



# Council Agenda

Wednesday 21 October 2026, 8:30 am

The meeting will be held at the Manawātū 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

A handwritten signature in dark ink, appearing to read 'Shayne Harris', with a stylized flourish at the end.

Shayne Harris  
**Chief Executive**

# ORDER OF BUSINESS

## PAGE

### 1. MEETING OPENING

Cr Rob Duindam opening the council meeting.

### 2. APOLOGIES

### 3. CONFIRMATION OF MINUTES

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#### ***Recommendation***

*That the minutes of the Council meeting held 07 October 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 PRESENTATION - REPRESENTATIVE FUND - MANAWATŪ U18 MENS HOCKEY TEAM (U18 HOCKEY NATIONALS) IN TAURANGA**

Mac Kowalewski will be in attendance to speaking to Council.

#### **6.1 PRESENTATION - REPRESENTATIVE FUND - MĀORI RUGBY LEAGUE TOURNAMENT**

Nina Soteria and Alio Skipper will be in attendance to speaking to 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 08 October to 20 October 2026 :

| COMMITTEE MEETINGS                                                                                                                                                                          |                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Manawatu Water Services Committee                                                                                                                                                           | • 13 October 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                                                                                                                                                                                      |                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Hiwinui – Cr Raewyn Loader                                                                                                                                                                                        | • 20 October 2026 |
| Kimbolton – Cr Rob Duindam                                                                                                                                                                                        | • 12 October 2026 |
| Kiwitea – Cr Andrew Quarrie                                                                                                                                                                                       | • 19 October 2026 |
| Pohangina Valley – Cr Bridget Bell                                                                                                                                                                                | • 14 October 2026 |
| Sanson – Cr Alison Short                                                                                                                                                                                          | • 08 October 2026 |
| Tangimoana – Cr James McKelvie                                                                                                                                                                                    | • 19 October 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                                     |
|-------------------------------------------|
| Aorangi Marae – Cr Rob Duindam            |
| Kauwhata Marae – Cr Raewyn Loader         |
| 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 Rangimārie Marae – Cr Jerry Pickford   |
| Te Tikanga Marae – Cr Shelley Dew-Hopkins |
| Ngāti Te Au – Cr Grant Hadfield           |
| Ngāwhakaraua Marae – Cr Andrew Quarrie    |

## 10. OFFICER REPORTS

### 10.1 RESIDENT SATISFACTION SURVEY YEARLY AND BENCHMARKING REPORTS

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Report of the General Manager – Corporate.

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| <b>10.2 VOTING AND QUORUM FOR NON-ELECTED MEMBERS - EXCEPTION REQUESTS</b> | <b>141</b>  |
| Report of the General Manager – Corporate                                  |             |
| <b>10.3 SUBMISSIONS MADE ON BEHALF OF COUNCIL</b>                          | <b>148</b>  |
| 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. Feilding Civic Centre Deed of Surrender request

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 |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 13.1 Feilding Civic Centre Deed of Surrender request | s7(2)(i) commercial negotiations 7(2)(j) improper gain or advantage<br><i>This report discusses sensitive contract terms</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 07 OCTOBER 2026 | 8:31 AM |

Minutes of a meeting of the Council held on Wednesday 7 October 2026, which commenced at 8.31 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   |
| Ash Garstang    | Acting General Manager – Corporate |
| Kate Jarvis     | General Manager – People           |
| Lyn Daly        | General Manager – Community        |
| Estelle de Beer | Acting Chief Financial Officer     |
| Steph Skinner   | Governance and Strategy Officer    |

MDC 25-28/413

#### MEETING OPENING

Martin Baldwin was in attendance from Feilding Baptist Church and opened the meeting.

MDC 25-28/414

#### APOLOGIES

There were no apologies.

MDC 25-28/415

#### CONFIRMATION OF MINUTES

#### RESOLVED

**That the minutes of the Council meeting held 16 September 2026 be adopted as a true and correct record, as amended:**

- **Correct to MDC 25-28/403 Marae Liaison Councillors – it was the marae that visited the koroneihana.**

**Moved by: Cr Grant Hadfield**

**Seconded by: Cr Colin Dyer**

**CARRIED (12-0)**

| MEETING MINUTES           |         |
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MDC 25-28/416

#### DECLARATIONS OF INTEREST

There were no declarations of interest.

MDC 25-28/417

#### PRESENTATION - REPRESENTATIVE FUND - U12 MANAWATŪ RUGBY LEAGUE - ANZMRL TAMARIKI TOURNAMENT, ROTORUA

Arama Te Moana was unable to attend the Council meeting and a video from him was played instead. Highlights:

- Arama was acknowledged as the best forward in the team.
- The tournament helped Arama gain more confidence in his skills.

MDC 25-28/418

#### PRESENTATION - REPRESENTATIVE FUND - GLOBAL GAMES 2026, TAUPO

Levai Hadfield was in attendance and spoke to Council. Highlights:

- Levai enjoyed the experience, and particularly a tough game against Auckland.
- One of Levai's goals for the future is to make the first 15 team in high school.
- Levai plays in the second-five position.

MDC 25-28/419

#### PUBLIC FORUM

James Beard was in attendance and spoke to Council about an arcade covering for Gladstone Street. Highlights:

- James was a foreign exchange student in Japan and recalls the arcade coverings there.
- He discussed the potential name for a covering, including in Japanese script.

MDC 25-28/420

#### PRESENTATION – THE CITY TO SEA RAIL TRAIL, MANAWATU

Alice Williamson from the Baines-Rangiotu Community Committee was in attendance and updated Council about this project. Highlights:

- LINZ operates the stock route on behalf of KiwiRail.
- In terms of what assistance, the project group would like from the Council:

| MEETING MINUTES           |         |
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- Continued support and advocacy for recreational cycling.
- Assist with communication with government agencies.
- A member point of contact – Mayor Ford volunteered to be Council’s liaison with the group.
- Support at the Mayoral Forum.

MDC 25-28/421

## CENTRAL ECONOMIC DEVELOPMENT AGENCY ANNUAL REPORT

Report of the General Manager – Community presenting the Central Economic Development Agency (CEDA) Annual Report 01 July 2025 – 30 June 2026.

Attending from CEDA were Katie Brosnahan (Board Member), Jerry Shearman (Chief Executive), Jacqui Middleton (GM Finance & Operations), Jordyn Blackett (GM Destination, Marketing & Communications), Tainui Woodmass (GM Māori Relationships), and Greg Bignall (GM Economic Development).

### RESOLVED

**That Council receives the Central Economic Development Agency (CEDA) Annual Report for the year ended 30 June 2026.**

**Moved by: Cr Alison Short**

**Seconded by: Cr Rob Duindam**

**CARRIED (12-0)**

MDC 25-28/422

## PRESENTATION – HOMES FOR PEOPLE

Darren Birch was in attendance speaking to Council about community housing and rent-to-own models, discussing potential Development and Financial Contributions policy changes that could enable more affordable first-home housing in Feilding and reduce long-term reliance on social housing.

- Darren and his wife founded Homes for People in 2016, and it is one of the few organisations that builds new homes for first-home buyers. They run four different home ownership programmes, and two of them are aimed at people over 40.
- By 2040 it is estimated that 40% of over 65-year-olds will not own a home.
- Development contributions add to the cost of intensification projects, and there is a degree of proportionality to consider for intensified housing.

*The meeting was adjourned at 9.58 am and reconvened at 10.22 am.*

| MEETING MINUTES           |         |
|---------------------------|---------|
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MDC 25-28/423

#### SUPERHUMAN, TŪ KAHA AWARD – NOMINATION FOR CR ALISON SHORT

Mayor Michael Ford acknowledged Cr Alison Short's nomination for the Superhuman, Tū Kaha Award, being decided at LGNZ's SuperLocal Awards on 15 October 2026.

MDC 25-28/424

#### NOTIFICATION OF LATE ITEMS

There were no late items of business notified for consideration.

MDC 25-28/425

#### RECOMMENDATION FROM THE FINANCE AND PERFORMANCE COMMITTEE RE: DRAFT ANNUAL REPORT FOR YEAR ENDING JUNE 2026

Report of the Chief Financial Officer presenting a recommendation from the Finance and Performance Committee that the Council receives the Draft Annual Report for the Year Ending June 2026 and note its release to Audit NZ (FPC 25-28/078).

The purpose of the report is to present the draft Annual Report for the year ending 30 June 2026 and detail the process required to adopt the Annual Report.

#### RESOLVED

##### That the Council:

- Notes the recommendation from the Finance and Performance Committee at its meeting 23 September 2026 (FPC 25-28/078), regarding the receipt of this report; and**
- Receives the draft Annual Report for the year ended 30 June 2026 and note its release to Audit NZ.**

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

**Seconded by: Cr Colin Dyer**

**CARRIED (12-0)**

MDC 25-28/426

#### COMMITTEE AND GROUP MEETINGS – FOR INFORMATION

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

| COMMITTEE MEETINGS                |                     |
|-----------------------------------|---------------------|
| Finance and Performance Committee | • 23 September 2026 |

| MEETING MINUTES           |         |
|---------------------------|---------|
| COUNCIL                   | TIME    |
| WEDNESDAY 07 OCTOBER 2026 | 8:31 AM |

| COMMUNITY COMMITTEES                         |                     |
|----------------------------------------------|---------------------|
| Āpiti – Cr Sam Hill                          | • 16 September 2026 |
| Colyton – Cr Colin Dyer                      | • 17 September 2026 |
| Glen Oroua-Taikorea – Cr Shelley Dew-Hopkins | • 22 September 2026 |
| Halcombe – Cr Jerry Pickford                 | • 5 October 2026    |
| Rongotea – Cr James McKelvie                 | • 5 October 2026    |
| Tangimoana – Cr James McKelvie               | • 21 September 2026 |

Liaison Councillors provided brief updates on their respective Committees.

- Āpiti – Cr Sam Hill. The Committee discussed recurring pothole issues (specifically around White Bridge). The Committee is happy with the work ongoing around the memorial trees, and the removal of lichen from footpaths.
- Colyton – Cr Colin Dyer. The Committee agreed a design for a ‘Welcome to Colyton’ sign. Four residents have donated \$5,000 each to the continuation of the pathway that has started, which is being added to the \$15,000 approved via the contestable fund.
- Glen Oroua-Taikorea – Cr Shelley Dew-Hopkins. The Committee was pleased to receive \$8,000 from the contestable fund for waterproofing the hall. There will be emergency management training at the November meeting. The Committee had written to the infrastructure team regarding safety concerns at the Rangiotū Road and Main Drain Road intersection and have since received a reply from officers indicating that the roading team will look into the issue further.
- Halcombe – Cr Jerry Pickford. The Community there is asking about the playground at the rugby fields and some fencing restricting access to parts of the park. The Committee is going to reach out to staff. They are also interested in any updates on Mt Lees.
- Rongotea – Cr James McKelvie. There was a demonstration of the new camera system (licence plate recognition). The spuds competition is now ongoing. There are questions about how “open plus” is going to work with the mix of books that will be there.
- Tangimoana – Cr James McKelvie. Cr Andrew Quarrie visited the meeting as well (on behalf of the RSA), to discuss the memorial for Richard Webber. New library lights have been installed, and there is a new children’s play group at the hall.
- Kiwitea – Cr Andrew Quarrie. There was concern regarding the playcentre, with the existing trustees looking to retire. They are struggling for finances, but they are an independent playcentre which makes it difficult to attract outside funding. The meeting did not have quorum.

MDC 25-28/427

## MARAE LIAISON COUNCILLORS

Councillors provided a verbal update on their attendance at marae meetings.

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- Aorangi Marae - Cr Rob Duindam. Along with Cr Bell they met with Oriana Paewai for initial introductions.
- Kauwhata Marae – Cr Raewyn Loader. Nothing to report.
- Parewahawaha Marae – Cr Alison Short. Nothing to report.
- Poupatatē Marae – Cr James McKelvie. Nothing to report.
- Taumata-o-te-rā Marae – Cr Colin Dyer. Has been in touch with Amber Moffit to arrange a meeting.
- Te Hiiri Marae – Cr Sam Hill. Nothing to report.
- Te Rangimārie Marae – Cr Jerry Pickford. Nothing to report.
- Te Tikanga Marae – Cr Shelley Dew-Hopkins. Nothing to report.
- Ngāti Te Au – Cr Grant Hadfield. Upcoming meeting this Friday.
- Ngāwhakaraua marae – Cr Andrew Quarrie. Nothing to report.

MDC 25-28/428

#### ADOPTION OF THE 2027 MEETING CALENDAR

Report of the General Manager – Corporate presenting to Council the proposed meetings schedule for the 2027 calendar year, for adoption.

#### RESOLVED

**That the Council adopts the Meetings Schedule for 2027, as set out in Attachment 1 of this report, without amendment.**

**Moved by: Cr Grant Hadfield**

**Seconded by: Cr Jerry Pickford**

**CARRIED (12-0)**

MDC 25-28/429

#### MANFEILD PARK TRUST - NEW TRUSTEES

Report of the General Manager – Community advising Council of changes to the Manfeild Park trustees and a variation to the Manfeild Park Trust Deed increasing the maximum number of trustees from five to six.

#### RESOLVED

**That Council:**

- **Note that Richard Jeffery, Helen Worboys, and Kelvyn Eglinton have been appointed by the Manfeild Park Electoral College as trustees to the Manfeild Park Trust.**

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- Note that the Manfeild Park Trust Deed has been varied with the approval of the settlors to increase the maximum number of trustees from five to six.

Moved by: Mayor Michael Ford

Seconded by: Cr Colin Dyer

**CARRIED (12-0)**

MDC 25-28/430

#### CONSIDERATION OF LATE ITEMS

There were no late items notified for consideration.

MDC 25-28/431

#### PUBLIC EXCLUDED BUSINESS

#### RESOLVED

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

##### 1. Confirmation of Minutes: 16 September 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; 16 September 2026  | <i>To consider the accuracy of the minutes of the public excluded Council meeting on 16 September 2026.</i><br><br><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.

| MEETING MINUTES           |         |
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**Moved by: Mayor Michael Ford**

**Seconded by: Cr Sam Hill**

**CARRIED (12-0)**

*The meeting went into public excluded session at 10.57 am. For items MDC 25-28/432 to MDC 25-28/433 refer to public excluded proceedings. The meeting returned to open session at 10.58 am.*

MDC 25-28/434

#### MEETING CLOSURE

The meeting was declared closed at 10.58 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 21 October 2026

Business Unit: Corporate

Date Created: 28 September 2026

## Resident Satisfaction Survey Yearly and Benchmarking Reports

### Purpose Te Aronga o te Pūrongo

To present the Manawātū DC Resident Survey Final Yearly Report 2025-26 and the Residents Survey Benchmark Report 2025-26 for endorsement, ahead of publication on the MDC website.

### Recommendations Ngā Tūtohunga

That the Council:

1. Receive the Manawātū DC Residents Survey Final Yearly Report 2025-26 (Appendix A) and the Residents Survey Benchmark Report 2025-26 (Appendix B) prepared by Key Research.

AND

2. Approves the uploading of these documents to Council's website.

Report prepared by:

Jeena Baines

Data, Insights and Research Analyst

Approved for submission by:

Ash Garstang

Acting General Manager – Corporate

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## **1 Background Ngā Kōrero o Muri**

- 1.1 The residents' satisfaction survey is carried out on a quarterly basis by an external company, Key Research. It is an independent survey, with questions designed to obtain insights and feedback from our community on a range of topics relating to Council's strategic priorities and adopted levels of service.
- 1.2 Many councils across the country carry out resident surveys, with another 22 councils also using Key Research. The survey provides Council with an understanding of residents' perceptions across a range of Council activities and services, helping identify areas that are performing well and those where improvement may be required. Council also considers trends in the data to help distinguish individual fluctuations or outliers from sustained changes in satisfaction that may require intervention.
- 1.3 The annual satisfaction survey results are used as performance measures for some activities in Council's Annual Report. The quarterly results are shared across the organisation and many are used as part of quarterly reporting as well as team discussion points. Some survey measures, such as satisfaction with enquiry handling, also contribute to the Chief Executive's KPIs.
- 1.4 Data collection is managed to achieve defined quota targets based on age, gender, and location (northern and southern communities as well as the Feilding community). Post data collection, the sample is weighted to make it representative of key population demographics based on the 2023 census. The results are therefore weighted to better reflect the demographic and geographic profile of the Manawatū District.
- 1.5 Key Research is contracted to provide the Manawatū District Council with an annual report, quarterly dashboards, and an annual benchmarking report which rates our Council's performance against the 22 other local authorities that also contract Key Research services for their Resident Surveys.
- 1.6 At an aggregate level, the survey has an expected 95% confidence interval (margin of error) of  $\pm 4.57\%$ . Results based on small respondent numbers should be interpreted with caution as they are subject to greater variation.
- 1.7 Once each quarterly report is received, the results are summarised and presented to Council. This helps Council understand how satisfaction rates are tracking over the year and how they compare with the previous year's benchmark. Comments from each survey also provide useful insight into the general sentiment around the topics raised. Results were presented to Council on 3 December 2025, 18 March 2026, 20 May 2026 and 5 August 2026.
- 1.8 Survey comments are analysed and those that require action or response are included within the presentation. The number of actionable comments generally ranges from 1 to 4, but for the majority of 2025-26 there were none. Raising awareness of these comments means that council is able to fix an issue, investigate a potential problem or improve residents' satisfaction in a particular activity. There were three actionable comments recorded over this 12-month period, and the council officer responses to these comments are included in Appendix C to this report.

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

- 2.1 This is largely an operational item. Its purpose is to inform the community about council's performance, as perceived by those residents surveyed. This report most closely aligns with council priority of "Value for money and excellence in local government," as these surveys help council monitor performance, and identify issues with current service performance that may need improvement.

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

### **Key findings from the Manawatū DC Residents Survey Final Yearly Report 2025-26 (Appendix A):**

- 3.1 The survey results show an increase of 6% in overall satisfaction between 2025 and 2026. Among those respondents who provided a comment, 25% expressed positive views, stating the "*Satisfied with Council/ Council actions/ enjoy living in the area*".
- 3.2 The three areas with the largest increases in satisfaction rates between 2025 and 2026 were enquiry handling/customer service, stormwater maintenance and overall water management. This past year saw a significant increase in the number of people answering the questions related to customer service.
- 3.3 Of the 90 measures included in the survey, 81% recorded an increase in satisfaction between 2025 and 2026.
- 3.4 In 2025-26, five new questions were introduced asking residents whether they considered Council spending on different service areas to be too much, about right or too little. Overall, the majority of respondents who expressed a view considered spending to be about right across four of the five service areas. "Roads, footpaths and cycleways" was the exception, with 54% considering Council spending to be too little. Further analysis of these results, including differences by location, is provided in Appendix D.

### **Key findings from the Residents Survey Benchmark Report 2025-26 (Appendix B):**

- 3.5 Across the 23 councils included in the Key Research benchmarking report, changes in average satisfaction between 2024/25 and 2025/26 were mixed. For example, average satisfaction with core service deliverables increased from 69% to 71%, while satisfaction with the performance of elected members decreased from 52% to 47%. Overall satisfaction remained relatively stable, increasing from 56% to 57%.
- 3.6 MDC performed above the all-council average across most measures included in the benchmarking report. Overall satisfaction with MDC was 75%, compared with the benchmark of 57%, while overall reputation was 72% compared with 54%. Satisfaction with core service deliverables was 88%, compared with the benchmark of 71%.
- 3.7 The Benchmarking Report highlights the following measures where MDC achieved the highest reported satisfaction score among the 23 councils included in the benchmarking report:
- Reliability of water supply, 96% (benchmark 89%)
  - Treating and disposing of sewage, 96% (benchmark 83%)

- Kerbside rubbish collection, 89% (benchmark 81%)
- Maintenance/quality of roads, 67% (benchmark 51%)
- Parks, reserves and green spaces, 94% (benchmark 83%)
- Sports fields, 93% (benchmark 85%)
- Public toilets/ public conveniences, 86% (benchmark 71%)
- Quality of services, 78% (benchmark 63%)
- District/City is going in the right direction, 77% (benchmark 57%)

3.8 Measures where MDC's satisfaction rating was within five percentage points of the highest reported score:

- Overall water management, 81% (benchmark 70%, top score 86%)
- Clarity of water, 87% (benchmark 81%, top score 91%)
- Overall sewerage/ wastewater systems, 96% (benchmark 84%, top score 97%)
- Reliability of sewerage system, 95% (benchmark 88%, top score 97%)
- Overall roading infrastructure, 69% (benchmark 55%, top score 73%)
- Provision of dedicated walkways and cycleways, 70% (benchmark 66%, top score 75%)
- Availability of parking, 77% (benchmark 61%, top score 80%)
- Playgrounds, 91% (benchmark 84%, top score 93%)
- Cemeteries, 93% (benchmark 85%, top score 98%)
- Dog and animal control, 78% (benchmark 56%, top score 81%)
- Food safety and alcohol licensing, 87% (benchmark 69%, top score 89%)
- Overall reputation, 72% (benchmark 54%, top score 74%)
- Financial management, 59% (benchmark 40%, top score 60%)
- Rates being fair and reasonable, 45% (benchmark 35%, top score 48%)

3.9 The following were topics where MDC's satisfaction rating has either fallen below the benchmark or remained below the benchmark. Included below is the MDC satisfaction rating, rationale as to why the rating is below the benchmark (if known), and what actions council is taking to help improve these satisfaction scores.

- Overall stormwater, 64% (benchmark 65%, top score 77%)

Council has included a significant programme of stormwater upgrades within the Long-Term Plan 2024 – 2034 to address ponding and flooding issues being experienced in Feilding and some of the district's village areas such as Halcombe. Long-term solutions are currently being planned, with several requiring land access and consenting. In the meantime, Council is working to also implement more near-term solutions to provide short term improvements. Satisfaction with the overall stormwater system increased by 14 percentage points between 2025 and 2026.

- Kerbside recycling collection, 76% (benchmark 82%, top score 92%)
- Green waste management, 67% (benchmark 75%, top score 91%)

Council's Waste Management and Minimisation Activity aims to enable a circular economy for all waste streams in the district. Green waste management has seen an increase of 3 percentage points between 2025 and 2026.

