CEDA's Annual Report:

- Change in total number of jobs
- Change in median salaries and wages
- Change in total earnings (salaries, wages and self-employed income)

Two further indicators as detailed in the Statement of Expectations are reported through CEDAs Statement of Service Performance each year.

- Number of investment leads and deals secured
- Strength of the relationship with strategic partners (reported biennially)

Other indicators that we will report on in CEDA's Annual Report include:

- Change in total GDP
- GDP per capita
- Electronic card spending by visitors in Manawatū region
- Number of guest nights in Manawatū region

# Ki te kahore he whakakitenga, ka ngaro te iwi

## Our Vision

### **Ko Manawatū te rohe tino ahu whakamua o Aotearoa**

New Zealand's most progressive region

Our vision is purposely bold, and it encompasses the aspirations of both our shareholder Councils. It requires our region to be ambitious, proactive, and future focused, and to be adaptable to the fast-moving economic landscape we face. We believe that Manawatū has strong leadership and the ingredients to position itself on the national stage – a vibrant and innovative region that will be first choice for investment, business, talent and visitors.

Our three big goals that show we are on our way to achieving this vision are:



Manawatū is renowned for its exceptional lifestyle, competitive advantages, and is a magnet for investment, business, talent and visitors



Manawatū is a world leading agrihub



Manawatū is a leading distribution hub, and leverages off its role in central New Zealand

To achieve this vision CEDA must work in partnership with our shareholders, central government, Māori and mana whenua, industry, and other regional stakeholders – He waka eke noa, it cannot be achieved alone.

# Ā Mātou Whāinga Rautaki

## Our Strategic Objectives

### Achieving our vision

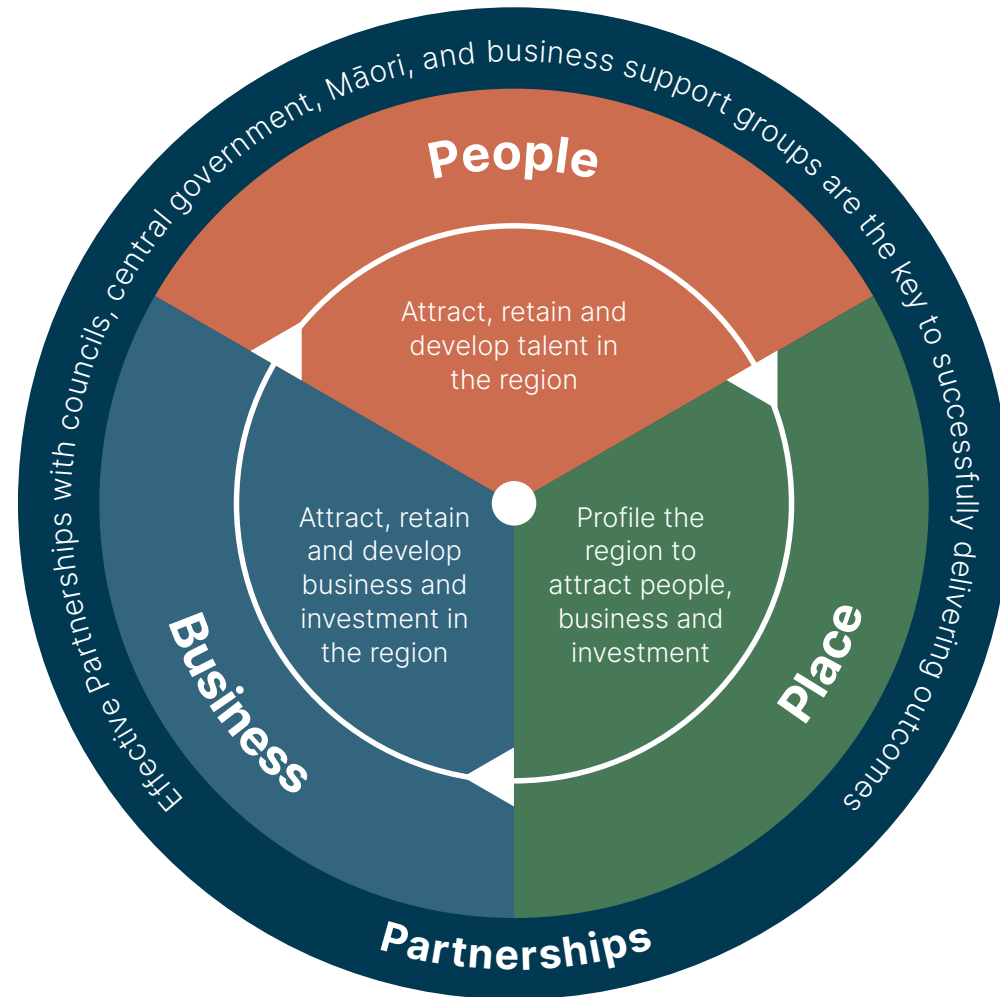
CEDA works across the three pillars of economic development; Business, People, and Place, and our success is underpinned and enabled by the strength of our relationships with our regional and national partners.

Our core objectives, programmes and activities are aligned across these pillars, and are designed to create the environment, stimulus, outcomes, and impact that will power our economic prosperity and achieve our vision for Palmerston North city and Manawatū district.

These strategic objectives guide the development of our short and medium-term programmes of work as articulated through our Statement of Intent.

When considering how to prioritise our efforts, based on our current resources, and guided by our intervention logic and the strategic priorities from our shareholder councils, we focus on programmes and activities that offer the greatest opportunities for economic prosperity.

These are identified through research, monitored, and reviewed using the latest data, and viewed through a regional, national, and international lens.





# Mahia te mahi hei painga mō te iwi What We Do




# Mā whero, mā pango ka oti ai te mahi

## Our Intervention Logic

CEDA operates within a simplified intervention logic that shows the connection between the programmes of work and activities undertaken, the strategic objectives for the region, and strategic priorities of our shareholder

councils. This is supported by key performance indicators in the Statement of Service Performance table, project deliverables, and through the measurement of stakeholder and client satisfaction. Together these form the basis

of CEDA's accountability and performance reporting. Long-term regional outcomes are also monitored through regional monitoring indicators measured by CEDA's shareholders.

<b>VISION</b>			
<b>Manawatū 2030; Ko te rohe tino ahu whakamua o Aotearoa</b> New Zealand's most progressive region			
<b>GOALS</b>			
	Manawatū is renowned for its exceptional lifestyle, competitive advantages, and is a magnet for investment, business, talent and visitors		Manawatū is a world leading agrihub
	Manawatū is a leading distribution hub, and leverages off its role in central New Zealand		
<b>ECONOMIC PILLARS</b>	<b>Business</b>	<b>People</b>	<b>Place</b>
<b>STRATEGIC OBJECTIVES</b>	Attract, retain, and develop, business in the region	Attract, retain, and develop talent in the region	Profile the region to attract people, business, and investment
<b>STRATEGIC PRIORITIES</b>	Te Utanganui Central New Zealand Distribution Hub • Manawatū Regional Food Strategy • Manawatū Destination Management Plan • Central Business District Investment		
<b>INITIATIVES LINKED TO STRATEGIC OBJECTIVES AND PRIORITIES</b>	<ul style="list-style-type: none"> <li>Implementation or identification of initiatives and opportunities to support investment to the region</li> <li>Initiatives to support development of priority sectors</li> <li>Business engagement to support growth retention and expansion</li> <li>Support of startups and innovation through partnerships</li> </ul>	<ul style="list-style-type: none"> <li>Initiatives to support the attraction of talent to the region or retention of talent in the region</li> <li>Supporting industry to attract and retain talent</li> <li>Initiatives that support youth into employment or employment pathways</li> </ul>	<ul style="list-style-type: none"> <li>Strengthening the regions narrative and unified positioning through the regional identity</li> <li>Online initiatives that support attraction of investment, people and business to the region</li> <li>Growing awareness of and information on the region's strengths and opportunities, including economic trends and data</li> </ul>
<b>Partnerships</b>			
Effective Partnerships with councils, government, Māori, and business support groups are the key to successfully delivering outcomes			
<b>STRATEGIC OBJECTIVE</b>		<b>INITIATIVES</b>	
Lead inclusive and sustainable economic development for the region		Initiatives that grow and foster relationships with mana whenua and support Māori sector development. Partnerships with shareholders, key partners and central government to enable shared regional outcomes	

# Business

## **He mahi kai te taonga**

Attract, retain, and develop business and investment in the region

Driving business development and expansion while attracting investment to the region is at the core of economic development. This is at the forefront of CEDA's key outcomes for Manawatū. CEDA's work focuses on our

sectors of strength including food, transport and logistics, and the visitor sector, profiling the region, developing a targeted pipeline, and removing barriers to investment.

## Mahia te mahi

Support the development and growth of business and sectors of strength in the region including inward investment

### Identify and develop regional investment opportunities by strengthening priority sectors through targeted business development, retention, and innovation partnerships

Identifying, developing, and promoting investment opportunities with regional partners is key to attracting investment in Manawatū. CEDA has raised the profile of Te Utanganui, the Central New Zealand Distribution Hub, by appointing a dedicated Programme Director. Looking ahead, we aim to confirm commercial options for important projects like the Manawatū Regional Freight Ring Road and the planned Regional Freight Hub. We are using our updated strategies and investment materials to encourage more investment in land, facilities, and new businesses at Te Utanganui.

We continue to promote and advocate for Te Utanganui at local and national levels, showing best practice in cluster development. A clear document outlining the economic impact and benefits of the wider Te Utanganui project will support our advocacy to central government, as we seek ongoing support in policy and funding.

When the Manawatū Regional Food Strategy launched in late 2023, it showed our commitment to building a secure and robust food system that supports the community, empowers producers, and promotes sustainability. By using our scientific expertise and agricultural innovation, Manawatū is set to lead New Zealand's changing food sector, especially in sustainable nutrition.

CEDA continues to position Manawatū as a strategic place to invest, including opportunities highlighted in

the Manawatū Destination Management Plan, such as creating new products and commercial accommodation. We are moving forward with projects in green energy and hyperdata centres, staying open to new opportunities through our stakeholder relationships, especially those matching the region's strengths. We are also focusing investment in Feilding and Palmerston North's central business districts, starting with hotels, serviced accommodation, office space, and retail. We work with shareholder Councils, real estate agencies, and commercial property developers to make sure our efforts are well targeted for the most benefit.

The development of priority sectors happens through targeted business growth, retention, and innovation partnerships. CEDA's approach to sector development focuses on delivering real results through our key regional strategies. These projects form the basis of our mission to drive sustainable economic growth, strengthen the region's resilience, and unlock future potential. For the Manawatū Regional Food Strategy, we focus on land diversification and productivity, backing projects that help the sector grow and adapt. In the visitor sector, we work to improve standards among operators, find new product opportunities, and build the regions reputation internationally while also growing local tourism. We focus on high-value opportunities in all sectors to encourage long-term growth, innovation, and economic contribution, keeping in regular contact with key businesses, sector groups, and visitor operators to ensure we deliver our work well.

Our business development strategy relies on strong relationships with business leaders and stakeholders across keys sectors in Manawatū. These connections help us stay up to date with business sentiment and regional opportunities, so we can proactively support business growth and investment. We offer practical support for

## BUSINESS

business growth through the Regional Business Partner Programme, workshops, connections to services like Business Mentors, and other tools that help businesses reach their potential.

Supporting innovation and start-ups is also a key focus. By working with organisations like The Factory and Sprout Agritech, CEDA fosters innovation, creates jobs, and attracts investment. The Factory supports bold start-ups through incubator programmes, while CEDA provides funding and mentoring to help new entrepreneurs succeed.

As the economic development partner for Sprout Agritech, we highlight strengths in agrifood technology, helping to grow the next generation of innovators. We also deliver funding support for Research and Development to businesses through the Ministry of Business, Innovation, and Employment Innovation Services as their regional delivery partner.



# PEOPLE

## **Ka rere a Tama-nui-te-rā, Ka mārama te rangi**

Attract, retain, and develop talent in the region

Through our data and research, we know that the biggest barrier to business growth in the region is the ability to attract the right people for the job. Developing a robust pipeline is crucial. This includes supporting industries, attracting skilled professionals, and investing in the

training and development of existing employees. Coupled with a clear understanding of the future needs of our sectors and businesses, this approach will empower the region to grow and thrive.

## Mauri tū, Mauri ora

Develop the talent pipeline to grow a skilled workforce and better utilise the existing labour market

### Support the development of the region's ability to attract and retain talent and skills

CEDA is committed to helping young people and job seekers connect with local businesses through programs like Accelerate Academy and the Young Enterprise Scheme. By working closely with schools, career advisors, and trades, we support students to be inspired and ready to move into local jobs.

To make sure our workforce is ready for the future, we align our talent and skills programs with wider regional strategies, such as Te Utanganui, the Manawatū Destination Management Plan, and the Manawatū Regional Food Strategy. By focusing on key sectors, we make sure our efforts to attract and keep talent match the region's strengths and support long term success of Manawatū. We also share insights with central government agencies to highlight emerging needs at a national level.

CEDA helps businesses grow by providing tools and insights through initiatives like the Employer and Workplace Hub on [ManawatuNZ.co.nz](https://www.manawatuNZ.co.nz). We support employers to attract, onboard, and retain talent, and help existing teams develop their skills. Our focus is always on preparing the workforce for the needs of tomorrow's key sectors.

We continue to build strong relationships with tertiary education providers and make sure workforce training matches the needs of major regional projects like Te Utanganui. Through collaboration, storytelling, and partnerships, CEDA works to grow, retain, and develop a skilled workforce that helps businesses thrive.

A strong regional identity is also key to attracting talent. Through collaboration with our region's priority sectors, we showcase the unique advantages of Manawatū to attract skilled professionals to live and work here. We support local businesses with curated content, targeted resources, and recruitment tools. Through platforms like [ManawatuNZ.co.nz](https://www.manawatuNZ.co.nz), we help showcase the lifestyle, businesses, and career opportunities that make our region special.

# Toitū te whenua whatungarongaro te tangata

Profile the region to attract people,  
business and investment

CEDA profiles the region by showcasing its strengths, people and places through a shared regional identity, targeted storytelling, and strategic partnerships across the economic pillars of People, Place and Business. This approach aligns with our core areas of work and reinforces the interconnectedness of regional growth.

When you create a region that people want to visit, you have created a place where people will choose to live. If you have created a place where people want to live and work, then you have created a region where businesses will want to invest, and if you have created a region where businesses want to invest, then you have a place that people will want to visit.

## Te Mauri o Manawatū

Profile Manawatū locally, nationally, and globally

### Lead and develop the stories of Manawatū, including online initiatives to support the attraction of inward investment, people and business

CEDA is focused on positioning Manawatū as a leading place for investment, business, talent, and visitors by clearly and authentically telling the region's story. We work closely with media and key partners to raise the profile of Manawatū across New Zealand and internationally. By embedding storytelling across all areas of our work, from investment attraction and tourism to talent and business support, we highlight what makes the region distinctive, competitive, and full of opportunity.

We take a consistent and thoughtful approach to how Manawatū is presented, using clear messaging, strong visuals, and targeted campaigns. This ensures every interaction - whether online, in print, or in person - reflects the region's strengths and reinforces Manawatū as an attractive place to live, work, invest, and visit.

Through strong relationships with media, and platforms such as ManawatuNZ.co.nz and the Resource Hub, we provide partners, stakeholders, and media with current information, real stories, and useful resources that showcases the value of Manawatū. As the Regional Tourism Organisation, CEDA also works with national and international partners including Tourism New Zealand, Air New Zealand, and Tourism Industry Aotearoa to expand the region's reach and support tourism and investment growth.

Our targeted digital initiatives and marketing activity promote the lifestyle, career opportunities, and strong business environment in Manawatū. Working alongside

stakeholders and the wider business community, we deliver campaigns informed by data and insights to ensure they are relevant and aligned with regional priorities. These efforts aim to increase visitation, encourage longer stays, and boost engagement, particularly around major events that deliver benefits for local businesses and communities.

By consistently promoting the lifestyle, accessibility, education and research strengths, and diverse economy of Manawatū, CEDA supports the region's reputation as a compelling destination for investors, skilled people, and businesses looking to grow.

## Grow engagement on regional website for increased awareness of, and information on the region, including economic trends and data

Our region's largest marketing tool, ManawatuNZ.co.nz sits at the centre of CEDA's strategic marketing activity, serving as the primary platform to showcase the region's strengths, opportunities, and stories. This digital hub connects with a wide range of audiences by highlighting the lifestyle in Manawatū, promoting talent and investment opportunities, showcasing the many experiences on offer, and sharing authentic local narratives. Through the website and social media channels, CEDA builds a consistent and engaging profile for Manawatū – reaching people locally, nationally, and globally to enhance the region's reputation and visibility.

By leveraging these digital channels, CEDA effectively communicates what makes Manawatū remarkable, encouraging visitation, attracting new residents, and fostering connections with potential investors and businesses. This integrated, data-driven approach ensures the region's identity is presented cohesively, supporting long-term economic development and growth.

CEDA also plays a key role in collecting, analysing, and communicating economic data and insights for Manawatū. In collaboration with national data agencies, Tourism New Zealand, and the Ministry of Business, Innovation and Employment, CEDA monitors key indicators such as visitor numbers, retail activity, GDP, housing trends, building consents, employment, and the performance of key sectors.

These insights are shared regularly with businesses and stakeholders through newsletters, online, via media partnerships, and through comprehensive economic reports – delivered in partnership with Palmerston North City Council, Manawatū District Council, and regional industry leaders. By providing accurate, up-to-date information, CEDA enables informed decision-making, helping stakeholders, businesses and partners understand the region's economic landscape and identify opportunities for future growth.



# Partners

## **He kuranui te tangata**

Lead inclusive and sustainable economic development for the region

A strength of our region is the ability to work together using our combined resources, connections and skills to compete nationally and globally. Strong partnerships with key stakeholders, including regional and national

organisations, central and local government, Māori, and iwi are essential to achieving our strategic goals for the city and district.

## Whiria te Tangata

Develop strategic partner relationships, leveraging opportunities

### Grow and foster relationships with Māori, and mana whenua of the region

CEDA works closely with mana whenua on key strategic projects to support their economic goals and create business and employment opportunities for Māori. We also back iwi-led initiatives and help build on the region's identity 'Te Mauri o Manawatū'.

Mahia te mahi hei painga mo te iwi. We are committed to strengthening our partnerships with Māori business networks like Te Au Pakihi and the Poutama Trust, supporting initiatives that help Māori businesses grow and succeed. To build meaningful relationships, we continue to develop our team's understanding of Te Ao Māori and all it encompasses. Whaia te matauranga hei ora māu.

CEDA recognises that improving Māori economic outcomes requires more than participation alone. It requires intentional alignment with iwi aspirations, support for Māori-led enterprise, and sustained effort to increase access and opportunity. CEDA will continue to refine how it measures, supports, and reports on Māori economic outcomes to ensure its mahi delivers meaningful and enduring benefit.

### Build on relationships with shareholders, central government agencies, and regional stakeholders

CEDA also builds strong relationships with shareholders, central government agencies, and regional stakeholders. By working with partners such as Rangitāne o Manawatū, Ngati Kauwhata, Ngati Raukawa, Rangitāne o Manawatū Settlement Trust, Te Roopu Hokowhitu, The Factory, Sprout Agritech, Manawatū Business Chamber, Feilding and District Promotions, Rangitikei Manawatū Federated Farmers, FoodHQ, Palmy Bid, Massey University, UCOL, IPU, New Zealand Defence Force, Economic Development New Zealand, Tourism New Zealand, Regional Tourism New Zealand, and the Ministry of Business Innovation and Employment, we connect, discover, and leverage opportunities for the region.

We regularly review our partnership agreements and workplans, always looking for new opportunities to work together and support collective progress across all our activities.

A full list of stakeholders and partners that CEDA is working with can be found on the last page.

A photograph of a couple standing on a wooden balcony, looking out over a vast, lush green landscape. The scene is captured during the golden hour of sunset, with warm light filtering through the trees. The balcony has a wooden railing and a dark corrugated metal wall. The background shows rolling hills and a winding road through a dense forest.

# Kei ōu ringaringa te ao

The world is yours

# Ko te pae tata, whakamaua kia tina

## Where we focus our time and money

CEDA receives funding from Palmerston North City Council and Manawatū District Council, its shareholders, and also from central government partners for initiatives that bring benefit to the wider region and New Zealand. This funding gives us the ability to deliver and partner in programmes of work across the region, business and community including targeted sector specific work that will bring benefit to the wider region in the long term.

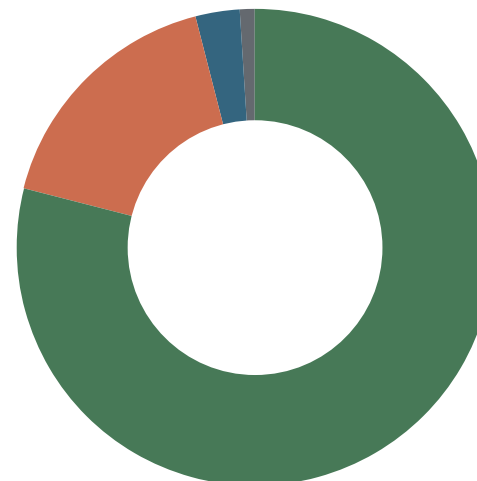
This year funding will also be received from the governments Regional Business Partner Network to support the development of business capability in the region.

**\*Note:**

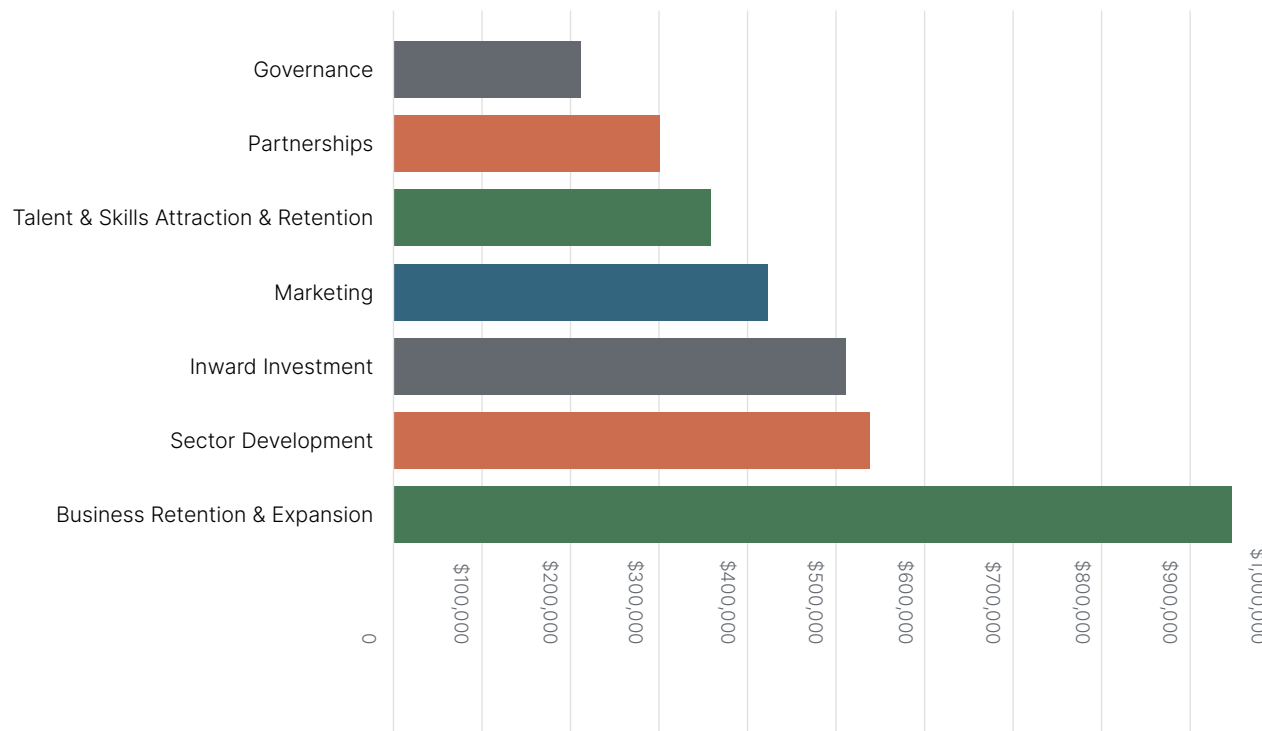
1. Council funding includes Councils contribution to projects, including Te Utanganui.
2. Central government funding includes the Regional Business Partner programme.
3. Industry/project contribution includes funding for Te Utanganui from Horizons regional council, KiwiRail, Ngāti Kauwhata, Palmerston North Airport and Rangitāne o Manawatū.
4. Marketing costs where directly related to an activity are included in the budgeted costs for that activity.
5. Sector Development includes the government Regional Events Promotion Fund.
6. Business Retention and Expansion includes the Regional Business Partner Programme.
7. Inward Investment includes project costs for the Te Utanganui programme.
8. Employee and operating expenses where not directly related to an activity have been allocated on a percentage of expenditure basis.

### Our Funding\*

- Council funding **80%**
- Central Government funding **17%**
- Industry contribution **3%**
- Other revenue **1%**



### How we're going to allocate our funding\*



# Ko wai te tangata o te ao mārama

## Who we are

CEDA is a team of people who are passionate about our region.

We are thought leaders, subject matter experts, and doers, working together with the common purpose of prosperity for our region and its people. Our success is underpinned by our people, connections,

partnerships, and networks locally, nationally, and internationally.

We are committed to operating efficiently and effectively, and as a future-focused organisation, to supporting initiatives that enhance and protect our natural and built environment.

### Our values



**Mā te mahi tahi  
e puta ai he hua  
whakaharahara**

Together we can achieve  
exceptional outcomes



**Me whakapono ki ō  
mahi me te āhua o tō  
kawe i aua mahi**

Believe in what you do  
and how you do it



**Kia poho kererū,  
kia mairangatia  
te hautūtanga**

Be proud and  
show leadership

## Te Tiriti o Waitangi

We recognise the historical and ongoing significance of Te Tiriti as a living document guiding our organisation's policies and practices and acknowledge the importance of partnering with local iwi and recognition of mana whenua in the region through localised partnering.

Our focus will continue to be on 'Participation' strengthened through our growing relationships with regional iwi and mana whenua across Manawatū. Through 'Partnerships', we work alongside mana whenua for agreed outcomes that benefit the region, and we will ensure 'Protection' remains a priority through the incorporation of kaitiakitanga, mātauranga and tikanga across our projects and programmes, supported by ongoing development of the team's cultural awareness, knowledge and understanding, of the principals of Te Tiriti o Waitangi.

## Our Commitment to Te Ao Māori

We honour te reo Māori not through direct translation, but by using Whakataukī, Whakatauākī, and Kīwaha that express the deeper intent, values, and worldview guiding our mahi.

Whakataukī used for CEDA's key areas of work under Business, People, Place and Partnerships, and Kīwaha for our Statement of Service Performance outcomes, are as follows:

### Whakataukī

- Mā te mahi ka ora – Through work comes success
- Ka rere ko Tamanuiterā, ka mārama te rangi – When Tamanuiterā takes flight, The sky is bright
- Toitū te whenua whatungarongaro te tangata – The land is forever, People disappear
- He kuranui te tangata – The human being is precious

### Kīwaha

- Mahia te mahi – Do the work
- Mauri tū, Mauri ora – An active spirit is a thriving spirit
- Te Mauri o Manawatū – The life force of Manawatū
- Whiria te tangata – Weave the people together

### Other Whakataukī used throughout (Titles) are as follows:

- He matawhānui tiritahi, he rautaki tiritahi mā te katoa – A shared vision, a shared strategy for everyone (Foreword)
- Ki te kahore he whakakitenga, ka ngaro te iwi – Without foresight or vision, the people will be lost (Our vision)
- Mahia te mahi hei painga mō te iwi – Do the work for the benefit of the people (What we do)
- Mā whero, mā pango ka oti ai te mahi – With red and black, the work will be completed (Our intervention logic)
- Ko te pae tata, whakamaua kia tina – Secure the near horizon, then strive for the distant goal (Where we focus our time and money)
- Ko wai te tangata o te ao mārama – Who are we in the world of light? (Who we are)
- Te tōia, tē haumatia – Nothing can be achieved without a plan, effort, and action (Our performance measures)

## Sustainability Commitment

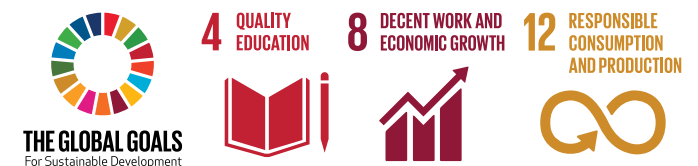
We are committed to sustainable practices in both CEDA's office environment and the environment within which we work and live. We value diversity in both our team at CEDA and our commitment to promoting diversity in age, culture, ethnicity, and gender in all that we do.