- Safety of the roads, 63% (benchmark 64%, top score 79%)

- Availability of footpaths, 60% (benchmark 66%, top score 79%)
- Maintenance/quality of cycleways, 59% (benchmark 61%, top score 75%)

Many of the road safety concerns relate to intersections on State Highways through Feilding. These are challenging for Council to address directly, as Council relies on NZ Transport Agency recognition and partnership to develop long-term improvements. At present, these issues do not meet NZTA's high-priority threshold. The safety of roads saw an increase of 2 percentage points between 2025 and 2026.

Feedback about footpaths mostly comes from rural townships where footpaths don't currently exist. Funding has not been secured to increase levels of service to meet these community expectations.

Feedback on cycleways is mixed, with some residents seeking greater provision while others question the current level of provision.

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

- 4.1 Not applicable. The recommendations relate to receiving and publishing the independently prepared Resident Satisfaction Survey and Benchmarking Report.

#### **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 specific Māori or cultural engagement requirements associated with receiving and publishing these reports.

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

- 6.1 Council staff will manage any tasks that arise from any resident satisfaction survey as part of a routine work programme.

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

- 7.1 There are no financial implications with this report, beyond those already being considered by Council as part of the usual Annual Plan and internal improvement processes.

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

- 8.1 The results of the customer satisfaction survey will inform our reporting against Levels of Service and performance measures set in the LTP 2024-34 in accordance with the LGA 2002.

## **9 Next Steps Te Kokenga**

- 9.1 Once received and endorsed by council, these reports will be uploaded to MDC's website, with some supporting information.
- 9.2 As part of making these reports public, council will release a news item on the website.

## **10 Attachments Ngā Āpitihanga**

- Appendix A: Manawatū DC Residents Survey Final Yearly Report 2025-26
- Appendix B: Manawatū DC Residents Survey Benchmark Report 2025-26
- Appendix C: Actionable comments and Council responses 2025-26
- Appendix D: Resident perceptions of Council Spending 2025-26



# Manawatū District Council

## 2025/2026 Residents' Survey

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# Background, Objectives, and Methodology

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## Introduction

The Manawātū District Council has an ongoing need to measure how satisfied residents are with resources, facilities and services provided by Council, and to prioritise improvement opportunities that will be valued by the community. Key Research has developed a comprehensive mechanism for providing this service.

## Research Objectives

- To measure residents' satisfaction with the Manawātū District Council's performance
- To provide insights into how Council can best invest its resources to improve residents' satisfaction with its overall performance

## Method

- The methodology involved a postal to online survey measuring the performance of Manawātū District Council with a sample of n=459 residents.
- The questionnaire was designed in consultation with the staff of Manawātū District Council and is structured to provide a comprehensive set of measures relating to core activities, services and infrastructure, and to provide a wider perspective of performance. This includes an assessment of reputation, the willingness of residents to become involved with Council's decision-making processes, and to measure satisfaction across a range of lifestyle-related measures.
- Data collection was conducted over four periods; 114 responses between 29 August and 28 September 2025, 115 responses between 03 November and 11 December 2025, 115 responses between 02 February and 09 April 2026, and 115 responses between 04 May and 07 June 2026.
- Data collection was managed to achieve defined quota targets based on age, gender, communities, and ethnicity. Post data collection the sample has been weighted to make it representative of key population demographics based on the 2023 Census.
- At an aggregate level the survey has an expected 95% confidence interval (margin of error) of  $\pm 4.57\%$ .
- There are instances where the sum of the whole number score varies by one point relative to the aggregate score due to rounding.

The responses were given scores on a scale of 1 to 10, which were grouped as follows:

|      |                       |
|------|-----------------------|
| 1-4  | Very dissatisfied     |
| 5    | Somewhat dissatisfied |
| 6    | Somewhat satisfied    |
| 7-8  | Satisfied             |
| 9-10 | Very satisfied        |

### Notes:

Due to rounding, percentages may add to just over or under (+/- 1%) totals.  
All satisfaction results exclude 'Don't know' responses.

# Executive Summary

## Key Findings

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### Overall satisfaction

- Satisfaction with Manawātū District Council's *Overall performance* has increased by 6% points year-on-year (75% in 2026 compared to 69% in 2025).
- The increase in overall performance is likely driven by an increase in satisfaction with key measures such as the following:
  - Overall Services and Facilities** (from 76% to 88%)
  - Value for Money** (from 45% to 48%)
  - Overall Reputation** (from 70% to 72%)
- Most residents who provided general feedback (25%) mentioned that they are *Satisfied with Council / Council actions / enjoy living in the area*.

### Services and Infrastructure

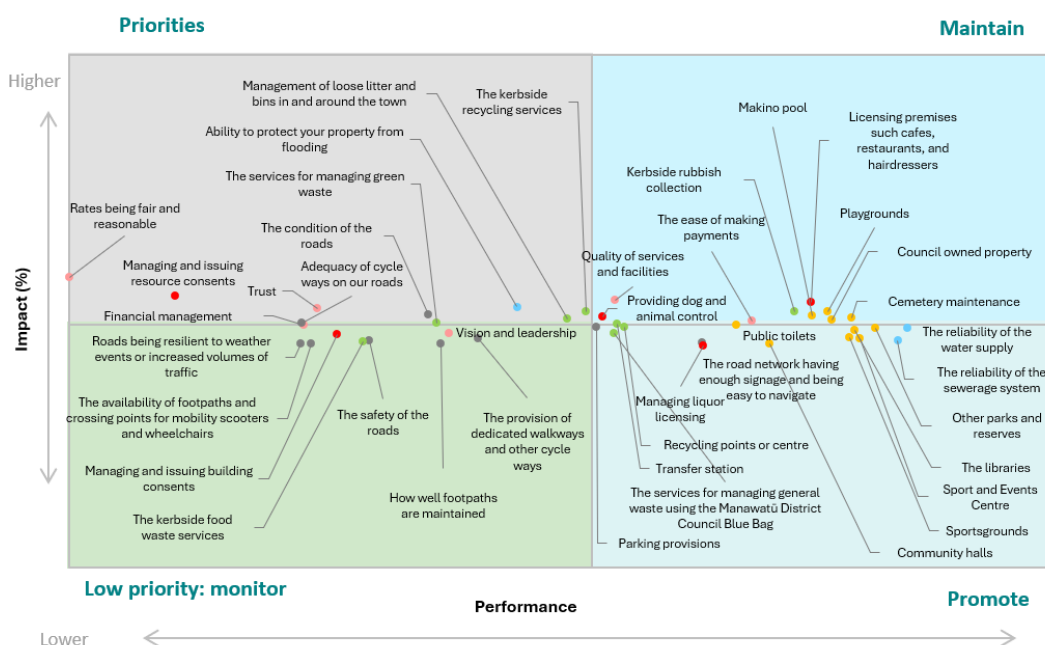
- Several key services and infrastructure recorded significantly higher satisfaction levels compared to the previous year. *Outdoor spaces* received the highest satisfaction rating (94%), followed by *Public facilities* (89%), *Water management* (81%), and *Handling of enquiries* (77%).
- Despite these improvements, satisfaction with *How Council informed the public* (62%) has continued to decline year-on-year, highlighting an opportunity to better communicate Council's initiatives and developments.

### Reputation

- The Council's reputation benchmark has increased year-on-year and continues to be within 'acceptable range' at +76, marking the highest recorded since 2024.

### Drivers and Priorities

- Reputation and Value for Money* combined is the strongest driver of the Council's overall performance, with a 24% impact score.
- Several areas have been identified as aspects for improvement, including Reputation and Value for Money attributes (*Trust, Rates being fair and reasonable*), Roading infrastructure (*Adequacy of cycle ways on our roads, and Condition of the roads*), Waste management (*The services for managing green waste, The kerbside recycling services, and Management of loose litter and bins in and around the town*) as well as *Ability to protect property from flooding and Managing and issuing resource consents*.



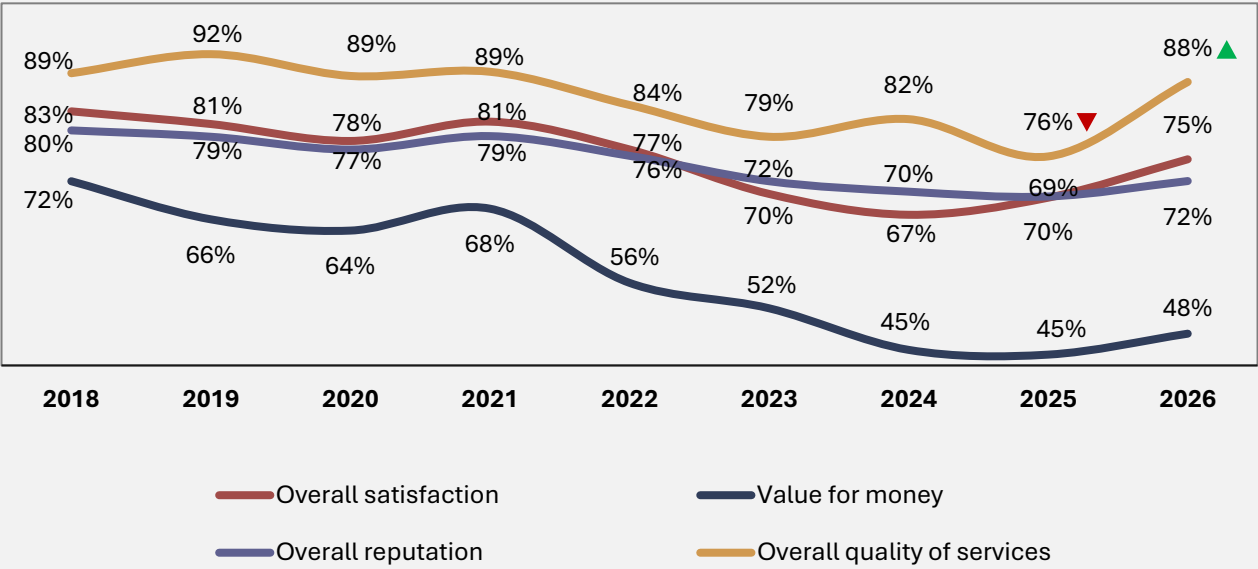
### Quality of Life and Perception with the District

- Residents' perceptions of the District as an *Environment to be proud of* has increased significantly since 2025 (from 75% to 82%). Similarly, perceptions of overall *Quality of life* have improved from 89% in 2025 to 94% in 2026, reflecting a more positive outlook among residents.
- Residents' perception of *District going in the right direction* improved by 3% points since 2025 (from 74% to 77%).

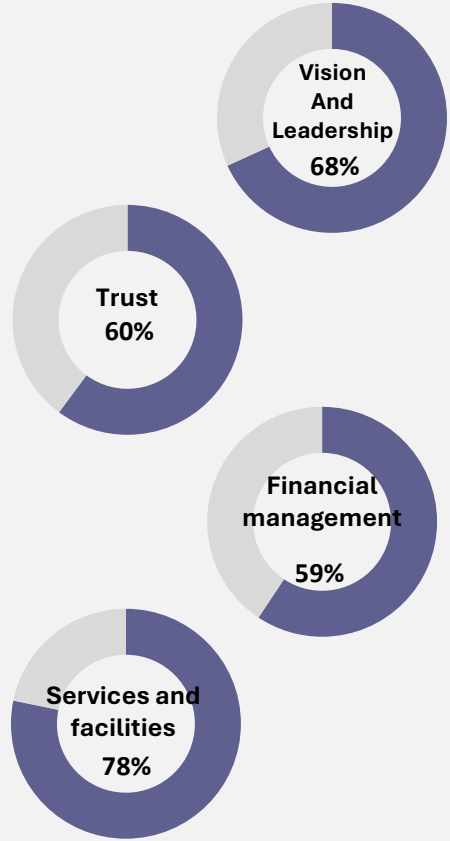
Summary of Key Performance Indicators (%6 – 10)

TOC

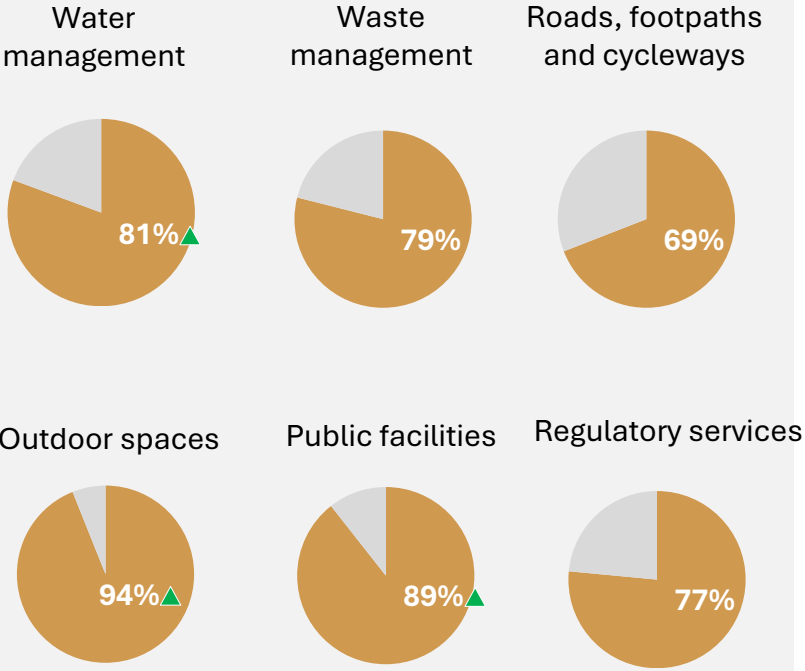
OVERALL MEASURES



REPUTATION



SERVICES AND FACILITIES



# Trends in Satisfaction (% 6-10)

◀ TOC

|                                                                                   | % point increase / decrease (2026-2025) | Percentage of respondents satisfied, or very satisfied |      |      |      |      |
|-----------------------------------------------------------------------------------|-----------------------------------------|--------------------------------------------------------|------|------|------|------|
|                                                                                   |                                         | 2026                                                   | 2025 | 2024 | 2023 | 2022 |
| The resolution or outcome achieved                                                | 20%                                     | 73%                                                    | 53%  | 52%  | 47%  | 43%  |
| Overall enquiry handled                                                           | 19%                                     | 77%                                                    | 58%  | 57%  | 50%  | 39%  |
| How long it took to resolve the matter                                            | 19%                                     | 75%                                                    | 56%  | 54%  | 46%  | 37%  |
| How well the stormwater system is maintained                                      | 14%                                     | 64%                                                    | 50%  | 48%  | 54%  | 62%  |
| Overall satisfaction with water management                                        | 13%                                     | 81%                                                    | 68%  | 70%  | 72%  | 78%  |
| The information provided being accurate                                           | 13%                                     | 74%                                                    | 61%  | 64%  | 52%  | 45%  |
| Overall services and facilities                                                   | 12%                                     | 88%                                                    | 76%  | 82%  | 79%  | 84%  |
| How well Council staff understood your request and how they communicated with you | 10%                                     | 79%                                                    | 69%  | 68%  | 58%  | 52%  |
| The taste of the water                                                            | 10%                                     | 72%                                                    | 62%  | 66%  | 73%  | 70%  |
| Keeping roads and footpaths free of flooding                                      | 10%                                     | 65%                                                    | 55%  | 55%  | 54%  | 63%  |
| Providing dog and animal control                                                  | 10%                                     | 78%                                                    | 68%  | 75%  | 77%  | 79%  |
| Managing and issuing building consents                                            | 10%                                     | 61%                                                    | 51%  | 59%  | 50%  | 57%  |
| Infrastructure fit for the future                                                 | 10%                                     | 66%                                                    | 56%  | 55%  | 57%  | 65%  |
| The clarity of the water                                                          | 9%                                      | 87%                                                    | 78%  | 81%  | 86%  | 86%  |
| Cemetery maintenance                                                              | 8%                                      | 93%                                                    | 85%  | 94%  | 89%  | 91%  |
| Overall satisfaction with council's regulatory services                           | 8%                                      | 77%                                                    | 69%  | 76%  | 72%  | 75%  |
| The condition of the roads in your area being to a quality that you expect        | 7%                                      | 67%                                                    | 60%  | 59%  | 61%  | 68%  |
| How the Manawatu District Council treats and disposes of sewage                   | 7%                                      | 96%                                                    | 89%  | 90%  | 90%  | 92%  |
| An environment to be proud of                                                     | 7%                                      | 82%                                                    | 75%  | 77%  | 76%  | 81%  |
| Transfer station                                                                  | 6%                                      | 78%                                                    | 72%  | 73%  | 74%  | 76%  |
| Overall performance                                                               | 6%                                      | 75%                                                    | 69%  | 67%  | 70%  | 77%  |
| The pressure of the water                                                         | 6%                                      | 85%                                                    | 79%  | 84%  | 86%  | 87%  |
| Ability to protect your property from flooding                                    | 6%                                      | 72%                                                    | 66%  | 66%  | 66%  | 72%  |
| Overall satisfaction with - Sports and events centre                              | 5%                                      | 93%                                                    | 88%  | 87%  | 87%  | 93%  |
| Rates being fair and reasonable                                                   | 5%                                      | 45%                                                    | 40%  | 45%  | 48%  | 54%  |
| Overall satisfaction with parks, reserves and sportsgrounds                       | 5%                                      | 94%                                                    | 89%  | 93%  | 93%  | 95%  |
| Managing liquor licensing                                                         | 5%                                      | 84%                                                    | 79%  | 88%  | 78%  | 80%  |

Year-on-year difference

|        |                      |
|--------|----------------------|
| Higher | Significantly higher |
| Lower  | Significantly lower  |

## Trends in Satisfaction (% 6-10)

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|                                                                                                                           | % point increase / decrease (2026-2025) | Percentage of respondents satisfied, or very satisfied |      |      |      |      |
|---------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------------------------------------------|------|------|------|------|
|                                                                                                                           |                                         | 2026                                                   | 2025 | 2024 | 2023 | 2022 |
| Overall quality of your life                                                                                              | 5%                                      | 94%                                                    | 89%  | 92%  | 93%  | -    |
| Sportsgrounds                                                                                                             | 4%                                      | 93%                                                    | 89%  | 90%  | 93%  | 94%  |
| Overall satisfaction with council's public facilities                                                                     | 4%                                      | 89%                                                    | 85%  | 85%  | 86%  | 89%  |
| Licensing premises such cafes, restaurants and haird                                                                      | 4%                                      | 90%                                                    | 86%  | 92%  | 83%  | 80%  |
| The Council is doing a good job growing the district economy                                                              | 4%                                      | 63%                                                    | 59%  | 64%  | 69%  | 69%  |
| Services and facilities                                                                                                   | 4%                                      | 78%                                                    | 74%  | 74%  | 75%  | 80%  |
| It is easy to find out what Council funding is available                                                                  | 4%                                      | 47%                                                    | 43%  | 48%  | 49%  | 47%  |
| The reliability of the water supply                                                                                       | 4%                                      | 96%                                                    | 92%  | 91%  | 95%  | 96%  |
| Financial management                                                                                                      | 4%                                      | 59%                                                    | 55%  | 51%  | 63%  | 66%  |
| The odour of the water                                                                                                    | 3%                                      | 77%                                                    | 74%  | 77%  | 84%  | 78%  |
| Recycling points or centre                                                                                                | 3%                                      | 79%                                                    | 76%  | 75%  | 75%  | 79%  |
| The services for managing green waste                                                                                     | 3%                                      | 67%                                                    | 64%  | 60%  | 64%  | 67%  |
| The services for managing general waste using the Manawatu District Council Blue Bag                                      | 3%                                      | 78%                                                    | 75%  | 79%  | 80%  | 81%  |
| Overall satisfaction with - Public toilets                                                                                | 3%                                      | 86%                                                    | 83%  | 76%  | 81%  | 87%  |
| How easy it was to make your enquiry or request                                                                           | 3%                                      | 85%                                                    | 82%  | 79%  | 64%  | 66%  |
| You're confident that the District is going in the right direction                                                        | 3%                                      | 77%                                                    | 74%  | 72%  | 74%  | 82%  |
| Overall value for money                                                                                                   | 3%                                      | 48%                                                    | 45%  | 45%  | 52%  | 56%  |
| Other parks and reserves                                                                                                  | 3%                                      | 94%                                                    | 91%  | 92%  | 93%  | 94%  |
| I am aware that Council is working with, and funding, external agencies to develop, improve and promote the local economy | 3%                                      | 59%                                                    | 56%  | 60%  | 61%  | 66%  |
| The safety of the roads                                                                                                   | 2%                                      | 63%                                                    | 61%  | 60%  | 62%  | 65%  |
| How well footpaths are maintained                                                                                         | 2%                                      | 68%                                                    | 66%  | 66%  | 68%  | 69%  |
| Overall satisfaction with - The libraries                                                                                 | 2%                                      | 93%                                                    | 91%  | 77%  | 85%  | 90%  |
| Overall satisfaction with - Makino Pools                                                                                  | 2%                                      | 90%                                                    | 88%  | 81%  | 85%  | 89%  |
| A prosperous, resilient economy                                                                                           | 2%                                      | 72%                                                    | 70%  | 74%  | 73%  | 78%  |
| The ease of making payments                                                                                               | 2%                                      | 87%                                                    | 85%  | 90%  | 92%  | 91%  |
| Overall reputation                                                                                                        | 2%                                      | 72%                                                    | 70%  | 70%  | 72%  | 76%  |
| The process to apply for funding for events and projects is easy                                                          | 2%                                      | 42%                                                    | 40%  | 48%  | 52%  | 52%  |

### Year-on-year difference

|        |                      |
|--------|----------------------|
| Higher | Significantly higher |
| Lower  | Significantly lower  |

## Trends in Satisfaction (% 6-10)

[◀ TOC](#)

|                                                                                                                                                  | % point increase / decrease (2026-2025) | Percentage of respondents satisfied, or very satisfied |      |      |      |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|--------------------------------------------------------|------|------|------|------|
|                                                                                                                                                  |                                         | 2026                                                   | 2025 | 2024 | 2023 | 2022 |
| The provision of dedicated walkways and other cycle ways around the Manawātū district                                                            | 2%                                      | 70%                                                    | 68%  | 69%  | 68%  | 72%  |
| Overall satisfaction with roads, footpaths, cycle ways                                                                                           | 2%                                      | 69%                                                    | 67%  | 66%  | 66%  | 76%  |
| The reliability of the sewage system                                                                                                             | 1%                                      | 95%                                                    | 94%  | 95%  | 96%  | 97%  |
| Management of loose litter and bins in and around the town                                                                                       | 1%                                      | 75%                                                    | 74%  | 78%  | 78%  | 81%  |
| Overall satisfaction with waste disposal services                                                                                                | 1%                                      | 79%                                                    | 78%  | 79%  | 78%  | 82%  |
| Playgrounds                                                                                                                                      | 1%                                      | 91%                                                    | 90%  | 90%  | 93%  | 90%  |
| Overall satisfaction with - Community halls                                                                                                      | 1%                                      | 88%                                                    | 87%  | 86%  | 87%  | 91%  |
| I am aware that Council is working in partnership with Palmerston North City Council (PNCC) to develop, improve and promote the region's economy | 1%                                      | 62%                                                    | 61%  | 64%  | 64%  | 69%  |
| I am satisfied with the economic development services                                                                                            | 1%                                      | 57%                                                    | 56%  | 60%  | 66%  | 70%  |
| The kerbside recycling services                                                                                                                  | -                                       | 76%                                                    | 76%  | 74%  | 77%  | 81%  |
| The kerbside food waste services                                                                                                                 | -                                       | 63%                                                    | -    | -    | -    | -    |
| The road network having enough signage and being easy to navigate                                                                                | -                                       | 84%                                                    | 84%  | 82%  | 82%  | 88%  |
| Parking provisions                                                                                                                               | -                                       | 77%                                                    | 77%  | 74%  | 75%  | 79%  |
| Roads being resilient to weather events or increased volumes of traffic                                                                          | -                                       | 59%                                                    | -    | -    | -    | -    |
| Overall satisfaction with - Council owned property e.g. Civic Centre, Council offices                                                            | -                                       | 91%                                                    | 91%  | 91%  | 89%  | 93%  |
| Vision and leadership                                                                                                                            | -                                       | 68%                                                    | 68%  | 66%  | 67%  | 74%  |
| The availability of footpaths and crossing points for mobility scooters and wheelchairs                                                          | -1%                                     | 60%                                                    | 61%  | 58%  | 65%  | 66%  |
| Adequacy of cycleways on our roads                                                                                                               | -1%                                     | 59%                                                    | 60%  | 56%  | 58%  | 59%  |
| A place to belong and grow                                                                                                                       | -1%                                     | 75%                                                    | 76%  | 78%  | 75%  | 78%  |
| A future planned together                                                                                                                        | -1%                                     | 62%                                                    | 63%  | 57%  | 61%  | 62%  |
| Trust                                                                                                                                            | -1%                                     | 60%                                                    | 61%  | 60%  | 65%  | 70%  |
| Managing and issuing resource consents                                                                                                           | -2%                                     | 51%                                                    | 53%  | 56%  | 48%  | 51%  |
| I feel a sense of connection with my neighbourhood or community                                                                                  | -3%                                     | 67%                                                    | 70%  | 68%  | 66%  | 71%  |
| Satisfaction with Overall communication                                                                                                          | -3%                                     | 62%                                                    | 65%  | 67%  | 66%  | 71%  |
| I am satisfied with Community Funding services                                                                                                   | -4%                                     | 44%                                                    | 48%  | 59%  | 55%  | 60%  |
| Kerbside rubbish collection                                                                                                                      | -4%                                     | 89%                                                    | 93%  | 91%  | 89%  | 91%  |

### Year-on-year difference

|        |                      |
|--------|----------------------|
| Higher | Significantly higher |
| Lower  | Significantly lower  |

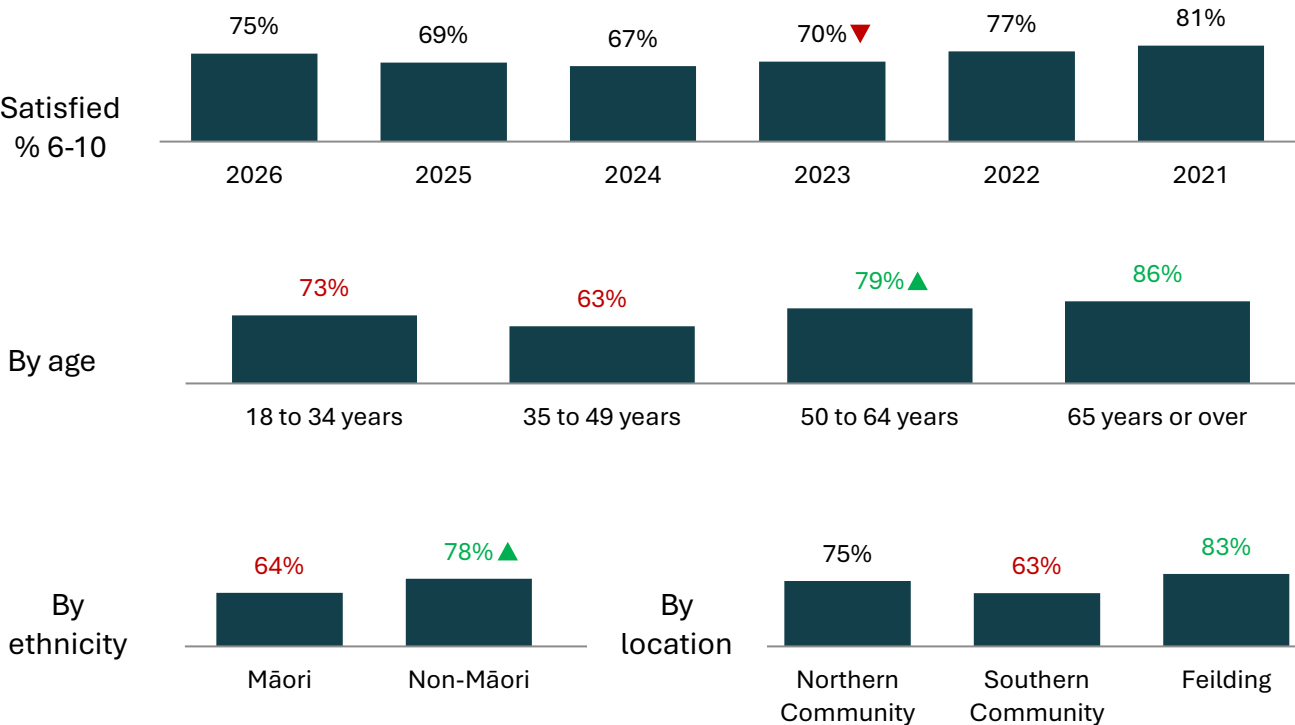
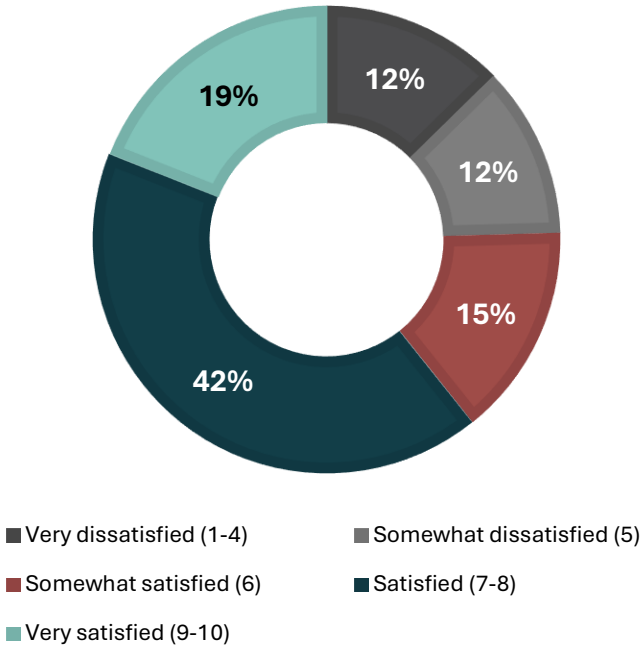
# Key Performance Measures



Overall Satisfaction with Manawatū District Council

TOC

- Satisfaction with Council’s *Overall performance* (75%) has increased by 6% points since 2025 (69%).
- This improvement is likely due to a significant increase in satisfaction among residents aged 50 to 64 years (from 65% to 79%) and Non-Māori residents (from 71% to 78%) since 2025.
- Most residents who provided a general comment (25%) expressed positive views, stating they are *Satisfied with Council / Council actions / enjoy living in the area*.



Notes:

1. OP1. Everything considered, reputation, services and facilities, and value for money, how satisfied are you with the overall performance of the Manawatū District Council? n=426

Year-on-year

▲ Significantly higher

▼ Significantly lower

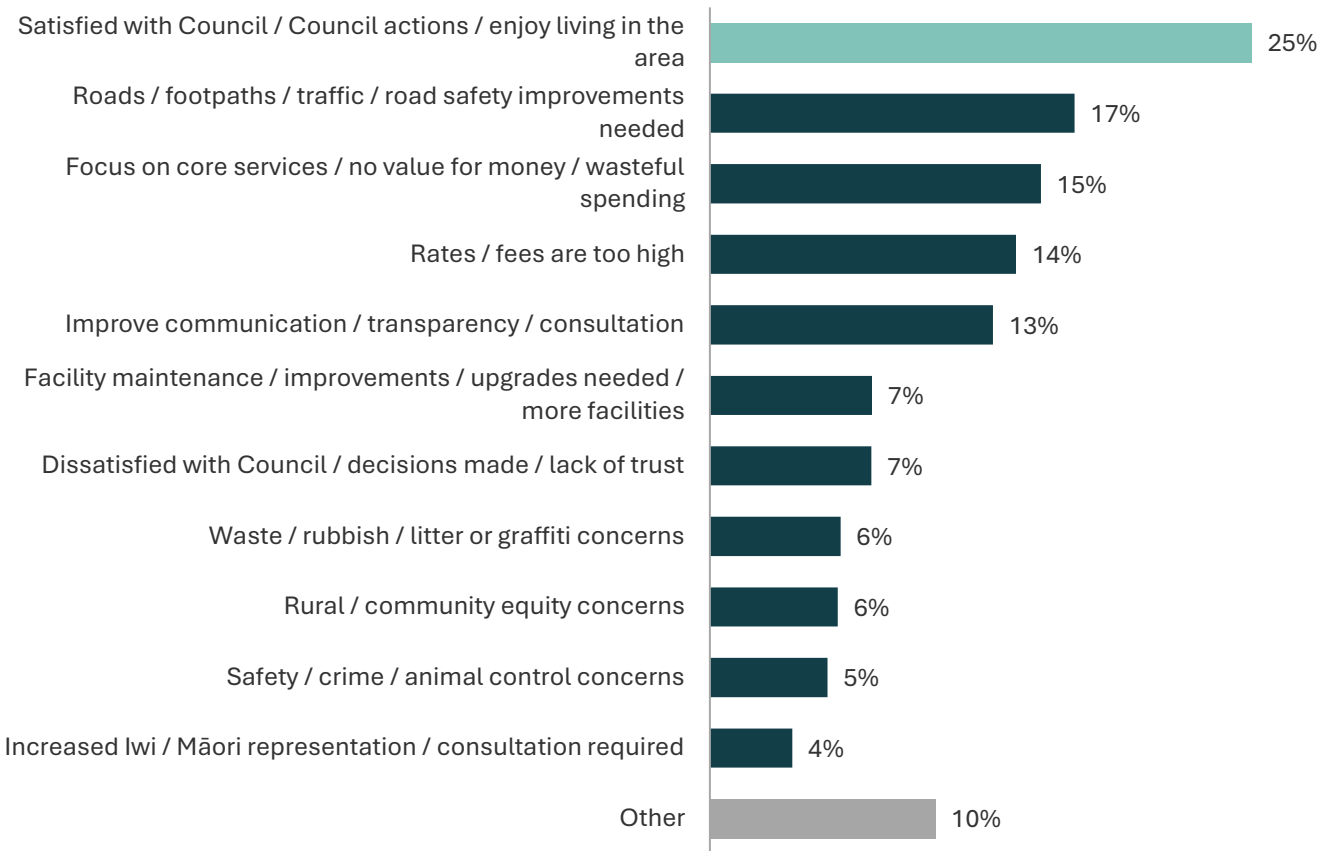
Between demographics

▲ Significantly higher

▼ Significantly lower

# General Comments\*

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- I have really appreciated the weekly Council reports that the mayor has given about the happenings of that week and what is coming up.*
- I think they do a great job in a difficult time.*
- Generally, overall satisfied with the Manawātū District Council.*
- I feel very fortunate to live in this area and to have 2 of our children have returned home to Feilding after living in Australia for 20 plus years and both have been bought in the town and are in full employment.*
- They give me confidence.*
- Overall I am a satisfied customer. Good job, well done.*
- We are retired and find Feilding suites our requirements.*
- Just continue listening to the community and ratepayers.*
- Only ever hear good things about Council, which I guess means they're doing a great job keeping things working.*



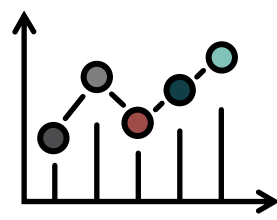
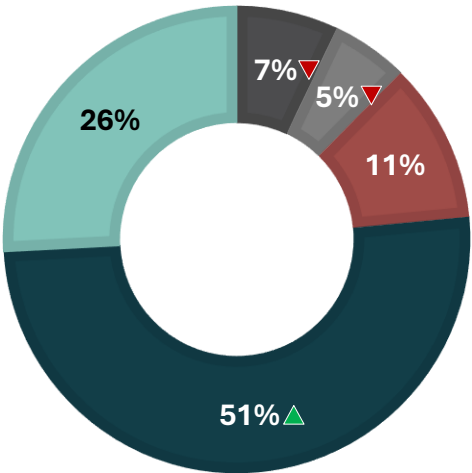
- Remove the speed bumps on Denbigh Street and Derby Street.*
- Please do something with the safety of our roads. This town is forever growing, and the current layout of areas is very concerning, especially for our young children, often vehicles don't stop at pedestrian crossings, especially on Kimbolton Road which is know for the majority of accidents.*
- I wish there could be traffic lights along Kimbolton Road but know that is out of the Councils hands.*
- Be wise and practical in deciding.*
- Keep to a budget. Reduce staff. Reduce consultants.*
- Keep focused on the core functions. have a long-term strategy for these. Cognisant of future growth in population.*
- The Council needs to stem spending where possible. Rates just keep going up and up and up.*

Notes:  
 1. GEN1. Are there any other comments that you would like to make about the Manawātū District Council? n=139

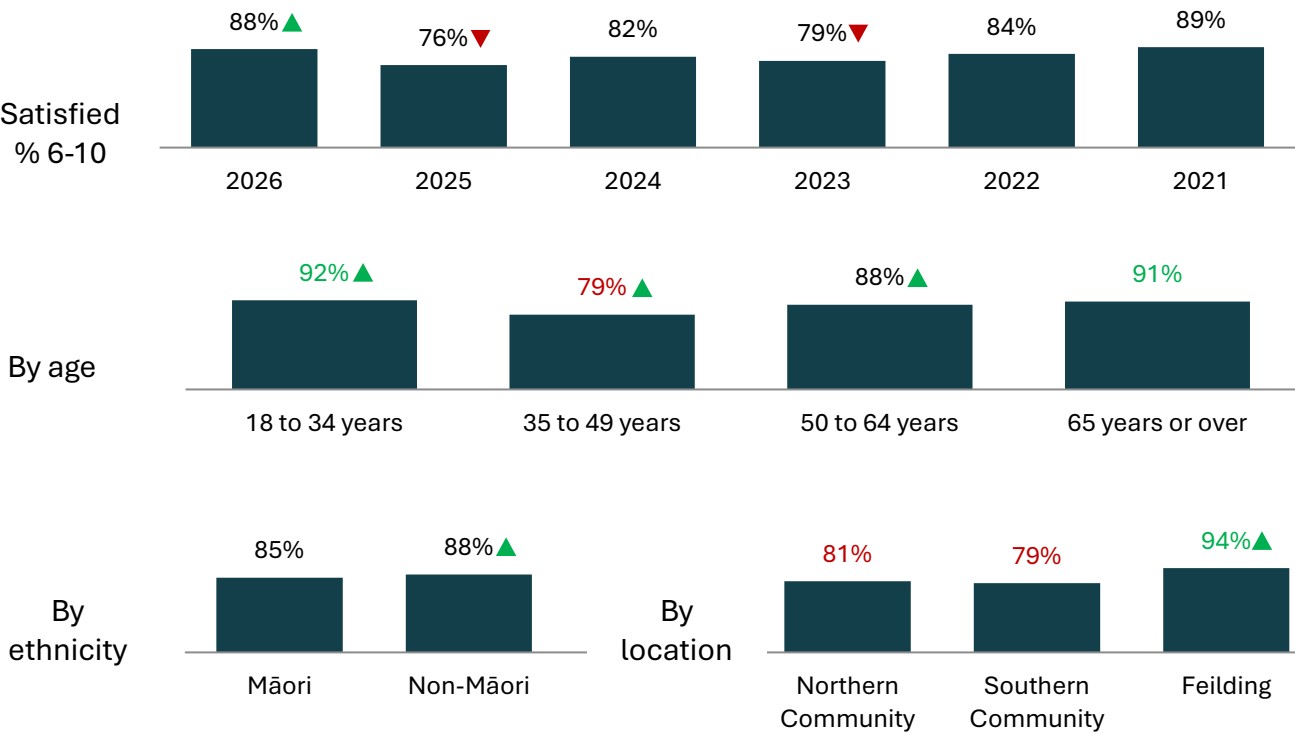
Overall Services and Facilities

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- A significant increase in satisfaction with *Overall services and facilities* Council provides has been recorded, increasing from 76% in 2025 to 88% in 2026. This is the highest rating recorded since 2022.
- Nearly all residents of Feilding (94%) are satisfied with *Overall services and facilities*.



- Very dissatisfied (1-4)
- Somewhat dissatisfied (5)
- Somewhat satisfied (6)
- Satisfied (7-8)
- Very satisfied (9-10)



Notes:

1. OVLSV. When you think of all the services and facilities that Council provides; roads, parks, water reticulation, waste disposal, swimming pools, museums, libraries and so on, and its regulatory services such as animal control, building consents, overall, how satisfied are you with the services and facilities that Council provides? n=414

Year-on-year

Between demographics

Significantly higher

Significantly lower

Significantly higher

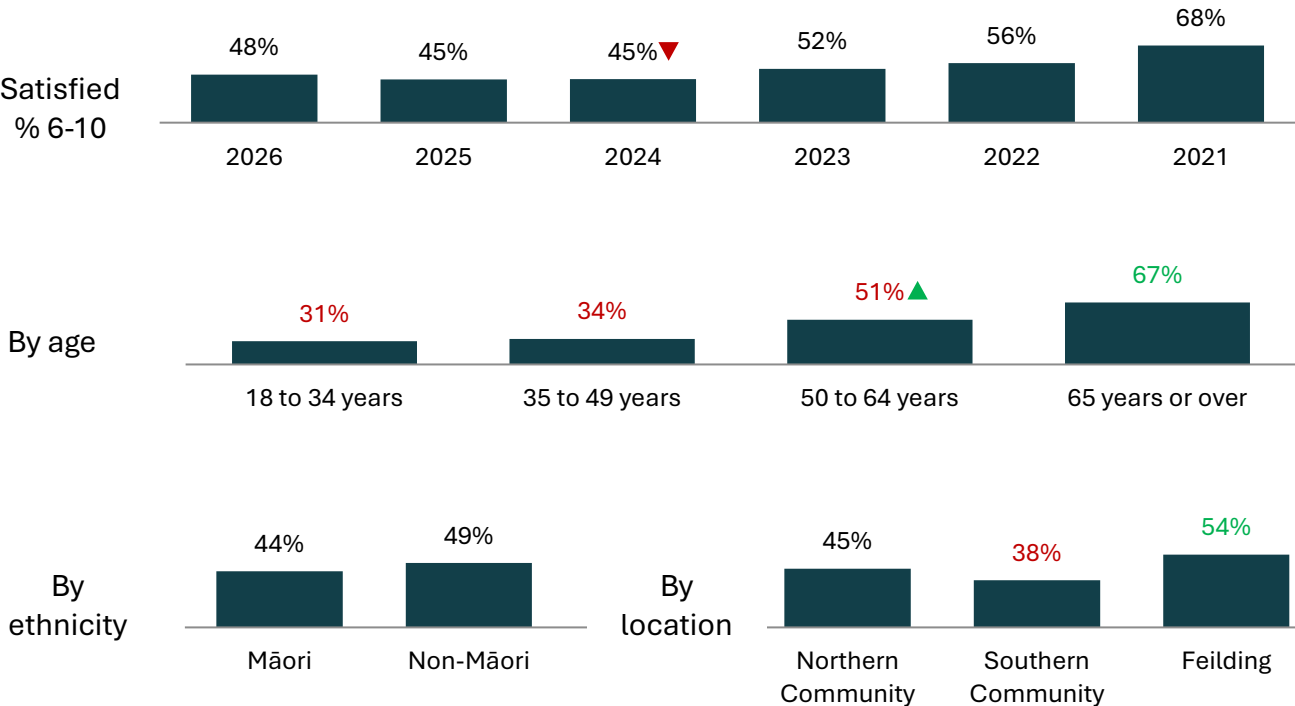
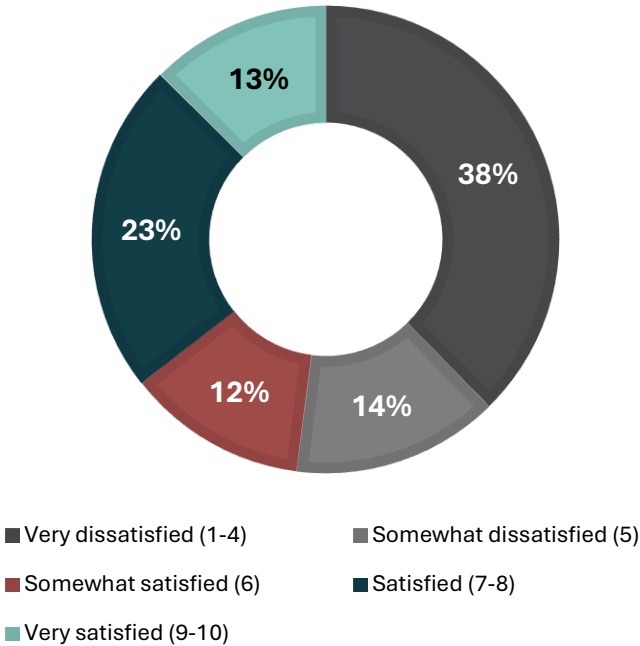
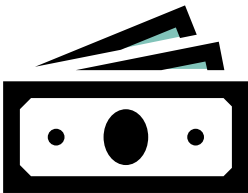
Significantly lower

# Value for Money

Value for Money

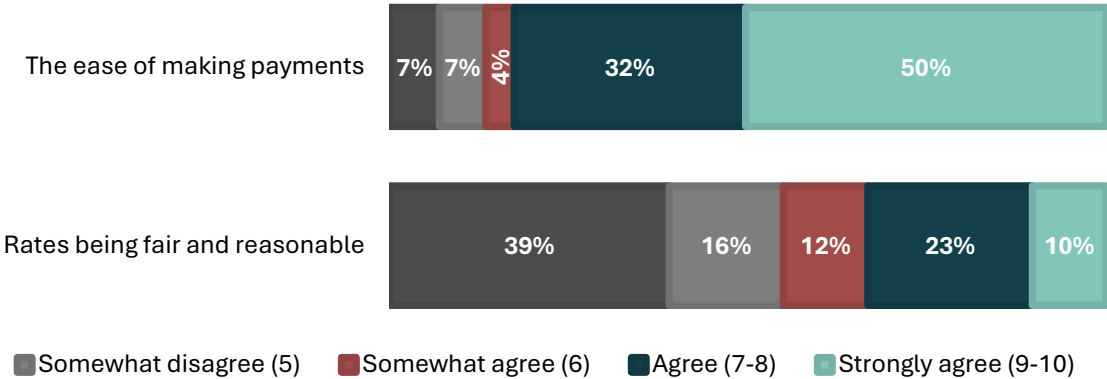
TOC

- Satisfaction with *Overall value for money* (48%) remained relatively consistent year-on-year.
- A significant increase in satisfaction has been recorded among residents aged 50 to 64 years, from 36% in 2025 to 51% in 2026.
- Residents in Feilding (54%) are significantly more likely to be satisfied with this measure than those in the Southern Community (38%).