CEDA works with businesses through its regular business engagements to encourage considerations around carbon emission reduction and sustainability options for their operations. When looking at opportunities for investment in the region we consider the environmental impacts of any businesses looking to relocate here.

CEDA also advocates for sustainability through our business and community engagements such as e-newsletters and social media and ensuring we as an organisation are doing what we can through procurement and waste reduction initiatives.

The Sustainable Development Goals or Global Goals are a collection of 17 interlinked global goals designed to be a "blueprint to achieve a better and more sustainable future for all". The Goals were set in 2015 by the United Nations General Assembly and are intended to be achieved by the year 2030.

CEDA's top three Sustainable Development Goals we use to inform our programmes of work are:





# Te tōia, tē haumatia

## Our Performance Measures

CEDA's performance measure framework identifies quantifiable measures of our programmes and activities aligned to our key strategic outcomes. These form the basis of our accountability and will be

reported on six-monthly. In our reporting, additional commentary will be used to inform on the delivery and effectiveness of the full range of CEDA's activity.

# Statement of Service Performance

## OUR PERFORMANCE MEASURES

Service Level Statement	Performance Measure	2026/27	2027/28	2028/29
<b>Mahia te mahi</b> Support the development and growth of business and sectors of strength in the region including inward investment	Identify and develop regional investment opportunities by strengthening priority sectors through targeted business development, retention, and innovation partnerships.	Deliver 20 inward investment and priority sector development initiatives aligned to the region's key strengths.	Deliver 20 inward investment and priority sector development initiatives aligned to the region's key strengths.	Deliver 20 inward investment and priority sector development initiatives aligned to the region's key strengths.
		400 engagements with businesses and industry to support business growth*	400 engagements with businesses and industry to support business growth*	400 engagements with businesses and industry to support business growth*
		Partner with key stakeholders to deliver 6 start-up and innovation activities or initiatives	Partner with key stakeholders to deliver 6 start-up and innovation activities or initiatives	Partner with key stakeholders to deliver 6 start-up and innovation activities or initiatives
<b>Mauri tū, Mauri ora</b> Develop the talent pipeline to support growing a skilled workforce, and better utilise the existing labour market	Support the development of the regions ability to attract and retain talent and skills	Deliver 4 initiatives that support talent attraction and retention, industry, or youth into employment	Deliver 4 initiatives that support talent attraction and retention, industry, or youth into employment	Deliver 4 initiatives that support talent attraction and retention, industry, or youth into employment
<b>Te Mauri o Manawatū</b> Profile Manawatū locally, nationally, and globally	Lead and develop the stories of Manawatū, including online initiatives to support the attraction of inward investment, people and business	20 content pieces or media features profiling the region	20 content pieces or media features profiling the region	20 content pieces or media features profiling the region
		2 campaigns or targeted digital initiatives to support CEDA's objectives	2 campaigns or targeted digital initiatives to support CEDA's objectives	2 campaigns or targeted digital initiatives to support CEDA's objectives

\* being meetings with businesses to support business growth and includes business engagements under the Regional Business Partner Programme

## OUR PERFORMANCE MEASURES

Service Level Statement	Performance Measure	2026/27	2027/28	2028/29
	Grow engagement on regional website for increased awareness of and information on the region, including economic trends and data	190,000 'sessions' per year on ManawatuNZ.co.nz	190,000 'sessions' per year on ManawatuNZ.co.nz	190,000 'sessions' per year on ManawatuNZ.co.nz
		Distillation and communication of 4 economic updates, providing context and trends	Distillation and communication of 4 economic updates, providing context and trends	Distillation and communication of 4 economic updates, providing context and trends
<b>Whiria te Tangata</b> Develop strategic partner relationships, leveraging opportunities	Grow and foster relationships with Māori, and mana whenua of the region	Deliver 3 initiatives to support iwi engagement including support of iwi led projects	Deliver 3 initiatives to support iwi engagement including support of iwi led projects	Deliver 3 initiatives to support iwi engagement including support of iwi led projects
	Build on relationships with shareholders, central government agencies, and regional stakeholders	12 Partnership and funding agreements in place	12 Partnership and funding agreements in place	12 Partnership and funding agreements in place
			Complete biennial Customer Satisfaction survey	

# Te Aronui

## Alignment with Our Shareholders

To enable that best outcomes for the region we ensure that CEDAs objectives are aligned with our shareholder council's plans and visions for the city and district. The Palmerston North City and Manawatū District Councils signed Long Term Plans outline these objectives. CEDA plays a critical part in delivering outcomes identified in the relative Long-Term Plans as outlined below:

PNCC Long Term Plan Strategic Goals	CEDA Service Level Statement alignment
An innovative and growing city <i>He tāone auaha, he tāone tiputipu</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Develop the talent pipeline to grow a skilled workforce and better utilise the existing labour market.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> <li>• Develop strategic partner relationships, leveraging opportunities.</li> </ul>
A creative and exciting city <i>He tāone whakaihiihi tapatapahi ana</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Develop the talent pipeline to grow a skilled workforce and better utilise the existing labour market.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> </ul>
A connected and safe community <i>He hāpori tūhonohono, he hāpori haumarū</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> </ul>
A sustainable and resilient city <i>He tāone toitū, he tāone manawaroa</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> </ul>
MDC Long Term Plan Priorities	CEDA Service Level Statement alignment
A prosperous, resilient economy <i>He kāinga ka tōnui tōna ōhanga</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Develop the talent pipeline to grow a skilled workforce and better utilise the existing labour market.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> <li>• Develop strategic partner relationships, leveraging opportunities.</li> </ul>
Infrastructure fit for future <i>He kāinga ka tūwhena tonu ōna pūnahahanga, haere ake nei te wā</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Develop strategic partner relationships, leveraging opportunities.</li> </ul>
A future planned together <i>He kāinga ka whakamaherea tahitia tōna anamata e te hāpori tonu</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Develop the talent pipeline to grow a skilled workforce and better utilise the existing labour market.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> <li>• Develop strategic partner relationships, leveraging opportunities.</li> </ul>
An environment to be proud of <i>He kāinga ka rauhitia tōna taiao</i>	<ul style="list-style-type: none"> <li>• Support the development and growth of business and sectors of strength in the region including inward investment.</li> <li>• Profile Manawatū locally, nationally, and globally.</li> </ul>

# About CEDA



The Central Economic Development Agency (CEDA) was incorporated with the Companies Office in October 2015 and began full operations in September 2016. CEDA is a Council Controlled Organisation jointly owned by the Palmerston North City Council and the Manawatū District Council.

## CEDA's Purpose

To drive and facilitate the creation and growth of economic wealth for Manawatū and beyond.

## CEDA's Constitution Objectives

- (a) The principal objectives of the Company are to achieve the objectives of the shareholders, both commercial and non-commercial as specified from time to time in the Statement of Intent and, in particular, to drive and facilitate the creation and growth of economic wealth for Manawatū and beyond;
- (b) be a good employer;
- (c) exhibit a sense of social and environmental responsibility by having regard to the interests of the community in which the Company operates and by endeavouring to accommodate or encourage these when reasonably able to do so.

## CEDA's Structure and Governance

The Board of a minimum of four and a maximum of six independent directors is responsible for the strategic direction and control of CEDA's activities.

The Board guides and monitors the business and affairs of CEDA, in accordance with the Companies Act 1993, the Local Government Act 2002, the Company's Constitution and this Statement of Intent.

The Board's approach to governance is to adopt "good practice" with respect to:

- the operation and performance of the Board
- managing the relationship with the Chief Executive
- being accountable to all shareholders and reporting to both the Manawatū District Council and Palmerston North City Council

The Chief Executive is responsible for the day-to-day operations of CEDA, engaging and oversight of staff and reporting to the directors on performance against CEDA's objectives.



# Ahumoni Financial Performance

**Statement of  
Comprehensive Revenue  
& Expenses**

For the 12 Months to June

	<b>2026-27 Budget</b>	<b>2027-28 Forecast</b>	<b>2028-29 Forecast</b>
<b>Revenue</b>			
Council Funding	2,862,794	2,934,364	3,007,723
Other Services Revenue	597,345	10,952	-
<b>Total Revenue</b>	<b>3,460,139</b>	<b>2,945,316</b>	<b>3,007,723</b>
<b>Cost of Sales</b>			
Other Services Expenses	887,377	815,426	787,662
<b>Total Cost of Sales</b>	<b>887,377</b>	<b>815,426</b>	<b>787,662</b>
<b>Gross Profit</b>	<b>2,572,762</b>	<b>2,129,890</b>	<b>2,220,061</b>
<b>Other Revenue</b>			
Interest Revenue	20,000	15,000	15,000

**Statement of  
Comprehensive Revenue  
& Expenses**

For the 12 Months to June

	<b>2026-27 Budget</b>	<b>2027-28 Forecast</b>	<b>2028-29 Forecast</b>
<b>Operating Expenses</b>			
Depreciation	20,880	14,618	-
Directors Fees	180,000	180,000	180,000
Employee Costs	1,963,479	1,552,762	1,599,344
Financing Expense	100	100	200
Other Operating Expenses	446,593	445,928	452,716
<b>Total Operating Expenses</b>	<b>2,611,052</b>	<b>2,193,408</b>	<b>2,232,260</b>
<b>Net Surplus (Deficit) before Tax</b>			
	<b>(18,290)</b>	<b>(48,518)</b>	<b>2,801</b>
<b>Taxation</b>			
Income Tax Expense	-	-	-
<b>Total Taxation</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Net Surplus (Deficit) after tax</b>			
	<b>(18,290)</b>	<b>(48,518)</b>	<b>2,801</b>

See Appendix for Accounting Policies

## Statement of Financial Position

As at 30 June

	30 June 2027 Budget	30 June 2028 Forecast	30 June 2029 Forecast
<b>Assets</b>			
<b>Current Assets</b>			
Cash and Cash Equivalents	751,771	731,383	733,596
Receivables and Accruals	186,700	181,764	182,364
<b>Total Current Assets</b>	<b>938,471</b>	<b>913,147</b>	<b>915,960</b>
<b>Non-Current Assets</b>			
Property, Plant and Equipment	14,618	-	-
<b>Total Non-Current Assets</b>	<b>14,618</b>	<b>-</b>	<b>-</b>
<b>Total Assets</b>	<b>953,089</b>	<b>913,147</b>	<b>915,960</b>
<b>Liabilities</b>			
<b>Current Liabilities</b>			
Payables and Deferred Revenue	241,251	249,827	249,839
Employee Entitlements	61,000	61,000	61,000
<b>Total Current Liabilities</b>	<b>302,251</b>	<b>310,827</b>	<b>310,839</b>
<b>Total Liabilities</b>	<b>302,251</b>	<b>310,827</b>	<b>310,839</b>
<b>Net Assets</b>	<b>650,838</b>	<b>602,320</b>	<b>605,121</b>
<b>Equity</b>			
Contributed Capital	1,000	1,000	1,000
Retained Earnings	649,838	601,320	604,121
<b>Total Capital and Reserves</b>	<b>650,838</b>	<b>602,320</b>	<b>605,121</b>

See Appendix for Accounting Policies

## Statement of Cash Flows

As at 30 June

	30 June 2027 Budget	30 June 2028 Forecast	30 June 2029 Forecast
<b>Cash Flows from Operating Activities</b>			
Receipts of council funding	3,291,624	3,373,836	3,458,170
Interest received	20,000	15,000	15,000
Receipts from other operating activity	679,077	18,216	-
GST	(249,815)	(258,566)	(264,472)
Payments to suppliers and employees	(3,986,819)	(3,168,774)	(3,206,385)
Interest expense	(100)	(100)	(100)
<b>Total Cash Flows from Operating Activities</b>	<b>(246,033)</b>	<b>(20,388)</b>	<b>2,213</b>
<b>Net Cash Flows</b>	<b>(246,033)</b>	<b>(20,388)</b>	<b>2,213</b>
<b>Cash Balances</b>			
Opening Balance	989,619	743,586	723,198
Closing Balance	743,586	723,198	725,411
<b>Net Cash Flows</b>	<b>(246,033)</b>	<b>(20,388)</b>	<b>2,213</b>

See Appendix for Accounting Policies

# Shareholder requirements

## Reporting to Shareholders

The Shareholders will invite CEDA to formally report to each Shareholder twice per year, being the Half Yearly Report and Annual Report.

The role of the formal reports to each shareholder is to:

- Review the performance of CEDA, and report to shareholders on that performance on a periodic basis
- Undertake performance monitoring of CEDA, as per section 65 of the Local Government Act
- Approve the appointment, removal, replacement, and remuneration of directors
- Review and approve any changes to policies, or the SOI, requiring their approval

The Board aims to ensure that the shareholders are informed of all major developments affecting CEDA's state of affairs, while at the same time recognising that commercial sensitivity may preclude certain information from being made public.

CEDA will adhere to a 'no surprises' approach in its dealings with its shareholders.

## Statement of Expectations

By 1 December in each year the shareholders will deliver to CEDA a Statement of Expectations. The Statement of Expectations is intended to provide direction on issues that are important to both Councils, and to assist in the development of CEDA's next SOI. A Statement of Expectations for the three years from 2024 to 2027 has been delivered to CEDA.

## Statement of Intent

By 1 March in each year CEDA will deliver to the shareholders its draft SOI for the following year in the form required by Clause 9(1) of Schedule 8 and Section 64(1) of the Local Government Act 2002.

Having considered any comments from the shareholders received by 30 April, the Board will deliver the completed SOI to the shareholders on or before 15 June each year.

## Half Yearly Report

By the end of February each year, CEDA will provide to the shareholders a Half Yearly Report complying with Section 66 of the Local Government Act 2002. The Half Yearly Report will include the following information:

- Director's commentary on operations for the relevant six-month period
- Comparison of CEDA's performance regarding the objectives and performance targets set out in the SOI, with an explanation of any material variances
- Un-audited half-yearly Financial Statements incorporating a Statement of Financial Performance, Statement of Financial Position, Statement of Changes in Equity and Statement of Cashflows

## Annual Report

By 30 September each year, CEDA will provide its shareholders an Annual Report complying with Sections 67, 68 and 69 of the Local Government Act 2002 and the Companies Act.

The Annual Report will contain the information necessary to enable an informed assessment of the operations of the company, and will include the following information:

- Directors' Report
- Financial Statements incorporating a Statement of Financial Performance, Statement of Financial Position, Statement of Changes in Equity, Statement of Cashflows, Statement of Accounting Policies and Notes to the Accounts
- Comparison of CEDA's performance regarding the objectives and performance targets set out in the SOI, with an explanation of any material variances
- Auditor's Report on the financial statements and the performance targets
- Any other information that the directors consider appropriate

## Shareholder Meetings

CEDA will hold an Annual General Meeting (AGM) between 30 September and 30 November each year to present the Annual Report to all shareholders unless it is agreed between CEDA and the shareholders that the business of the AGM will be done by resolution in writing.

## Shareholder Approval

Any subscription, purchase, or acquisition by CEDA of shares in a company or organisation will require shareholder approval by special resolution as will the other matters outlined in clause 3 of CEDA's Constitution.

## Dividend policy

CEDA is a not for profit Council Controlled Organisation, as such the Board is not intending to pay any dividends in the foreseeable future.

# Appendices

## Accounting Policies

### 1. Reporting Entity

Central Economic Development Agency Ltd (CEDA) was established and commenced operations in New Zealand on 15 October 2015 under the Companies Act 1993 (NZBN 9429042001096). As the shareholders of CEDA are Palmerston North City Council (50%) and Manawātū District Council (50%). CEDA is a council-controlled organisation as defined in section 6 of the Local Government Act 2002.

CEDA has designated itself as a public benefit entity (PBE) for financial reporting purposes.

### 2. Statement of Accounting Policies

#### Basis of Preparation

The financial statements are prepared on the going concern basis, and the accounting policies have been applied consistently throughout the period, unless otherwise stated.

#### Statement of Compliance

The financial statements of CEDA have been prepared in accordance with the requirements of the Local Government Act 2002, the Companies Act 1993, and the Financial Reporting Act 2013. This includes the requirement to comply with generally accepted accounting practice in New Zealand (NZ GAAP).

These financial statements comply with Public Benefit Entity International Public Sector Accounting Standards (PBE IPSAS) Reduced Disclosure Regime (RDR). CEDA is eligible and has elected to report in accordance with Tier 2 PBE standards RDR on the basis the entity has no public accountability and has expenses < \$33m.

#### Presentation Currency

The financial statements are presented in New Zealand dollars (NZ\$) and all values are rounded to the nearest NZ\$, except when otherwise indicated.

#### Historical Cost

These financial statements have been prepared on a historical cost basis.

#### Changes in Accounting Policies

There have been no changes in accounting policies. Policies have been applied on a consistent basis with those of the previous reporting period.

#### Revenue Recognition

Non-exchange transactions are transactions where, an entity either received value from another entity without directly giving approximately equal value in exchange or gives value to another entity without directly receiving approximately equal value in exchange. CEDA considers that the nature of the core funding received from Councils is 'non exchange' in nature as the service value that CEDA returns to Councils as 'economic development' is not always directly provided to the Councils as funders, but rather to the broader community on behalf of the Councils.

Other services revenue has been classed as non-exchange revenue as the services are generally provided to the community rather than the funder.

Exchange transactions are transactions in which one entity receives assets or services or has liabilities extinguished, and directly gives approximately equal value (primarily in the form of cash, goods, services, or use of assets) to another entity in exchange. In CEDA exchange revenue is derived from interest revenue and the provision of office meeting space.

Interest received is recognised using the effective interest method. Interest revenue on an impaired financial asset is recognised using the original effective interest method.

Grants are recognised as revenue when they become receivable unless there is an obligation in substance to return the funds if conditions of the grant are not met. If there is such an obligation, the grants are initially recorded as grants received in advance and recognised as revenue when conditions of the grant are satisfied.

Donated assets. Where a physical asset is gifted to or acquired by CEDA for nil consideration or at a subsidised cost, the asset is recognised at fair value. The difference between the consideration provided and fair value of the asset is recognised as revenue.

The fair value of donated assets is determined as follows:

- For new assets, fair value is usually determined by reference to the retail price of the same or similar assets at the time the asset was received.
- For used assets, fair value is usually determined by reference to market information for assets of a similar type, condition, and age.

## Inventories

Inventories held for use in the provision of goods and services on a commercial basis are valued at the lower of cost and net realisable value.

The amount of any write-down for the loss of service potential or from cost to net realisable value is recognised in the surplus (deficit) in the period of the write-down.

## Property, Plant and Equipment

Property, plant and equipment are stated at historical cost less any accumulated depreciation and impairment losses. Historical cost includes expenditure directly attributable to the acquisition of assets and includes the cost of replacements that are eligible for capitalisation when these are incurred.

An item of property, plant and equipment is derecognised upon disposal or when no further future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in profit or loss in the year the asset is derecognised.

## Depreciation

Account	Method	Rate
Office Furniture & Equipment	Diminishing Value	0% – 50%
Office Furniture & Equipment	Straight Line	8.5% – 30%
Vehicles	Diminishing Value	30%
Websites	Straight Line	40%

## Income Tax

Income tax expense includes components relating to current tax and deferred tax.

Current tax is the amount of income tax payable based on the taxable profit for the current year, and any adjustments to income tax payable in respect of prior years.

Deferred tax is the amount of income tax payable or recoverable in future periods in respect of temporary differences and unused tax losses. Temporary differences are differences between the carrying amount of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit.

Deferred tax liabilities are generally recognised for all taxable temporary differences. Deferred tax assets are recognised to the extent that it is probable that taxable profits will be available against which the deductible temporary differences or tax losses can be utilised.

Deferred tax is not recognised if the temporary difference arises from the initial recognition of goodwill or from the initial recognition of an asset or liability in a transaction that affects neither accounting profit nor taxable profit.

Current tax and deferred tax are measured using tax rates (and tax laws) that have been enacted or substantively enacted at balance date.

Current and deferred tax is recognised against the profit or loss for the period, except to the extent that it relates to items recognised in other comprehensive income or directly in equity.

## Cash and cash equivalents

Cash and cash equivalents comprise cash on hand, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less, and bank overdrafts.

Bank overdrafts are shown within borrowings in current liabilities in the statement of financial position.

## Receivables

Receivables are recorded at their face value, less any provision for impairment.

## Impairment of financial assets

Financial assets are assessed for evidence of impairment at each balance date. Impairment losses are recognised in the surplus or deficit.

### *Loans and receivables*

Impairment is established when there is evidence CEDA will not be able to collect amounts due according to the original terms of the receivable. Significant financial difficulties of the debtor, probability that the debtor will enter into bankruptcy, receivership, or liquidation and default in payments are indicators that the asset is impaired. The amount of the impairment is the difference between the asset's carrying amount and the present value of estimated future cash flows, discounted using the original effective interest rate. For debtors and other receivables, the carrying amount of the asset is reduced through the use of an allowance account, and the amount of the loss is recognised in the surplus or deficit. When the receivable is uncollectable, it is written-off against the allowance account. Overdue receivables that have been renegotiated are reclassified as current (that is, not past due). Impairment in term deposits or bonds are recognised directly against the instrument's carrying amount.

## Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They are included in current assets, except for maturities greater than 12 months after the balance date, which are included in non-current assets.

After initial recognition, they are measured at amortised cost, using the effective interest method, less impairment. Gains and losses when the asset is impaired or derecognised are recognised in the surplus or deficit.

## **Payables**

Short-term creditors and other payables are recorded at their face value.

## **Equity**

Equity is the shareholders' interest in CEDA and is measured as the difference between total assets and total liabilities.

## **Good and Services Tax**

All items in the financial statements are stated exclusive of GST, except for receivables and payables, which are presented on a GST inclusive basis. Where GST is not recoverable as input tax, it is recognised as part of related asset or expense.

The net amount of GST recoverable from, or payable to, the IRD is included as part of receivables or payables in the statement of financial position.

The net GST paid to, or received from, the IRD, including the GST relating to investing and financing activities, is classified as operating cash flow in the statement of cashflows.

Commitments and contingencies are disclosed exclusive of GST.

## **Employee Entitlements**

Employer contributions to KiwiSaver are accounted for as defined contribution superannuation schemes and are expensed in the surplus or deficit as incurred.

Short-term employee entitlements – Employee benefits that are due to be settled within 12 months after the end of the year in which the employee provides the related service are measured based on accrued entitlements at current rates of pay. These include salaries and wages accrued up to balance date, and annual leave earned but not yet taken at balance date, and sick leave. These are classified as a current liability.

A liability and an expense are recognised for bonuses where there is a contractual obligation or where there is past practice that has created a constructive obligation and a reliable estimate of the obligation can be made.

CEDA does not provide for long service or retirement leave entitlements.

## **Provisions**

A provision is recognised for future expenditure of uncertain amount or timing when there is an obligation (either legal or constructive) as a result of a past event, it is probable that an outflow of future economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

Provisions are measured at the present value of the expenditures expected to be required to settle the obligation using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the obligation. The increase in the provision due to the passage of time is recognised as an interest expense and is included in 'finance costs'.

## **Leases – Where CEDA is the Lessee**

An operating lease is a lease that does not transfer substantially all the risks and rewards incidental to ownership of an asset to the lessee. Lease payments under an operating lease are recognised as an expense on a straight-line basis over the lease term. Lease incentives received are recognised in the surplus or deficit as a reduction of rental expense over the lease term.

# Tauākī Kawatau

## Statement of Expectations



22 December 2023

Bobbie O'Fee  
Chair  
Central Economic Development Agency Ltd  
Level 1/1-19 Fitzherbert Avenue  
**PALMERSTON NORTH 4410**

Dear Bobbie,

### **CEDA Statement of Expectations 2024/25 to 2026/27 (2024/34 Long Term Plan)**

This Statement of Expectations (SOE) covers the period 1 July 2024 to 30 June 2027, which is years 1-3 of the Shareholders' 2024/34 Long Term Plan. Amendments to the Statement of Expectations may be sought during this period.

The purpose of this SOE is to provide CEDA with the Shareholders' focus and priorities for delivery, against its purpose of driving and facilitating the creation and growth of economic wealth in the Manawatū region and beyond.

When working beyond the Manawatū, there must be a causal link of the outcomes or benefits back to the Manawatū region based on the core functions and measures of success outlined below.

It is also expected that CEDA will use this SOE to guide the development of an annual Statement of Intent (SOI) for 2024/25, 2025/26 and 2026/27.

### **Strategic Relationships**

Taking a leadership position and building strategic relationships in the Manawatū region and beyond, is fundamental for CEDA to achieve its purpose. CEDA must be relationship-driven at all levels and we appreciate your commitment to this. From our perspective (both as shareholders and partners), this means CEDA developing a deep understanding of the roles of its strategic partner organisations, what their priorities and strengths are, and how CEDA can add value to the relationship (and vice versa) to achieve better economic outcomes for the region.

CEDA formalising these strategic relationships, is important to us as shareholders, to ensure we have cohesion in the region around economic development activities. We would like this to be driven further by CEDA through mutually agreed partnership agreements or similar, to ensure everyone is on the same page and provide the basis for a consistent and collective approach with measurable outcomes.

Ongoing review of the existing strategic partnership agreements already in place is expected.

The shareholders have identified the following key partners for CEDA: Palmerston North City Council, Manawatū District Council, Horizons Regional Council, Iwi, Manawatū Chamber of Commerce, NZ Defence Force, Federated Farmers, Accelerate 25, KiwiRail, FoodHQ, Massey University, The Factory, Palmy BID, Feilding & District Promotions, and key Government agencies.

The Shareholders and CEDA will continue to work together to update the existing list of strategic partners.

#### Key Agreed Functions and Outcomes

We understand that to be effective, CEDA must be able to focus on key outcomes within a well-defined mandate. We also recognize this is a challenge given there can be differing stakeholder expectations.

This means CEDA focusing on the delivery of its core functions and outcomes in:

- Stimulate inward investment (both national and international), retention and expansion of business in the Manawatū region.
- Developing a talent pipeline.
- Support domestic visitation and tourism.

Top priorities are:

- Te Utanganui, Central New Zealand Distribution Hub.
- Strategic oversight and coordination of the Manawatū Food Strategy.
- Promotion and development of key tourism and visitor destinations.
- Inward investment in the Feilding town centre and Palmerston North city centre.

Action plans to deliver on these core functions should identify KPIs based on clear intervention logic. The SOI should include specific KPIs for the new top priority regarding inward investment in the Feilding town centre and Palmerston North city centre.

It is expected that CEDA will work very closely with key stakeholders of the regions strengths of food production and research, distribution and logistics, defence, health, visitor, education (domestic and international), digital and technology, and a growing Māori economy.

CEDA is expected to scan for new opportunities, whether or not it is a key strength, where this can benefit the region.

CEDA's success will be measured by the shareholders using the following indicators of the health of the regional economy:

- Job growth.
- Increase in median household income.
- Number of investment leads and deals secured.
- Strength of the relationship with strategic partners.