Other Measures Related to Value for Money

◀ TOC



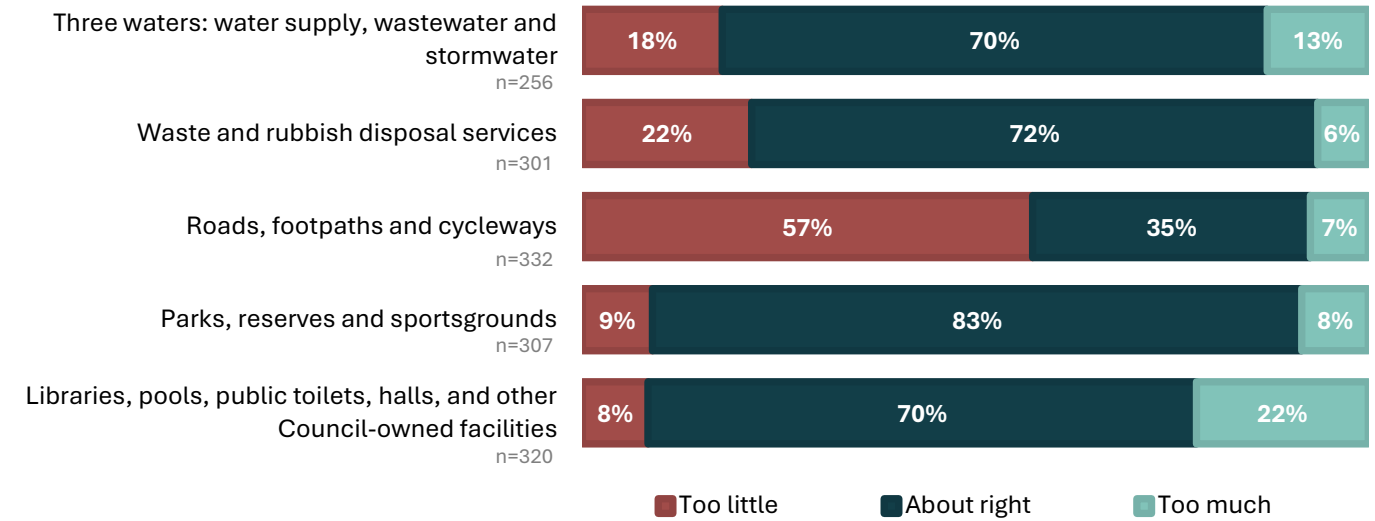
| Scores with % 6 - 10            | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|---------------------------------|------|------|------|------|------|------|
| The ease of making payments     | 87%  | 85%  | 90%  | 92%  | 91%  | 94%  |
| Rates being fair and reasonable | 45%  | 40%  | 45%  | 48%  | 54%  | 57%  |

| Scores with % 6 – 10<br>(by ethnicity and location) | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|-----------------------------------------------------|-------|-----------|--------------------|--------------------|----------|
| The ease of making payments                         | 83%   | 87%       | 85%                | 77%                | 92%      |
| Rates being fair and reasonable                     | 38%   | 46%       | 37%                | 39%                | 50%▲     |

Spending Priorities\*\*

TOC

- Most respondents believe that Council spending is 'About right' in regard to *Parks, reserves and sportsgrounds* (83%).
- In contrast, 57% of residents think there is 'Too little' money spent on *Roads, footpaths and cycleways*.



| Three waters                                                                | Māori      |             |          | Non-Māori  |             |          |
|-----------------------------------------------------------------------------|------------|-------------|----------|------------|-------------|----------|
|                                                                             | Too little | About right | Too much | Too little | About right | Too much |
| Three waters: water supply, wastewater and stormwater                       | 20%*       | 59%*        | 21%*     | 18%        | 71%         | 11%      |
| Waste and rubbish disposal services                                         | 32%        | 65%         | 3%       | 19%        | 73%         | 7%       |
| Roads, footpaths and cycleways                                              | 60%        | 29%         | 11%      | 57%        | 37%         | 7%       |
| Parks, reserves and sportsgrounds                                           | 14%        | 74%         | 12%      | 8%         | 84%         | 8%       |
| Libraries, pools, public toilets, halls, and other Council-owned facilities | 14%        | 67%         | 20%      | 8%         | 70%         | 22%      |

| Three waters                                                                | Northern Community |             |          | Southern Community |             |          | Feilding   |             |          |
|-----------------------------------------------------------------------------|--------------------|-------------|----------|--------------------|-------------|----------|------------|-------------|----------|
|                                                                             | Too little         | About right | Too much | Too little         | About right | Too much | Too little | About right | Too much |
| Three waters: water supply, wastewater and stormwater                       | 25%                | 47%         | 28%      | 27%                | 58%         | 15%      | 12%        | 81%         | 7%       |
| Waste and rubbish disposal services                                         | 37%                | 55%         | 9%       | 42%                | 53%         | 4%       | 6%         | 87%         | 7%       |
| Roads, footpaths and cycleways                                              | 65%                | 22%         | 13%      | 65%                | 31%         | 4%       | 50%        | 42%         | 8%       |
| Parks, reserves and sportsgrounds                                           | 9%                 | 82%         | 10%      | 6%                 | 87%         | 6%       | 10%        | 81%         | 9%       |
| Libraries, pools, public toilets, halls, and other Council-owned facilities | 5%                 | 74%         | 21%      | 9%                 | 73%         | 19%      | 9%         | 67%         | 24%      |

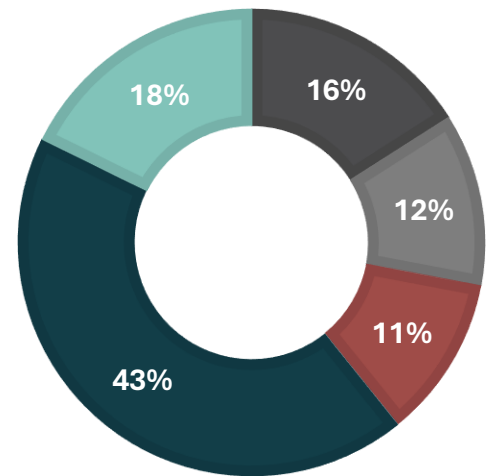
# Image and Reputation



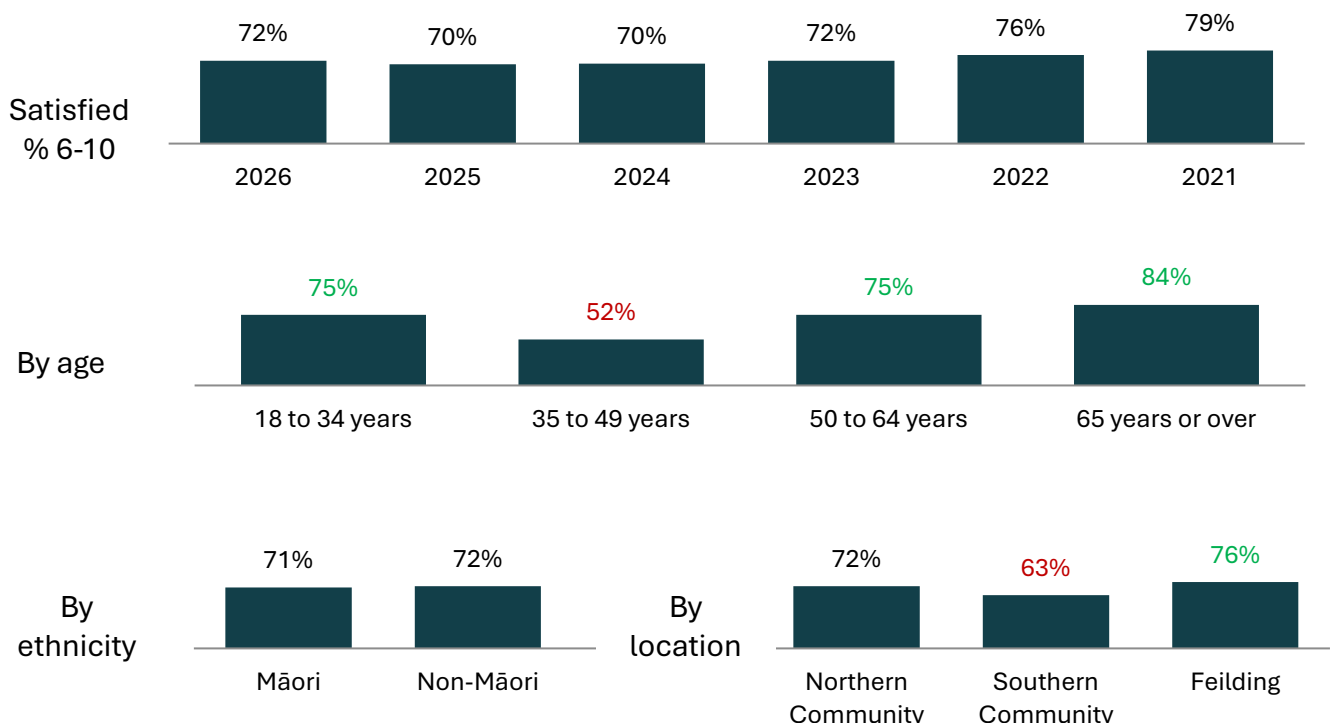
## Overall Reputation

◀ TOC

- Just over seven in ten residents (72%) are satisfied with Council's *Overall reputation*.
- Satisfaction is significantly lower among residents aged 35 to 49 years (52%) compared to other age groups.
- Quality of services and facilities* continues to receive the highest satisfaction rating among all related attributes, at 78%. Satisfaction with this measure has significantly increased year-on-year among the Southern Community, from 58% in 2025 to 71% in 2026.



■ Poor (1-4)      ■ Somewhat poor (5)  
 ■ Somewhat good (6)      ■ Good (7-8)  
 ■ Excellent (9-10)



### Notes:

- REP5. So, considering, leadership, trust, financial management and quality of services provided, how would you rate the Manawātū District Council for its overall reputation? n=397

### Year-on-year

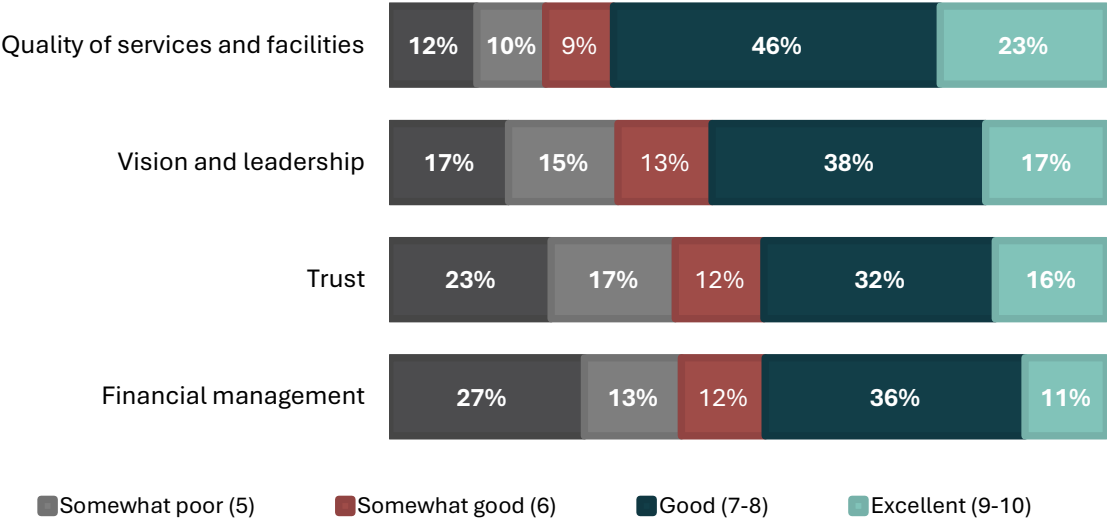
▲ Significantly higher  
 ▼ Significantly lower

### Between demographics

▲ Significantly higher  
 ▼ Significantly lower

Other Measures Related to Image and Reputation

◀ TOC



| Scores with % 6 - 10               | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|------------------------------------|------|------|------|------|------|------|
| Quality of services and facilities | 78%  | 74%  | 74%  | 75%  | 80%  | 83%  |
| Vision and leadership              | 68%  | 68%  | 66%  | 67%▼ | 74%  | 72%  |
| Trust                              | 60%  | 61%  | 60%  | 65%  | 70%  | 64%  |
| Financial management               | 59%  | 55%  | 51%▼ | 63%  | 66%  | 60%  |

| Scores with % 6 – 10<br>(by ethnicity and location) | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|-----------------------------------------------------|-------|-----------|--------------------|--------------------|----------|
| Quality of services and facilities                  | 75%   | 79%       | 72%                | 71%▲               | 84%      |
| Vision and leadership                               | 58%   | 70%       | 56%                | 55%                | 77%      |
| Trust                                               | 51%   | 62%       | 53%                | 54%                | 65%      |
| Financial management                                | 59%   | 59%       | 47%                | 48%                | 68%      |

Notes:

1. REP1. ...how would you rate the Council for its vision and leadership? n=348

2. REP2. Overall, how would you rate the Council in terms of the trust you have in them? n=360

3. REP3. How would you rate the Council overall for its financial management? n=295

4. REP4. ...how would you rate them for the quality of the services and facilities they provide? n=419

Year-on-year

▲ Significantly higher

▼ Significantly lower

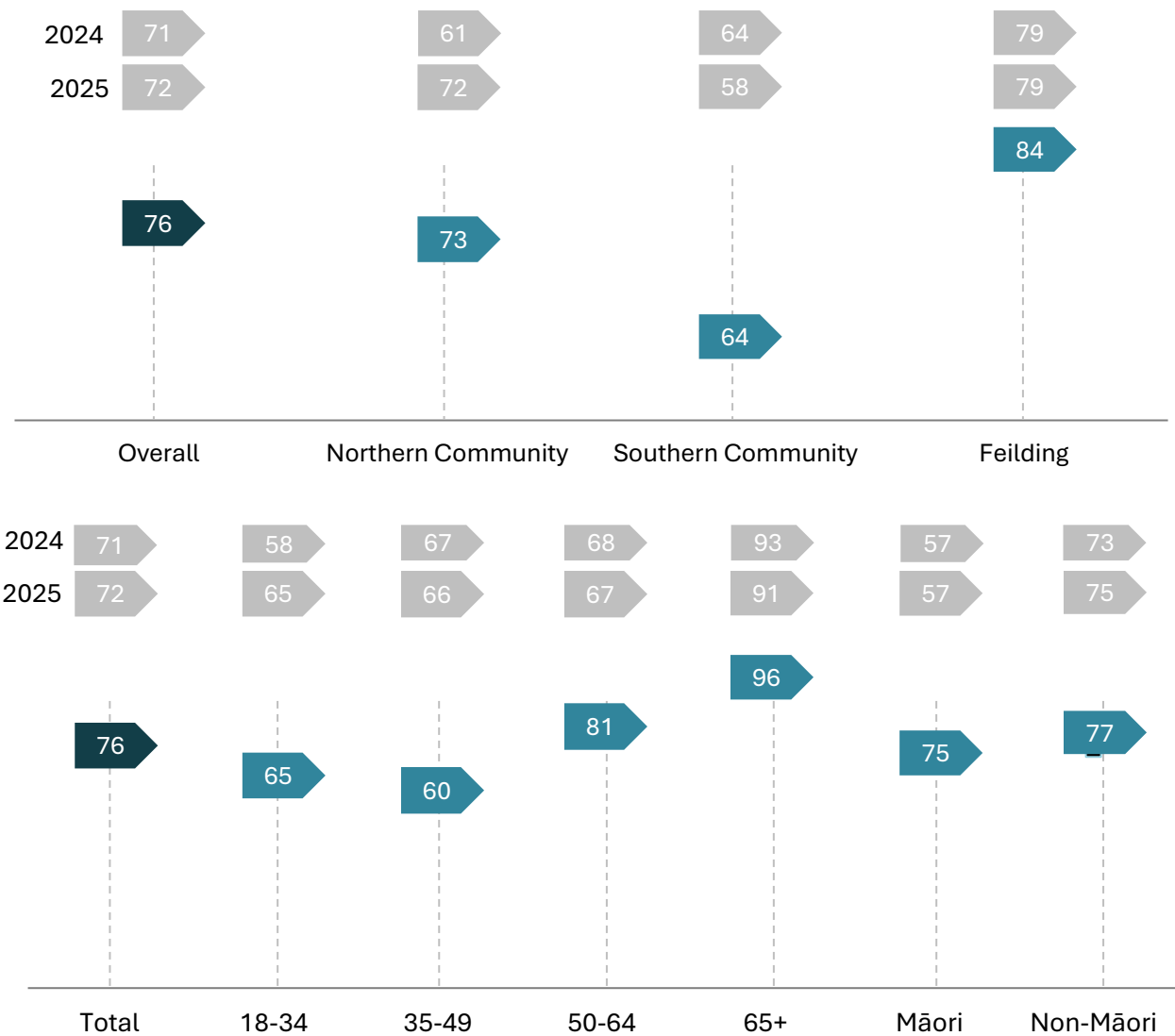
Between demographics

Significantly higher

Significantly lower

Reputation Benchmark

[<< TOC](#)



- Council’s reputation benchmark continues to improve, increasing from +71 in 2024 to +72 in 2025, and further to +76 in 2026.
- Residents aged 65 years and over recorded the highest reputation benchmark score of +96, indicating an ‘excellent reputation’. Residents in the Southern Community recorded the lowest reputation benchmark of +64.

Notes:

1. REP5. So, considering, leadership, trust, financial management and quality of services provided, how would you rate the Manawātū District Council for its overall reputation? n=459

2. The benchmark is calculated by rescaling the overall reputation measure to a new scale between -50 and +150 to improve granularity for the purpose of benchmarking.

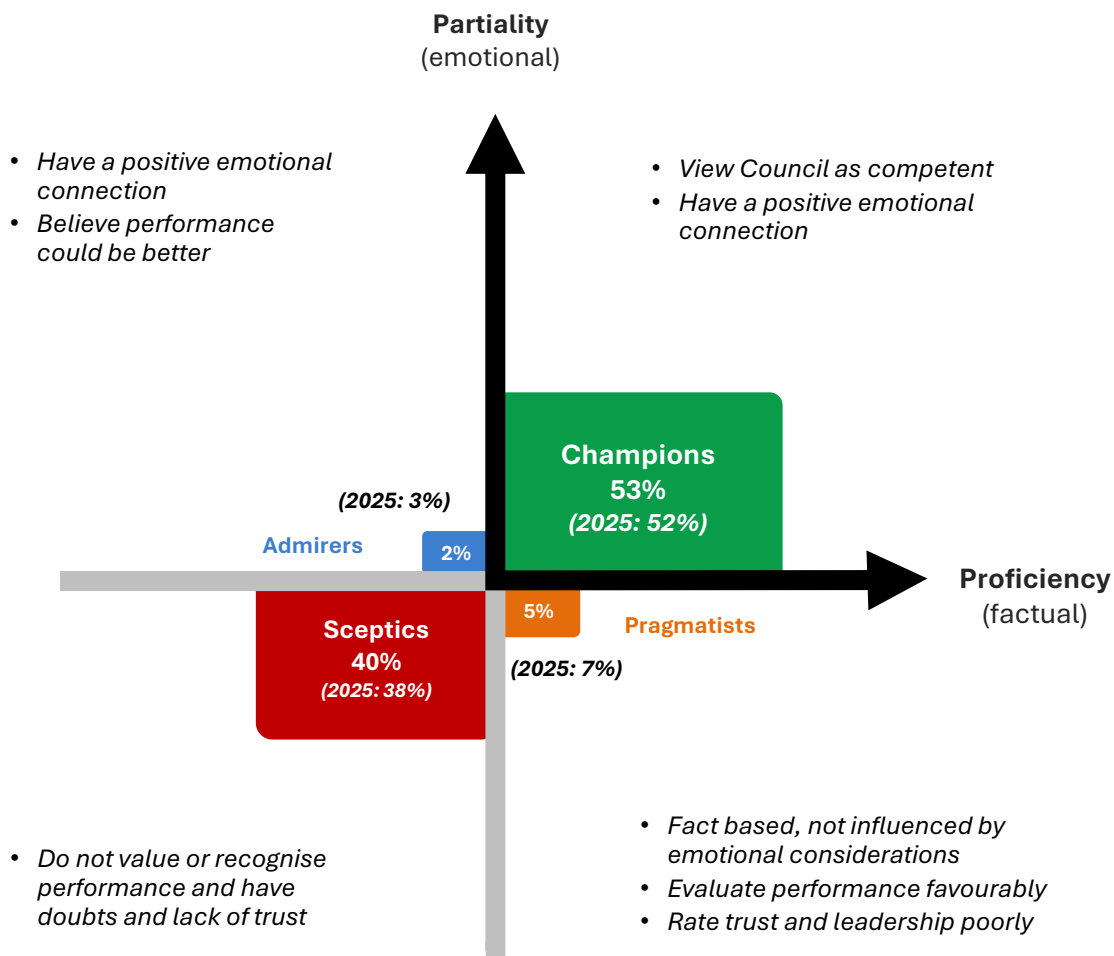
**Key:**  
 >80    Excellent reputation  
 60-79    Acceptable reputation  
 <60    Poor reputation  
 150    Maximum score

Year-on-year  
 ▲ Significantly higher  
 ▼ Significantly lower

Between demographics  
 ▲ Significantly higher  
 ▼ Significantly lower

## Reputation Profile

« TOC



- The overall reputation profile has remained relatively consistent since 2025. Small shifts between segments have been reported, with slight increases in both 'Champions' (from 52% to 53%) and Sceptics (from 38% to 40%) .
- Residents aged 65 or above are most likely to be classed as 'Champions' (71%) compared to those from other age groups.
- 'Pragmatists' (5%) are the group that mostly approves of the Council's -making; however, they lack trust and often are not satisfied with leadership.
- 2% of residents can be classed as 'Admirers'. This group might not support all of Council's decisions, but overall they trust that Council is acting in the best interests of the District.

### Notes:

- Segments have been determined using the results from a set of five overall level questions
- REP1. ...how would you rate the Council for its vision and leadership? n=348
- REP2. Overall, how would you rate the Council in terms of the trust you have in them? n=360
- REP3. How would you rate the Council overall for its financial management? n=295
- REP4. ...how would you rate them for the quality of the services and facilities they provide? n=419
- REP5. So, considering, leadership, trust, financial management and quality of services provided, how would you rate the Manawātū District Council for its overall reputation? n=397
- Excludes don't know response

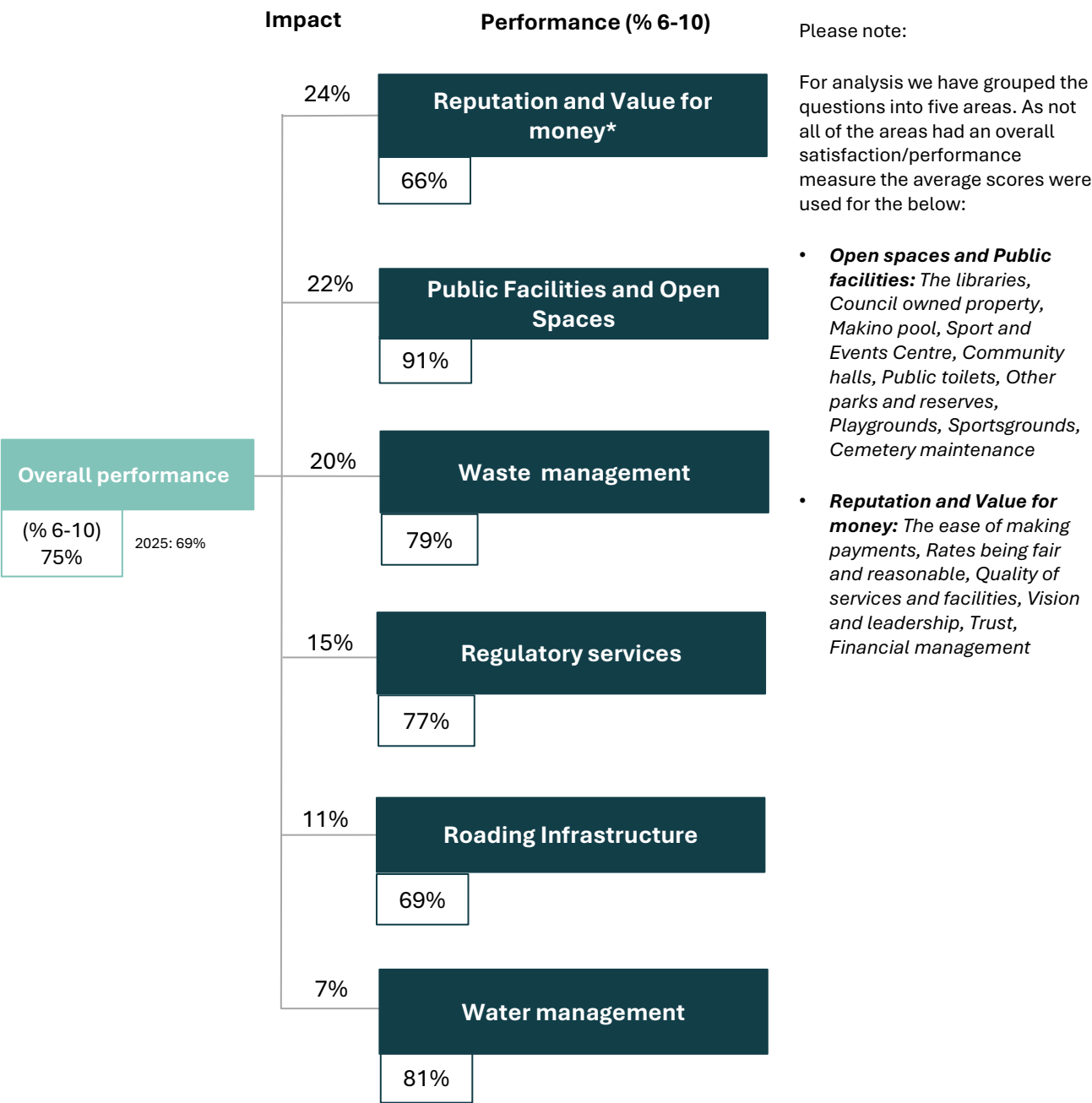
# Priorities and Opportunities



Drivers of Perception of Manawatū District Council’s Performance

TOC

- *Reputation and Value for money* (24% impact) holds the greatest impact on Council’s Overall performance.
- Satisfaction with these measures has increased, contributing to the overall increase in satisfaction with Council’s *Overall performance*.



Year-on-year

- ▲ Significantly higher
- ▼ Significantly lower

NOTES:

1.

\*These measures were grouped as they reflect overall resident sentiment about how well the Council is perceived to manage resources and maintain public trust.

2.

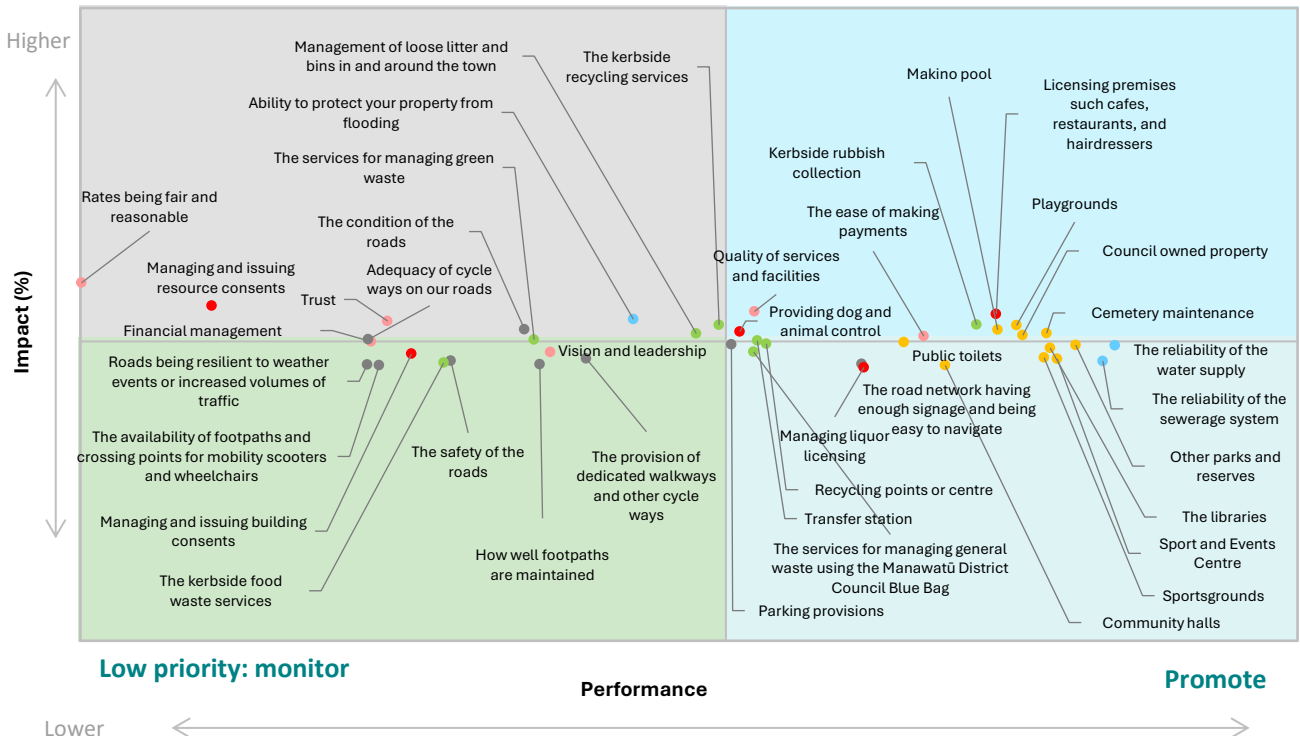
Excludes ‘Don’t know’ responses

## Opportunities and Priorities - Overall measures

« TOC

### Priorities

### Maintain



Manawatu District Council needs to prioritise improvements across several key aspects, particularly in:

#### 1. Reputation and Value for money

- Trust
- Rates being fair and reasonable

#### 2. Rooding Infrastructure

- Adequacy of cycle ways on our roads
- Condition of the roads

#### 3. Waste Management

- The services for managing green waste
- The kerbside recycling services
- Management of loose litter and bins in and around the town

#### 4. Others

- Ability to protect your property from flooding
- Managing and issuing resource consents

These findings suggest a need to strengthen both infrastructure-related services and efforts that build community connection and confidence in Council leadership.

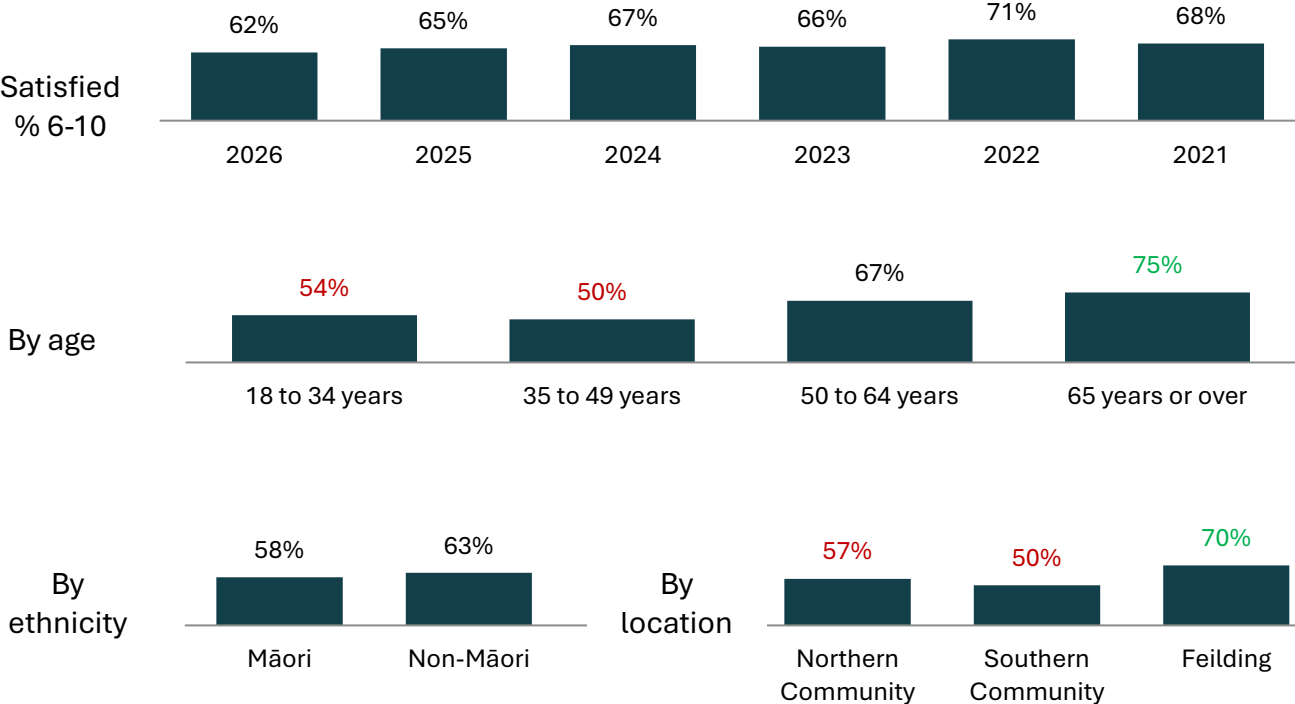
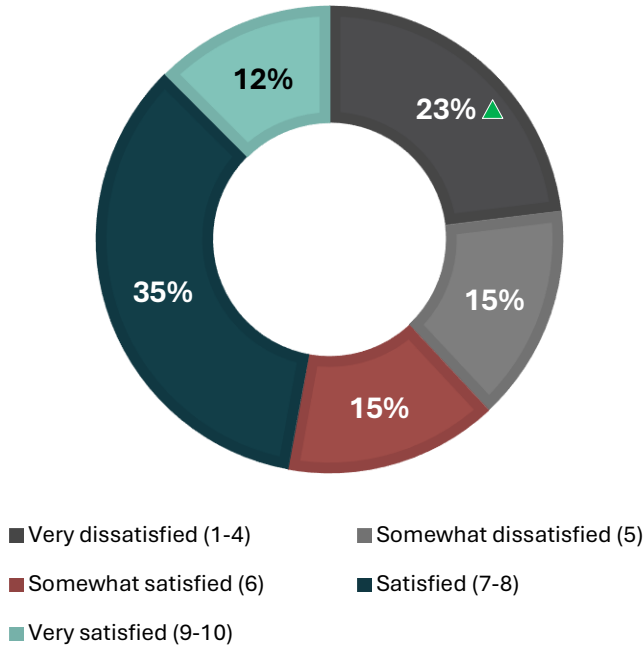
# Communication and Engagement



# Overall Communication

[<< TOC](#)

- Satisfaction with *How Council keeps the public informed* (62%) has slightly decreased by 3% points since 2025 (65%).
- Satisfaction is significantly lower among residents aged 18 to 34 (54%) and 35 to 49 (50%) than among residents aged 65 years or over (75%).
- Preference for *Newspapers* as a source of Council information has decreased significantly since 2025, from 17% to 12%, while preference for *Instagram* as a medium for communication has increased significantly from less than 1% to 5%.



Notes:  
 1. CM4. How would you rate council for keeping the public informed? n=401

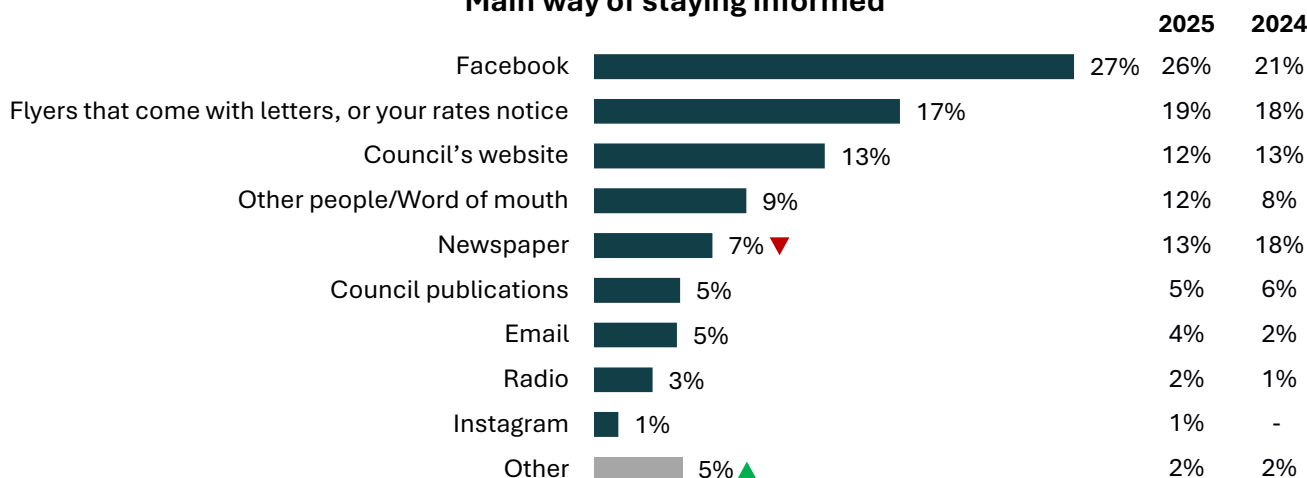
**Year-on-year**  
 ▲ Significantly higher  
 ▼ Significantly lower

**Between demographics**  
 ▲ Significantly higher  
 ▼ Significantly lower

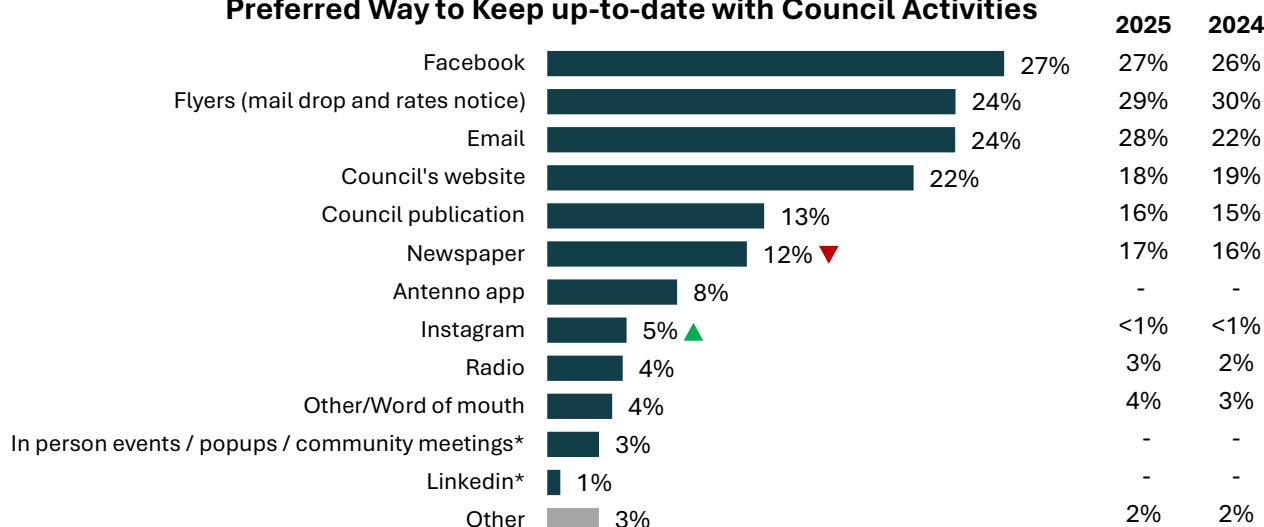
## Communications

[◀ TOC](#)

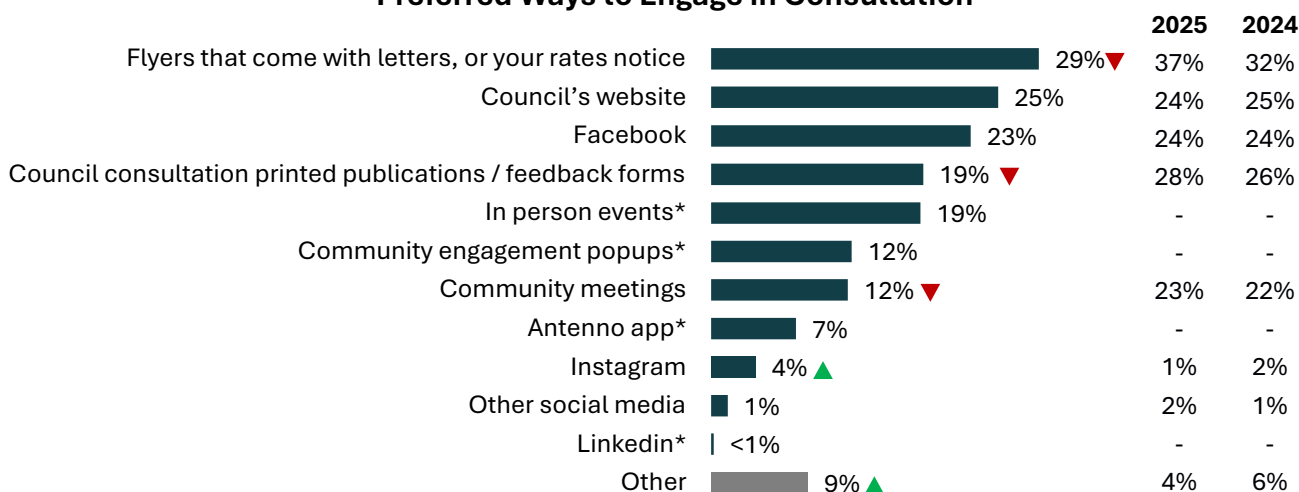
### Main way of staying informed



### Preferred Way to Keep up-to-date with Council Activities



### Preferred Ways to Engage in Consultation



Year-on-year

▲ Significantly higher  
▼ Significantly lower

Notes:

- CM1. Which of the following do you most rely on for information about the Manawātū District Council? n=459
- CM2. How would you prefer to receive information about Manawātū District Council? n=459
- CM3. Thinking about when Council wants your input to decisions, how would you prefer to engage in the process? n=459
- New item added to 2025/2026 survey. No historical data available.