The Shareholders acknowledge that the first two measures are not directly under CEDA's control. Significant changes in international and national economic factors will be taken into account when the Shareholders measure CEDA's performance.

Understanding the strategic drivers of the Shareholders and aligning CEDA's core functions to those drivers is critical to the partnership between the Councils and CEDA.

The Shareholders have a key role in setting the economic environment for business to flourish and CEDA acts on the Councils behalf in facilitating opportunities for improved economic outcomes. CEDA is the Councils' agency for the delivery of economic development across the region.

Therefore, it is expected that CEDA will engage with the Councils in the development and implementation of their strategies and plans. These strategies and plans are expected to demonstrate active engagement with other strategic partners in their development.

The Councils are obliged to ensure that our services are delivered effectively and efficiently. As a Council-Controlled Organisation (CCO), this expectation extends to CEDA. The Shareholders require CEDA to provide an activity-based budget so the Councils can effectively communicate levels of service and value for money to their ratepayers. In addition, there are many opportunities where shared resourcing, expertise and services should be explored and we would like to discuss these opportunities from both a short-term and long-term perspective.

To ensure the Shareholders and CEDA are on the same page, the focus, scope of activity, and priorities will be set through the Statement of Intent (SOI), and delivery managed through any relationship agreement that is put in place.

The Shareholders expect that where CEDA is marketing the Manawatū region and this requires differentiating between the Manawatu, Feilding and Palmerston North, that this will continue to be delivered by CEDA in close collaboration with both Shareholders.

The Shareholders would like to continue the bi-monthly team meeting between the Mayors, Council CE's and relationship managers with the CEDA Chair and CE.

The Shareholders will invite CEDA to formally report to each Shareholder twice per year, being the 6-month report and Annual Report.

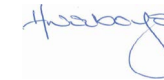
CEDA will host two informal meetings with the Shareholders together to share progress on key priorities and connect outside of the formal reporting processes.

We look forward to working with CEDA to develop an economic development model that successfully delivers. We thank the Board, CEDA CE, and CEDA staff for their continued commitment to economic growth in the Manawatū region.

Yours sincerely



Grant Smith  
Mayor  
PALMERSTON NORTH CITY COUNCIL



Helen Worboys  
Mayor  
MANAWATŪ DISTRICT COUNCIL

# Ngā Manawa Tītī

## Our Partner Organisations

### Local

Central Skills Hub  
Feilding and District Promotion  
FoodHQ  
IPU New Zealand  
Lamberts  
ManawaTech  
Manawatū Business Chamber  
Manawatū District Council  
Manawatū Young Chamber  
Manawatū Young Professionals Network  
Manfeild  
Massey University Te Kunenga ki Pūrehuroa  
Network of Skilled Migrants  
Palmerston North City Council  
Palmerston North Airport  
Palmy BID  
Rangitāne o Manawatū  
Rangitāne o Manawatū Settlement Trust  
Regional Schools  
Sport Manawatū  
Sprout Agritech  
Talent Central  
Te Au Pakihi  
Te Manawa

Te Roopu Hokowhitu

The Factory

UCOL

Venues and Events Palmerston North

Welcoming Communities

### Regional

Accelerate35

Business Central and Export NZ

Business Whanganui Chamber of Commerce

Hawkes Bay Regional Economic Development Agency

Horizons Regional Council

Horowhenua District Council

MidCentral Health | Te Pae Hauora o Ruahine o Tararua

Rangitīkei District Council

Rangitīkei Manawatū Federated Farmers

Ruapehu District Council

Tararua District Council

The Horowhenua Development Company

Te Utanganui partners, Kiwirail, Centreport and Napier Ports

Venture Taranaki

Wellington Regional Economic Development Agency

Whanganui District Council

### National

AgResearch

Agritech New Zealand

Air New Zealand

Business Mentors New Zealand

Department of Internal Affairs | Te Tari Taiwhenua

Department of Conservation

Economic Development New Zealand

Health New Zealand | Te Whatu Ora

Immigration New Zealand

Ministry of Business, Innovation and Employment | Hīkina

Whakatutuki

Ministry of Culture and Heritage | Manatū Taonga

Ministry of Education | Te Tāhuhu o te Māturanga

New Zealand Careers Expo

New Zealand Defence Force

New Zealand Motor Caravan Association

New Zealand Trade and Enterprise | Te Taurapa Tuhono

New Zealand Transport Agency | Waka Kotahi

Poutama Trust

Regional Tourism New Zealand

Stuff

Tourism Industry Aotearoa

Tourism New Zealand



## Council

Meeting of 03 June 2026

Business Unit: Community

Date Created: 26 May 2026

## Council Controlled Organisations Exemption Report

### Purpose Te Aronga o te Pūrongo

To consider the granting of exemptions to the Manawātū District Youth Development and Wellbeing Trust, MWLASS, Camp Rangī Woods Trust, Manawatu-Wanganui Regional Disaster Relief Fund, RNZAF Ohakea Visitor Centre Trust, and Heartland Contractors from being a Council Controlled Organisation (CCO) in accordance with section 7(5) of the Local Government Act 2002.

### Recommendations Ngā Tūtohunga

That the Council grants exemptions from Council-Controlled Organisation (CCO) status under section 7(5) of the Local Government Act 2002 to the following entities for a three-year period expiring 16 June 2029:

1. Manawātū District Youth Development and Wellbeing Trust
2. Camp Rangī Woods Trust
3. Manawatu-Wanganui Regional Disaster Relief Fund
4. RNZAF Ohakea Visitor Centre Trust
5. MWLASS
6. Heartlands Contractors

Report prepared by:

Karyn Crawley

Community Operations Advisor

Approved for submission by:

Lyn Daly

General Manager - Community

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## 1 Background Ngā Kōrero o Muri

1.1 Under section 6(1) of the Local Government Act 2002 (the Act) a Council-Controlled Organisation (CCO) means a council organisation that is:

- (a) a company with 50% or more of the shares owned by one or more local authorities; or
- (b) an organisation that one or more local authorities have the right to appoint 50% or more of the trustees or directors.

1.2 Under the above definition the Manawatū District Youth Development and Wellbeing Trust, Camp Rangī Woods Trust, Manawatu-Wanganui Regional Disaster Relief Fund, RNZAF Ohakea Visitor Centre Trust, MWLASS and Heartland Contractors Limited are all CCOs.

1.3 Section 7 of the Local Government Act 2002 authorises a local authority to exempt a small CCO (that is not a council-controlled trading organisation) from the statutory requirements to prepare a Statement of Intent and undertake monitoring and reporting in accordance with Part 5 of the Act.

1.4 Such an exemption can only be granted by resolution of Council after taking account of section 7(5):

- a) the nature and scope of the activities provided by the organisation; and
- b) the costs and benefits, if an exemption is granted, to the Council, the CCO and the community.

If an exemption is applied the organisation would still be a Council Organisation (CO).

1.5 When an exemption is granted it must be reviewed within three years and can be revoked at any time. This report brings all CCO exemption reviews into one report to make the process more efficient and synchronised.

## 2 Strategic Fit Te Tautika ki te Rautaki

2.1 The CCOs in this report contribute to the following priorities of Council as laid out in the Long-term Plan: A place to belong and grow; A prosperous, resilient economy; Value for money and excellence in local government.

## 3 Discussion and Options Considered Ngā Matapakinga me ngā Kōwhiringa i Wānangahia

3.1 In accordance with section 7 of the Act, the following Council Organisations are now due for consideration to be exempted as a CCO:

3.2 **Manawatū District Youth Development and Wellbeing Trust** - Council established the Manawatū District Youth Development and Wellbeing Trust in October 2019. The Trust

operates as both a Charitable Trust and a Council Controlled Organisation. The current exemption expires on 16 June 2026. There have been no changes to the nature and scope of the activities of the Trust since establishment.

- 3.3 **Camp Rangī Woods Trust** – this trust was established in 1993 for the charitable purpose of maintaining and managing Camp Rangī Woods. A variation to the trust deed in 2014 resulted in the Trust reducing from three trustees to two and MDC being able to appoint 50% of the Board. It therefore became a CCO. The current exemption as a CCO is due to expire 16 June 2026.

As per Council resolution MDC 21/714 18 March 2021, it was resolved Council delegate authority to the Chief Executive to negotiate the exit of Manawātū District Council from the Camp Rangī Woods Trust. Progress towards the exit of Manawātū District Council from the Trust is on-going.

- 3.4 **RNZAF Ohakea Visitor Centre Trust** – this trust was established in 2007 for the purpose of investigating the viability of a combined Heritage Visitor Centre at Ohakea and promoting aviation history. The trusts five trustees are appointed by an Electoral College of 9, comprising 6 representatives from Manawatu District Council, Palmerston North City Council and Rangitikei District Council. It is therefore a CCO. The Trust has never operated but still remains a CCO as a majority Council appointing power and would be needed if the Trust was to be wound up. The current exemption as a CCO is due to expire 16 June 2026.

- 3.5 **Manawatu-Wanganui Regional Disaster Relief Fund Trust** – this trust was established in 2004 by all the Councils in the Horizon region to establish a fund for the primary purpose of meeting the welfare needs of people following a significant natural or man-made disaster in the Manawatu-Wanganui region or elsewhere in New Zealand. It is a CCO, with all trustees being appointed by Councils. The current exemption as a CCO is due to expire 16 June 2026.

- 3.6 **MWLASS** – Manawatu-Whanganui Local Authority Shared Services Ltd (MWLASS) was created in 2008 to provide a platform for collaborative projects between eight councils in the Horizons Region. Council first exempted MWLASS from being a CCO in conjunction with agreement from other member Councils in 2008. The current exemption expires on 19 June 2026. There have been no changes to the nature and the scope of the activities of the Trust.

- 3.7 **Heartland Contractors Limited** – Heartland Contractors Limited is a 100% owned subsidiary of the Manawatu District Council. The company has been inactive for a number of years and does not provide any services to the community. The company has accumulated tax losses that may be beneficial in future years. Council first exempted the company from being a CCO in 2003 and granted exemptions in 2007, 2011, 2014, 2017 and 2020. The current exemption expires 19 June 2026.

- 3.8 The Central Economic Development Agency (CEDA), Manawatu Community Trust, and Feilding Civic Centre Trust are not small CCOs and are not being reviewed for exemptions.

- 3.9 Council could choose to not renew the exemptions for a further three-year period of some, or all of the exemptions previously granted under Section 7(5) of the Local Government Act. Should the Council decide not to renew some, or all of the exemptions previously granted, the organisations not exempted would then be subject to the statutory

requirements to prepare a Statement of Intent and undertake monitoring and reporting in accordance with Part 5 and Schedule 8 of the Act.

## **4 Risk Assessment Te Arotake Tūraru**

4.1 Not applicable.

## **5 Engagement Te Whakapānga**

### Significance of Decision

5.1 The Council's Significance and Engagement Policy is not triggered by matters discussed in this report. No stakeholder engagement is required.

### Māori and Cultural Engagement

5.2 There are no known cultural considerations associated with the matters addressed in this report. No specific engagement with Māori or other ethnicity groups is necessary.

### Community Engagement

5.3 The CCOs will be informed of the resolution of Council subsequent to Council consideration. No further consultation is required.

## **6 Operational Implications Ngā Pānga Whakahaere**

6.1 There are no operational implications with this report.

## **7 Financial Implications Ngā Pānga Ahumoni**

7.1 There are no financial implications with this report.

## **8 Statutory Requirements Ngā Here ā-Ture**

8.1 The recommendations are in accordance with Council's Statutory Requirements as set out in Section 7 of the Local Government Act 2002.

## **9 Next Steps Te Kokenga**

9.1 Inform the Manawatū District Youth Development and Wellbeing Trust, Camp Rangi Woods Trust, Manawatu-Wanganui Regional Disaster Relief Fund, RNZAF Ohakea Visitor Centre Trust, MWLASS and Heartland Contractors Limited CCO's of the outcome of the Council decision to grant exemptions under Section 7(5) of the Local Government Act 2002 for a three-year period.

## **10 Attachments Ngā Āpitihanga**

- Nil



## **Council**

Meeting of 03 June 2026

Business Unit: Community

Date Created: 26 May 2026

## **Manawatu Community Trust Final Statement of Intent 2026/2027**

### **Purpose Te Aronga o te Pūrongo**

To present the Manawatū Community Trust Final Statement of Intent 2026-2027 in accordance with the Local Government Act (2002) Schedule 8 Part 1.

### **Recommendations Ngā Tūtohinga**

That the Council agrees to the Manawatū Community Trust Final Statement of Intent 2026 – 2027 (Attachment 2).

Report prepared by:

Karyn Crawley

Community Operations Advisor

Approved for submission by:

Lyn Daly

General Manager - Community

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## 1 Background Ngā Kōrero o Muri

- 1.1 The Manawatū Community Trust (MCT) was established in July 2008. The Trust operates as a Council Controlled Organisation (CCO) – an organisation in which the Council owns at least 50 percent of the voting rights or has the right to appoint at least 50 percent of the directors or trustees.
- 1.2 Although Council has full confidence in MCT and the operation of the Trust, a Statement of Expectation was introduced for the first time in the 2025/26 year to align with Council’s approach to other Council-Controlled Organisations and to provide clearer guidance on Council’s expectations.
- 1.3 Council agreed to the 2026/27 Statement of Expectation at its Council meeting on the 4th February 2026 (ref: [Appendix 1](#)).
- 1.4 Manawatū Community Trust presented their draft Statement of Intent 2026 – 2027 to Council on the 4<sup>th</sup> of March 2026 in response to the Statement of Expectation.
- 1.5 The feedback from Elected Members and the points raised from the discussion on the draft Statement of Intent along with updated financial information from MCT has been incorporated in the final version of the Statement of Intent 2026 – 2027 that is presented today for Council’s acceptance. These changes requested include:
- Correcting the title and coverage period (pg 1)
  - Restructuring of the Performance Targets to align with the headings in the Statement of Expectations (pg 2 – pg 6)
  - Increased detail around demand analysis and housing need to include demographic and demand analysis (pg 3)
  - New strategic housing targets replacing the earlier version (pg 3):
    - “MCT must expand its housing stock to 252 homes by 2043” **replaces** “250 homes by 2030”
    - “2030: Contribute 41 new affordable and accessible homes” replaces “Annual stepped targets (221, 231, 241 homes)”
  - Reorganisation of the existing housing maintenance content. No major wording changes (pg 4). Note: the maintenance/compliance content previously under Goal 1 is now moved into Goal 3
  - Feilding Health Care is separated into its own subsection with the addition of “2023: Facility Condition Assessment and Long-Term Maintenance Plan commissioned.” which was not included in the original Draft SOI (pg 5).

## 2 Strategic Fit Te Tautika ki te Rautaki

- 2.1 The annual Statement of Intent is a legislative requirement for a Council Controlled Organisation as per the LGA Schedule 8 Part 1.
- 2.2 The Manawatū Community Trust (MCT) has the purpose of the promotion of housing for senior and disabled residents of the Manawatū district and the promotion of wellbeing services for residents of the Manawatū district. This aligns with Manawatū District Council’s priorities as a ‘Place to belong and grow’ and ‘Value for money and excellence in local government.’

## 3 Discussion and Options Considered Ngā Matapakinga me ngā Kōwhiringa i Wānangahia

- 3.1 The Statement of Expectation from Council detailed the following expectations for MCT for 2026 – 2027, along with comments on focus areas.

Council’s Expectations	Comment to Trust for preparation of SOI 2026 - 2027
Identify demand in the Manawatū District for affordable housing stock for seniors and disabled people	<ul style="list-style-type: none"> <li>Engage with the community to determine the number and type of housing offerings needed in the district</li> </ul>
Contribute to community health and wellbeing by increasing the number of affordable housing units in the Manawatū District	<ul style="list-style-type: none"> <li>Plan to develop and diversify housing stock, tenure options, neighbourhoods, and service offerings, that align with demand.</li> </ul>
Contribute to community health and wellbeing in the Manawatū District by: <ul style="list-style-type: none"> <li>maintaining and developing the existing housing stock to be user friendly, adaptable, accessible, compliant, and safe</li> <li>maintain the Feilding Health Care (FHC) facility for the benefit of the community</li> </ul>	<ul style="list-style-type: none"> <li>Ensure housing stock is fit for purpose and complies with legislation</li> <li>Ensure housing stock is affordable for the target market</li> <li>Collaborate with FHC for the benefit of the community</li> </ul>
Practice good governance principles and sound financial performance.	<ul style="list-style-type: none"> <li>Succession planning for the continuation and development of MCT</li> <li>Submit a six-monthly financial report and an audited annual report that meets the timelines of MDC and Audit NZ</li> <li>Seek out partnerships including third party funding opportunities, grants and financing to ensure MCT remains financially sustainable</li> <li>Practice good governance principles</li> </ul>

- 3.2 The Manawatū Community Trust’s 2026 - 2027 final Statement of Intent is consistent with its constitution, complies with statutory requirements, and responds to the Statement of Expectation.

## **4 Risk Assessment Te Arotake Tūraru**

4.1 The Statement of Intent aligns with Council's strategic direction for the promotion of housing for senior and disabled residents of the Manawatū district and the promotion of wellbeing services for residents of the Manawatū district. Risk mitigation includes:

- Selection of Trustees by Council through a sound recruitment process with consideration of the Trust Boards skills matrix to ensure the practice of good governance principles and sound financial performance;
- Adherence to LGA requirements for 6-monthly reporting;
- Strong relationships are developed with the Trust Board and Chief Executive with two-way communication and support provided as required.

## **5 Engagement Te Whakapānga**

### Significance of Decision

5.1 The Council's Significance and Engagement Policy is not triggered by matters discussed in this report. No stakeholder engagement is required.

### Māori and Cultural Engagement

5.2 There are no known cultural considerations associated with the matters addressed in this report. No specific engagement with Māori or other ethnicity groups is necessary.

### Community Engagement

5.3 There are no consultation requirements as a result of this report.

## **6 Operational Implications Ngā Pānga Whakahaere**

6.1 There are no operational implications with this report.

## **7 Financial Implications Ngā Pānga Ahumoni**

7.1 There are no financial implications with this report.

7.2 Manawatū District Council supports Manawatū Community Trust with enabling lower interest loans through LGFA.

## **8 Statutory Requirements Ngā Here ā-Ture**

8.1 Under the provisions of the Local Government Act 2002, Part 5 (Council – Controlled Organisations and Council Organisations), section 64 (Statement of Intent), Manawatū Community Trust has a statutory obligation to provide Council with a Statement of Intent for the coming financial year that is consistent with its constitution.

8.2 The CCO board must deliver the completed statement of intent to the shareholders before the commencement of the financial year to which it relates.

- 8.3 The content of every statement of intent of a CCO must comply with Part 2 of Schedule 8 of the Local Government Act 2002, covering the financial year to which it relates and each of the immediately following 2 financial years.

## **9 Next Steps Te Kokenga**

- 9.1 The Manawatū Community Trust's 2026 - 2027 final Statement of Intent is consistent with its constitution, complies with statutory requirements, and is presented to Council for agreement.
- 9.2 The Statement of Intent 2026 – 2027 will be published on the Manawatū District Council's website and MCT will report on progress towards the targets / KPI's on a six-monthly basis.

## **10 Attachments Ngā Āpitihanga**

- Manawatū Community Trust Statement of Expectations 2026/2027
- Manawatū Community Trust's Statement of Intent 2026/2027



## STATEMENT OF INTENT 2026/27

**THIS STATEMENT OF INTENT COVERS THE YEAR 1 JULY 2026 TO 30 JUNE 2027**

### PURPOSE

The purpose of this statement of intent is to

- (a) state publicly the activities and intentions of this council-controlled organisation for the year and the objectives to which those activities will contribute; and
- (b) provide an opportunity for shareholders<sup>1</sup> to influence the direction of the organisation; and
- (c) provide a basis for the accountability of the directors<sup>2</sup> to their shareholders for the performance of the organisation.

### OBJECTIVES OF THE COUNCIL CONTROLLED ORGANISATION

1. Section 59 of the Local Government Act 2002 provides:

#### Principal objective of a council-controlled organisation

- (1) The principal objective of a council-controlled organisation is to

- (a) achieve the objectives of its shareholders, both commercial and non-commercial, as specified in the statement of intent; and
- (b) be a good employer; and
- (c) exhibit a sense of social and environmental responsibility by having regard to the interests of the community in which it operates and by endeavouring to accommodate or encourage these when able to do so; and
- (d) if the council-controlled organisation is a council-controlled trading organisation, conduct its affairs in accordance with sound business practice.

- (2) In subsection (1)(b), good employer has the same meaning as in clause 36 of Schedule 7 of the Local Government Act 2002.

### NATURE AND SCOPE OF ACTIVITIES

#### Nature

The Nature of the Trust is to promote and provide housing and wellbeing services that are relevant and meet long term community needs.

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<sup>1</sup> 'Shareholders' include any partners, joint venture partners, members or other persons holding equity securities in relation to the organisation. In this case the shareholders will be the Mayor and the Councillors of the Manawatū District Council.

<sup>2</sup> 'Directors' and the 'Board' include trustees, managers or office holders (however described in the organisation).

## Scope

The Trust is a robust, professional, and viable organisation that is providing a modern healthy living environment, up to date, good quality, sustainable housing and health facilities that address the needs of the community to enhance the long-term wellbeing of Manawatū residents.

## OBJECTIVES OF THE MANAWATŪ COMMUNITY TRUST

The objectives of the Manawatū Community Trust as identified in its Deed of Trust are:

1. Any charitable purpose within the Manawatū District
2. To create a fund to be used for:
  - 2.1 The promotion of any purpose or purposes within the Manawatū District for the relief of poverty and for the benefit of the residents of the Manawatū District.
  - 2.2 The promotion and provision of housing for the elderly and disabled residents of the Manawatū District.
  - 2.3 The promotion of health services for the residents of the Manawatū District.
  - 2.4 The promotion of wellbeing services for residents of the Manawatū District – these services shall include services promoting the improvement of the lifestyle, health and welfare of residents in the Manawatū District and creating a sense of community for the benefit of the residents of the Manawatū District.
  - 2.5 To accept gifts and grants of whatever description, provided that any private benefit conferred on any individual is incidental to the above purposes.

## GOVERNANCE

Five Trustees have been appointed by the Manawatū District Council to the Trust with terms as set out below.

- **Allan Davey**, reappointed for 3 years from 6 May 2022 – 5 May 2028
- **Liam Greer**, Chairperson, reappointed for 3 years from 1 April 2024 – 31 March 2027
- **Joanne Shortall**, reappointed for 3 years from 1 April 2024 – 31 March 2027
- **Tracey Hunt**, reappointed for 3 years from 1 July 2024 – 30 June 2027
- **Ian McKelvie**, appointed for 3 years from 1 July 2025 – 30 June 2028

The Trust meets for Board meetings on a monthly basis and regular meetings are held with senior staff to review the operational business of the Trust.

## STATEMENT OF ACCOUNTING POLICIES

The Trust has elected to apply PBESFR-A (PS) Public Benefit Simple Format Reporting – Accrual (Public Sector) on the basis that the Trust does not have public accountability (as defined) and has total annual expenses of less than \$5 million in the two years prior to June 2025.

All transactions in the financial statements are reported using the accrual basis of accounting.

The financial statements are prepared on the assumption that the Trust will continue to operate in the foreseeable future.

**PERFORMANCE TARGETS**

**Goal 1: Identify demand in the Manawatū District for affordable housing stock for seniors and disabled people**

Description	Starting Point	Target
<p>Engage with the community to determine the number and type of housing offerings needed in the district.</p>	<p>2026:</p> <ul style="list-style-type: none"> <li>• Number of suitable applicants on MCT waiting list: 18</li> <li>• Wait time: up to 12 months.</li> <li>• As at September, MSD has 84 Priority A (at risk) people on its social housing register, down 9 since December 2020. 61% of these applicants require one-bedroom units.</li> <li>• Statistics NZ estimates of severe housing deprivation demonstrate Manawatū as one of the least affected areas in NZ at &lt;150 per 10,000 people.</li> </ul> <p>2024/25: Housing model forum to guide future housing.</p> <p>2022: Research based community needs assessment for senior citizens was completed.</p> <ul style="list-style-type: none"> <li>• Manawatū population is projected to increase both in Feilding and the wider Manawatū district by 30% to 2043.</li> <li>• The majority of this growth will be in the 65+ age group (77%) meaning a 23% increase in the number of people 65+.</li> </ul>	<p>2026 - 2029: Maintain an evidence-based understanding of demand for affordable housing for seniors and disabled people in the Manawatū District by:</p> <ul style="list-style-type: none"> <li>• Ongoing engagement with local health and wellbeing providers.</li> <li>• Ongoing analysis of housing demand indicators.</li> </ul>

**Goal 2: Contribute to community health and wellbeing by increasing the number of affordable housing units in the Manawatū District.**

Description	Starting Point	Target
<p>Plan to develop and diversify housing stock, tenure options, neighbourhoods, and service offerings that align with demand.</p>	<p>2020: 2050 homes by 2030 strategy introduced.</p> <ul style="list-style-type: none"> <li>• MCT must expand its housing stock to 252 homes by 2043 to meet projected growth in the 65+ population (without addressing waiting lists or wait times).</li> </ul> <p>2025: 205 units 1-bedroom homes.</p> <p>2026: 209 homes. Addition of 4 x 2-bedroom homes at Manawanui Complex based on LifeMark</p>	<p>2026: Assess feasibility and design of infill of existing MCT property.</p> <p>2027: Complete design and build Corrick Court Complex based on LifeMark Universal Design Standards.</p> <p>2030: Contribute 41 new affordable and accessible homes into the Manawatū District.</p>

Universal Design Standards and Crime Prevention through Environment Design.