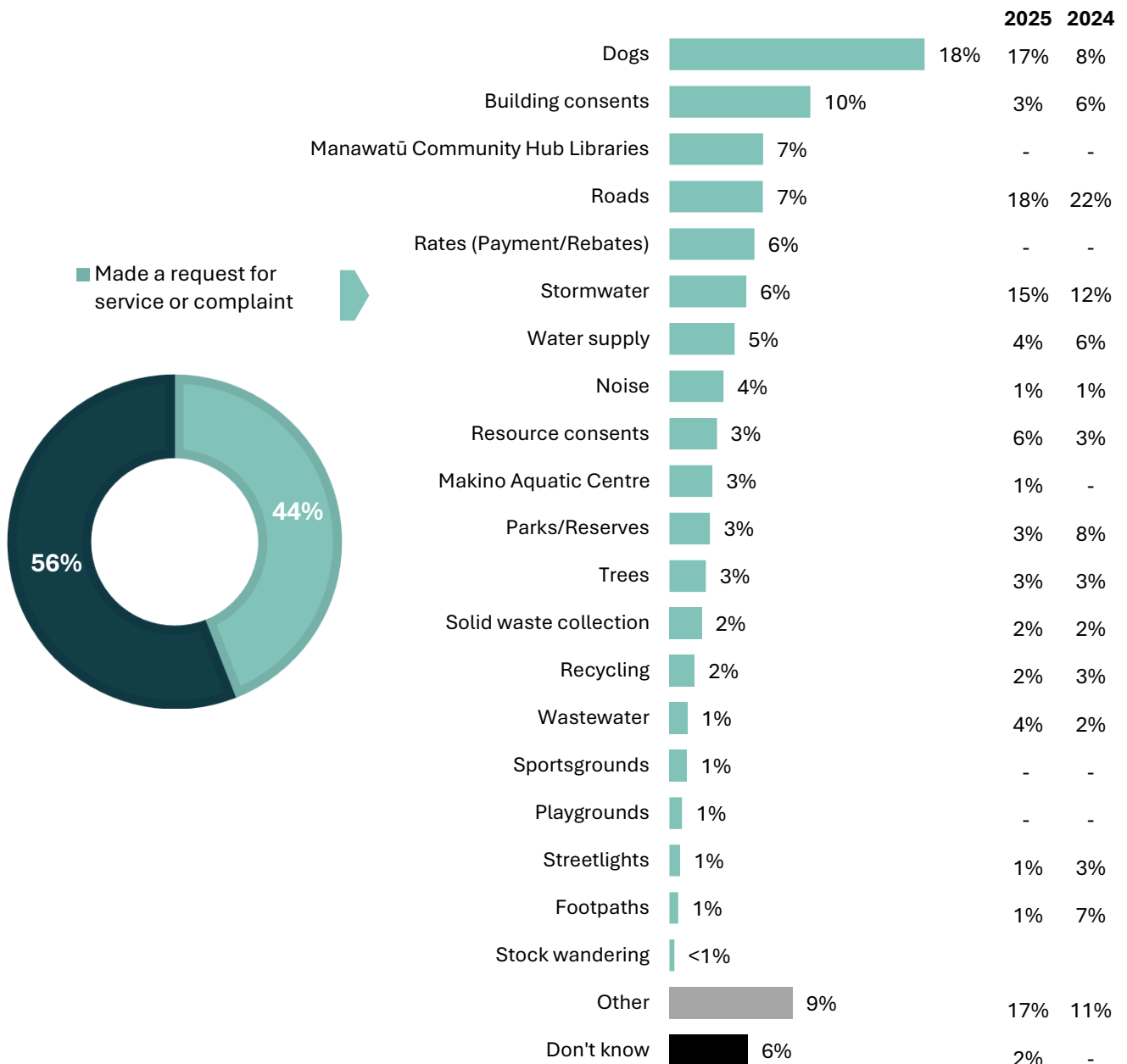
# Council Interaction



## Council Interaction

« TOC

- 44% of residents had interacted with the Council during the past 12 months.
- Among those residents, aspects related to *Dogs* (18%) were the most prevalent reason for contacting the Council.



Notes:

- RS1. Have you interacted with Council during the past 12 months? n=456
- RS2. Thinking about your most recent request or complaint, what did it relate to? n=213

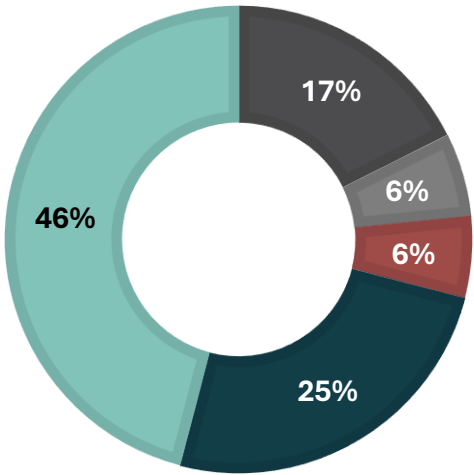
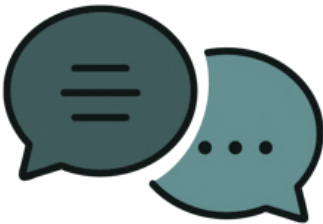
Year-on-year

▲ Significantly higher  
▼ Significantly lower

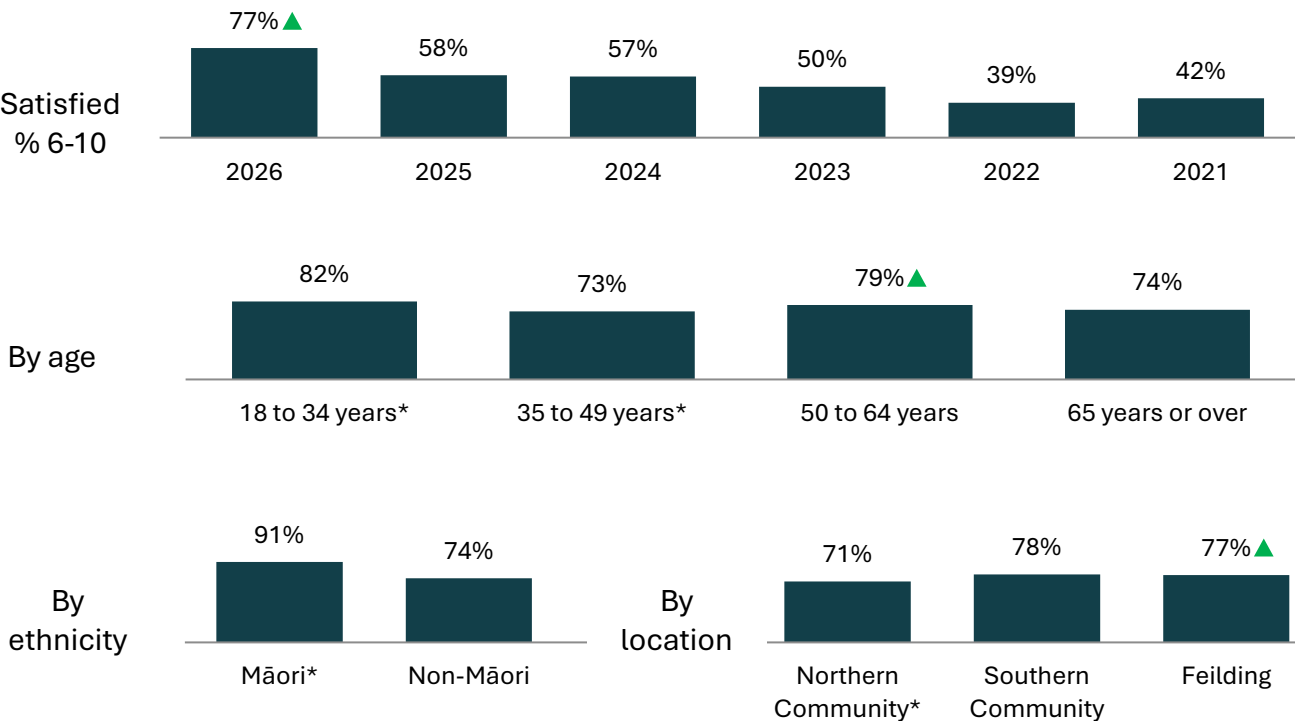
# Overall Enquiry Handling

TOC

- Satisfaction with *How Council handled enquiry overall* has significantly increased since 2025, improving from 58% in 2025 to 77% in 2026.
- Similarly, satisfaction has increased significantly among residents aged 50 to 64 years who contacted the Council, from 56% in 2025 to 79% in 2026, and among residents in Feilding, from 55% in 2025 to 77% in 2026.



- Very dissatisfied (1-4)
- Somewhat dissatisfied (5)
- Somewhat satisfied (6)
- Satisfied (7-8)
- Very satisfied (9-10)



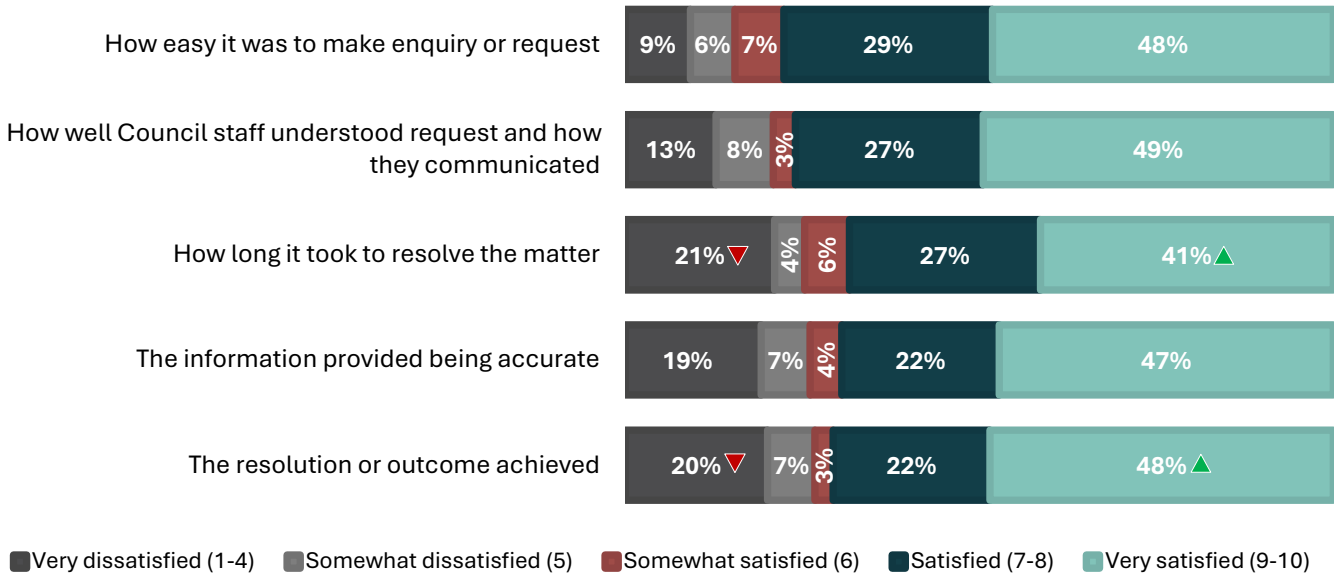
Notes:

1. RS3\_F. How would you rate Council overall for how well they handled your enquiry? n=198

2. \*Caution: Small sample size (n<30). Results are indicative only.

## Enquiry Handling (continued)

◀ TOC



| Scores with % 6-10                                                  | 2026  | 2025 | 2024  | 2023 | 2022 | 2021 |
|---------------------------------------------------------------------|-------|------|-------|------|------|------|
| How easy it was to make enquiry or request                          | 85%   | 82%  | 79% ▲ | 64%  | 66%  | 70%  |
| How well Council staff understood request and how they communicated | 79%   | 69%  | 68%   | 58%  | 52%  | 52%  |
| How long it took to resolve the matter                              | 75% ▲ | 56%  | 54%   | 46%  | 37%  | 33%  |
| The information provided being accurate                             | 74% ▲ | 61%  | 64%   | 52%  | 45%  | 50%  |
| The resolution or outcome achieved                                  | 73% ▲ | 53%  | 52%   | 47%  | 43%  | 38%  |

| Scores with % 6-10                                                  | Māori* | Non-Māori | Northern Community* | Southern Community | Feilding |
|---------------------------------------------------------------------|--------|-----------|---------------------|--------------------|----------|
| How easy it was to make enquiry or request                          | 85%    | 84%       | 85%                 | 82%                | 85%      |
| How well Council staff understood request and how they communicated | 85%    | 78%       | 71%                 | 80%                | 81%      |
| How long it took to resolve the matter                              | 87%    | 73% ▲     | 70%                 | 70%                | 78% ▲    |
| The information provided being accurate                             | 84%    | 72%       | 64%                 | 61%                | 81% ▲    |
| The resolution or outcome achieved                                  | 83%    | 72% ▲     | 62%                 | 70%                | 77% ▲    |

### Notes:

- RS3. Thinking back to your most recent request, how would you rate your satisfaction with each of the following?
  - How easy it was to make your enquiry or request n=199
  - How long it took to resolve the matter n=187
  - The information provided being accurate n=177
  - How well Council staff understood your request and how they communicated with you n=197
  - The resolution or outcome achieved n=187
- \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

▲ Significantly higher  
▼ Significantly lower

### Between demographics

▲ Significantly higher  
▼ Significantly lower

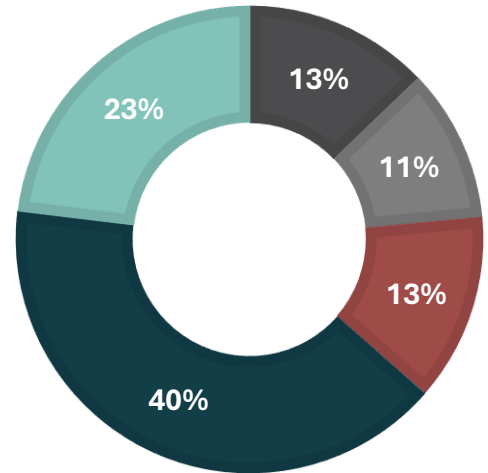
# Regulatory Services



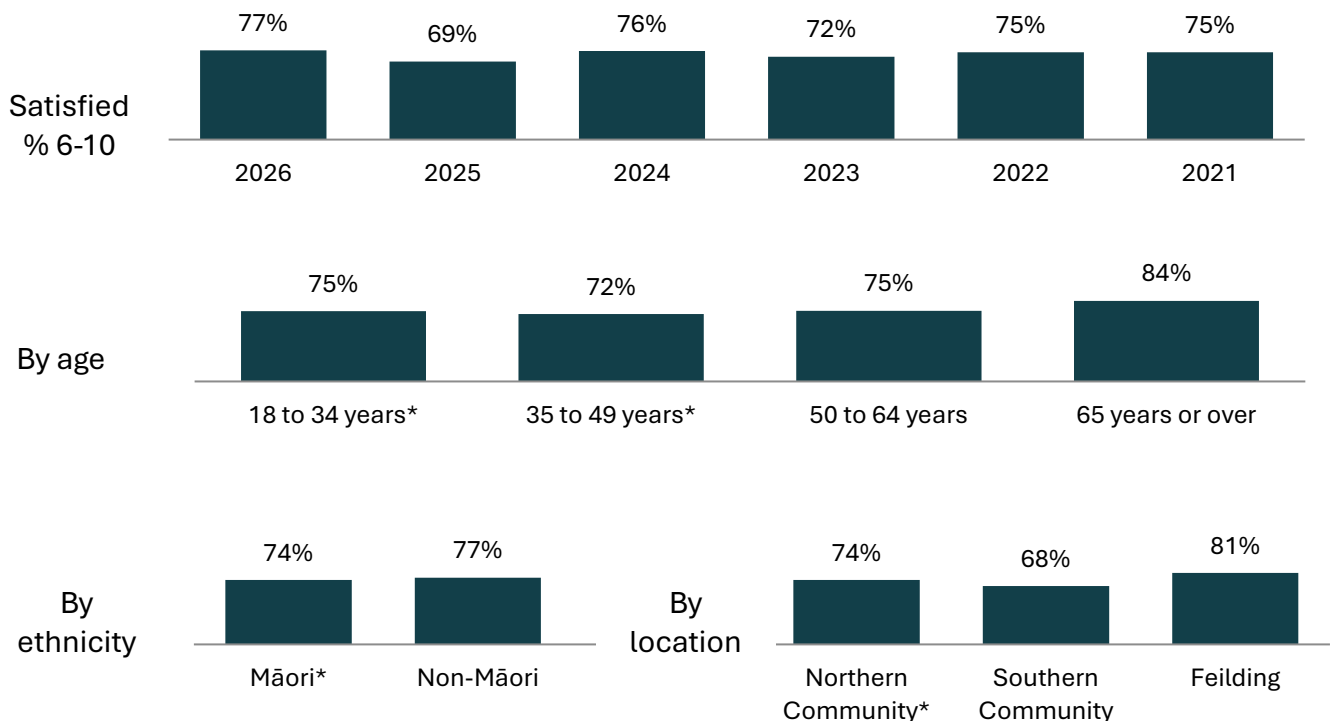
## Overall Regulatory Services

◀ TOC

- An 8% point increase in satisfaction with *Overall regulatory services* has been recorded, improving from 69% in 2025 to 77% in 2026.
- Across all other *Regulatory services*, *Dog or Animal Control* is the most prevalent reason residents contacted the Council in the past 12 months (17%).
- Licensing Premises* received the highest satisfaction rating (90%), while *Managing and issuing resource consents* received the lowest rating (51%) and has been identified as an area for improvement.



■ Poor (1-4)      ■ Somewhat poor (5)  
 ■ Somewhat good (6)      ■ Good (7-8)  
 ■ Excellent (9-10)



### Notes:

- OS4. And how would you rate the Manawātū District Council overall for how well it provides these types of regulatory services? n=200
- \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

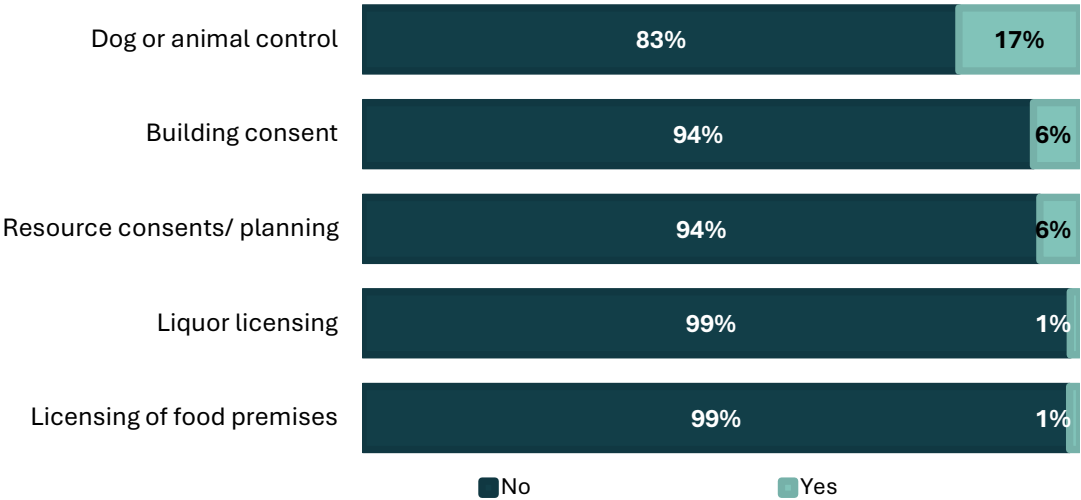
▲ Significantly higher  
 ▼ Significantly lower

### Between demographics

▲ Significantly higher  
 ▼ Significantly lower

Involvement with Regulatory Services

◀◀ TOC



| % Involved                  | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|-----------------------------|------|------|------|------|------|------|
| Dog or animal control       | 17%  | 20%  | 18%  | 14%  | 17%  | 17%  |
| Building consent            | 6%▼  | 10%  | 9%   | 11%  | 12%  | 14%  |
| Resource consents/ planning | 6%   | 8%   | 7%   | 10%  | 8%   | 9%   |
| Liquor licensing            | 1%   | 2%   | 2%   | 2%   | 1%   | 3%   |
| Licensing of food premises  | 1%   | 3%   | 2%   | 3%   | 1%   | 2%   |

| % Involved                  | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|-----------------------------|-------|-----------|--------------------|--------------------|----------|
| Dog or animal control       | 17%   | 17%       | 21%                | 16%▼               | 16%      |
| Building consent            | 4%    | 7%▼       | 5%▼                | 10%                | 5%       |
| Resource consents/ planning | 4%    | 6%        | 4%▼                | 10%                | 3%       |
| Liquor licensing            | 2%    | 1%        | 3%                 | 0%                 | 1%       |
| Licensing of food premises  | 0%    | 2%        | 1%                 | 1%                 | 2%       |

Notes:

1. OS1. Council also provides a range of other services. In the last year have you had any direct involvement or contact with Council in relation to any of the following? n=459

Year-on-year

Between demographics

▲ Significantly higher

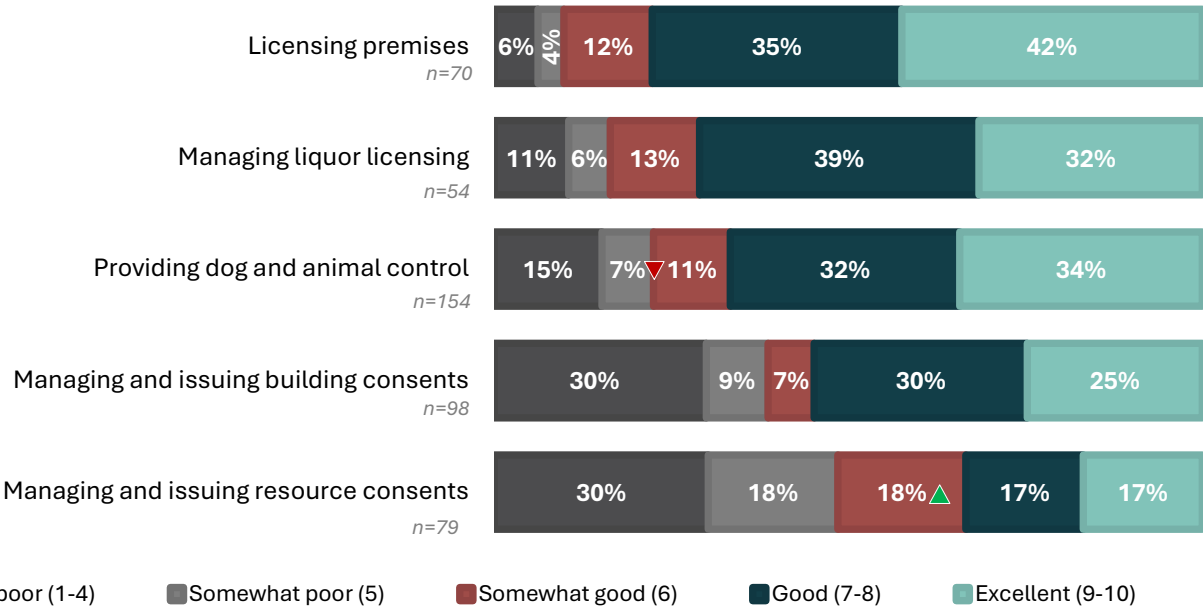
▼ Significantly lower

Significantly higher

Significantly lower

## Satisfaction with Regulatory Services

◀ TOC



| Scores with % 6-10                     | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|----------------------------------------|------|------|------|------|------|------|
| Licensing premises                     | 90%  | 86%  | 92%  | 83%  | 80%  | 80%  |
| Managing liquor licensing              | 84%  | 79%  | 88%  | 78%  | 80%  | 72%  |
| Providing dog and animal control       | 78%  | 68%  | 75%  | 77%  | 79%  | 80%  |
| Managing and issuing building consents | 61%  | 51%  | 59%  | 50%  | 57%  | 50%  |
| Managing and issuing resource consents | 51%  | 53%  | 56%  | 48%  | 51%  | 50%  |

Notes:

1. OS2. Based on your experience and impressions, how would you rate the council’s performance in providing each of these services?