**Goal 3: Contribute to community health and wellbeing in the Manawatū District.**

Description	Starting Point	Target
<p>Maintain and develop the existing housing stock to be user friendly, adaptable, accessible, compliant, and safe.</p> <p>Maintain all occupied housing stock at a 3 Star* rating or above. * A rating system from 1 to 5 Star; 5 Star being the highest.</p> <p>Maintain Healthy Homes Compliance.</p> <p>Be responsive to urgent maintenance requirements and resident health and safety needs.</p>	<p>Housing at a 3 Star rating or above as at 30 June 2021: 193 of 205. 2025/26: 100% Achieved.</p> <p>Units are independently assessed when new tenancies occur. Reactive maintenance occurs during inspections or when tenants report concerns.</p> <p>Urgent requests are recorded electronically and are responded to in accordance with their priority.</p>	<p>2027: All housing stock 2028: All housing stock 2029: All housing stock</p> <p>2027: 100% Compliance 2028: 100% Compliance 2029: 100% Compliance</p> <p>2027 - 2029: Urgent maintenance requests are actioned in alignment with MCT Tenant Health and Safety Policy.</p>
<p>Ensure housing stock is affordable for the target market.</p>	<p>2025/26: Highest rental at 30% of superannuation benefit (as at April 2022) including 100% of available accommodation supplement applied to 1-bedroom units.</p>	<p>2027 - 2029:</p> <ul style="list-style-type: none"> <li>• Rent for 1-bedroom unmodified units remains at &lt;30%.</li> <li>• As diversified housing is developed, including larger units, 2-bedroom homes and accessible housing, rent may be set at &lt;80% of market rent, with lawn and garden services at additional cost where this supports tenant wellbeing.</li> </ul>
<p>Provide and maintain health and wellbeing facilities for the benefit of the community the residents of the Manawatū.</p>	<p>2017: Duke Street boiler house leased to Menzshed Feilding.</p> <p>2018: Bowen Street facility leased to Manchester House Senior Hub.</p>	<p>2027: Renew lease with Menzshed Feilding in 2027 if the facility is still required.</p> <p>2027: Collaborate with Manchester House on long-term planning to ensure their service can continue</p>

Maintain the Feilding Health Care (FHC) facility for the benefit of the community.	<p>2016: Designed and custom-built the Duke Street Health Centre in collaboration with Feilding Health Care.</p> <p>2023: Designed and custom-built the Clevely facility in collaboration with Feilding Health Care.</p> <p>2023: Facility Condition Assessment and Long-Term Maintenance Plan commissioned.</p> <p>2024: Upgraded site thoroughfares and landscaping to improve safety and accessibility; including upgraded roading, and the removal of hazardous trees and structures to reduce health and safety risks and to discourage vandalism at Feilding Health Care.</p>	<p>while enabling the future development of the property in line with community housing needs.</p> <p>2027 - 2029: Maintain facilities FHC and Clevely facilities to achieve safety and longevity and continue to collaborate with Feilding Health Care in a mutually beneficial partnership that supports the growth and success of both organisations.</p>
Maintain average month end occupancy at above 95% of available units (excluding units decommissioned due to infill developments).	Average month end occupancy 2022: 96%.	<p>2027: &gt;95%</p> <p>2028: &gt;95%</p> <p>2029: &gt;95%</p>

**Goal 4: Practice Good Governance Principles and Sound Financial Performance.**

Description	Starting Point	Target
Provide financial reporting to the MDC as required applying PBE SFR (PS) Public Benefit Entity Simple Format Reporting - Accrual (Public Sector).	2025/26: MDC and Audit NZ six monthly and annual reporting standards and deadlines met.	2026 - 2029: Submit six-monthly financial reports and audited annual reports that meet the timelines of MDC and Audit NZ.
Seek out partnerships including third party funding opportunities, grants and financing to ensure MCT remains financially sustainable.	<p>2024: Establishment of a Feilding based Community Housing Provider scoped; application declined.</p> <p>2025/26: CET Grant Application for Manawanui project accepted (\$96,500).</p>	<p>2026/27: Continue to scope and develop partnership opportunities with landowners under existing Memoranda of Understanding.</p> <p>2026/27: Secure grant funding to contribute to the cost of the Corrick Court development.</p>

	<p>2025/26: CET Impact Investment financing received; \$1m at 2.25% interest received.</p> <p>2025/26: LGFA financing for Corrick Court of \$5.3m approved by Council.</p>	<p>2027 - 2029: Collaborate with MDC on the availability of suitable Council owned land or planned decommission of MDC existing property.</p>
<p>Meet ANZ financial undertakings as per our loan agreements to maintain an effective equity / total tangible asset % greater or equal to 50%.</p>	<p>As at 30 June 2022: 83.6%</p>	<p>2027 - 2029: ≥ 50%</p>
<p>Maintain an interest coverage ratio of EBITDA to interest at above 3.</p>	<p>As at 30 June 2022: 8.47</p>	<p>2027 - 2029: &gt;3</p>
<p>Practice good governance principles and sound financial performance.</p>	<p>2025/26:</p> <ul style="list-style-type: none"> <li>• Annual Board performance, and skills assessment review.</li> <li>• IOD Membership maintained.</li> <li>• Bi-monthly review of Board selected of governance articles/case studies.</li> </ul>	<p>2027 - 2029</p> <ul style="list-style-type: none"> <li>• Continuation of annual Board Performance Reviews.</li> <li>• Board training based on board performance review.</li> <li>• Maintenance of IOD membership.</li> <li>• Continued review of topical governance matters.</li> <li>• Succession plan for the continuation and development of MCT.</li> </ul>

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Liam Greer

**Chairperson**  
**Manawatū Community Trust**



**STATEMENT OF FINANCIAL PERFORMANCE FORECASTING**  
**To Financial Year Ending 30 June 2029**

	<b>FY2027</b>	<b>FY2028</b>	<b>FY2029</b>
<b>Income</b>			
Residential Housing Income	2,284,786	2,474,472	2,617,864
Commercial Rental Income	1,073,155	1,083,833	1,105,191
Sundry Income	112,648	390,334	111,182
<b>Total Consolidated Income</b>	<b>3,470,589</b>	<b>3,948,639</b>	<b>3,834,236</b>
<b>Expenses</b>			
Administration Expenses	253,195	260,791	297,518
Maintenance Expense	354,235	364,862	375,808
Rates Expense	224,338	239,518	255,745
Insurance Expense	345,564	369,569	395,247
Trustee & Staff Expenses	614,272	626,342	640,745
Interest on Borrowing	562,937	802,071	1,083,790
<b>Total Consolidated Expenses</b>	<b>2,354,541</b>	<b>2,663,152</b>	<b>3,048,852</b>
<b>Operating Surplus / Deficit</b>	<b>1,116,048</b>	<b>1,285,487</b>	<b>785,384</b>
Depreciation	1,031,439	1,062,382	1,104,877
<b>Net Surplus / (Deficit)</b>	<b>84,609</b>	<b>223,105</b>	<b>-319,493</b>
<b>Planned Capital Programme</b>	<b>Year End 30 June 27</b>	<b>Year End 30 June 28</b>	<b>Year End 30 June 29</b>
Housing Improvements	214,400	220,832	227,457
New Housing	5,511,620	5,000,000	5,000,000
Other Capital Spend	3,720	3,832	63,947
<b>Total Capital Programme</b>	<b>5,729,740</b>	<b>5,224,664</b>	<b>5,291,404</b>



**STATEMENT OF FINANCIAL POSITION FORECASTING**  
To Financial Year Ending 30 June 2029

	FY2027	FY2028	FY2029
<b>Asset</b>			
<b>Current Asset</b>			
Bank Accounts & Cash	4,974,720	221,859	4,591,683
Other Current Asset	52,089	61,027	100,666
<b>Non-current Asset</b>	0	0	0
Property, Plant & Equipment	43,208,734	47,371,016	51,557,542
<b>Total Asset</b>	<b>48,235,543</b>	<b>47,653,901</b>	<b>56,249,890</b>
<b>Liabilities</b>			
<b>Current Liabilities</b>			
Current Portion Of Loans From MDC	262,148	269,867	258,535
Current Portion Of Loans From ANZ	216,939	146,939	939
Current Portion Of New Loans	285,135	302,722	589,224
Trade Payables	859,249	822,586	906,718
Tax Payables	18,721	19,255	19,833
Lease Payable - Current	24,947	27,818	30,688
Payroll Liability	35,786	36,579	37,406
Other Current Liabilities	92,080	95,977	99,235
<b>Non-current Liabilities</b>			
Loan From MDC	3,890,909	3,621,042	3,361,469
Loan From ANZ	146,000	0	0
Loan From CET	1,000,000	1,000,000	1,000,000
New Loan	9,850,366	9,547,644	18,514,757
Lease Payable	80,512	67,618	54,723
<b>Total Liabilities</b>	<b>16,762,792</b>	<b>15,958,045</b>	<b>24,873,527</b>
<b>Net Assets</b>	<b>31,472,751</b>	<b>31,695,856</b>	<b>31,376,363</b>
<b>Accumulated Funds</b>			
Capital	10	10	10
Accumulated Surpluses	15,730,797	15,953,901	15,634,409
Asset Revaluation Reserve	15,741,945	15,741,945	15,741,945
<b>Total Accumulated Funds</b>	<b>31,472,751</b>	<b>31,695,856</b>	<b>31,376,363</b>
<b>Borrowing and Debt Repayment Programme</b>			
Existing Borrowing	11,474,567	15,650,558	14,887,274
New Borrowing	5,000,000	0	9,700,000
Debt Repayment	-824,009	-763,283	-863,289
<b>Total Borrowing and Repayment</b>	<b>15,650,558</b>	<b>14,887,274</b>	<b>23,723,986</b>



**STATEMENT OF CASH FLOW FORECASTING**  
To Financial Year Ending 30 June 2029

	<b>FY2027</b>	<b>FY2028</b>	<b>FY2029</b>
<b>Cash Flow from Operating Activities</b>			
Operating Income	3,461,585	3,944,444	3,797,708
Operating Expenses	-2,328,211	-2,661,987	-2,998,557
<b>Net Cash from Operating Activities</b>	<b>1,133,374</b>	<b>1,282,457</b>	<b>799,151</b>
<b>Cash Flow from Investing Activities</b>			
Sales of Fixed Assets	0	0	0
Payments to Acquire Property, Plant & Equipment	-5,519,785	-5,266,753	-5,290,842
<b>Net Cash from Investing Activities</b>	<b>-5,519,785</b>	<b>-5,266,753</b>	<b>-5,290,842</b>
<b>Cash Flow from Financing Activities</b>			
Proceeds from Loans	5,000,000	0	9,700,000
Payments of Loans	-715,847	-768,565	-838,485
Term Deposit Movement	0	4,790,000	-4,190,000
<b>Net Cash from Financing Activities</b>	<b>4,284,153</b>	<b>4,021,435</b>	<b>4,671,515</b>
<b>Cash and Cash Equivalent</b>			
Net Decrease/Increase in Cash For The Year	-102,259	37,139	179,824
Add Opening Bank Accounts and Cash	176,978	74,720	111,859
<b>Closing Bank Accounts and Cash</b>	<b>74,720</b>	<b>111,859</b>	<b>291,683</b>

**FINANCIAL RATIOS FORECASTING**  
To Financial Year Ending 30 June 2028

Ratio	Description	Bench Mark	FY2027	FY2028	FY2029
<b>Equity to tangible asset</b>	Meet ANZ financial undertakings as per our loan agreements to maintain an effective equity / total tangible asset % greater or equal to 50%.	≥ 50%	65.25%	66.51%	55.78%
<b>Interest coverage</b>	Maintain an interest coverage ratio of EBITDA to interest at above 3.	>3	2.98	2.60	1.72

## **MANAWATŪ COMMUNITY TRUST**

### **Statement of Accounting Policies**

#### **Basis of Preparation**

The Trust has elected to apply PBE SFR-A (PS) Public Benefit Entity Simple Format Reporting – Accrual (Public Sector) on the basis that the Trust does not have public accountability (as defined) and has total annual expenses of less than \$5 million in the two years prior to 30 June 2024.

The Trust will not be required to transition to Tier 2 not-for-profit Public Benefit Entities Standards Reduced Disclosure Regime as the XRB has increased the tier 3 threshold from \$2 million to \$5 million. The tier 2 threshold is \$5 million or above. Application of the amendments is required for accounting periods that end on or after 28 March 2024. However, the Trust has already adopted Tier 2 PBE IPSAS 17 Property, Plant and Equipment and PBE IPSAS 31 Intangible Assets.

All transactions in the management reports are reported using the accrual basis of accounting. The management reports are prepared on the assumption that the Trust will continue to operate in the foreseeable future.

#### **Goods and Services Tax (GST)**

The Trust is registered for GST. All amounts in the management reports are recorded exclusive of GST, except for debtors and creditors, which are stated inclusive of GST. The Trust also carries out transactions which fall under exempt supplies legislation for GST purposes and therefore are not applicable for GST and are recorded gross in the management reports.

#### **Summary of Significant Accounting Policies**

##### **Revenue**

###### **Rental/Lease Income**

Rental revenue is recognised as revenue on a straight-line basis over the term of the agreement.

###### **Grants**

Council, government, and non-government grants are recognised as revenue when the funding is received unless there is an obligation to return the funds if conditions of the grant are not met (“use or return condition”). If there is such an obligation, the grant is initially recorded as a liability and recognised as revenue when conditions of the grant are satisfied.

###### **Sale of goods**

Revenue from the sale of goods is recognised when the goods are sold to the customer. Sale of services Revenue from the sale of services is recognised by reference to the stage of completion of the services delivered at balance date as a percentage of the total services to be provided.

###### **Donated assets**

Revenue from donated assets is recognised upon receipt of the asset if the asset has a useful life of 12 months or more, and the value of the asset is readily obtainable and significant.

###### **Interest**

Interest revenue is recorded as it is earned during the year.

#### **Employee Related Costs**

Wages, salaries, and annual leave are recorded as an expense as staff provide services and become entitled to wages, salaries, and leave entitlements.

Superannuation contributions are recorded as an expense as staff provide services.

#### **Advertising, Marketing, Administration, Overhead, and Fundraising Costs**

These are expensed when the related service has been received.

#### **Lease Expense**

Lease payments are recognised as an expense on a straight-line basis over the lease term.

#### **Bank Accounts and Cash**

Bank accounts and cash comprise cash on hand, cheque or savings accounts, and deposits held at call with banks.

#### **Debtors**

Debtors are initially recorded at the amount owed. When it is likely the amount owed (or some portion) will not be collected, a provision for impairment is recognised and the loss is recorded as a bad debt expense.

#### **Property, Plant and Equipment**

Property, plant and equipment consist of rental accommodation available for the elderly and disabled and property leased out and operated as an integrated health centre, the Manchester House Senior Hub Facility and The Feilding Menzshed. This has been classified as property plant and equipment rather than investment property as it is held to meet service delivery objectives rather than to earn rentals or for capital appreciation.

Land is measured at fair value, and buildings are measured at fair value less accumulated depreciation. All other asset classes are measured at cost less accumulated depreciation and impairment losses.

#### **Revaluation**

Operation Land and buildings are revalued with sufficient regularity to ensure that their carrying amount does not differ materially from the assets' fair value and at least every three years.

The carrying values of revalued assets are assessed annually to ensure that they do not differ materially from the assets' fair values. If there is a material difference, then an off-cycle asset valuation is undertaken.

Revaluations of property, plant, and equipment are accounted for on a class-of-asset basis.

The net revaluation results of revaluing are credited or debited to the asset revaluation reserve in equity. Where this would result in a debit balance in the asset revaluation reserve, this balance is recognised in the Statement of Comprehensive Revenue and Expenses. Any subsequent increase on revaluation that reverses a previous decrease in value recognised in the Statement of Comprehensive Revenue and Expenses will be first recognised in the Statement of Comprehensive Revenue and Expenses up to the amount previously expensed, and then recognised in equity.

## Additions

The cost of an item of property, plant and equipment is recognised as an asset if, and only if, it is probable that the asset will provide future economic benefits or service potential to the Trust and the cost of the item can be measured reliably.

Work in progress is recognised at cost less impairment and is not depreciated.

In most instances, an item of property, plant and equipment is recognised at its cost. Where an asset is acquired at no cost, or for a nominal cost, it is recognised at fair value as at the date of acquisition.

## Disposals

Gains and losses on disposals are determined by comparing the proceeds with the carrying amount of the asset. Gains and losses on disposals are included in the Statement of Financial Performance. When revalued assets are sold, the amounts included in asset revaluation reserves in respect of those assets are transferred to retained earnings.

## Subsequent costs

Costs incurred subsequent to initial acquisition are capitalised only when it is probable that future economic benefits or service potential associated with the item will flow to the Trust and the cost of the item can be measured reliably.

The costs of day-to-day servicing of property, plant and equipment are recognised in the Statement of Financial Performance.

## Depreciation

Depreciation is provided on a straight-line basis on all property, plant and equipment other than land (which is not depreciated), at rates that will write off the cost (or valuation) of the assets over their useful lives. The residual value and useful life of an asset is reviewed and adjusted, if applicable, at each financial year end.

The useful lives and associated depreciation rates of major classes of assets have been estimated as follows:

Land	Indefinite	None
Buildings and Improvements	2- 58 years	1.72% - 50%
Motor Vehicles	5 years	20%
Plant and Equipment	3 - 10 years	10% - 33%

## Impairment of Assets

Property, plant, and equipment assets subsequently measured at cost that have a finite useful life are reviewed for impairment whenever events or changes in circumstances indicated that the carrying amount may not be recoverable.

An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use.

If an asset's carrying amount exceeds its recoverable amount, the asset is regarded as impaired and the carrying amount is written-down to the recoverable amount. The total impairment loss is recognised in the Statement of Financial Performance. The reversal of an impairment loss is recognised in the Statement of Financial Performance.

## **Intangible Assets**

### Recognition and measurement

Intangible assets are initially measured at cost. All of the Trust's intangible assets are subsequently measured in accordance with the cost model, being cost (or fair value for items acquired through non-exchange transactions) less accumulated amortisation and impairment. The Trust has no intangible assets with indefinite useful lives. Cost includes expenditure that is directly attributable to the acquisition of the asset.

### Subsequent expenditure

Subsequent expenditure is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates. All other expenditure, including expenditure on internally generated goodwill and brands, is recognised in surplus or deficit as incurred.

## **Amortisation**

Amortisation is recognised in surplus or deficit on a straight-line basis over the estimated useful lives of each amortisable intangible asset. The estimated useful lives amortisation rates are:

Software	3 years (2022: 3 years).
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## **Creditors and Accrued Expenses**

Creditors and accrued expenses are measured at the amount owed.

## **Loans**

Loans are recorded at the amount borrowed from the lender. Loan balances include any interest accrued at balance that has not yet been paid.

## **Employee Costs Payable**

A liability for employee costs payable is recognised when an employee has earned the entitlement.

These include salaries and wages accrued up to balance date and annual leave earned but not yet taken at balance date.

## **Income Tax**

The Manawatū Community Trust has been granted charitable status by the Inland Revenue Department and therefore is exempt from income tax.

## **Tier 2 PBE Accounting Standards Applied**

The Trust has elected to apply Tier 2 Accounting Standard PBE IPSAS 17 Property, Plant and Equipment and PBE IPSAS 31 Intangible Assets when preparing its financial statements.

## **Changes in Accounting Policies**

There have been no changes in accounting policies. The accounting policies detailed have been applied consistently with those of the previous reporting period.



## Office of the Mayor

4 February 2026

Manawatū Community Trust  
Liam Greer (Chair)  
FEILDING

Dear Liam

### **Statement of Expectations for Manawatū Community Trust 1 July 2026 – 30 June 2027**

Manawatū District Council values the important contribution Manawatū Community Trust (MCT) makes to our vision of “Proudly Provincial. A great place to land - Wehi nā te kāinga taurikura nei ki tuawhenua”.

This Statement of Expectations provides direction to assist MCT in preparing its required Statement of Intent (SOI) as a Council Controlled Organisation for the three years 2026 – 2029. It also clarifies Council’s expectations on how MCT and Council can work together for maximum community benefit.

#### **1.0 Strategic Direction**

Manawatū District Council’s vision is:

***Proudly provincial. A great place to land - Wehi nā te kāinga taurikura nei ki tuawhenua***

Manawatū Community Trust has an important role to play in helping Council achieve its strategic priorities to achieve our vision. Although all priorities are relevant, of particular focus is the priorities of a place to belong and grow, a future planned together, and value for money and excellence in local government.

Manawatū District Council’s Strategic priorities are:

- **A place to belong and grow. He kāinga e ora pai ai te katoa - We provide leisure and sports facilities and support community activities to encourage social and cultural well-being for everyone.**
- **A future planned together. He kāinga ka whakamaherea tahitia tōna anamata e te hapori tonu - We work with all parts of our community to plan for a future everyone can enjoy.**
- An environment to be proud of. He kāinga ka rauhītia tōna taiao - We protect and care for the Manawatū District’s natural and physical resources.
- Infrastructure fit for future. He kāinga ka tūwhena tonu ōna pūnahahanga, haere ake nei te wā - We ensure the Manawatū District has infrastructure (water, roads, etc.) that meets the needs of the community now and into the future.

- A prosperous, resilient economy. He kāinga ka tōnui tōna ōhanga - We aim to make the Manawatū District a great place to live, to visit and to do business.
- **Value for money and excellence in local government He kāinga ka eke tōna kāwanatanga ā-rohe ki ngā taumata o te kairangi - We take pride in serving our communities. We focus on doing the best for the District.**

The overall result Council strives for is - Our people delivering great service and facilities to our community. MCT as a Council Controlled Organisation (CCO) is seen as an extension of Council striving towards this outcome.

## 2.0 Development of the Statement of Intent (SOI)

When developing Manawatū Community Trust’s SOI, we expect that you will address the following:

Council’s Expectations	Comment to Trust for preparation of SOI 2026 - 2029
Identify demand in the Manawatū District for affordable housing stock for seniors and disabled people	<ul style="list-style-type: none"> <li>• Engage with the community to determine the number and type of housing offerings needed in the district</li> </ul>
Contribute to community health and wellbeing by increasing the number of affordable housing units in the Manawatū District	<ul style="list-style-type: none"> <li>• Plan to develop and diversify housing stock, tenure options, neighbourhoods, and service offerings, that align with demand.</li> </ul>
Contribute to community health and wellbeing in the Manawatū District by: <ul style="list-style-type: none"> <li>• maintaining and developing the existing housing stock to be user friendly, adaptable, accessible, compliant, and safe</li> <li>• maintain the Feilding Health Care (FHC) facility for the benefit of the community</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure housing stock is fit for purpose and complies with legislation</li> <li>• Ensure housing stock is affordable for the target market</li> <li>• Collaborate with FHC for the benefit of the community</li> </ul>
Practice good governance principles and sound financial performance.	<ul style="list-style-type: none"> <li>• Succession planning for the continuation and development of MCT</li> <li>• Submit a six-monthly financial report and an audited annual report that meets the timelines of MDC and Audit NZ</li> <li>• Seek out partnerships including third party funding opportunities, grants and financing to ensure MCT remains financially sustainable</li> <li>• Practice good governance principles</li> </ul>

## 3.0 Working together

One of Council's priorities is to establish and manage an effective working relationship based on mutual respect and trust with its CCOs. This means more than regular reporting, it means two-way dialogue and working together to achieve shared outcomes.

To achieve these aims, Council has the following expectations:

- Collaboration – MCT and Council will work together collaboratively to ensure MCT’s policies and decisions represent the strategic direction and best interest of the Council and ultimately the community;
- Communication - Ongoing engagement between MCT and Council, both at a governance and operational level, to ensure that all parties are well-informed of each other's mandate and priorities. Council decisions are to be communicated in a positive manner and any concerns should be raised directly with Council Officers;
- Performance - MCT is the most important monitor of their performance. Council expects MCT to advise regularly of its performance, implications for future performance, and risks and opportunities faced by the organisation. Reporting to Council is required six-monthly and annually with a no surprises approach to communication. Performance measures will be developed together;
- Partnerships - Strategic partnerships will be developed and maintained;
- Funding – In addition to the access through Council for reduced interest loans from the Local Government Funding Authority (LGFA) and Local Government New Zealand (LGNZ), opportunities to attract third party investment to be identified and actioned as appropriate.

Council will notify MCT of any actions or announcements that may affect MCT before any public announcement is made.

#### **4.0 Responsibilities**

The Council expects that MCT will:

- Achieve the objectives and performance measures as determined through the Manawatū Community Trust Deed, the Statement of Expectations, and the Statement of Intent;
- Align its strategic priorities to Council’s wider strategic priorities;
- Manage financials in a prudent manner which promotes current and future interests of the community, ensuring efficient allocation of public resources;
- Provide audited financial statements which are prepared with generally accepted accounting practice;
- Work to mitigate risk through ensuring sound Health and Wellbeing practices. Reporting on Health and Wellbeing to be included in the six-monthly reporting to Council;
- Uphold good governance practices, such as managing real or perceived conflicts of interest in line with Council’s policy; be sensitive to the demand for accountability and transparency required by the status of a public entity; and retain good visibility over operational decision-making, managing risks in a proactive manner.

The responsibilities of Council are to:

- Enable access for reduced interest loans through the Local Government Funding Authority (LGFA);
- Support MCT to achieve the objectives of this Statement of Expectation, receiving and approving the draft and final Statement of Intent;
- Appoint trustees to the MCT board in accordance with the Trust Deed and Appointment of Directors to Council Controlled Organisations Policy;

- Monitor MCT’s performance as informed through the presentation of six-monthly and annual reports to Council;
- Build and maintain a relationship of mutual respect and trust, including communicating in a positive manner about MCT’s successes.

**5.0 Accountability, monitoring and transparency**

MCT is statutorily required to meet its obligations under Part 5 and Schedule 8 of the Local Government Act 2002 (LGA) including achieving the objectives of the Council, be a good employer, and exhibit a sense of social and environmental responsibility. The Act was amended with changes applicable from October 2019.

It is important to the Council that the people of the Manawatū District know that they can attend at least one public board meeting each year, even if the majority will not choose to do so. The Council sees MCT’s AGM as the ideal opportunity to do this and encourages MCT to actively promote this to the public.

**6.0 Timeline of the Statement of Intent (SOI)**

04 March 2026	Draft SOI presented to Council
05 March 2026	Council recommended changes to the draft SOI sent to the Trust for consideration / inclusion
On or before 25 May 2026	Updated SOI delivered to Council Officers by MCT
03 June 2026	Final SOI presented to Council

We look forward to continuing our collaborative working relationship with MCT as a robust, professional, and viable organisation that is providing a modern healthy living environment, up to date, good quality, sustainable housing and health facilities that address the needs of the community to enhance the long-term wellbeing of Manawatu residents.

We thank the Trust and Employees of MCT for their work and collaboration as we move ahead together.

Yours sincerely

Michael Ford JP  
**Mayor**

## Council

Meeting of 03 June 2026

Business Unit: Infrastructure

Date Created: 19 May 2026

## Silver Fern Rally 2026 Road Closure Request

### Purpose Te Aronga o te Pūrongo

To consider the application from Ultimate Rally Group Ltd to close various roads within the Manawātū District Council jurisdiction in order to undertake the Silver Fern Rally 2026.

### Recommendations Ngā Tūtohinga

That the Council, pursuant to Section 342 (b) and the Tenth Schedule of the Local Government Act 1974, permit the following roads to be closed to ordinary vehicular traffic on Thursday 3 December 2026, for the purpose of allowing Ultimate Rally Group Ltd to conduct the Silver Fern Rally 2026. This remains subject to the receipt of the Public Liability and Insurance Policy which will be current at the time of the event, and a traffic management plan, prepared by an authorised Site Traffic Management Supervisor and in accordance with the New Zealand Transport Agency Code of Practice of Temporary Traffic Management.

Roads proposed to be closed to ordinary vehicular traffic:

#### **Stage Name: ZigZag / Ridge Road**

Time of Closure: 07.30am to 12.00pm

**Zigzag Road** - 200m from its intersection with Valley Road, to its intersection with Finnis Road.

**Finnis Road** - from its intersection with ZigZag Road, to its intersection with Ridge Road.

**Ridge Road** - from its intersection with Finnis Road, to stage finish at house #2931 (approx 1km south from its intersection with Reids Line Apiti).

**\* Note: To assist with the stage security, the closure is also to include 120 metres of each adjoining road, from where it intersects with the road being applied for.**

**Adjoining Roads:** Finnis Road, Pollock Road, Branch Road (no exit), Coulters Line, Te Awa Road, Londons Ford Road and Coal Creek Road (no exit).

#### **Stage Name: Peep-O-Day /Waipuru Road**

Time of Closure: 08.55am to 01.25pm

**Peep-O-Day Road** - at its intersection with Rangiwahia Road, to its intersection with Upper Pakihikura Road.

**Upper Pakihikura Road** - from its intersection with Peep-O-Day Road, to its intersection with Mangapapa Road.

**Mangapapa Road** - from its intersection with Upper Pakihikura Road, to its change into Waipuru Road.

**Waipuru Road** - from its intersection with Mangapapa Road, to its intersection with Mangamako Road.

**Mangamako Road** - from its intersection with Waipuru Road, to finish at house #1437 (approx 2km from its intersection with Otara Road).

**\* Note: To assist with the stage security, the closure is also to include 120 metres of each adjoining road, from where it intersects with the road being applied for.**

**Adjoining Roads:** Ireland Road (no exit), Waituna Tapuae Road, Lower Pakihikura Road, Sandon Block Road, Orangipongo Road (no exit).

Report prepared by:  
Amy West  
Technical Infrastructure Support Officer

Approved for submission by:  
Hamish Waugh  
General Manager - Infrastructure

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## 1 Background Ngā Kōrero o Muri

- 1.1 Ultimate Rally Group Ltd have applied to hold 2 stages of the Silver Fern Rally in the Manawatū District on Thursday 3 December 2026. The Silver Fern Rally is a gravel road race, therefore all roads being used are unsealed.
- 1.2 The Silver Fern Rally was last held in the Manawatu District in November 2018. It is primarily raced by Classic 2WD pre 1987 vehicles with entrants coming from across the world. The event is expected to attract around 100 entries, however the current fuel crisis has created some uncertainty around international travel and participation numbers.
- 1.3 There are two stages within our District, each with road closures of 4.5 hours per stage. Portions of each stage are run simultaneously.
- 1.4 Section 342 (b) and the Tenth Schedule of the Local Government Act 1974 does not require Council to call for objections. Ultimate Rally Group Ltd have requested that the closure was advertised and objections called for. The objection period closed at 4.00pm on 15 May 2026. No objections were received.

## 2 Strategic Fit Te Tautika ki te Rautaki

2.1 Not applicable as this is a legislative / operational item.

## 3 Discussion and Options Considered Ngā Matapakinga me ngā Kōwhiringa i Wānangahia

3.1 No objections to the proposed road closures were received. Therefore no alternative options were considered.

3.2 The February 2026 Weather event resulted in some damage to assets, and downed trees at the time. Of the roads requested to be closed by the Ultimate Rally group, only Mangamako Road currently has debris remaining to be cleared as part of the recovery phase. Subject to funding availability this is anticipated to be cleared by December, although this doesn't affect the rally being able to operate.

3.3 Should any major damage occur as a result of the Silver Fern Rally, the cost of repairs would be recovered from Ultimate Rally Group Ltd.

## 4 Risk Assessment Te Arotake Tūraru

4.1 This road closure application carries an element of reputational risk for both Council and the event organisers in terms of proceeding, or not. There are economic benefits to the region in supporting this, however if it is not supported then this traditionally biennially run event may select alternative regions to conduct the rally.

## 5 Engagement Te Whakapānga

### Significance of Decision

5.1 The Council's Significance and Engagement Policy is not triggered by matters discussed in this report. No stakeholder engagement is required.

### Māori and Cultural Engagement

5.2 There are no known cultural considerations associated with the matters addressed in this report. No specific engagement with Māori or other ethnicity groups is necessary.

### Community Engagement

5.3 Public notice of the intention to temporarily close the roads was placed on the public notices webpage on 22 April 2026. Should the Council agree to the proposed temporary closure of the roads, a further public notice will be given of the confirmed road closures.

5.4 The closure information was sent out to the community committees for distribution to local residents while the objection period was open.

5.5 Ultimate Rally Group representatives will undertake a resident letter drop to all affected properties within the road closure area.

5.6 Signage will be installed on all roads once the road closure is approved to notify residents and provide contact information and instructions should there be a matter arise whilst the Rally is in operation.

## 6 Operational Implications Ngā Pānga Whakahaere

6.1 There are no operational implications with this report. Any major damage to the road would be recouped from Ultimate Rally Group Ltd who are required to have public liability insurance.

## 7 Financial Implications Ngā Pānga Ahumoni

7.1 There are no financial implications with this report.

## 8 Statutory Requirements Ngā Here ā-Ture

8.1 Section 342 (b) and the Tenth Schedule of the Local Government Act 1974 sets out the statutory requirements associated with proposals for temporary closure of roads.

8.2 Council must approve applications under section 11(e) of the Local Government Act 1974 Schedule 10 for temporary prohibition of traffic on a Council Road.

## 9 Next Steps Te Kokenga

9.1 A decision to temporarily close the roads is requested from the Council to enable prior public notice of the closure to be given to residents of the Manawatu District.

## 10 Attachments Ngā ĀpitiHanga

- Appendix 1 – Temporary Road Closure Application for the Silver Fern Rally



January 27, 2026

Manawatu District Council  
Private Bag 10001  
Feilding 4743

PO Box 499  
Drury, Auckland 2247  
Mob: 021 525 643  
Tel: 09 298 8322  
E-mail: gm@urg.co.nz

Dear Manawatu District Council

## REF: Application for Road Closure(s), for the New Zealand Silver Fern Rally 2026 Event

The Ultimate Rally Group proposes the attached closures under the Tenth Schedule, Paragraph 11(e) of the Local Government Act 1974.

Although Council may close roads under the Tenth Schedule without calling for submissions, we would like the opportunity for public comment to remain in place. This system has worked well over many years, and we feel that the good relationship the Ultimate Rally Group has established with the residents of the district could suffer if that right was withdrawn.

The Ultimate Rally Group's initial consultation will inform residents of the proposed time and date of the road closure application. We prefer to start this as soon as possible.

The Ultimate Rally Group wishes to be advised of any comments regarding the closure that Council may receive from residents or businesses to re-consult with them to achieve a mutually satisfactory agreement.

Upon approval of the applications, 'Notice Road of Closure' signage will be erected on the proposed roads no sooner than 21 days prior to the event date to advise users of the impending closure. Any new comments will be handled by the Ultimate Rally Group, with Council being advised of the outcome.

A reminder letter will be dropped to residents on the affected roads reminding them of the closure 7 - 21 days before the NZ Silver Fern event. This final letter will detail Emergency Procedures should an emergency arise. **An emergency 0800 number** will be published enabling residents to contact the organisers during the road closure in case of an emergency. The event can then be stopped at any time to allow emergency access. Medical staff are located at the start of each road closure and are there to render assistance if required, including residents. This letter will also advise the residents of our commitment to repair any property damage that may occur by the participants.

In addition, written correspondence will be made to all transport operators, dairy companies, rural delivery, utilities, schools, bus operators and associated organizations that could be affected by the closure, including Police, Fire Service and St John. Every effort is made to enable local schools / community groups to benefit from our event by initiating them to hold fundraising activities.

### Could we suggest the following timetable:

- ❖ Ultimate Rally Group visits residents as soon as possible.
- ❖ "Proposal Public Notice" to be published no later than 90 days before event.
- ❖ Comments to be received within 14 days.
- ❖ Council decision finalised no later than 60 days before the event.
- ❖ Advise Ultimate Rally Group of the decisions no later than 40 days before the event.
- ❖ The "Road Closure public notice" is published no less than 21 days before the event.
- ❖ The Ultimate Rally Group to carry out resident mail drop advice and erect "Notice of Event" signs 7-21 days before event.

The New Zealand Silver Fern Marathon Rally Event is primarily for Classic 2WD pre-1987 vehicles with participants coming from all corners of the world. Cars leave at one-minute intervals. All vehicles carry a live GPS tracking device monitored by our HQ. All side roads will be taped and marshalled to ensure public, and spectators remain off the closed road.

**The following safety measures for the event include:**

- ❖ All area emergency services and their communication centers are informed of the Event.
- ❖ Direct radio communication between start and finish points with HQ.
- ❖ AASA Public Liability Insurance policy of \$50,000,000.00.
- ❖ An FIV (First Intervention Vehicle) will be located at the start of each road closure. This vehicle is equipped with medical, recovery and fire suppression personnel.
- ❖ All closed roads will be cleared for safety purposes by official vehicles with flashing lights and/or a siren immediately before participants can commence.
- ❖ Closed roads re-open behind the official Safety Clearance Vehicle "SWEEP" vehicle who immediately follow the last participating vehicle.

**Advertising Criteria:**

- ❖ **Only local papers** are to be used. We have found that on rural roads, these papers have the best coverage.
- ❖ Optional community social media pages are encouraged but not required.
- ❖ If the cost of advertising exceeds \$500 collectively, written confirmation must be sought from the Ultimate Rally Group.
- ❖ We ask that each advertisement be kept to the minimum size possible (200mm by 2 columns) by the elimination of repetition, and use of abbreviation. We have found this size to be adequate for communicating up to six Road Stage Closure Applications. Smaller Closure Applications generally only require one column width.
- ❖ Ultimate Rally Group can supply examples of past event advertisements if required.

Please confirm receipt of this application.

Thank you for your assistance and we look forward to your reply.

Kind Regards,



Victoria Edwards  
General Manager  
Ultimate Rally Group  
Mob: 021 525 643  
Tel: 09 298 8322

<b>Stage 33</b>	<b>ZIGZAG / RIDGE ROAD</b>
<b>Road Closure:</b>	<b>7:30am – 12:00pm   Thursday 3<sup>rd</sup> December 2026</b>
<b>RCA:</b>	<b>Manawatu District Council</b>
<b>Start:</b>	<b>Zigzag Road, 200m from its intersection with Valley Road</b>
	Right onto Finns Road
	Left onto Ridge Road
	Past Pollock Road
	Past Branch Road (no exit)
	Past Coulters Line
	Past Te Awa Road
	Past Londons Ford Road
<b>Finish:</b>	<b>Ridge Road, 1km south of its intersection with Reids Line</b>



<b>Stage 34</b>	<b>PEEP-O-DAY / WAIPURU ROAD</b>
<b>Road Closure:</b>	<b>8:55am – 1:25pm   Thursday 3<sup>rd</sup> December 2026</b>
<b>RCA:</b>	<b>Manawatu District Council</b>
<b>Start:</b>	<b>Peep-O-Day, 200m from its intersection with Rangiwahia Road</b>
	Past Irelands Road (no exit)
	Right into Upper Pakihikura Road (at Waituna Tapuae Road)
	Right into Mangapapa Road (at Lower Pakihikura Road)
	Straight onto Waipuru Road
	Right into Mangamako Road (at Sandon Block Road)
	Past Orangipongo Road
<b>Finish:</b>	<b>Mangamako Road, 2km from its intersection with Otarā Road</b>



## Council

Meeting of 03 June 2026

Business Unit: Corporate

Date Created: 15 May 2026

## Submissions made on behalf of Council 12 March to 14 May 2026

### Purpose Te Aronga o te Pūrongo

To present to Council for information, copies of recent submissions lodged on behalf of the Manawātū District Council.

### Recommendations Ngā Tūtohinga

That the Council receives and notes the listed submissions, lodged on behalf of the Manawātū District Council between 12 March and 14 May 2026.

- 1 Health and Safety at Work Amendment Bill
- 2 Proposals to Change Total Mobility
- 3 NZTA Lane Use Improvements
- 4 NZTA Revised Procurement Manual
- 5 Statistics NZ Infringement Consultation
- 6 Targeted Speed Limit Reviews
- 7 Technical Amendments to the Wastewater Performance Standards
- 8 Data and Statistics Amendment Bill
- 9 Cyber Security of Critical Infrastructure
- 10 Policing Amendment Bill 2026
- 11 Firefighting Water Supplies – Code of Practice
- 12 Sale of Alcohol (Improving Alcohol Regulation) Amendment Bill

Report prepared by:

Steph Skinner

Governance and Strategy officer

Approved for submission by:

Frances Smorti

General Manager - Corporate

## 1 Background Ngā Kōrero o Muri

- 1.1 The Council established the Submissions Assessment Panel as a subordinate decision-making body of Council, on 16 June 2022. This was to address timing issues for making submissions within the often-limited submission response timeframes.
- 1.2 The Panel is delegated the authority to consider and approve submissions on regional or national policy consultations, for submitting either under the signature of the Mayor, or under the signature of the Chief Executive.
- 1.3 The Council agreed that to ensure transparency of process, completed submissions would be reported to the next scheduled Council meeting for receipt and noting.

## 2 Strategic Fit Te Tautika ki te Rautaki

- 2.1 Not applicable as this is a legislative / operational item.

## 3 Discussion and Options Considered Ngā Matapakinga me ngā Kōwhiringa i Wānangahia

- 3.1 The following is a list of submissions that have been lodged on behalf of Council since the last report to Council at the 01 April 2026 meeting.

Attach #	Submission topic:	Date lodged:
1	Health and Safety at Work Amendment Bill	18 Mar 2026
2	Proposals to Change Total Mobility	19 Mar 2026
3	NZTA Lane Use Improvements	25 Mar 2026
4	NZTA Revised Procurement Manual	31 Mar 2026
5	Statistics NZ Infringement Consultation	02 Apr 2026
6	Targeted Speed Limit Reviews	08 Apr 2026
7	Technical Amendments to the Wastewater Performance Standards	9 Apr 2026
8	Data and Statistics Amendment Bill	15 Apr 2026
9	Cyber Security of Critical Infrastructure	17 Apr 2026
10	Policing Amendment Bill 2026	22 Apr 2026
11	Firefighting Water Supplies – Code of Practice	28 Apr 2026
12	Sale of Alcohol (Improving Alcohol Regulation) Amendment Bill	14 May 2026

## 4 Risk Assessment Te Arotake Tūraru

- 4.1 Submissions are prepared on behalf of the Manawatū District Council and, depending on the nature of the topic, are intended to reflect the views and needs of the wider Manawatū Community. The primary risk that has been identified in relation to submissions prepared on behalf of Council to national and regional consultations is reputational risk. That is, if individuals or the community at large disagree with the views raised in submission prepared on behalf of the Council and the Manawatū Community, this could be damaging for the reputation of the Council. Council adopts a cautious approach with respect to reputational risk.

- 4.2 Reputational risk is managed via an informed and collaborative approach to preparing submissions. Officers draft submissions using the best available information, including input from technical experts from across the organisation. Officers also consider submissions prepared by local government sector organisations including Taituarā and Local Government New Zealand, where available. Any submissions that involve potentially controversial topics are reviewed by the Executive Leadership Team prior to being shared with the members of the Submissions Assessment Panel.
- 4.3 The submissions assessment panel is made up of elected members, who are democratically elected to represent the views of the Manawatū Community, and members of the executive leadership team. Feedback from the submissions assessment panel members is considered and incorporated where appropriate prior to the final submission being approved by Mayor Ford for lodgement. This collaborative approach to submission drafting ensures that submissions are reflective of the collective views of the Council, rather than individual views.
- 4.4 Where submissions relate to matters of broad Council interest, officers will involve all elected members, not just those that are members on the submissions assessment panel. Where time allows, officers will hold educational workshop sessions and invite feedback on the draft submission prior to it being finalised. This ensures that submissions are representative of the collective views of Council.

## **5 Engagement Te Whakapānga**

### Significance of Decision

- 5.1 The Council's Significance and Engagement Policy is not triggered by matters discussed in this report. No stakeholder engagement is required.

### Māori and Cultural Engagement

- 5.2 There are no known cultural considerations associated with the matters addressed in this report. No specific engagement with Māori or other ethnicity groups is necessary.

### Community Engagement

- 5.3 The Submissions Assessment Panel is delegated authority to approve submissions for lodging on behalf of the Manawatū District Council. A copy of submissions lodged are required to be reported to a future council meeting for receipt and noting by Council.

## **6 Operational Implications Ngā Pānga Whakahaere**

- 6.1 Due to often limited timelines to consider a Council response to regional and national matters, the Submissions Assessment Panel was delegated authority to consider and approve submissions for lodgement on behalf of the Manawatū District Council. This enables Council to contribute to consultations on national and regional policy matters, that often have short timeframes in which to make a submission.
- 6.2 Copies of submissions lodged under delegated authority are reported to Council for noting and receipt.

## **7 Financial Implications Ngā Pānga Ahumoni**

7.1 There are no financial implications with this report.

## **8 Statutory Requirements Ngā Here ā-Ture**

8.1 There are no statutory requirements for this report.

## **9 Next Steps Te Kokenga**

9.1 There are no next steps required.

## **10 Attachments Ngā Āpitihanga**

- Lodged Submissions attached:
  - Health and Safety at Work Amendment Bill
  - Proposals to Change Total Mobility
  - NZTA Lane Use Improvements
  - NZTA Revised Procurement Manual
  - Statistics NZ Infringement Consultation
  - Targeted Speed Limit Reviews
  - Technical Amendments to the Wastewater Performance Standards
  - Data and Statistics Amendment Bill
  - Cyber Security of Critical Infrastructure
  - Policing Amendment Bill 2026
  - Firefighting Water Supplies – Code of Practice
  - Sale of Alcohol (Improving Alcohol Regulation) Amendment Bill

17 March 2026

Committee Secretariat  
Education and Workforce Committee  
Parliament Buildings  
Wellington

Submitted via: [Health and Safety at Work Amendment Bill - New Zealand Parliament](#)

Dear Members of the Education and Workforce Committee

### **Submission from the Manawatū District Council on Health and Safety at Work Amendment Bill**

The Manawatū District Council (MDC) thanks the Education and Workforce Committee for the opportunity to provide feedback on the Health and Safety at Work Amendment Bill (“the Bill”). MDC strongly supports the intent of the Bill to improve clarity within the work health and safety system, reduce unnecessary compliance burden, and ensure that regulatory effort is directed toward preventing serious harm while maintaining effective management of workplace health and safety risks. However, MDC does have some concerns regarding how the proposed prioritisation of critical risks may operate in practice and seeks clarity regarding responsibility for recreational land use where permits are issued.

#### ***Introduction***

Manawatū District Council (MDC) is a territorial local authority employing more than 100 staff and managing a diverse portfolio of public assets, infrastructure, and community facilities. MDC operates across low, medium, and high-risk environments, including office-based work, aquatic facilities, wastewater treatment plants, road corridors, and public open space. We also regularly engage contractors, and issue permits for events and community activities on Council-owned land.

Council supports the overarching objectives of the Bill to improve clarity within the work health and safety system, reduce unnecessary compliance burden, and ensure regulatory effort is directed toward preventing serious harm. Our submission focuses on:

1. The proposed shift to a focus on critical risks
2. The proposed reforms clarifying duties relating to recreational use of land
3. Clarification of overlaps with other legislation
4. Strengthening of approved codes of practice (ACOPs)

#### ***Focusing the System on Critical Risks***

MDC is supportive of a clearer focus on risks that are capable of causing death, serious injury, serious illness, or notifiable events. Prioritising the prevention of serious harm is sensible and aligns with established risk management methodologies.

MDC uses a critical risk framework internally to identify and manage high-consequence hazards in areas such as confined spaces, heavy plant operation, wastewater treatment, and

traffic management. However, we have concerns about the potential unintended consequences of reframing the purpose of the Act and regulatory expectations around critical risks.

Many workplace injuries and illnesses that materially affect Council operations do not meet the threshold of likely death or notifiable injury but nonetheless have significant impact.

Examples include:

- Manual handling injuries;
- Musculoskeletal disorders arising from repetitive or awkward tasks;
- Slips, trips, and falls;
- Psychosocial risks and stress-related harm;
- Fatigue and cumulative exposure risks.

These risks may not involve immediate life-threatening consequences, but they can result in prolonged absences, long-term health impacts, significant ACC costs, productivity loss, and operational disruption. For a local authority delivering essential services, these impacts are material.

While the Bill maintains the obligation for larger PCBUs to manage all risks (while prioritising critical risks), small PCBUs will only be required to manage critical risks under their primary duties. Council is concerned that, in practice, the reforms could create a two-tier system where only critical risks receive attention, and non-critical but operationally significant harms are implicitly deprioritised.

This may not be the intent of the Bill, but it is a foreseeable behavioural outcome.

### **Decisions Sought**

Council asks the Committee to ensure that:

- The legislation or accompanying explanatory material clearly confirms that prioritising critical risks does not reduce expectations for managing other workplace health and safety risks.
- The focus on critical risks is not interpreted as diminishing the importance of managing chronic, cumulative, or psychosocial harm.

### **Recommendations**

To support effective implementation of the reforms, Council recommends that:

- Regulators provide clear guidance on how prioritisation of critical risks is intended to operate in practice without weakening preventative health and safety practices.
- Particular attention be given to sectors with high numbers of small operators to ensure long-term harm trends do not worsen.

The Manawatū District includes a large number of small businesses and farm owners that would meet the proposed definition of a small PCBU.

We support proportionate reforms that reduce compliance burden and administrative cost for these operators, recognising this as an important policy objective. However, in rural and small business contexts, cumulative and manual handling injuries, fatigue, and long-term

exposure risks are common and can have significant workforce and financial impacts. Council considers it important that the reforms do not unintentionally signal that these risks are of secondary importance simply because they do not meet the critical risk threshold.

### ***Clarifying Duties Relating to Recreational Use of Land***

MDC is supportive of the proposed clarification of duties for PCBUs who manage, or control open space used for recreational purposes. In principle, we welcome reforms that reduce unnecessary administrative burden and remove uncertainty where a landowner has no active involvement in, or control over, the recreational activity taking place.

As a significant landowner that administers permits for events and community activities across parks, reserves, sports fields, and walkways, Council has had concerns about the extent of its responsibility for the operational decisions and risk management of those given formal permission via the permit process to utilise these spaces.

Clarifying that landowners are not responsible for recreational users in circumstances where the activity is not connected to the PCBU's work, is a constructive reform. However, the Bill provides that the exemption does not apply where other work connected to the PCBU's business is being carried out "at the time in the open space near where the entry and use are taking place."

In large or complex public open spaces, this raises practical questions.

Council land frequently accommodates:

- Multiple concurrent activities;
- Routine maintenance work occurring in one area of a reserve;
- Permitted events or recreational use occurring elsewhere in the same reserve.

### **Decision Sought**

- Council seeks clarification that issuing a permit for an event or activity, in itself, does not constitute operational control of that activity for the purposes of the Health and Safety at Work Act.
- Council seeks clarification that the legislation, or Select Committee commentary, clearly articulate the boundary between passive land ownership and operational control where recreational activities occur on land owned or managed by a PCBU.

### **Recommendations**

To support consistent interpretation of reforms, MDC recommends that:

- Clear statutory guidance or regulatory commentary distinguish passive land ownership from active management or control.
- Guidance to clarify how the terms "near" and "at the time" are intended to apply in large, multi-use open space where multiple activities may occur simultaneously.
- Permit frameworks are able to allocate risk management responsibilities clearly to event organisers without creating unintended liability for the landowner.

The reform is welcome, but its practical effectiveness will depend on clarity of interpretation.

### ***Clarifying Overlaps with Other Legislation***

MDC supports the intent of the Bill to clarify overlaps between the HSW Act and other legislation, and to confirm that compliance with relevant requirements under another Act may satisfy corresponding duties under the HSW Act.

As a local authority operating within multiple regulatory frameworks, Council has experienced complexity where duties appear to overlap. Greater clarity that the HSW Act is not intended to function as a “backstop” for risks that are comprehensively managed under other systems is welcome.

#### *Recommendation*

MDC recommends that:

- Clear cross-regulator guidance be developed to ensure there are no unintended regulatory gaps where worker safety expectations differ across systems.
- Particular care be taken in areas such as seismic risk and building compliance to ensure that the interaction between the HSW Act and the Building Act 2004 remains coherent and does not create uncertainty for building owners, tenants, or regulators.
- Ongoing coordination between regulators be transparent and readily understood by those subject to the legislation.

Clarity should reduce duplication without inadvertently lowering safety standards or creating ambiguity about enforcement responsibility.

#### ***Strengthening Approved Codes of Practice***

Council notes the proposed changes to strengthen Approved Codes of Practice (ACOPs), including the introduction of safe harbour status whereby a person acting in accordance with an approved ACOP for a specific risk is deemed to have complied with their duty for managing that risk.

MDC supports efforts to provide greater certainty for duty holders. Clear, up-to-date, and practical codes of practice can assist PCBUs in understanding what is reasonably practicable in particular circumstances.

#### *Recommendations*

Given the elevated status ACOPs will hold under the proposed reforms, MDC recommends that:

- ACOPs are regularly reviewed and updated to reflect current technology, equipment, and industry practice.
- ACOPs do not become overly prescriptive in ways that undermine the performance-based nature of the HSW Act.
- Transparency is maintained where draft ACOPs are developed by external organisations and submitted to the regulator for approval.
- The development and revision of ACOPs include input from relevant industry sectors and practitioners to ensure that guidance is practical, technically accurate, and workable in real-world operating environments.

MDC has previously observed that some legacy ACOPs and guidance material have become outdated over time. If ACOPs are to carry safe harbour status, it becomes even more important that they are up to date, high quality, and developed with broad sector input.

## **Conclusion**

MDC supports the objectives of the Health and Safety at Work Amendment Bill and recognises the importance of reducing unnecessary compliance and burden while improving clarity.

MDC submits that the Bill would benefit from ensuring that:

- The focus on critical risks does not inadvertently diminish attention to cumulative and high-frequency harms;
- The recreational land reforms provide genuine clarity for significant public landowners;
- Legislative overlap provisions are supported by inter-agency coordination; and
- The strengthened status of ACOPs is matched by robust development and review of processes.

Manawatū District Council appreciates the opportunity to provide feedback on the Bill and thanks the Committee for its consideration of this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Ford', with a long, sweeping horizontal stroke extending to the right.

Michael Ford, JP  
**Mayor**

/03/2026

Total Mobility Consultation  
Ministry of Transport  
PO Box 3175  
Wellington 6140

*Emailed to: [totalmobilityreview@transport.govt.nz](mailto:totalmobilityreview@transport.govt.nz)*

## **Submission from the Manawatū District Council on Proposals to Strengthen Total Mobility**

Dear Sir/Madam

The Manawatū District Council (MDC) thanks the Ministry of Transport for the opportunity to provide feedback on the proposals to strengthen Total Mobility.

### **General feedback:**

The Manawatū District has a population of approximately 34,000, with just under half living in rural areas across 16 villages and rural communities. In response to transport challenges, the Manawatū Rural Bus was established as a not-for-profit, on-demand service connecting rural communities across the district. However, it currently does not meet the criteria required to participate in the Total Mobility Scheme. In rural areas, the availability of registered taxi services is limited, which can restrict access to the scheme for these communities.

While the Manawatū District Council does not provide a public transport service directly, we have a representative on both the Regional Public Transport Committee and the Manawatū Public Transport Governance Group. As at March 2025 there were 580 people registered for Total Mobility in the Manawatū District.

Across the Manawatū-Whanganui Region, 84.7% of Total Mobility users are aged 61 and over. This aligns with the Manawatū District's demographic profile, which includes a higher proportion of residents aged 65 years and older. Council emphasises that many of these residents are living on fixed incomes and have experienced sustained cost-of-living pressures in recent years. Any increases in transport costs will disproportionately affect this already vulnerable group and may limit their ability to access essential services, social connections, and community participation.

Council is concerned that the cost of the Total Mobility scheme has increased without prior consultation, particularly given the significant impact on residents aged 65 and over. Meaningful engagement with affected communities should occur before implementing changes of this nature. Consultation is especially important where policy

changes directly affect older people and those with disabilities, who may have limited capacity to absorb additional financial burdens.

**Proposal 2: Make assessments fair and consistent:**

Council supports greater consistency in eligibility assessments across the region. However, this must be implemented in a way that is transparent, well-communicated, and easy to navigate. Clear guidance must be provided to both assessors and applicants to ensure equitable outcomes. Any new assessment framework should prioritise accessibility, fairness, and the dignity of applicants.

**Proposal 2A: Show evidence of your impairment:**

While Council acknowledges the need for appropriate evidence to support eligibility decisions, we strongly caution against introducing processes that create additional financial or administrative barriers. Many Total Mobility users are already on limited incomes. Requiring further documentation, medical verification, or reassessment processes may inadvertently increase costs for those the scheme is designed to support. The scheme must remain accessible and not impose additional hardship.

**Proposal 2B: Regular reassessments:**

Council is particularly concerned about the potential for unnecessary reassessments. For individuals with permanent or non-changing disabilities, repeated reassessment would be both burdensome and inequitable. Clear guidance is required regarding whether such individuals will be required to undergo reassessment, and at what frequency. There are also associated transport costs involved in attending assessments. Frequent reassessment risks creating a “catch-22” situation, where individuals incur additional transport costs simply to maintain access to subsidised transport.

Council suggests that eligibility confirmation could be simplified by allowing a person’s general practitioner to indicate whether a mobility impairment is permanent or temporary. Where a condition is permanent, reassessment should not be required. This would reduce administrative and financial barriers for applicants.

**Proposal 5: Allowing new providers:**

Council encourages the inclusion of additional transport providers within the scheme. In the Manawatū District, the Manawatū Rural Bus Service provides a critical and affordable transport option for residents in isolated rural communities travelling to Feilding and Palmerston North. While the service is not currently wheelchair accessible, it plays an essential role in supporting access to services at a significantly lower cost than private taxi services. Expanding the range of approved providers would improve affordability, enhance accessibility, and better reflect the transport realities of rural communities.