Year-on-year

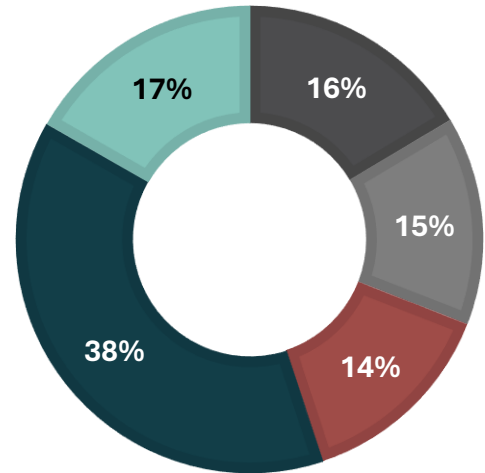
Between demographics

# Roads, Footpaths, and Cycleways

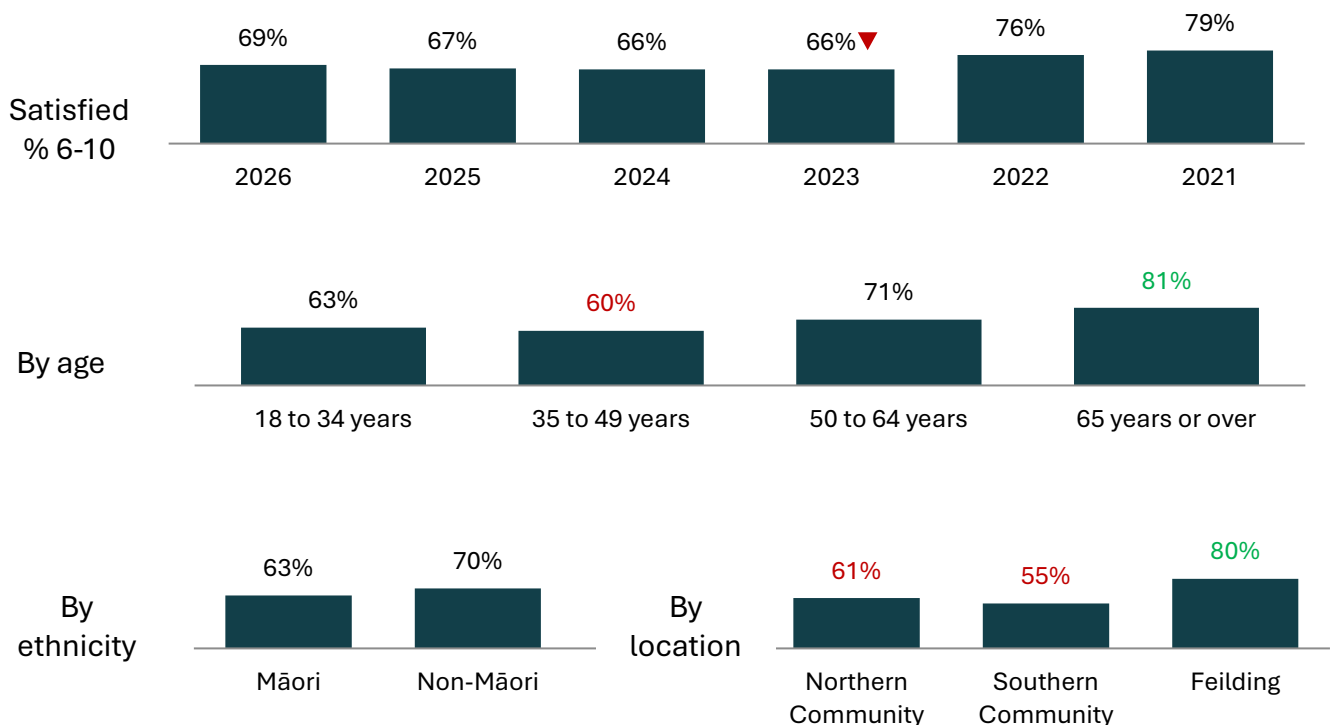
## Overall Roads, Footpaths, and Cycleways

◀ TOC

- A gradual increase in satisfaction with *Overall roads, footpaths, and cycleways* has been recorded, increasing from 66% in 2024, to 67% in 2025, and further 69% in 2026.
- Residents in Feilding (80%) are significantly more likely to be satisfied than those in other areas.
- Satisfaction with *The condition of the roads* has significantly increased since the previous reporting year, from 60% in 2025 to 67% in 2026.



■ Poor (1-4)      ■ Somewhat poor (5)  
 ■ Somewhat good (6)      ■ Good (7-8)  
 ■ Excellent (9-10)



### Notes:

- RF3. Overall, how satisfied are you with the roads, cycle ways, footpaths, and walkways around the Manawātū district? n=442

### Year-on-year

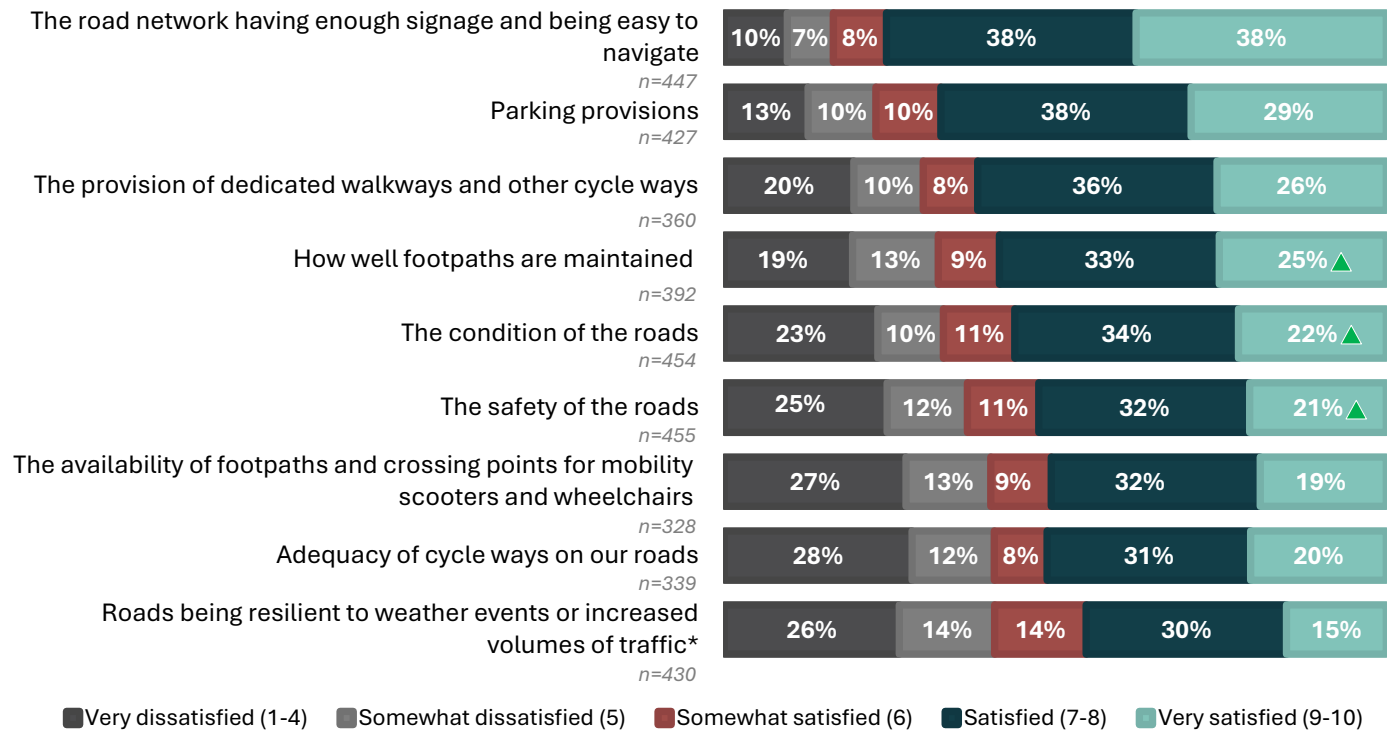
▲ Significantly higher  
 ▼ Significantly lower

### Between demographics

▲ Significantly higher  
 ▼ Significantly lower

Other Measures Related to Roads, Footpaths and Cycleways

TOC



## Other Measures Related to Roads, Footpaths and Cycleways (continued)

[<< TOC](#) 

| Scores with % 6-10                                                                      | Māori | Non-Māori |
|-----------------------------------------------------------------------------------------|-------|-----------|
| The road network having enough signage and being easy to navigate                       | 78%   | 84%       |
| Parking provisions                                                                      | 57%   | 81%       |
| The provision of dedicated walkways and other cycle ways                                | 60%   | 72%       |
| How well footpaths are maintained                                                       | 63%   | 69%       |
| The condition of the roads                                                              | 62%   | 68%▲      |
| The safety of the roads                                                                 | 51%   | 65%       |
| The availability of footpaths and crossing points for mobility scooters and wheelchairs | 50%   | 62%       |
| Adequacy of cycle ways on our roads                                                     | 57%   | 60%       |
| Roads being resilient to weather events or increased volumes of traffic*                | 54%   | 60%       |

| Scores with % 6-10                                                                      | Northern Community | Southern Community | Feilding |
|-----------------------------------------------------------------------------------------|--------------------|--------------------|----------|
| The road network having enough signage and being easy to navigate                       | 86%                | 73%                | 89%      |
| Parking provisions                                                                      | 70%                | 74%                | 81%      |
| The provision of dedicated walkways and other cycle ways                                | 70%                | 52%                | 79%      |
| How well footpaths are maintained                                                       | 59%                | 61%                | 73%      |
| The condition of the roads                                                              | 53%                | 52%                | 80%▲     |
| The safety of the roads                                                                 | 53%                | 46%                | 77%      |
| The availability of footpaths and crossing points for mobility scooters and wheelchairs | 46%                | 46%                | 69%      |
| Adequacy of cycle ways on our roads                                                     | 52%                | 37%                | 71%      |
| Roads being resilient to weather events or increased volumes of traffic*                | 47%                | 48%                | 70%      |

### Notes:

- RF1. Still using the 1 to 10 scale where 1 means 'very dissatisfied' and 10 means 'very satisfied', how would you rate your overall satisfaction with each of the following?
- New item added to 2025/2026 survey. No historical data available.

### Year-on-year

▲ Significantly higher  
▼ Significantly lower

### Between demographics

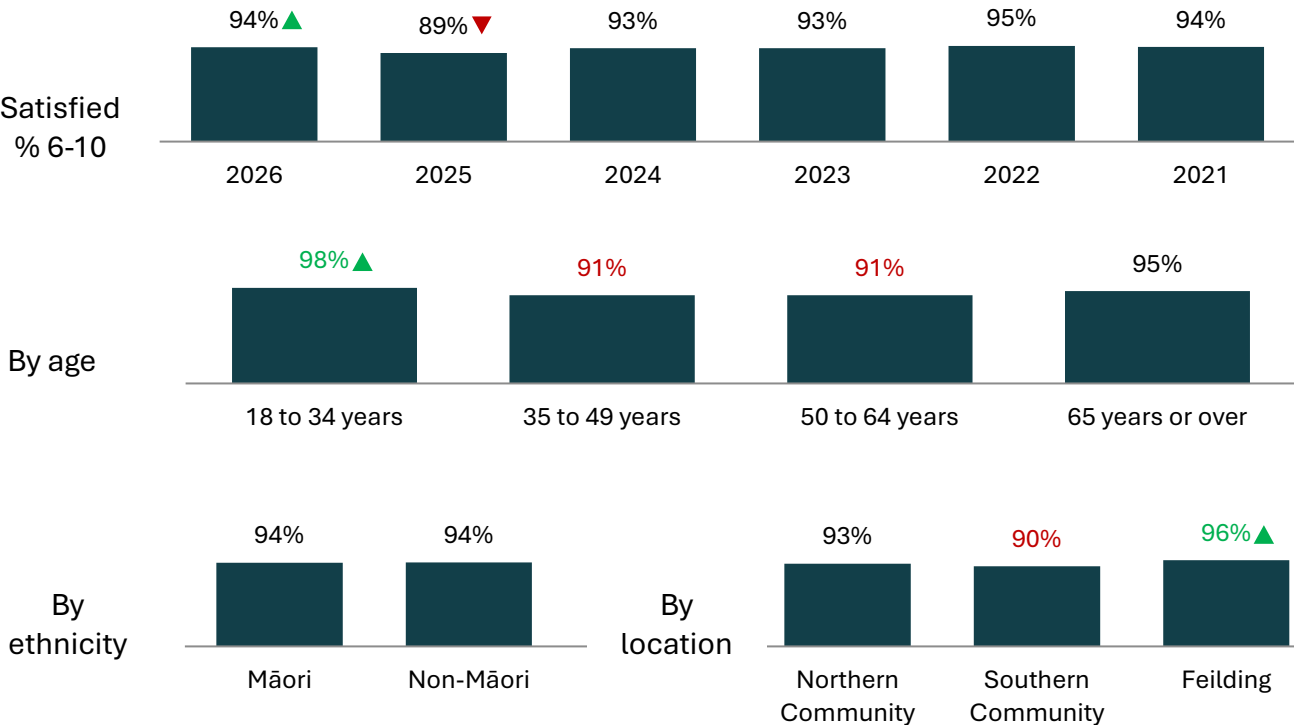
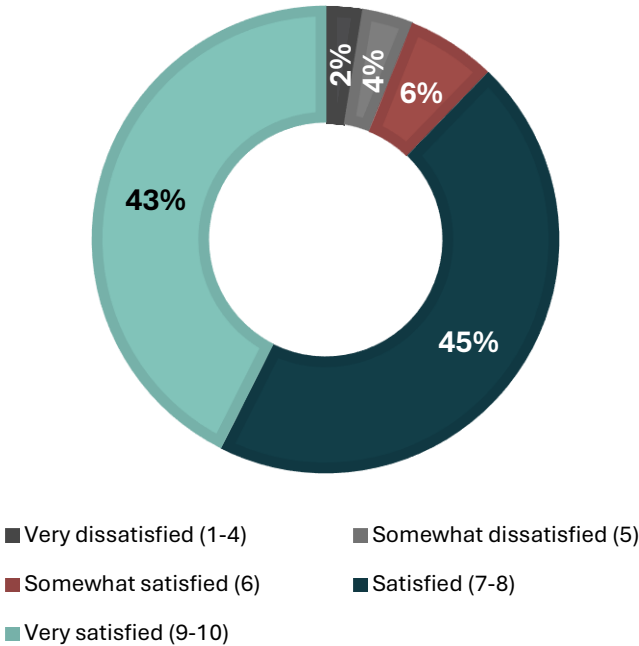
▲ Significantly higher  
▼ Significantly lower

# Outdoor Spaces

# Outdoor Spaces

TOC

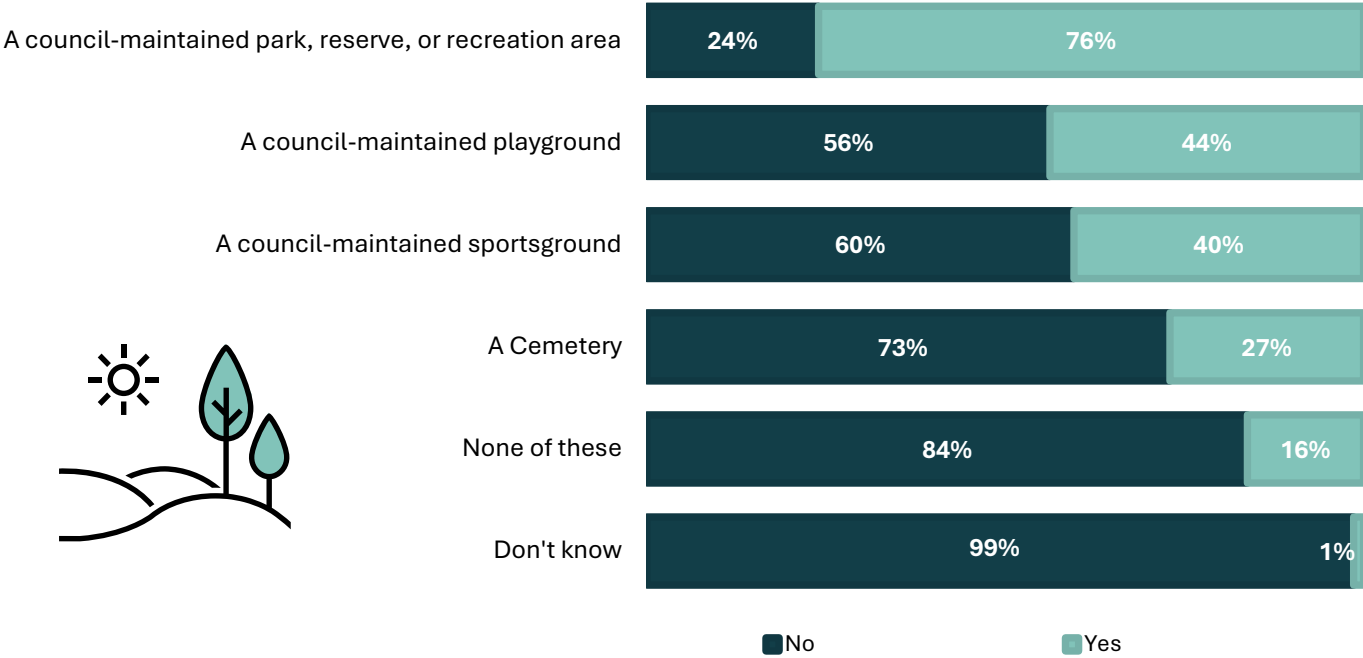
- Nearly all respondents (94%) are satisfied with the district’s *Outdoor spaces*, a significant increase since the previous reporting period (89%).
- Despite the slight decrease of 3% points, *Council-maintained parks, reserves or recreation areas* continue to be the most visited open spaces, with 76% of residents reporting visiting one in the past year.
- In contrast, only 27% of residents have visited *A cemetery* in the past year. Despite this, satisfaction has significantly increased from 85% in 2025 to 93% in 2026.



# Visitation of Outdoor Spaces

<<

TOC



| % Who visited the outdoor spaces                       | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|--------------------------------------------------------|------|------|------|------|------|------|
| A council-maintained park, reserve, or recreation area | 76%  | 79%  | 78%  | 76%  | 75%  | 78%  |
| A council-maintained playground                        | 44%  | 46%  | 48%  | 45%  | 48%  | 55%  |
| A council-maintained sportsground                      | 40%  | 46%  | 46%  | 39%  | 46%  | 60%  |
| A Cemetery                                             | 27%  | 29%  | 27%  | 32%  | 33%  | 41%  |

| % Who visited the outdoor spaces                       | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|--------------------------------------------------------|-------|-----------|--------------------|--------------------|----------|
| A council-maintained park, reserve, or recreation area | 75%   | 76%       | 80%                | 65%                | 81%      |
| A council-maintained playground                        | 46%   | 43%       | 60%                | 41%                | 40% ▼    |
| A council-maintained sportsground                      | 48% ▼ | 39%       | 43%                | 34%                | 43% ▼    |
| A Cemetery                                             | 17%   | 29%       | 26%                | 23%                | 29%      |

Notes:

1. PR1. In the last year, which of the following have you visited? n=458

Year-on-year

▲ Significantly higher

▼ Significantly lower

Between demographics

▲ Significantly higher

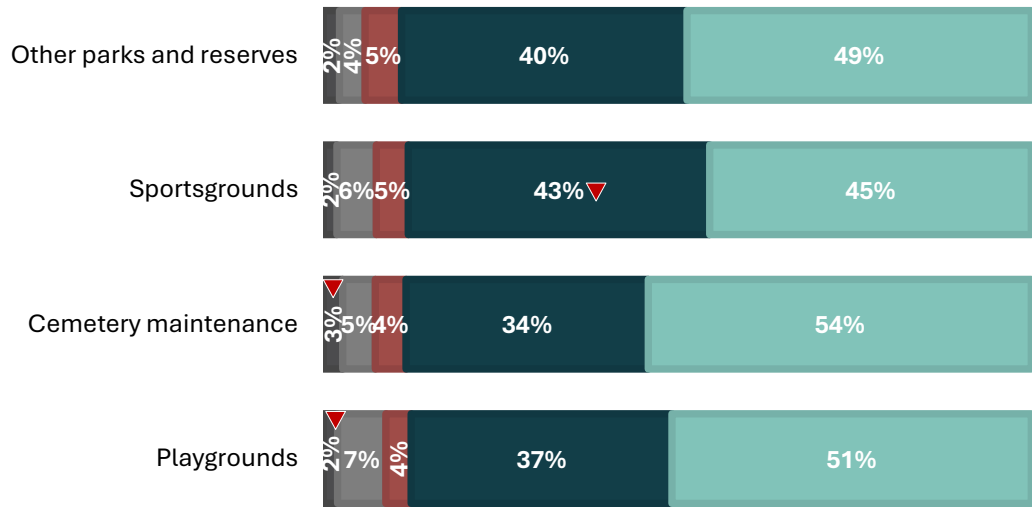
▼ Significantly lower

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## Satisfaction with Outdoor Spaces