**Support for the Horizons Regional Council position**

Council notes and supports the submission provided by Horizons Regional Council on the Total Mobility review. As the regional authority responsible for administering the Total Mobility scheme and overseeing public transport services across the Manawatū–

Whanganui region, Horizons provides an important regional perspective on the operation, funding, and future development of the scheme. Council supports the key recommendations outlined in the Horizons submission, particularly those relating to improving consistency in assessments, avoiding unnecessary reassessments for people with permanent disabilities, enabling a broader range of transport providers, and ensuring that any policy changes maintain equitable access to transport for people with disabilities.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Ford', with a long, sweeping underline that extends to the right.

Michael Ford

**Mayor**

25 March 2026

NZ Transport Agency Waka Kotahi

Submitted via: [Consultation on lane use improvements | New Zealand Transport Agency Waka Kotahi](#)

Tēnā koutou

**Submission from the Manawatū District Council in response to the Consultation on lane use improvements**

The Manawatū District Council (MDC) thanks the New Zealand Transport Agency Waka Kotahi (NZTA) for the opportunity to submit on the land use improvements consultation. MDC generally supports the intent of the proposed changes, particularly where they improve safety, clarity, and consistency in how different road users interact.

**Proposal 1**

*Do you agree with allowing children aged 12 years and under to ride bikes on footpaths?*

Yes.

MDC supports the proposed change due to safety benefits for young cyclists, and benefits associated with increased uptake of active transport modes, particularly for transport to and from school.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

MDC is satisfied that the current provisions within the Road User Rule that require anyone using a path to be considerate of other users and to not use devices at hazardous speed is sufficient to appropriately manage the risks associated with this change.

**Proposal 2**

*Do you agree with introducing a minimum passing distance when drivers overtake other road users (such as cyclists, horse riders, and micro-mobility users)?*

Yes.

MDC supports the introduction of a minimum passing distance, as it provides greater clarity and consistency for all road users regarding what constitutes safe overtaking behaviour. The current requirement to pass safely is open to interpretation, which can lead to inconsistent behaviour and increased risk for vulnerable road users such as cyclists, horse riders, and micromobility users. Establishing a clear minimum distance sets a more predictable standard, which is expected to improve both actual and perceived safety. From a local government perspective, clearer rules also support

education and behaviour change initiatives, and align with broader safe system principles by reducing ambiguity and promoting safer interactions between different road users.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

MDC notes that there may be practical challenges associated with implementing and enforcing minimum passing distances, particularly on narrow rural roads, which are common throughout the Manawatū District. In these environments, road widths may make it difficult for drivers to consistently achieve the specified passing distances without crossing the centreline or significantly reducing speed. This can create uncertainty for drivers and present enforcement challenges, particularly where it is difficult to accurately assess or prove compliance with a specific passing distance.

MDC acknowledges that safe overtaking behaviour often relies on driver judgement and adapting to the conditions at the time, and that translating this into a fixed minimum distance is not always straightforward in practice. However, MDC considers that the proposed rule still provides value by establishing a clearer baseline expectation of safe behaviour. To support effective implementation, MDC recommends that consideration be given to how the rule will be applied in rural contexts, including the role of driver education, guidance, and enforcement discretion to ensure the rule is practical and proportionate.

MDC also notes that horses present a different risk profile to other road users due to their size and potential unpredictability. While the Road User Rule requires drivers to pass animals safely, it does not currently provide specific guidance on passing distances or speeds when overtaking horses. In rural areas such as the Manawatū District, where horse riding commonly occurs on high-speed roads, a minimum passing distance alone may not always be sufficient to ensure safety. MDC considers that overtaking a horse and rider often requires a greater level of care, including reducing speed and, where practicable, moving fully into the opposing lane. MDC recommends that consideration be given to whether additional guidance or requirements are needed when passing horses, to better reflect these risks.

### **Proposal 3**

*Do you agree with allowing e-scooters to be used in cycle lanes?*

Yes.

MDC evaluated the use of e-scooters on footpaths during the recent review of its Public Places Bylaw. As there are currently no commercial e-scooter operators within the Manawatū District, there are no known significant issues associated with e-scooter use that require active management. However, MDC is aware of issues experienced in larger urban centres with commercial operators, such as Palmerston North, and considers that these provide a useful indication of potential future impacts.

MDC agrees with the behavioural concerns outlined in the consultation document regarding e-scooter use on footpaths, particularly the potential for conflict with other users. Allowing e-scooters to operate in cycle lanes is likely to reduce these conflicts by providing a more appropriate operating environment.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

While outside the scope of this consultation, MDC recommends that future rule reform consider whether the existing classification framework remains fit for purpose for micromobility devices. Currently, e-scooters are classified as “wheeled recreational devices.” This classification does not align with their speed, function, or increasing use as a mode of transport within the network. As a result, inconsistencies arise in where they can operate, the safety expectations placed on riders, and how infrastructure is planned and managed. The need to introduce targeted rule changes (such as clarifying access to cycle lanes) suggests that the existing classification framework may no longer be fit for purpose.

The consultation document recognises that e-scooters travel at similar speeds and face similar risks to bicycle users. Under Rule 11.8 of the Land Transport (Road User) Rule 2004, cyclists are required to wear safety helmets. Given the comparable risk profile, MDC considers that there is a strong safety rationale for applying a similar requirement to e-scooter users, particularly where they are operating within the transport network alongside other vehicles and cyclists.

MDC also notes concerns regarding the obstruction of footpaths by e-scooters that are parked or left in inappropriate locations. While this issue is not directly addressed by this proposal, increased uptake of e-scooter use may exacerbate these effects. MDC recommends that NZTA consider potential controls or guidance to better manage parking behaviour, such as the provision of designated micromobility parking areas.

However, MDC requests that NZTA give consideration to the following:

1. That future rule reform consider whether the existing classification framework remains fit for purpose for micromobility devices.
2. That consideration be given to introducing a requirement for e-scooter users to wear helmets, reflecting their comparable speed and risk profile to cyclists.
3. That consideration be given to potential measures to manage the parking of e-scooters to minimise obstruction of footpaths and accessways.

#### **Proposal 4**

*Do you support requiring drivers to give way to buses leaving bus stops on roads with speed limits of 60 km/h or less?*

Yes.

MDC does not have direct responsibility for public transport. However, MDC has representation on the Regional Passenger Transport Committee (co-ordinated by Horizons Regional Council) and the Manawatū Public Transport Governance Group. MDC’s support for this proposal is out of recognition of the benefits of efficient and effective public transport for communities, including: improving access to education, healthcare and services, reducing transport disadvantage, and supporting mode shift away from private vehicles.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance)?*

MDC has not identified any additional impacts beyond those outlined above.

**Proposal 5**

*Do you agree with the proposal to clarify that signage is not required for berm parking rules to be enforceable?*

Yes.

MDC supports the proposal to clarify that signage is not required for berm parking rules to be enforceable.

From an operational perspective, the current ambiguity regarding signage requirements has resulted in inconsistent approaches across road controlling authorities. Clarifying that signage is not mandatory will support a more consistent and efficient approach, reducing uncertainty for councils when determining whether signage is required.

The proposal also has the potential to reduce unnecessary costs associated with installing and maintaining signage, while still enabling councils to use signage where it is appropriate to support compliance in high-risk or high-demand locations.

MDC considers that the primary benefit of this proposal is the increased clarity it provides, allowing road controlling authorities to apply a more consistent and proportionate approach to managing berm parking.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

While MDC supports the proposed clarification, consideration should be given to how consistency in practice will be achieved across different road controlling authorities.

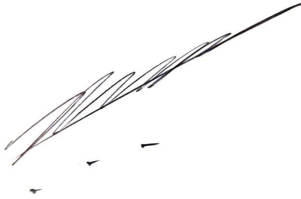
Without signage, there is potential for reduced awareness among road users regarding berm parking restrictions, particularly where practices vary between districts. This may create compliance challenges and require increased reliance on public education and communication.

MDC recommends that NZTA provide guidance to support consistent implementation of the rule change, including when signage is likely to be appropriate and how councils can effectively communicate berm parking restrictions to road users.

**MDC Submission on NZTA Lane Use Improvements Consultation**

Thank you again for the opportunity to provide feedback on NZTA's lane use improvements consultation.

Ngā mihi nui

A handwritten signature in black ink, appearing to read 'Michael Ford', written in a cursive style.

Michael Ford

**Mayor**

31 March 2026

New Zealand Transport Agency,  
Waka Kotahi,  
Private Bag 6995  
Marion Square  
Wellington 6141  
New Zealand

Submitted via: [procurement@nzta.govt.nz](mailto:procurement@nzta.govt.nz)

Tēnā koutou,

### **Submission of Manawātū District Council on the Amendment to the New Zealand Transport Agency (NZTA) Waka Kotahi Procurement Manual**

Manawātū District Council (MDC) thanks the NZTA Waka Kotahi for the opportunity to provide feedback on developing an updated, simplified Procurement Manual for Approved Organisations.

MDC manages a significant local roading network which constitutes core Council asset. Roading represents approximately 18% of Council's overall annual operating expenditure. The network includes over 85,500 individual asset components recorded in the RAMM (Road Assessment and Maintenance Management) database. A high proportion (over 91%) of the network's pavements and surfaces are considered to be in acceptable condition under the One Network Roading Classification (ONRC) framework.

### **Council's Approach to Procurement**

MDC operates as an approved organisation under the Land Transport Management Act 2003 (LTMA), receiving National Land Transport Fund (NLTF) assistance through the National Land Transport Programme (NLTP). Council has maintained an NZTA Waka Kotahi-endorsed roading procurement strategy covering the 2024–2027 period, which has provided clear guidance on procurement approaches aligned with local market conditions and supplier capability.

Council's existing procurement approach has centred on a consolidated road maintenance contract that bundles a range of maintenance and operational activities into a single contract. This model has served the district well in terms of administrative efficiency and market engagement. However, as outlined in this submission, Council is actively reviewing its strategy to align with emerging directions around multiple smaller contracts and enhanced in-house professional services delivery, consistent with the signals from Amendment 6 and Council's own Long-term Plan directions from 1 July 2027.

## **General Feedback**

MDC notes that the amendments in the current manual are relatively incremental in nature and do not represent a wholesale departure from existing frameworks. We consider the most significant changes to be:

1. Clarified and strengthened language around ‘best value for money’, introducing a definition that explicitly references cost, quality, benefit and risk — an approach that better reflects whole-of-life procurement thinking;
2. Signalling of earlier and more structured engagement with the supplier market during procurement phasing; and
3. A substantial body of amendments relating to public transport services procurement, including partnering delivery models, contract terms, and key performance indicators.

Council supports the simplified value for money approach and considers it a positive development. Our submission elaborates on specific areas of both support and concern and raises a number of matters that Council considers warrant further attention in the finalisation of Amendment 6.

## **Areas of Support**

### **Simplified and Clarified ‘Best Value for Money’ Definition**

MDC supports the amended definition of ‘best value for money’ in Chapter 3, which now reads as ‘the most effective combination of cost, quality, benefit and risk to meet a requirement.’ This is a clearer and more practically useful definition than previous formulations, and it appropriately acknowledges that lowest price is not synonymous with best outcome.

This framing aligns well with MDC’s own procurement experience. Our NZTA Waka Kotahi-endorsed procurement strategy is explicitly built around value for money principles that prioritise local market sustainability, whole-of-life asset cost, and supplier performance rather than simply price competition. The amended definition strengthens the policy basis for this approach and should provide approved organisations with greater confidence in pursuing quality-oriented procurement decisions.

Council would encourage NZTA Waka Kotahi to ensure that the guidance accompanying this definition makes clear that the four components — cost, quality, benefit and risk — should be assessed holistically and not in isolation. In particular, there is a risk that in practice, cost considerations dominate at the expense of quality and risk management, particularly in constrained funding environments.

### **Early Market Engagement**

Council supports the proposed emphasis on earlier engagement with the supplier market during procurement phasing. For a district of MDC’s size and geography, the local

contractor and professional services market is relatively limited. Engaging early with local suppliers allows Council to better understand capacity and capability constraints, plan procurement timing to smooth workload across the market, and signal forward pipeline to allow suppliers to resource appropriately. Council considers that early engagement guidance should be embedded as a standard expectation within the procurement strategy requirements, not treated as an optional best practice.

### **Alignment with Existing MDC Strategy**

The proposed amendments are broadly consistent with MDC's existing endorsed procurement strategy, which supports local market development, long-term supplier relationships, and a value-for-money orientation. Council has been implementing procurement procedures aligned with the manual for a number of years and has developed institutional knowledge and capability that supports ongoing compliance.

The signal from Amendment 6 toward multiple smaller contracts as opposed to a single large-bundled maintenance contract, is one that Council is independently considering as part of its forthcoming procurement strategy review. Council welcomes this directional alignment and considers that the amended manual provides a stronger policy foundation for that shift.

### **Areas of Concern**

#### ***Transition Support for Smaller Approved Organisations***

While Council is broadly supportive of the amended manual's directions, we wish to highlight the practical challenges for smaller approved organisations in transitioning to new procurement approaches, particularly the move toward multiple smaller contracts and enhanced in-house professional services delivery.

MDC's current road maintenance contract combines a wide range of activities into a single agreement. Moving to multiple smaller contracts would increase procurement complexity, require greater internal project management and contract oversight capability, and impose higher transaction costs on both Council and the supplier market. For a council with limited professional services staffing, this is not a trivial transition.

Council requests that NZTA Waka Kotahi:

1. Provide clear guidance on the circumstances under which a bundled single contract remains appropriate versus multiple smaller contracts, with explicit acknowledgement that the right approach will vary by district size, market conditions and organisational capability;
2. Develop transition support resources, including template documentation, capability-building guidance and examples of how peer councils have managed similar transitions; and
3. Consider a phased implementation expectation that provides smaller councils sufficient time to revise their procurement strategies and build internal capability before full alignment with any new directional signals is expected.

### ***In-House Professional Services – Practical Barriers***

Chapter 1.9 and Chapter 4.4 of the manual address in-house professional services (IHPS), noting that approved organisations must seek NZTA Waka Kotahi approval under section 26 of the LTMA to use IHPS, and that this should be reflected in their procurement strategy.

Council notes that for smaller councils, the practical barriers to expanded IHPS are significant. The cost of recruiting and retaining qualified transport engineers and planners in a competitive labour market is substantial, and the risk of under-utilisation during periods of lower activity makes permanent staffing difficult to justify on a value-for-money basis. Council is actively considering how to expand IHPS capability as part of its strategy review, but this will require investment and time.

Council requests that the amended manual and associated guidance provide more specific recognition of the challenges facing smaller councils in this area, and that the approval process for IHPS be as streamlined as possible to avoid creating an additional procedural barrier to councils seeking to make the transition.

### ***Contract Bundling Signals and Local Market Sustainability***

Amendment 6 signals a direction toward unbundling and multiple smaller contracts. While Council can see the rationale for this approach in terms of opening the market to a broader range of suppliers and encouraging competition, there are risks for local market sustainability in smaller districts that warrant careful consideration.

In rural districts like the Manawatū, the local contractor market is already limited. Unbundling contracts into smaller parcels may not increase competition if the result is that national contractors, who can compete on multiple small contracts simultaneously, displace local firms who lack the capacity to tender for many individual contracts. Conversely, for some categories of work, smaller contracts may suit local operators who cannot resource large-bundled contracts.

Council recommends that NZTA Waka Kotahi provide explicit guidance in the manual (or accompanying guidance notes) on how approved organisations should undertake market analysis to determine the appropriate level of bundling or disaggregation for their specific district context. The current manual discusses this in general terms but does not provide sufficient practical direction for smaller organisations.

### ***Broader Outcomes and Sustainability***

Council notes that the manual references Broader Outcomes (Government Procurement Rule 16) and the requirement for approved organisations to consider how procurement activities can contribute to the Government's priority outcomes. MDC is committed to sustainable procurement and to contributing to the district's economic, environmental and social outcomes through its procurement decisions.

However, Council notes that the manual's treatment of Broader Outcomes remains relatively high-level and does not provide detailed guidance on how approved organisations should operationalise these requirements in practice particularly in relation

to balancing Broader Outcomes considerations against cost and value-for-money obligations. For a small council with limited procurement resources, more practical guidance in this area would be welcomed.

Council would specifically welcome guidance on how to give weight to support for local and regional suppliers, a matter of importance to the Manawatū economy, within the constraints of the manual's non-discrimination requirements and the requirement to enable fair competition

### **Conclusion**

MDC is supportive of the general direction of Amendment 6 to the NZTA Waka Kotahi Procurement Manual. The strengthened value for money framework, the signal toward earlier market engagement, and the continued emphasis on strategic procurement planning are all consistent with MDC's own approach and priorities. Our submission has highlighted a number of areas where additional guidance, transition support or clarification would assist smaller approved organisations to implement the amended manual effectively.

MDC thanks NZTA Waka Kotahi for the opportunity to submit on Amendment 6 and looks forward to ongoing engagement on the finalisation of the amended manual.

MDC does not wish to speak to this submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Shayne Harris', with a stylized flourish at the end.

Shayne Harris

**Chief Executive**

## **Manawatū District Council responses for questions relating to Statistics New Zealand Implementing an infringement scheme (use of fees and fines) to support their mandatory data requests consultation**

### **Question 1**

**Do you agree that the most appropriate use of infringement offences is when there is an ongoing issue with non-compliance and other tools have already been used? Why? Why not?**

Council supports the collection of high-quality statistical data and recognises its importance in informing decision-making at both local and national levels.

Council also acknowledges that the Data and Statistics Act 2022 establishes a clear legal obligation to provide requested data, and enforcement mechanisms have a role in upholding this requirement.

Council agrees with the consideration that infringement offences should be used as a last resort, where there is clear evidence of ongoing non-compliance and where other engagement tools have already been exhausted. A graduated approach supports fairness, encourages voluntary compliance, and helps maintain constructive relationships between agencies and respondents.

### **Question 2**

**Do you agree that infringement offences should apply to respondents who deliberately avoid their obligation to provide information? Why? Why not?**

Council acknowledges that where individuals or organisations deliberately avoid their obligations, the use of infringement offences may be appropriate.

However, Council emphasises that discretion should be applied, and infringement should not be used in cases where non-compliance is due to lack of understanding, capacity, or genuine barriers. Care should also be taken to avoid reinforcing mistrust in government agencies.

### **Question 3**

**Do you have other suggestions about how we can make sure infringement offences are used consistently across collections and cases of non-compliance?**

Council recommends the development of clear, transparent guidelines outlining when and how infringement offences will be applied. These guidelines should ensure consistency across collections and cases, and should be supported by a framework that considers the underlying reasons for non-compliance. Understanding barriers to compliance will be critical to ensuring appropriate and proportionate responses.

#### **Question 4**

**Do you have other suggestions about how we can make sure infringement offences are used fairly and equitably?**

Council supports the implementation of regular monitoring and reporting mechanisms to assess the application of infringement offences to ensure that particular regions, sectors, or communities, including vulnerable or marginalised groups, are not disproportionately impacted.

#### **Question 5**

**Given the offence involved, do you think the proposed fee and maximum fine amounts are reasonable? Why? Why not?**

Council considers that fee levels should be proportionate to the nature of the offence and sufficient to act as a meaningful deterrent.

While recognising the need to encourage compliance, Council emphasises that penalties should remain reasonable and be applied with discretion, particularly where there are barriers to compliance.

#### **Question 6**

**In your view, do the proposed fee and maximum fine amounts provide a credible deterrent? Why? Why not?**

In Council's view, fines are likely to act as a deterrent where there is deliberate or repeated non-compliance. However, they are less likely to be effective where non-compliance arises from privacy concerns, lack of understanding, or inability to provide the information.

#### **Question 7**

**What other costs or benefits do you think could result from introducing infringement offences?**

Council notes that potential benefits include increased compliance, improved data quality and stronger evidence to support decision making.

However, there may also be unintended costs, such as increased administrative burden, potential strain on relationships between agencies and respondents, and the risk of further disengagement from communities with existing mistrust of government.

#### **Question 8**

**Do you have any other feedback about how we propose to use infringement offences?**

Council recommends that clear processes and expectations be established in advance, including engagement with local government, to ensure transparency and avoid unintended consequences. This will be particularly important as data requirements evolve with the changing to an admin-first based census.

# Manawatu- Whanganui Intersection Speed Zones

NZ Transport Agency Waka Kotahi speed limit review

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## Your response and privacy:

The information you have provided in this form will be made publicly available (with the exception of any personal information that could be used to identify an individual person such as names, contact details and physical addresses) and will be used by NZ Transport Agency Waka Kotahi (we/us) to gain feedback, write our consultation report, and to meet the consultation requirements for Manawatū - Whanganui Region: Intersection Speed Zones (ISZs) as set out in the Land Transport Rule: Setting of Speed Limits 2024.

Any personal information you provide might legally need to be disclosed to third parties if subject to a request under the Official Information Act 1982 (or as otherwise required by law). If your feedback is commercially sensitive or you do not want it disclosed, please let us know. Under the Privacy Act 2020 you have the right to know what personal information we hold about you. You can read more about how we handle your information on our [website \(https://www.nzta.govt.nz/about-us/public-consultation-hub/how-we-protect-yourinformation/\)](https://www.nzta.govt.nz/about-us/public-consultation-hub/how-we-protect-yourinformation/) or contact us at [info@nzta.govt.nz \(mailto:info@nzta.govt.nz\)](mailto:info@nzta.govt.nz)

## Note on use of AI in analysing feedback

To help us analyse the feedback we receive through this consultation, we may use artificial intelligence (AI) tools. These tools can assist us in identifying common themes and summarising responses more efficiently. Any use of AI will follow our privacy and data protection standards, and your feedback will always be reviewed by our team to ensure fair and accurate reporting.

## Please tell us some information about you:

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Your name Required

Shayne Harris

Your email Required

**Would you like to receive email updates on speed reviews and their outcomes (including these reviews)?**

- Yes
- No

**How did you hear about this speed review?**

- Radio advert
- Flyer was delivered to my mailbox
- Advert in the newspaper
- Online advert
- Other (please specify)

Website

**Which of the following state highway sections would you like to comment on? Required** We will then ask you to provide feedback on all of the sections you selected.

- SH1/Himatangi Beach Road ISZ - north of Foxton**
- SH1/Kakariki Road ISZ - south of Marton
- SH57 (Makerua Road)/SH56 (Opiki Road) ISZ - northeast of Shannon
- SH54 (Milson Line) /Newbury Line ISZ - northwest of Palmerston North**

ISZs slow traffic to 60km/h when vehicles approach an intersection. Approaching traffic is detected, and the electronic signage shows the temporarily lowered legal speed limit for the state highway, changing the normal speed limit of 100km/h (or 80km/h) to a temporary speed limit of 60km/h while the ISZ is operating (i.e. when traffic is approaching or at the intersection). ISZs make it safer for people to pull into or out of a side road onto a busy state highway, or turn from the busy highway onto a side road.

Your input will help inform the decision on whether to proceed with the ISZs at these intersections.

**SH1/Himatangi Beach Road ISZ**

**SH1, either side of the intersection with Himatangi Beach Road**

**Approximate length: 0.32km**

**Current speed limit: 100km/h (70km/h existing ISZ)**

**Proposed new speed limit: 60km/h when ISZ is activated**

**What is your connection to this road? Required**

- I use this road to travel through, but I don't live locally
- I use this road mostly for local travel and I live, work or go to school in the area
- I am a professional driver using this road to transport passengers, goods or freight
- I'm authorised to represent an iwi, rū nanga, hapū , stakeholder organisation, council
- I use this road to access sites I have a whakapapa connection to (maunga, awa, marae, urupā or wā hi tapu)
- Other (please specify)

Local government

**Where do you live? Required**

- Himatangi Beach
- Foxton
- Sanson
- Horowhenua District
- Other (please specify)

**What do you think of the proposed intersection speed zone? Select one or both options Required**

- I can see benefits in the proposal
- I have concerns about the proposal

**Why do you think this? Please click all the options you think apply Required**

- People won't comply with the ISZ
- Will mean longer travel time
- Will give more time to make decisions
- Improved safety for everyone using the road
- Safer and easier to turn at the intersection
- Will result in fewer crashes with reduced injury severity and near misses

**Do you have any other comments about the proposal? Please tell us in your own words**

MDC raises no objection to the reduced speed limit and notes road users would not require a lot of adapting to these changes.

## SH54 (Milson Line) / Newbury Line ISZ

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**SH54, either side of the intersection with Newbury Line**

**Approximate length: 0.36km**

**Current speed limit: 100km/h**

**Proposed new speed limit: 60km/h when ISZ is activated**

**What is your connection to this road? Required**

- I use this road to travel through, but I don't live locally
- I use this road mostly for local travel and I live, work or go to school in the area
- I am a professional driver using this road to transport passengers, goods or freight
- I'm authorised to represent an iwi, rū nanga, hapū , stakeholder organisation, council
- I use this road to access sites I have a whakapapa connection to (maunga, awa, marae, urupā or wā hi tapu)
- Other (please specify)

Territorial Authority

**Where do you live? Required**

- Palmerston North
- Newbury
- Bunnythorpe
- Manawatū District**
- Other (please specify)

**What do you think of the proposed intersection speed zone? Select one or both options**  
Required

- I can see benefits in the proposal**
- I have concerns about the proposal**

**Why do you think this? Please click all the options you think apply** Required

- Will mean longer travel time
- People won't comply with the ISZ
- Will result in fewer crashes with reduced injury severity and near misses
- Will give more time to make decisions
- Improved safety for everyone using the road
- Safer and easier to turn at the intersection

Manawatū District Council (MDC) does not object to the proposal in principle. MDC notes that ISZs are already present at other intersections in the area, and the technology is therefore not an unfamiliar road safety intervention for users of this network. The activated speed reduction can reasonably be expected to be understood and observed by road users once the ISZ is operational.

MDC also observes that the SH54 / Newbury Line intersection does not lend itself to easy circumvention by road users seeking to avoid reduced travel speeds; suitable alternative routes are not readily available. Accordingly, MDC considers the risk of displacement traffic generating an unintended increase in crash frequency on the surrounding local or state highway road network to be low.

MDC wishes to draw Waka Kotahi's attention to a question of network consistency that it considers warrants further consideration. The proposed ISZ on SH54 / Newbury Line is set at an activated speed of 60 km/h. However, the existing ISZ at the nearby SH54 / SH3 / Kairanga Bunnythorpe Road intersection currently operates at 70 km/h. Both ISZs are

located on the same state highway corridor and serve the same functional purpose of managing conflict risk at rural intersections. Road users travelling along SH54 would therefore encounter two ISZs on the same route activating at materially different speed thresholds, with no apparent operational or safety rationale articulated in the consultation documentation to justify the differential. MDC submits that consistency in activated speed limits across proximate ISZs on the same corridor is an important principle, both for driver comprehension and for the credibility of the speed management regime. Inconsistency between activated speeds without clear and documented justification, risks undermining road user confidence in the system and may reduce voluntary compliance.

MDC respectfully requests that Waka Kotahi review whether the activated speed limit of the existing SH54 / SH3 / Kairanga Bunnythorpe Road ISZ should be aligned with the proposed 60 km/h, or alternatively, that the rationale for maintaining a differential be clearly documented and communicated. MDC's preference is that the chosen activated speed limit across both ISZs on this corridor be made consistent.

**Do you have any other comments about the proposal? Please tell us in your own words**

**Please ensure you've answered all sections of the survey before clicking submit (including the different road sections in the tick list above, if there is more than one). Clicking submit will end your survey.**

**Submit**

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9 April 2026

Dr Sara McFall  
Head of Systems, Strategy and Performance  
The Water Services Authority Taumata Arowai  
Level 2, 10 Brandon Street  
Wellington 6140

Lodged via email to: [stormwater\\_wastewater@taumataarowai.govt.nz](mailto:stormwater_wastewater@taumataarowai.govt.nz)

Dear Dr McFall,

The Manawatū District Council (MDC) thanks the Water Services Authority Taumata Arowai (the “Authority”) for the opportunity to provide feedback on targeted amendments to the wastewater environmental performance standards (the “standards”).

While MDC generally supports the recommended amendments to the regulations that are detailed in the correspondence from the Authority, these changes alone fail to address all the concerns that MDC has with the proposed standards. MDC’s feedback therefore includes some matters that may be considered “out of scope” for this current consultation. However, MDC would like to continue to work with the Authority to see these other matters addressed via future amendments to the standards.

### **Support for the proposed technical amendments**

#### **Amendments to regulation 48 – Calculation of dilution ratio classes**

MDC supports the proposed amendments to the 7MALF formula in regulation 48 (treatment requirements for discharges to water).

In addition, MDC recommends that the exact methodology for calculating the 7MALF be documented in the regulations following discussion with the SIG Hydrology group. MDC considers that without such guidance being published, there is potential for the formula to be inconsistently interpreted and/or applied.

To ensure consistency between hydrological monitoring and discharge monitoring, MDC also recommends that all data be linked to New Zealand Standard Time and the hydrological year (July – June).

**Recommendations:**

1. That the proposed amendments to the 7MALF formula in regulation 48 be retained.
2. That the Authority develop a clear methodology for calculating the 7MALF in consultation with the SIG Hydrology group, and that this methodology be published in guidance that sits alongside the regulations.
3. That all data used for hydrological and discharge monitoring be linked to New Zealand Standard Time and the hydrological year (July-June).

**Regulation 93 - Risk and Site Capability Assessments for discharge of treated wastewater to land**

MDC understands that the Authority is proposing to amend the discharge to land standards to provide that risk and site capability assessments relate to the time period when the discharge is occurring. MDC supports this change. However, MDC has some broader concerns with the overall approach taken in the standards to manage discharges to land.

Based on the initial consultation material, MDC understands that the intent was for the wastewater standards to facilitate or encourage the discharge of treated wastewater to land where possible, due to cultural and environmental benefits relative to direct river discharges. As the Authority is aware, MDC operates a dual discharge from its Manawatū Wastewater Treatment Plant in Feilding. While MDC is unable to discharge to land all year round, due to seasonal weather variations in rainfall and temperature and the impact on soil conditions, the irrigation season between November and March has significantly improved water quality and periphyton risk as low flow, high risk periods are avoided. MDC therefore agrees with the policy direction to enable land-based discharge of treated wastewater.

As land discharges are not common within New Zealand, MDC understands that there is limited information on which to base the regulations, especially in comparison to river discharges. MDC is concerned that as a result of limited information, the requirements that apply to land based disposal within the standard are overly conservative. Due to this conservatism, MDC is of the opinion that the intent of this policy direction will not be fully realised, and the uptake of land-based disposal options will be less than forecast. Council is aware that since the wastewater performance standards have been published, both the Palmerston North City Council and Rangitikei District Council have removed land disposal options from their consenting programs due to the perceived barriers / risk.

**Recommendations**

1. That future amendments to the regulations consider whether the standards are achieving their policy intent of encouraging land-based discharge over discharges to water.

AND

2. That the Authority work with MDC and the wider sector to amend the regulations to better facilitate land-based disposal and dual discharge systems.

**Regulation 93 Determination of site classification category: slow-infiltration discharge**

- (1) *The person carrying out a site assessment must determine the site classification category for a site with slow-infiltration discharge in accordance with this regulation.*

Regulation 93 requires a site to be classified based on six factors. These factors are assessed independently from one another. For example, five of the factors could result in site being classified as “category 1” but if one factor is classified as “category 5” the site is considered unsuitable for land disposal. Due to the array of factors there is a high probability that at least one factor will have a low grading. The matrix appears to be based around defining the optimal land disposal option. If the intent is to encourage wastewater operators to discharge to land, Council encourage the Water Service Authority to review this section to be more inclusive as ideal circumstances are not always feasible. As detailed above both Palmerston North and Rangitikei have excluded land discharge options from future plans due to the limitations imposed.

While the land that Manawatū District Council utilise for irrigation is not considered suitable under the standards matrix, wastewater has been successfully discharged to land for seven seasons. Both groundwater and surface water monitoring data has been independently reviewed to confirm that there is no evidence that the land disposal is having an adverse effect on the environment – in fact quite the opposite is true.

It is recommended that the Water Service Authority consider adding a clause similar to clause 92(8) to regulation 93. This would allow a more balanced assessment of the land suitability rather than discounting land disposal due to one factor.

In the event that the site is still classified as “Land Class 4” under table S91(2), the site should not be automatically excluded from the standards. It is recommended that a suitably qualified and experienced person (SQEP) should be required to determine the suitability of the land and recommend a suitable Land Class based on conditions of the site, discharge regime, additional mitigation and available evidence.

MDC remains committed to its dual discharge regime and has advocated for the standards to support such treatment regimes being constructed in other communities. However, we remain concerned that the current discharge to land requirements, including the risk and site capability assessment requirements, effectively encourage operators to discharge to water rather than land. For this reason, MDC encourages the Water Service Authority to review the land discharge section as a matter of urgency.

**Recommendation:**

1. That the Authority review the land discharge section of the regulations as a matter of urgency.

**Other Feedback on the Wastewater Performance Standards**

MDC requests that the Authority consider the following feedback that relates to other sections of the regulations. While potentially outside of the scope of the proposed technical amendments being consulted on currently, MDC recommends that this feedback be addressed through future amendments to the wastewater performance standards. MDC welcomes any further discussion with the Authority regarding these matters.

**Part 3 Discharge from Wastewater Treatment Plants into Water**

**S40 Application of this Part**

*S 40 (2) (2) However, the standards set out in this Part do not apply—*

- (a) to the discharge of treated wastewater if the wastewater is sourced only from producers of industrial and trade waste; or*

To improve treatment and management efficiencies, MDC is in the process of separating trade and industrial waster streams from domestic wastewater. Clarification is sought to determine if a domestic proportion needs to be mixed with the commercial waste stream for it to be covered under this standard. This appears to be an unintended consequence.

**Recommendation**

1. That the Authority clarify whether domestic wastewater must be mixed with industrial and trade waste for it to be covered under regulation 40.

**S 47 Classification of rivers into dilution ratio classes**

- (1) If an application under [regulation 46](#) is to discharge wastewater into a river, the application must specify the river's dilution ratio class.*
- (2) The dilution ratio class must be one of the following:*
  - (a) high dilution:*
  - (b) moderate dilution:*
  - (c) low dilution:*
  - (d) very low dilution.*

Issue 1 - Step Change between dilution categories

MDC is concerned about the significant differences/steps in the treatment requirements that apply across the different dilution categories. The current dilution thresholds mean that the same level of treatment quality applies to a discharge with a dilution ratio of 200,

as a discharge with a dilution ratio of 50. For reasons of affordability, Council requests that the Water Service Authority consider how the categories can be replaced with a linear formula.

The benefits of a linear relationship are as follows:

- It allows operators to set a balance between treatment requirements and dilution,
- Operators are encouraged to increase the dilution ratio when moving an entire dilution category is not possible
- A formulae drives transparency. This is currently missing as the limits for different dilution categories are inconsistent (see point 2).
- Simplifies the standards as there will be one category rather than four.
- Address the inconsistencies between dilution categories

This would increase transparency as it would link the quality standard to the target in river quality. This consistency and transparency is lost under the current wording of the performance standards due to the step changes.

**Recommendation**

1. That the Authority develop a linear formula for treatment requirements at different dilution thresholds.

Issue 2 - Inconsistency in effluent quality standards

With the exception of E.coli, the effluent quality standards are inconsistent. When you divide the standards by the minimum dilution requirements for the low, moderate and high dilution categories the results should be identical if the same outcome is intended. As shown in Table 1 below, in general, the level of treatment required increases as dilution increases. MDC encourages the Authority to implement a further review to create consistency between categories.

**TABLE 1: RECEIVING ENVIRONMENT CONCENTRATIONS AFTER COMPLETE MIXING**

Parameter	Stats	Low	Moderate	High
cBOD5	median	1	0.3	0.08
	90th	2	0.6	0.16
TSS	median	1	0.3	0.12
	90th	2	0.6	0.24
Ammonia	90th	0.1	0.06	0.1
T Nitrogen	median	0.5	0.2	0.14
T Phosphorous	median	0.1	0.1	0.04
E.coli	90th	65	65	65

If the concentrations for low dilution are considered appropriate then MDC suggests that those effective concentrations should also be deemed appropriate for moderate and high

dilution. For clarity, where there is a change, the actual limits have been included in brackets (See Table 2 for details). Given the inconsistencies, clarification is required.

**TABLE 2: ADOPTING A CONSISTENT APPROACH**

Parameter	Stats	Low	Moderate	High
cBOD5	median	10	50(15)	250(20)
	90th	20	100(30)	500(40)
TSS	median	10	50(15)	250(30)
	90th	20	100(30)	500(60)
Ammonia	90th	1	5(3)	25
T Nitrogen	median	5	25 (10)	125(35)
T Phosphorous	median	1	5	25(10)
E.coli	90th	650	3250	16250

As these effluent quality standards are used as part of the periphyton adjustment, the inconsistencies in quality for different dilution ratios are compounded when the limits are adjusted for periphyton risk. This is especially significant when looking at total phosphorous limits. For instance, the total phosphorous concentration after full mixing for “high dilution low risk” is lower than the “low dilution high risk.” Insufficient justification has been provided for these differences.

While Council concurs with the effective phosphorous concentration after full mixing reducing in relation to risk, the dilution category is irrelevant in relation to preventing periphyton growth (see Table 3 for details). MDC requests further clarification as to how the respective limits were derived, given the apparent inconsistencies in the approach.

**TABLE 3: PHOSPHOROUS CONCENTRATIONS AFTER FULL MIXING AND PERIPHYTON RISK GRADING APPLIED**

Total Phosphorous	Low risk	Medium Risk	High Risk	Very High Risk
Low	0.1	0.07	0.05	0.025
Moderate	0.06	0.02	0.01	0.005
High dilution	0.04	0.02	0.004	0.001

**S69 (3)(a) Periphyton risk assessment: mandatory considerations**

- (a) first, determining the overall risk of excess periphyton establishment and growth;  
and

If the intent of the wastewater Environmental Performance standards is to create consistency, a clear definition of what constitutes excess periphyton establishment and growth is required.

In addition to the defining what excess periphyton is, the assessment should assess the effect of the discharge and proposed discharge regime.

**Recommendations:**

1. That a definition of “excess periphyton establishment and growth” be added to the regulations.
2. That the Authority amend regulation 69(3)(a) as follows: (additions underlined)  
(a) first, determining the overall risk of the proposed discharge causing, or contributing to, excess periphyton establishment and growth;
3. That the periphyton risk assessment also considers the effect of the discharge and the proposed discharge regime.

**S70 Periphyton risk categories**

*The person or consent authority preparing the periphyton risk assessment must determine that the overall periphyton risk category is one of the following:*

- (a) low risk:  
(b) medium risk:  
(c) high risk:  
(d) very high risk.

In order to create consistency the low, medium, high and very high risks need to be defined. Without this clarification there will be an inconsistent approach in how periphyton risk is assessed. Ideally a SQEP should be involved with developing a consistent approach or methodology for periphyton risk assessments, and this approach specified in the standards, or associated guidance.

**Recommendation:**

1. That the Authority engage a suitably qualified and experienced person to develop an approach/methodology for determining overall periphyton risk and that this be documented in the standards or associated guidance.

### **S68 Application for resource consent must include periphyton risk assessment**

*(5) A consent authority that receives an application under subclause (1) must review the periphyton risk assessment as part of deciding whether to grant the resource consent.*

For every application to discharge into a hard bottomed waterway, **three** SQEP are required to review the risk assessment. If there is uncertainty regarding how risk is to be determined, there could be three different opinions. This will lead to significant costs to the applicant and delay decisions from occurring. Where there are disagreements of this nature, the consenting authority typically defers to their expert. Due to the wording of the standards consenting authorities may use this to significantly increase treatment requirements.

### **Periphyton Implementation Material**

While the performance standards are silent on the need for a multidisciplinary team to assess periphyton risk, there is reference to this in the implementation material. With wastewater treatment and cultural advisors being involved with the QMRAs it appears that the scope of periphyton risk assessment is being expanded. If the intent of the assessment is to determine the risk of excessive periphyton growth, MDC considers that the expertise and experience should be limited to this area of expertise. Clarification is required around the use of multidisciplinary team to complete the Periphyton assessment so as to ensure that the requirements are reasonable and do not add unnecessary cost.

### **Recommendation**

1. That each periphyton risk category is clearly defined in the standards or associated guidance.

AND

2. That the authority reconsider the need for a second SQEP to review the periphyton risk assessment, given that the regulations require that the consent authority completes their own risk assessment.

### **s71 Alternative nitrogen and phosphorus discharge concentration limits**

*(4) (a) (ii) If the river's dilution ratio class under [regulation 47](#) is moderate dilution, the discharge concentration limits are as follows:*

*(a) if the discharge is classified as low risk,—*

*(ii) the annual median concentration of total phosphorus must not exceed 3 milligrams per litre of wastewater:*

Under each dilution category, the TN and TP limits where the periphyton risk category is low are the same as the “default” limits set out in Regulation 49, with the exception of the TP limit in regulation 71(4)(a)(ii) for discharge in the moderate dilution category. This inconsistency seems to be in error and should be corrected to be consistent with S49(4)(g).

The original phosphorous limit for Total phosphorous in the consultation document was 3mg/l. However, through the consultation period this was increased to 5mg/l. It appears this amendment has not been carried through to the periphyton risk assessment.

Increasing the phosphorous limit to 5mg/l for low risk moderate dilution category is consistent with the “low dilution” limit of 1mg/l as it results in 0.1mg/l ( $5/50 = 0.1$ ) after complete mixing.

**Recommendation:**

1. That regulation 71(4)(a)(ii) be amended as follows:

“The annual median concentration of total phosphorus must not exceed ~~3~~**5** milligrams per litre of wastewater”

**S74 Application for resource consent**

- (1) *An application for a resource consent to discharge wastewater in the circumstances set out in [regulation 72](#) must—*
  - (a) *be for a consent under which the consent holder would be permitted to discharge wastewater into a river only during a time period specified in the consent, but at all other times would be required to discharge the wastewater to land, store the wastewater, or manage it in another way (a **time-based consent**); and...*

MDC currently irrigates treated wastewater from the Manawatū WWTP in Feilding to land between November and March inclusive. With the exception of storm events, this discharge regime limits the “time period” for the risk and site capability for discharge to land sites to April – October inclusive. MDC considers that the same rationale should be applied to the “relevant period” that the mixed discharge regime 7MALF is calculated based on. That is, MDC requests that the Authority clarify that if the same discharge regime is retained, the 7MALF is calculated based on the months of April to October. This will achieve the intent of defining the likely low flow conditions during the “time period”.

MDC recommends that the following definitions of “time period” and “exclusion period” be included in Section 42 (Interpretation)

- “Time period” – River discharge not restricted, 7MALF calculated based on this time period.
- “Exclusion period” - No river discharge occurs when river flows are below the amended 7MALF. Discharging during high flow events during this period are still permitted

In MDC’s opinion, the low flow conditions during the “exclusion period” are not relevant in relation to calculating the 7MALF, as a river discharge will be prevented during these conditions. During storm events however, river discharges should still be permitted during the exclusion period as these discharges will coincide with conditions where the flows are significantly above the “time period” 7MALF. Given the higher flows during

storm events, river discharges during this period will have no impact on the likely minimum dilution.

**Recommendations:**

1. That Section 42 be amended to include definitions of “time period” and “exclusion period.” Suggested wording for these definitions is above.
2. That the calculation of the 7MALF excludes that period of time when no river discharge occurs.

**S77 Sampling**

*A wastewater treatment plant must comply with the following sampling, testing, and record-keeping requirements:*

- (a) *if the plant is not a small wastewater treatment plant and it services a community of 10,000 or more people, it must implement a system to ensure that,—*
  - (i) *at least once each day, it samples the treated wastewater; and*

A community with 100,000+ people has significantly more resources than a community with 20,000. To reduce the monitoring burden and lower costs for moderate-sized communities, MDC recommends that additional sampling frequency categories be added to the standards (i.e. 10,000-25,000 & 25,000 – 50,000).

**Recommendation:**

1. That regulation 77 (Sampling) is amended as follows:
  - (a) *if the plant is not a small wastewater treatment plant and it services a community of 10,000 or more people, it must implement a system to ensure that it samples the treated wastewater at the following frequencies,—*
    - ~~(ii) — at least once each day, it samples the treated wastewater; and~~
    - (i) <10,000 every two weeks
    - (ii) 10,000 – 25,000 Once a week
    - (iii) 25,000 – 50,000 once each work day (Mon-Fri)
    - (iv) >50,000 Once each day

**s82 Reporting requirements: wastewater treatment plants**

- (5) *The consent holder must ensure that an annual report—*
  - (a) *is reviewed by an independent and suitably qualified person; and*
  - (b) *includes a statement from that person verifying the contents of the report.*

S82 (5) requires a independent suitably qualified person to review the annual report and verify its contents. As the contents in the annual report are “factual” and not ones “opinion” the need for this additional expenditure is questionable. There is limited value in requiring an independent SQEP to confirm that the required quality and discharge volume standards have been achieved when it is an achieved or not achieved scenario.

**Recommendation:**

1. That regulation 82 be amended to require an independent review of the annual report by an independent SQEP only if compliance has not been achieved.

AND

2. That any review be limited to the proposed amendments for the purpose of concluding if they are going to be sufficient to address the identified non-compliances.

**S89(3) Resource Consent Applications**

*The application may propose that the resource consent be granted subject to conditions that will alter the risk assessment or site classification undertaken for the purpose of the site assessment carried out under regulation 90*

To avoid potential conflicts, at the application stage, MDC seeks working examples of how specific conditions might change the risk assessment / site classification.

The Manawatū District Council again thanks the Water Service Authority Taumata Arowai for the opportunity to provide feedback on technical amendments to the wastewater performance standards. We welcome any further conversations with the Authority in relation to any of the matters raised in this feedback.

Yours sincerely,



Shayne Harris

**Chief Executive**

15/04/2026

Committee Secretariat  
Justice Committee  
Parliament Buildings  
Wellington

## **Submission from the Manawatū District Council on Data and Statistics (Census) Amendment Bill**

Dear Members of the Committee

Manawatū District Council (MDC) thanks the Justice Select Committee for the opportunity to submit on the Data and Statistics (Census) Amendment Bill.

MDC has concerns that a complete move towards an admin-first Census will mean that districts like ours may no longer have reliable data to inform significant planning and decision-making. MDC uses census population counts and demographic breakdowns to underpin our Long-Term Plan (LTP) and infrastructure strategies. MDC further relies on this data when applying for central government funding and when supporting community groups with funding applications. In addition, Stats NZ data is used in policy development—for example, when reviewing the smokefree policy, we analysed smoking rates across demographics to identify priority groups.

The admin-first Census approach assumes that people interact consistently with government systems. There is a significant risk that those experiencing digital exclusion will be left out of this approach. It will be important for government to actively support participation from individuals who have limited or no engagement with digital or administrative systems, and to ensure appropriate mechanisms are in place to enable their inclusion.

An admin-first Census is more reliable in countries that use a unique identifier that follows individuals across government agencies. New Zealand does not currently have such a system. MDC therefore has concerns about an increased risk of misidentification where names differ across organisations. Developing a secure national unique identifier before moving to an admin-first Census would help reduce this margin of error.

MDC also has concerns about the potential expectation that local authorities may need to supply additional data to central government. This could result in increased costs, including staff training and changes to existing data collection practices. For example, MDC does not currently collect ethnicity data, as we rely on census data as best practice. If required to collect this information, issues may arise under the Privacy Act 2020 regarding what councils can collect to properly undertake their functions. There is

also a risk of eroding public trust if communities perceive MDC as sharing their data with central government.

MDC also notes that, since the COVID-19 pandemic, there appears to be a growing reluctance among some parts of the population to engage with government agencies, including local government.

There is a real risk that the expected savings from discontinuing a full Census will not materialise, particularly within the next 5–10 years, and MDC is not convinced that the necessary improvements can be achieved within the proposed timeframes. While the Census was historically a well-respected process with high participation rates, this is no longer consistently the case for all groups. MDC considers that effort should be directed toward rebuilding trust and improving participation, rather than removing the Census in its current form.

MDC has a genuine concern about the accurate representation of smaller population groups within our district. Under the proposed approach, these groups may not be reliably captured until at least 2031, if at all. This could result in reduced funding for certain communities and a misunderstanding of the district’s demographic reality. MDC is particularly concerned that an admin-first model will disproportionately impact iwi, Māori, Pacific, disabled, rainbow, and other smaller or more mobile communities. These are the communities that most need high-quality data to identify and monitor inequities. Without a full Census, iwi affiliation data is likely to degrade quickly, with no alternative population-wide source currently available. We also note strong calls from Māori data experts for investment in iwi-led data systems and indigenous data sovereignty, rather than increased reliance on fragmented government administrative records.

MDC is unsure whether administrative data will produce accurate Māori descent counts and iwi affiliation. Individuals may be hesitant to share whakapapa information with agencies that do not clearly explain why it is required. Additionally, some government forms do not include comprehensive iwi options, which risks under-representation of smaller or less well-known iwi. Administrative data sources also have gaps for people born overseas.

This data is critical for:

- Determining Māori electoral populations and electorates
- Māori health and education planning
- Local partnership and relationship agreements
- Local service planning and investment

MDC also notes that the unhoused community often has a high level of reluctance to engage with government agencies. Relying on community services to provide this data to Statistics New Zealand may erode the trust these services have built. It is also important to recognise that many of these services have experienced recent reductions in central government funding.

To accurately understand the extent of homelessness, MDC considers that dedicated roles would need to be established to collect this data directly. These roles would need to build and maintain trust with the unhoused population over time.

MDC sees merit in retaining a full Census for at least one or two further cycles, alongside the development of administrative data methods. This would allow for benchmarking and validation of administrative data, identification of biases, and a smoother transition. It would also provide a crucial quality assurance mechanism and help maintain public trust in both the electoral system and the wider data system. MDC reiterates that a nationwide Census in 2028 remains the most reliable way to obtain essential population data in the short to medium term.

Yours sincerely,



Michael Ford  
**Mayor**

17 April 2026

Rt Hon Christopher Luxon  
Minister for National Security and Intelligence  
Department of the Prime Minister and Cabinet  
Parliament Buildings  
Wellington 6160

Emailed to: [criticalinfrastructure@dpmc.govt.nz](mailto:criticalinfrastructure@dpmc.govt.nz)

Dear Prime Minister

The Manawatū District Council thanks the Minister for National Security and Intelligence for the opportunity to provide feedback on the discussion document titled “Enhancing the cyber security of New Zealand’s Critical Infrastructure System.”

MDC considers that drinking water and wastewater services are among the most critical infrastructure services, given their direct impact on public health, environmental protection, and the functioning of communities and local economies.

MDC generally supports the intent of the proposed measures to improve cyber resilience across critical infrastructure. However, MDC considers that their effectiveness will depend on being implemented in a risk-based and proportionate manner, with clear guidance, alignment to existing frameworks, and recognition of the capacity constraints facing smaller councils.

### **Introduction**

MDC’s critical infrastructure consists of extensive roading and three waters networks, which underpin essential service delivery across a largely rural district. The Council is responsible for approximately 1,368 kilometres of roads (including both sealed and unsealed), supported by associated assets such as bridges, culverts, and footpaths. Its water supply network extends over 326 kilometres of mains and includes multiple treatment plants, while wastewater services are delivered through a district-wide network of pipes and treatment facilities servicing key settlements. MDC is progressing a significant wastewater centralisation programme, which will consolidate treatment across the district into fewer, more efficient facilities, increasing reliance on interconnected digital and operational systems.

MDC’s infrastructure also supports regionally significant users, including RNZAF Base Ohakea, which relies on Council for water supply and discharges wastewater into the

centralised network, meaning disruption could have consequences beyond the district's resident population. These factors demonstrate that the scale of impact and level of risk associated with MDC's infrastructure are not adequately reflected by connection numbers alone, particularly where services are increasingly centralised and support critical regional assets.

MDC's critical infrastructure serves a population of approximately 34,000 residents (as at 30 June 2025). Approximately 52% of the population resides in Feilding, with the remaining 48% of the population living rurally or in our rural villages. MDC has elected to retain delivery of drinking water, wastewater, and stormwater services in-house as a dedicated water services business unit, reinforcing local control but also concentrating operational and cyber risk within Council-managed systems. Collectively, these roading and water services assets are fundamental to community outcomes, economic activity, and public health, and their scale, interdependence, concentration, and increasing digital integration highlight the importance of a risk-based approach to cyber security protections to ensure service continuity and resilience.

MDC notes the development of Te Utanganui inland port near the district boundary. While this infrastructure may be regionally significant, MDC's expectation is that cyber security responsibilities for such assets would appropriately sit with national operators (such as KiwiRail), rather than with territorial authorities.

#### **Parts of Council infrastructure that could be affected by a cyber attack**

MDC's water and wastewater infrastructure relies on a range of interconnected operational and information systems to monitor, control, and maintain essential services. These systems are increasingly digitally enabled and remotely accessed, which improves efficiency but also expands the potential cyber attack surface. The most critical and vulnerable components are operational technology systems, particularly telemetry and control systems that directly manage the delivery and treatment of water and wastewater.

The following systems are understood to be within scope of potential cyber impact:

- **Operational control systems**, including SCADA, telemetry, PLCs, and other remote monitoring and control technologies
- **Water infrastructure controls**, including treatment plant systems, reservoir controls, and pump station operations
- **Wastewater infrastructure controls**, including treatment plants and pump stations
- **Communications and access pathways**, including networks and remote access used by staff, contractors, and service providers
- **Supporting systems**, such as asset management, GIS, maintenance, outage, and incident response platforms that enable service continuity

- **Backup and recovery systems**, which are critical for restoring services following a disruption

Of these, telemetry and operational control systems represent the most direct pathway for service disruption if compromised. Other systems, such as corporate or administrative platforms, are generally of secondary relevance unless they are required to support incident response, customer communication, or service restoration.

While MDC has not undertaken a detailed technical assessment in this context, common vulnerabilities for local government infrastructure of this nature are well understood. These typically include:

- **Legacy systems**, particularly older telemetry or SCADA components that may not support modern security controls
- **Remote access risks**, including access by operators, vendors, or third-party support providers
- **Constraints on patching and updates**, particularly for operational technology where uptime requirements limit maintenance windows
- **Single points of failure**, especially within communications networks or centralised systems
- **Reliance on third parties**, including for hosting, monitoring, maintenance, or system support
- **Gaps in asset visibility**, including incomplete records of critical systems and their interdependencies
- **Unproven recovery capability**, where backup, recovery, and restoration processes have not been fully tested under realistic conditions

Addressing these risks requires a layered and proportionate approach to cyber security. Key areas for strengthening resilience include access controls (such as multi-factor authentication and privileged access management), network separation between IT and operational systems, improved monitoring and logging, robust patching practices where feasible, secure and tested backup arrangements (including offline or immutable backups), incident response planning and regular testing, and stronger assurance of third-party providers through contractual and operational controls.

MDC considers that the depth of cyber security controls should be proportionate to the consequence of failure, with higher expectations applied to systems that are centralised, lack redundancy, or present significant public health or environmental risk.

### **Thresholds for Critical Infrastructure**

MDC's drinking water and wastewater networks do not meet the proposed threshold of at least 25,000 connections. However, this threshold does not adequately reflect the importance of networks that serve concentrated urban communities such as Feilding, where a service outage could have significant public health, environmental, and

community impacts. As wastewater services become increasingly centralised in Feilding, the consequences of a cyber security failure are amplified, with the potential to disrupt services across multiple communities.

MDC considers that consequence of failure, rather than network size alone, is a more appropriate basis for defining critical infrastructure. A simple national threshold based solely on connection numbers risks excluding infrastructure that is regionally significant, highly centralised, or associated with high-consequence failure. This includes infrastructure that, while smaller in scale, plays a critical role in maintaining essential services and supporting economic activity.

MDC's infrastructure also supports regionally significant users whose importance is not captured by a connection-based threshold. RNZAF Base Ohakea, for example, relies on Council for water supply and discharges wastewater into the Sanson Centralisation Line, which ultimately conveys flows to the Manawatū Wastewater Treatment Plant. Disruption to these services could therefore have impacts beyond the district's residential population, reinforcing the need for a broader, consequence-based assessment of criticality. On this basis, MDC considers that it may fall outside the proposed thresholds while still representing infrastructure with significant regional and national consequence risk.

MDC acknowledges that its infrastructure may be of greater significance than a simple connection-based threshold would suggest. However, MDC is concerned that classification as critical infrastructure could introduce significant cost, capability, and compliance requirements that may be disproportionate to the scale and resourcing of a rural territorial authority.

The proposal would benefit from greater clarity on how it intends to account for factors such as concentration risk, reliance on single treatment or conveyance systems, lack of redundancy, and the potential public health and environmental consequences of service failure.

MDC considers that recognising infrastructure as critical does not necessarily mean that all associated cyber security obligations should be placed at the level of individual councils, particularly where capability and control sit more appropriately with national or system-level providers.

***Decisions sought:***

1. That rather than relying solely on a connection threshold, that the definition of critical infrastructure be replaced with a risk-based framework that considers factors such as service criticality, degree of centralisation, interdependencies, consequence of failure, and the presence (or absence) of redundancy.
2. That where smaller councils are captured within a risk-based definition of critical infrastructure, implementation requirements are scaled appropriately and supported to ensure compliance is achievable without disproportionate cost or capability uplift.

## Information Sharing and Reporting

MDC supports improved information sharing and situational awareness across the critical infrastructure system. Should local authority networks such as water supply and wastewater networks be classified as critical (such as under a risk-based approach), this will have implications for how councils manage cyber risk, and is likely to introduce additional reporting requirements, including for third-party service providers. To support practical implementation, MDC recommends:

- Alignment with and use of existing regulatory and reporting frameworks, to avoid duplication and unnecessary compliance burden
- Clear guidance and expectations for territorial authorities, particularly where infrastructure is regionally significant but below national thresholds
- A phased implementation approach, allowing councils time to assess gaps, prioritise investment, and build capability
- Clarity on the role of third-party providers, including shared responsibilities
- A proportionate approach to compliance, reflecting the scale, resources, and risk profile of smaller councils

This would help ensure that any new requirements improve cyber resilience outcomes without imposing disproportionate costs or duplicative obligations on local government.

MDC notes the proposed requirements for reporting cyber incidents, including the expectation to provide early notification within 24 hours and a full report within 72 hours. While MDC supports timely reporting, the ability for smaller councils to meet these timeframes will depend on the scope and level of detail required, particularly where incidents involve third-party systems or where information is still being verified.

MDC seeks clarity on the expected standards and processes for handling sensitive cyber incident information, including secure transmission methods and confidentiality requirements to ensure consistent practice across the sector. It is important that reporting mechanisms provide assurance that sensitive information will be protected to minimise security risks and avoid unintended reputational impacts, particularly where incidents are still being assessed or managed.

To support effective implementation, MDC considers that clear, nationally consistent guidance and assessment frameworks would be beneficial. This could include a decision-making matrix to assist councils in determining the significance of incidents and whether reporting thresholds have been met, similar to existing tools used for assessing notifiable privacy breaches. Such tools would support more consistent and efficient reporting without requiring significant additional capability at the local level.

MDC also notes that the extent of reporting and compliance requirements, including system capability and assurance expectations, may create additional cost pressures for councils. It is therefore important that the framework is designed to ensure equitable and consistent application across the sector, supported by clear benchmarks or maturity

expectations to avoid variability or unintended double standards between organisations of different scale and capability.

***Decisions sought:***

1. That implementation of cyber security requirements is proportionate to risk and council capability, avoids duplication with existing regulatory frameworks, and is supported by clear guidance, consistent benchmarks, and phased timeframes to manage cost and resourcing impacts.
2. That incident reporting requirements are supported by clear guidance, confidentiality protections, and standardised assessment frameworks, to enable consistent and practical implementation without imposing unnecessary additional costs on councils.

**Capability, cost, and allocation of responsibility**

MDC considers that the proposed framework, as currently framed, appears to be oriented toward larger, nationally significant infrastructure providers and may not adequately reflect the scale, capability, and resourcing constraints of rural and provincial councils.

For councils such as MDC, implementing and maintaining the level of cyber security capability implied by the proposed measures would require significant investment in specialist skills, systems, and ongoing operational support. Given the current level of organisational maturity across the local government sector, achieving and sustaining compliance would likely involve material and ongoing cost increases, which would ultimately be borne by ratepayers.

MDC also considers that the proposed approach places a significant portion of responsibility on infrastructure owners and operators, rather than on the technology and service providers that design, supply, and maintain many of the core systems relied upon by councils. This includes systems such as SCADA platforms, telemetry systems, and enterprise software (e.g. ERP and SaaS platforms), where there are a limited number of providers operating nationally.

In MDC's view, there is a strong case for placing greater emphasis on provider-level obligations, where capability, scale, and technical expertise are more concentrated. For example, requiring system providers to meet defined cyber security standards, monitor threats, and report vulnerabilities could deliver more consistent and cost-effective outcomes than expecting each individual council to develop equivalent capability independently.

MDC is also concerned about the potential future introduction of audit or assurance requirements. While not proposed in the medium term, such requirements are signalled as a possible future step. If implemented, these could impose significant additional costs on councils, particularly where external assurance is required. In a local government

context, these costs would ultimately be borne by ratepayers, which raises affordability concerns.

MDC notes that the proposed framework enables the Minister to specify additional measures as part of an entity's risk management programme, including requirements to address single points of failure. While improving resilience is important, meeting such expectations may require increased staffing, duplication of roles, or access to scarce specialist expertise, all of which carry significant cost implications for smaller councils.

This reinforces MDC's view that requirements of this nature are more appropriately directed at national-level system and service providers, where capability and resources are more concentrated, rather than at individual councils with limited scale and capacity.

In addition, MDC notes that the proposed regime includes significant penalties for non-compliance, including for relatively minor breaches. This reinforces the need to ensure that obligations are aligned with the level of control and capability that councils can reasonably maintain, particularly where systems and risks are shared with third-party providers.

***Decisions sought:***

1. That the framework gives greater consideration to the role of technology and service providers in managing cyber risk, including the potential for provider-level obligations to deliver more efficient and consistent outcomes across the sector.
2. That any requirements placed on councils are aligned with their scale and capability, and that compliance expectations, including any future audit requirements, are proportionate and affordable.

**Third-party services and assurance requirements**

MDC relies on a range of third-party providers to support the delivery, operation, and maintenance of its water and wastewater systems, including for software, telemetry, hosting, and specialist operational support. While Councils retain overall accountability as asset owners, delivery of cyber security outcomes is often dependent on third-party systems and providers. As a result, cyber security risk is not solely within Council's direct control but is shared across the systems and services that Council depends on. This raises questions about liability where cyber incidents arise from systems or services managed by third parties.

The proposed framework would benefit from greater clarity on how responsibilities are allocated where critical systems or services are delivered or supported by third parties. In particular, it is important that expectations placed on councils are aligned with the level of control they can reasonably exercise over external providers.

MDC also notes that any audit or assurance requirements relating to third-party systems must be realistic, proportionate, and affordable, particularly for smaller councils. Requirements that rely on extensive third-party certification, auditing, or contractual

enforcement may create significant cost and administrative burden, without necessarily improving cyber resilience outcomes.

**Decision sought:**

1. That Government provides clear guidance on the allocation of cyber security responsibilities between councils and third-party providers, and that any associated audit or assurance requirements are proportionate, practical, and aligned with councils' ability to influence and manage vendor risk.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Ford', written in a cursive style.

Michael Ford

**Mayor**

22 April 2026

Committee Secretariat  
Justice Committee  
Parliament Buildings  
Wellington

Submitted via: [Policing Amendment Bill - New Zealand Parliament](#)

Dear Members of the Justice Committee,

### **Submission from the Manawatū District Council on the Policing Amendment Bill**

The Manawatū District Council (MDC) thanks the Justice Committee for the opportunity to provide feedback on the Policing Amendment Bill (“the Bill”).

MDC supports the intent of the Bill and welcomes the proposed amendments to the Policing Act 2008. Council considers the Bill provides practical benefits by clarifying Police powers following recent legal developments and strengthening the enforcement tools available in public spaces. However, MDC considers it important that the expanded powers are accompanied by clear guidance, appropriate safeguards, and alignment with local government functions to ensure they are applied proportionately and maintain public confidence.

#### **Introduction**

Local authorities frequently encounter challenges in managing behaviour in public spaces, particularly where limited enforcement tools exist or are reliant on Police support. Issues such as non-compliant freedom camping, antisocial behaviour, and misuse of public spaces can be difficult to address effectively without clear and enforceable powers.

Council is often aware of locations where problematic behaviours occur but lacks the enforcement tools to respond effectively, particularly where compliance relies on voluntary behaviour or where there is limited ability to compel individuals to leave an area.

In this context, MDC recognises the importance of ensuring that Police have the necessary legislative authority to support public safety, maintain order, and assist councils in enforcing bylaws where appropriate.

#### **Clarification of Police Powers to Record Images and Sounds**

MDC supports the Bill’s intent to clarify the Police’s authority to record images and sounds in public places and in private places where they are lawfully present.

Council recognises that the recent legal uncertainty following the *Tamiefuna* decision has created operational challenges for Police. Clarifying these powers is appropriate, and Council acknowledges that the ability to collect and use information is a critical component of effective policing, including for prevention, investigation, and intelligence purposes.

However, MDC notes that the proposed provisions are broad, particularly in enabling:

- Recording of any image or sound in public places

- Ongoing or continuous recording for lawful purposes

While this may not be the intent of the Bill, the breadth of these provisions creates a risk that recording powers could be applied inconsistently or more widely than anticipated in practice.

Given the scope of these powers, MDC considers it important that clear operational guidance, appropriate safeguards, and strong oversight mechanisms are in place to ensure these powers are applied proportionately and with due regard to privacy. The breadth of the proposed provisions has the potential to impact public perceptions of privacy if not carefully managed in practice. Maintaining public trust and confidence will be critical to the effective use of these powers.

#### *Decisions Sought*

1. That the Committee recommends that clear guidance and safeguards be developed to support the consistent and proportionate use of recording powers.
2. That the Committee recommends that:
  - Operational guidance on the use of recording powers is publicly available.
  - The application of continuous recording powers is clearly limited to appropriate circumstances.
  - Oversight and accountability mechanisms are clearly articulated.

#### **Expanded Temporary Closure Powers**

MDC strongly supports the expansion of temporary closure powers to include a broader range of accessible areas, including parks, reserves, and other public spaces accessible by vehicle.

From a local government perspective, these changes are particularly beneficial. Councils often face practical limitations in managing high-risk or non-compliant behaviour in public spaces, particularly in areas where reliance is placed on voluntary compliance or where there is limited ability to intervene directly. The ability for Police to close areas where there is disorder, danger, or anticipated offending, to direct individuals and vehicles to leave those areas, and to enforce those directions will significantly strengthen the overall effectiveness of managing such situations.

These powers are likely to be particularly useful in locations such as:

- Freedom camping spots
- Areas experiencing antisocial behaviour
- Places where public safety risks arise quickly and require immediate response

#### **Enforcement and Compliance**

MDC supports the introduction of new enforcement mechanisms, including:

- The power to stop vehicles and direct occupants to leave closed areas.
- Infringement offences for failing to comply with directions.
- Powers to obtain biographical details for enforcement purposes.

These provisions address a key gap in current enforcement frameworks, where non-compliance is difficult to manage in practice. The ability for Police to take direct enforcement action will improve both compliance and deterrence.

The introduction of infringement offences is a proportionate response that enables enforcement without unnecessarily burdening the courts, while still providing a meaningful deterrent.

From a practical perspective, MDC notes that the effectiveness of these powers will depend on Police resourcing and operational prioritisation. In many cases, the ability to respond in a timely manner will determine whether these powers can be meaningfully applied. Ensuring that Police are adequately resourced, particularly in rural areas and outside standard operating hours, will be important to achieving the intended outcomes of the Bill.

### **Interface with Local Government Functions**

MDC considers that, in practice, the effectiveness of these powers will depend on how they interface with local authority bylaws and enforcement activity.

Councils often rely on Police support to assist with enforcement in public places. Without clear alignment, there is a risk that expectations of enforcement may not be consistently met, and that responsibilities between Police and councils remain unclear in practice.

#### *Decisions Sought*

1. That the Committee recommends that guidance be developed that clarifies how Police powers under the Bill will operate alongside local authority bylaws
2. That clear expectations are established regarding when and how Police will support council-led enforcement activities.

Improved alignment will help ensure that the benefits of the Bill are realised in practice and that responsibilities between agencies are clearly understood.

### **Safeguards and Proportionality**

While MDC supports the Bill, we also wish to emphasise the importance of ensuring that the expanded powers are exercised proportionately and appropriately in practice.

Specifically, we consider that:

- The use of recording powers should be proportionate and necessary.
- The use of force and detention powers in closed areas should be carefully managed.
- Clear accountability mechanisms should be maintained.

Appropriate safeguards will be essential to maintaining public confidence and ensuring that the powers are used consistently and fairly.

### **Conclusion**

The Manawatū District Council supports the Policing Amendment Bill in principle.

The Bill provides important clarification of Police powers and introduces practical tools that will strengthen the ability to manage public safety issues in a range of settings. In particular, the expanded temporary closure and enforcement powers will provide meaningful benefits for councils and communities.

MDC considers the Bill would benefit from:

- Clear operational guidance and safeguards relating to recording powers.
- Greater clarity on how Police powers will interface with local government bylaws and enforcement activities.

MDC also notes that the practical effectiveness of the proposed powers will depend on proportional application, clear operational guidance, and sufficient Police resourcing.

With these considerations addressed, MDC considers the Bill will make a positive contribution to public safety and community wellbeing.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Ford, JP', written in a cursive style.

Michael Ford, JP  
**Mayor**

28 April 2026

P4509 Firefighting water supplies Technical Advisory Group

Standards New Zealand

PO Box 1473

Wellington 6140

Dear members of the Technical Advisory Group

### **Submission from the Manawatū District Council on DZ PAS 4509:202X Firefighting Water Supplies – Code of Practice**

The Manawatū District Council (MDC) thanks Standards New Zealand for the opportunity to provide feedback on DZ PAS 4509:202X – Firefighting Water Supplies – Code of Practice (the “draft COP”).

MDC generally supports the proposed Code of Practice as a necessary update to SNZ PAS 4509:2008 to reflect current legislation and Fire and Emergency New Zealand operational practice, and its role as a single framework applicable across both urban and rural contexts. MDC particularly supports the stronger planning focus of the draft and its recognition that firefighting water supply issues are best addressed early through subdivision, land use, and design processes. MDC also supports the Code’s move toward more risk-based hydrant testing and improved record-keeping expectations, while noting the need for these requirements to remain practical and proportionate for smaller councils.

However, MDC considers that the Code requires clearer direction on the treatment of legacy, constrained, and low-pressure water supply systems, and clearer distinction between the level of service reasonably expected from the public network and the mitigation that may be required for site-specific developments.

#### **Introduction**

Manawatū District Council provides drinking water services to a range of communities across the district through a mix of urban and rural reticulated schemes, alongside areas that rely on private or self-supplied water sources. Council-operated supplies service the main communities of Feilding, Himatangi Beach, Rongotea, Sanson/Ōhakea, Stanway-Halcombe, and Waituna West, each with differing source water characteristics, treatment processes, storage capacity, and levels of resilience. A significant proportion of the district’s rural population also relies on private supplies, including roof water and shallow bores, where levels of service, reliability, and water quality can vary.

Larger urban systems, such as Feilding, benefit from multiple sources, substantial storage, and on-demand reticulation networks. In contrast, smaller and rural schemes, including Sanson/Ōhakea, Stanway-Halcombe, and Waituna West, operate as restricted or constant flow systems that supply water to onsite storage tanks at individual properties. These systems are designed to provide a reliable potable water supply, rather than high instantaneous flows.

As a result, while most communities receive a sufficient and generally safe supply of drinking water, not all schemes are configured to provide firefighting water supply through the network. In particular, restricted and rural systems may be unlikely to meet firefighting water supply requirements without significant modification.

### **General Feedback**

While MDC supports the intent of the proposed Code of Practice (COP), we are concerned about potential implications for small and restricted water supply schemes such as Sanson and Ōhakea. MDC understands that the COP is expected to act as a benchmark for assessing the adequacy of firefighting water supply and could influence planning, consenting, and infrastructure decision-making over time. While non-mandatory, there is a risk the COP may be applied as a de facto standard through these processes.

MDC therefore requests that the Code be amended to clarify that it does not create an obligation on water service providers to upgrade existing public water supply networks where firefighting capacity was not part of the original network design. MDC further requests that the Code clearly confirm that compliance can be achieved through alternative site-level or non-reticulated solutions where network capacity is limited. This reflects the need to clearly distinguish between public network service obligations and development-specific mitigation, and to address these matters separately through planning and consenting processes.

MDC notes that, read together, the foreword and clause 1.2 may create uncertainty in practice. The foreword indicates that the Code is not intended to provide specifications for individual fire protection systems, while clause 1.2 places responsibility on the building owner where public supply is insufficient. MDC considers that the relationship between these statements, and the Code's intended use in planning and consenting frameworks, should be clarified.

It is also unclear how the COP is intended to be applied in practice alongside broader council decision-making processes, including consideration of cost, proportionality, and local context, particularly for small or rural schemes.

MDC also seeks clearer direction in the Code on the treatment of legacy or constrained water supply systems that do not meet all performance requirements, including minimum pressure. This should include how such constraints are to be identified, mapped, classified, disclosed, and managed through planning and consenting processes, LIMs, customer communication, and long-term asset planning. Consideration should also be given to how such systems are described or classified, as broad categorisation as “non-compliant” may not accurately reflect operational capability and could create unintended consequences, including misinterpretation of

risk by property owners, insurers, and the wider community and reduced confidence in water services.

In particular, the Code should confirm that acknowledging an existing network constraint does not make that supply compliant, but instead provides a transparent basis for recording deficiencies, informing affected parties, managing risk, and prioritising upgrade or mitigation over time. The final Code should also provide practical guidance on how these supplies are to be managed without creating an unintended expectation that all existing networks must be upgraded to full Code performance. Clear direction on this issue is particularly important for smaller and mixed rural-urban districts, where historic infrastructure limitations may persist for some time.

MDC recommends supplementing the Code with additional guidance and worked examples that reflect a broader range of real-world scenarios, particularly those involving small, rural, or restricted water supply schemes.

This could include a simple and standardised set of minimum requirements for alternative firefighting water supplies, such as storage volume, fittings and couplings, signage, access, hardstands, refill arrangements, and ongoing maintenance responsibilities, to support consistent application and reduce interpretation disputes.

Expanding the examples to demonstrate how compliance can be achieved through a combination of reticulated and non-reticulated solutions, staged development, or site-specific mitigation measures would improve clarity and support more consistent application across different contexts. This could also include a concise implementation checklist or clear minimum information requirements for subdivision, resource consent, and building consent processes to support consistent application.

MDC supports the inclusion of flexible, site-specific solutions for achieving firefighting water supply outcomes, particularly in rural and non-reticulated areas. In many parts of the Manawatū District, practical approaches such as on-site storage tanks, shared community supply points, or other non-reticulated sources will be more feasible and proportionate than upgrading reticulated networks. The Code should more explicitly recognise and enable these approaches as valid means of achieving compliance, where they deliver an appropriate level of risk management.

MDC also considers it important that the Code more clearly acknowledges the need to balance firefighting water supply expectations with broader water service obligations, including the provision of safe drinking water and the management of emergency events such as drought or contamination. In practice, water service providers may be required to prioritise public health and continuity of supply, which can constrain the availability of water for firefighting purposes. Recognising these constraints would support a more realistic and integrated approach to water management.

Addressing these matters would improve the clarity and usability of the Code, particularly for councils managing diverse and resource-constrained water supply systems.

**Decisions sought:**

1. That the Code be amended to explicitly confirm that it does not create an obligation on water service providers to upgrade existing public water supply networks to meet firefighting requirements, and that compliance can be achieved through non-reticulated and site-level solutions where network capacity is limited.
2. That the Code provide clearer guidance that any solutions to firefighting water supply should be proportionate, taking into account cost, scale, and local context, particularly for small or rural communities.
3. That the Code be amended to include additional guidance and worked examples that reflect a wider range of real-world scenarios, including small, rural, and restricted water supply schemes.
4. That the Code be amended to include clear guidance on the treatment of legacy or constrained water supply systems that do not meet all performance requirements, including how such constraints are to be identified, recorded, disclosed, and managed through planning, consenting, and long-term asset planning processes, and to confirm that acknowledging a constraint does not make a supply compliant.
5. That the Code include practical implementation guidance, including minimum information requirements for subdivision, resource consent, and building consent processes.

MDC appreciates the opportunity to provide feedback and would welcome further engagement as the Code is finalised.

Yours sincerely



Shayne Harris  
**Chief Executive**

14 May 2026

Committee Secretariat  
Justice Committee  
Parliament Buildings  
Wellington

Submitted via: [Sale and Supply of Alcohol \(Improving Alcohol Regulation\) Amendment Bill - New Zealand Parliament](#)

Dear Members of the Justice Committee,

**Re: Submission from the Manawatū District Council on the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill**

The Manawatū District Council (MDC) thanks the Justice Committee for the opportunity to provide feedback on the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill (“the Bill”).

MDC supports the intent of the Bill and acknowledges the objective of improving alcohol regulation while reducing unnecessary regulatory burden and supporting economic growth. From an operational perspective, Council sees clear benefits in terms of efficiency, clarity, and alignment with current industry practice.

Council recognises that a well-functioning licensing system is important for community wellbeing and economic activity. However, MDC considers it important that the proposed changes are implemented in a way that maintains the primary objective of minimising alcohol-related harm, while supporting effective local decision-making and providing clarity for licensing authorities.

**Introduction**

Territorial authorities play a key role in the alcohol licensing system through District Licensing Committees (DLCs), enforcement functions, and the development of Local Alcohol Policies (LAPs). Councils are also directly impacted by the social, environmental, and community effects of alcohol-related harm.

From a local government perspective, it is important that any changes to the regulatory framework are practical to implement, clearly understood, and able to support effective decision-making at a local level.

**Overview of Supported Amendments**

MDC supports a number of the amendments proposed in the Bill, particularly those that:

- Improve the efficiency and clarity of licensing processes;
- Reflect modern business models and practices, including provisions for dual licences and producer tasting rooms;

- Clarify responsibilities for rapid delivery services to reduce the risk of supply to minors and intoxicated persons;
- Enable the promotion and availability of zero-alcohol products; and
- Provide a low-risk exemption for hairdressers and barbers under defined conditions.

These changes represent practical improvements and align with harm minimisation objectives.

## **Considerations**

### *Balance and Proportionality*

MDC considers that the overall effectiveness of the Bill will depend on how well it maintains an appropriate balance between improving efficiency and minimising alcohol-related harm.

While many of the proposed changes are individually reasonable, their cumulative effect has the potential to increase alcohol availability and shift how decision-making is undertaken across the licensing system. Council notes that while some amendments, such as the restriction on objections, strengthen the role of local communities, other changes move key aspects of the framework into regulations or reduce the influence of local tools such as Local Alcohol Policies.

Council considers that the overall impact of these combined changes is as important as the individual amendments, and that careful consideration should be given to how they interact in practice.

### *Changes to Licensing Processes*

MDC supports the aspects of the Bill that aim to improve efficiency and clarity of licensing processes, including providing applicants with a right of reply to objections and clarifying procedural requirements.

MDC also supports the proposal to limit objections to persons who reside or have a business within the district or in close proximity to the premises. Council considers that licensing decisions should be informed by those communities most directly affected by the operation of a premises.

Focusing objections on local perspectives is likely to improve the relevance and quality of information presented to District Licensing Committees and contribute to more efficient and targeted decision-making processes.

MDC notes that, while this approach appropriately prioritises local input, it will be important to ensure that licensing committees retain access to relevant expertise and evidence where appropriate.

### *Special Licensing Framework*

MDC acknowledges the intent to streamline special licensing and introduce a risk-based framework.

However, Council notes that key criteria and conditions for special licences are proposed to be set out in regulations rather than in the Act. At present, the detail of this framework is not available.

From a local government perspective, this creates uncertainty for licensing committees responsible for applying the framework in practice. It also reduces transparency and may limit local discretion in decision-making.

MDC recommends that sufficient clarity and guidance are provided, and that territorial authorities are appropriately involved in the development of this framework to ensure it is workable and consistently applied.

There is a risk that, without sufficient detail in primary legislation, the framework could be applied inconsistently across districts, reducing predictability for applicants and undermining confidence in the licensing system.

#### *Increased Availability and New Licensing Pathways*

The Bill introduces a number of changes that expand the ways in which alcohol can be sold and supplied, including:

- Allowing certain premises to hold both on- and off- licences;
- Expanding producer tasting rooms;
- Enabling restaurants to obtain off-licences in additional circumstances; and
- Allowing extended trading for significant events.

MDC recognises that these changes reflect modern business models and may provide economic and operational benefits.

At the same time, Council notes that collectively these changes may increase the availability of alcohol. It will be important that this is carefully managed to ensure alignment with the objective of minimising alcohol-related harm.

#### *Local Alcohol Policies and Local Decision-Making*

MDC notes that the Bill reduces the influence of Local Alcohol Policies (LAPs) on certain licensing decisions, including renewals.

LAPs are an important tool for territorial authorities to reflect community views and respond to local conditions over time. While MDC does not currently have a LAP in place, Council recognises the importance of maintaining the effectiveness of these tools across the sector. It is important that the interaction between LAPs and the proposed changes is clearly understood, and that their role in supporting local decision-making is not unintentionally weakened.

#### *Implementation and Local Government Interface*

MDC considers that the practical effectiveness of the proposed changes will depend on how they are implemented and how they interface with local government responsibilities.

The Bill introduces new processes and requirements that will impact DLCs and council staff. This includes changes to licensing procedures, new regulatory frameworks, and transitional arrangements where different rules apply at different times.

Effective implementation will also rely on enforcement and regulatory agencies having sufficient capacity and resourcing to respond to increased licensing activity and compliance requirements.

From a local government perspective, it will be important that:

- Clear guidance is provided to support consistent decision-making.
- Implementation is supported with appropriate resources and information.
- The interaction between national regulations and local decision-making is well understood.

Without this clarity, there is a risk of inconsistency, increased administrative complexity, and uncertainty for applicants and communities.

### **Recommendations**

MDC recommends that:

- Clear guidance is developed to support the consistent and practical implementation of the new licensing framework, particularly for District Licensing Committees.
- Further detail is provided on the proposed risk-based framework for special licences before it is implemented.
- Territorial authorities are appropriately consulted on regulatory changes affecting licensing processes.
- The interaction between Local Alcohol Policies and the proposed changes is clarified.
- The impacts of increased alcohol availability resulting from the Bill are actively monitored and reviewed.

### **Conclusion**

The Manawātū District Council supports the Sale and Supply of Alcohol (Improving Alcohol Regulation) Amendment Bill in principle.

The Bill introduces a range of practical changes that aim to improve the efficiency and clarity of the licensing system and better reflect current practices.

However, MDC notes that the Bill would benefit from greater clarity in key areas, particularly in relation to the special licensing framework, local decision-making, and implementation at a local government level.

With this clarity, the Bill has the potential to improve the effectiveness of the alcohol licensing system while maintaining appropriate safeguards to minimise alcohol-related harm.

Yours sincerely



Michael Ford, JP  
**Mayor**