◀ TOC



Very dissatisfied (1-4)   Somewhat dissatisfied (5)   Somewhat satisfied (6)   Satisfied (7-8)   Very satisfied (9-10)

| Scores with % 6-10       | 2026  | 2025  | 2024 | 2023 | 2022 | 2021 |
|--------------------------|-------|-------|------|------|------|------|
| Other parks and reserves | 94%   | 91%   | 92%  | 93%  | 94%  | 96%  |
| Sportsgrounds            | 93%   | 89%   | 90%  | 93%  | 94%  | 95%  |
| Cemetery maintenance     | 93% ▲ | 85% ▼ | 94%  | 89%  | 91%  | 92%  |
| Playgrounds              | 91%   | 90%   | 90%  | 93%  | 90%  | 94%  |

| Scores with % 6-10       | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|--------------------------|-------|-----------|--------------------|--------------------|----------|
| Other parks and reserves | 91%   | 95% ▲     | 96% ▲              | 95%                | 93%      |
| Sportsgrounds            | 93% ▲ | 92%       | 91%                | 91%                | 93%      |
| Cemetery maintenance     | 88%*  | 94% ▲     | 93%*               | 87%                | 95%      |
| Playgrounds              | 76%   | 95% ▲     | 93%                | 88%                | 92%      |

### Notes:

- PR2. Still using the 1 to 10 scale where 1 means 'very dissatisfied' and 10 means 'very satisfied', how would you rate your overall experience with Council's...
  - Sportsground n=285
  - Other parks and reserves n=376
  - Playgrounds n=277
  - Cemetery maintenance n=193
- \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

▲ Significantly higher  
▼ Significantly lower

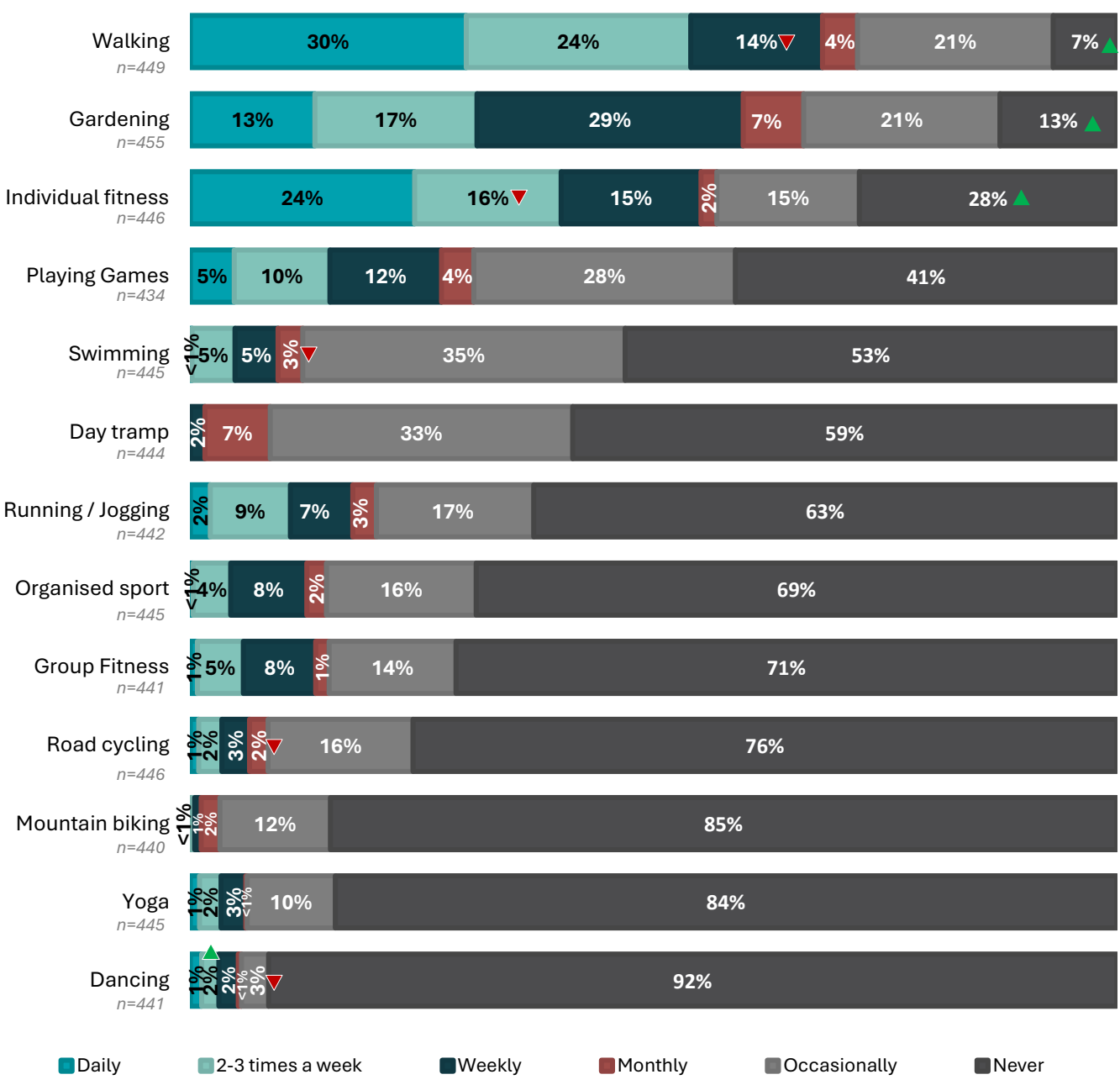
### Between demographics

▲ Significantly higher  
▼ Significantly lower

# Leisure and Recreational Activities Residents take part in

TOC

- Walking (93%), Gardening (87%), and Individual fitness (72%) are the top leisure activities residents participated in over the past 12 months.
- In keeping with the previous year, participation in Dancing (8%) and Yoga (16%) remains the lowest.



Notes:

- PR5. In the last 12 months, what type of leisure and recreational activities do you take part in and how often do you do it?

Year-on-year  
 ▲ Significantly higher  
 ▼ Significantly lower  
 Between demographics  
 ▲ Significantly higher  
 ▼ Significantly lower

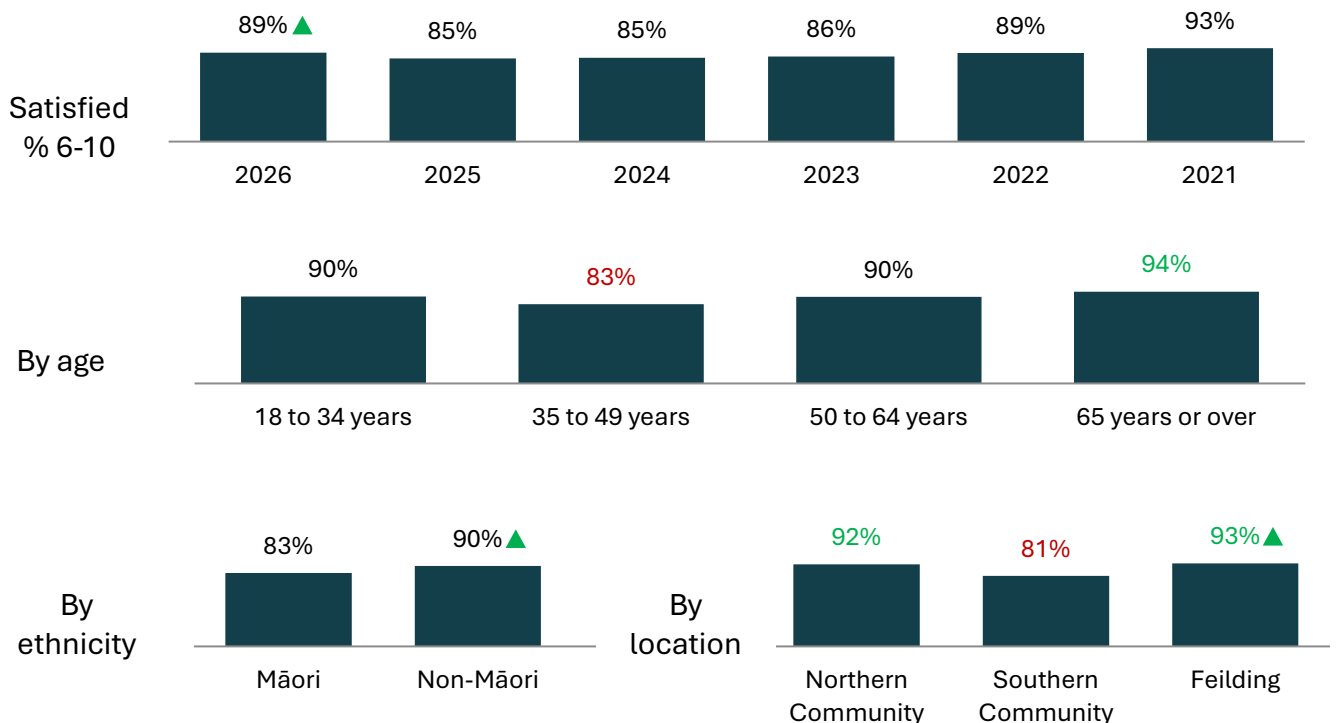
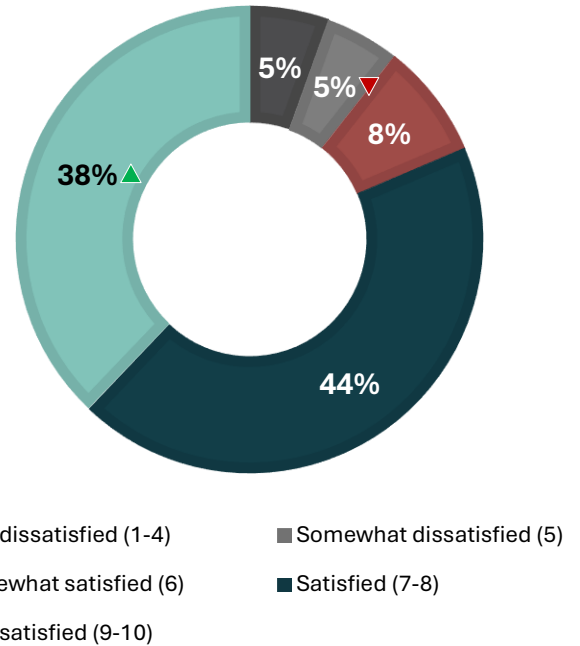
# Public facilities



## Public Facilities

«« TOC

- Satisfaction with *Public facilities* has significantly increased since 2025, from 85% to 89%.
- This improvement is likely driven by a significant increase in satisfaction among Feilding residents, from 87% in 2025 to 94% in 2026.
- *Public toilets* (66%) and *Libraries* (55%) remain the most visited public facilities year-on-year.
- All public facilities receive high satisfaction levels, with the highest ratings for the *Sport and Events Centre* and *Libraries*, both at 93%.



### Notes:

1. CF4. When you consider all the public facilities that are provided by Manawātū District Council including how well they are maintained, the opening hours and where applicable, the cost to use these, how would you rate your overall satisfaction with the public facilities that are provided? n=404

### Year-on-year

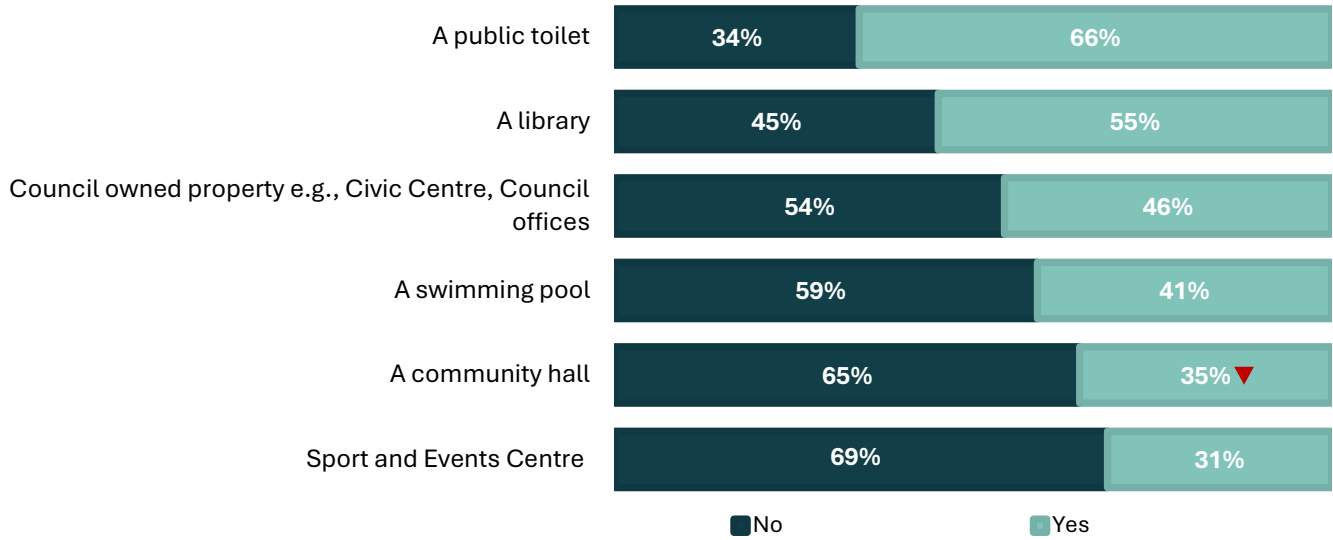
▲ Significantly higher  
▼ Significantly lower

### Between demographics

▲ Significantly higher  
▼ Significantly lower

Visitation of Public Facilities

◀ TOC

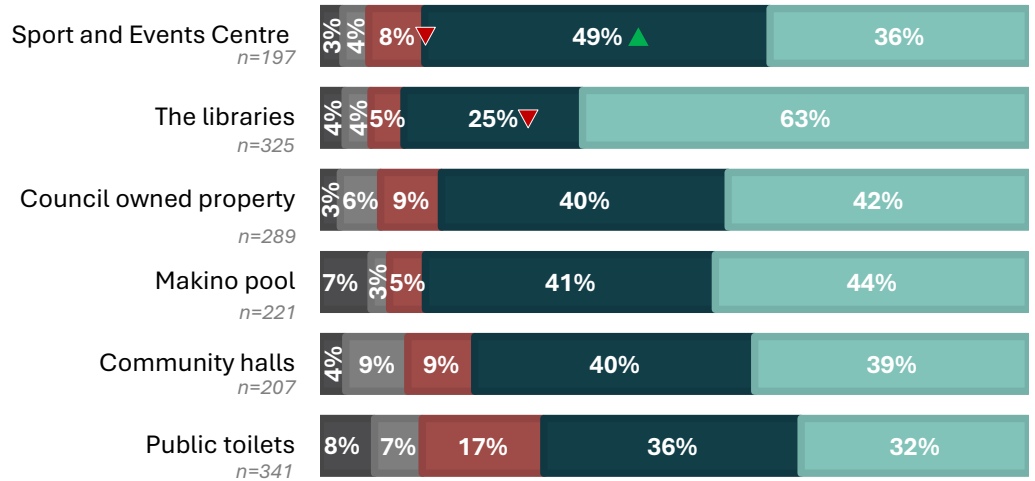


| % Who visited the public facilities | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|-------------------------------------|------|------|------|------|------|------|
| A public toilet                     | 66%  | 68%  | 70%  | 67%  | 68%  | 74%  |
| A library                           | 55%  | 55%▲ | 45%  | 49%  | 49%  | 55%  |
| Council owned property              | 46%  | 49%  | 52%  | 47%  | 46%  | 62%  |
| A swimming pool                     | 41%  | 38%  | 42%  | 42%  | 40%  | 45%  |
| A community hall                    | 35%▼ | 42%  | 46%  | 37%  | 37%  | 54%  |
| Sport and Events Centre             | 31%  | 29%  | 33%  | 29%  | 32%  | 45%  |

| % Who visited the public facilities | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|-------------------------------------|-------|-----------|--------------------|--------------------|----------|
| A public toilet                     | 67%   | 66%       | 83%                | 60%                | 63%      |
| A library                           | 52%   | 55%       | 54%                | 36%                | 66%      |
| Council owned property              | 52%   | 44%       | 45%                | 29%                | 55%      |
| A community hall                    | 37%   | 35%▼      | 41%                | 35%                | 33%      |
| A swimming pool                     | 67%▲  | 37%       | 46%                | 40%                | 40%      |
| Sport and Events Centre             | 33%   | 31%       | 34%                | 34%▲               | 29%      |

## Satisfaction with Public Facilities

◀ TOC



Very dissatisfied (1-4)   Somewhat dissatisfied (5)   Somewhat satisfied (6)   Satisfied (7-8)   Very satisfied (9-10)

| Scores with % 6-10      | 2026 | 2025  | 2024 | 2023 | 2022 | 2021 |
|-------------------------|------|-------|------|------|------|------|
| Sport and Events Centre | 93%  | 88%   | 87%  | 87%  | 93%  | 89%  |
| The libraries           | 93%  | 91% ▲ | 77%  | 85%  | 90%  | 94%  |
| Council owned property  | 91%  | 91% ▲ | 91%  | 89%  | 93%  | 96%  |
| Makino pool             | 90%  | 88%   | 81%  | 85%  | 89%  | 93%  |
| Community halls         | 88%  | 87%   | 86%  | 87%  | 91%  | 89%  |
| Public toilets          | 86%  | 83% ▲ | 76%  | 81%  | 87%  | 89%  |

| Scores with % 6-10      | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|-------------------------|-------|-----------|--------------------|--------------------|----------|
| Sport and Events Centre | 96%   | 93%       | 95%                | 86%                | 97%      |
| The libraries           | 89%   | 94%       | 93%                | 89%                | 94%      |
| Council owned property  | 86%   | 93%       | 93%                | 86%                | 93%      |
| Makino pool             | 88%   | 91%       | 90%                | 82%                | 94%      |
| Community halls         | 78%   | 90%       | 92%                | 77%                | 93%      |
| Public toilets          | 76%   | 87%       | 88%                | 87%                | 84%      |

### Notes:

- CF2. How would you rate your overall satisfaction with each of the following facilities?
- \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

▲ Significantly higher  
▼ Significantly lower

### Between demographics

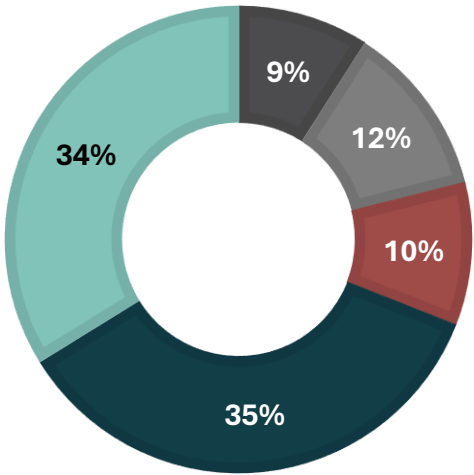
▲ Significantly higher  
▼ Significantly lower

# Waste Management

## Overall Waste Disposal Services

[<< TOC](#)

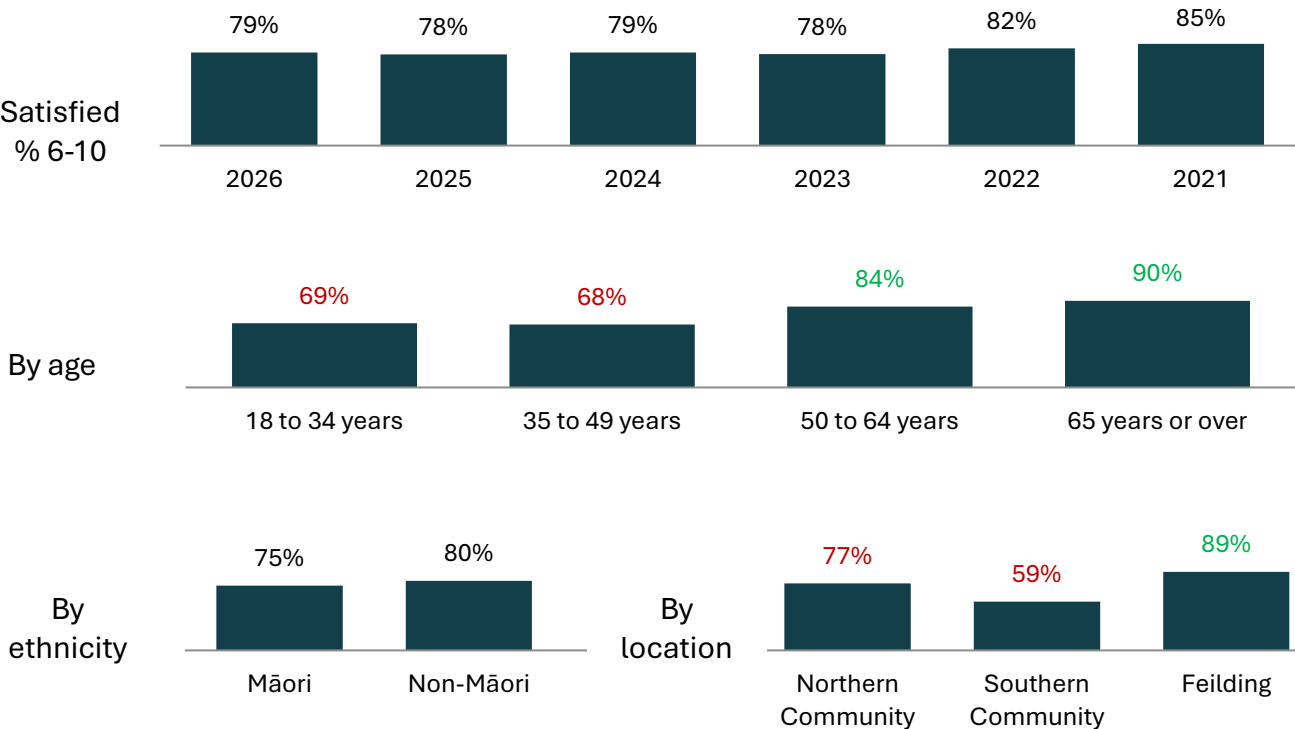
- Satisfaction with *Overall waste disposal services* remained consistent year-on-year with nearly eight in ten residents (79%) satisfied.
- Six in ten households (60%) use *Regular kerbside collection* for disposal of their non-recyclable waste.
- Among them, 89% are satisfied, a 4% point decrease since 2025 (93%).



Very dissatisfied (1-4)
 Somewhat dissatisfied (5)

Somewhat satisfied (6)
 Satisfied (7-8)

Very satisfied (9-10)



Notes:

- WR6. How would you rate your satisfaction with the Manawātū District Council overall for its waste disposal services? n=398

Year-on-year

▲ Significantly higher  
 ▼ Significantly lower

Between demographics

▲ Significantly higher  
 ▼ Significantly lower

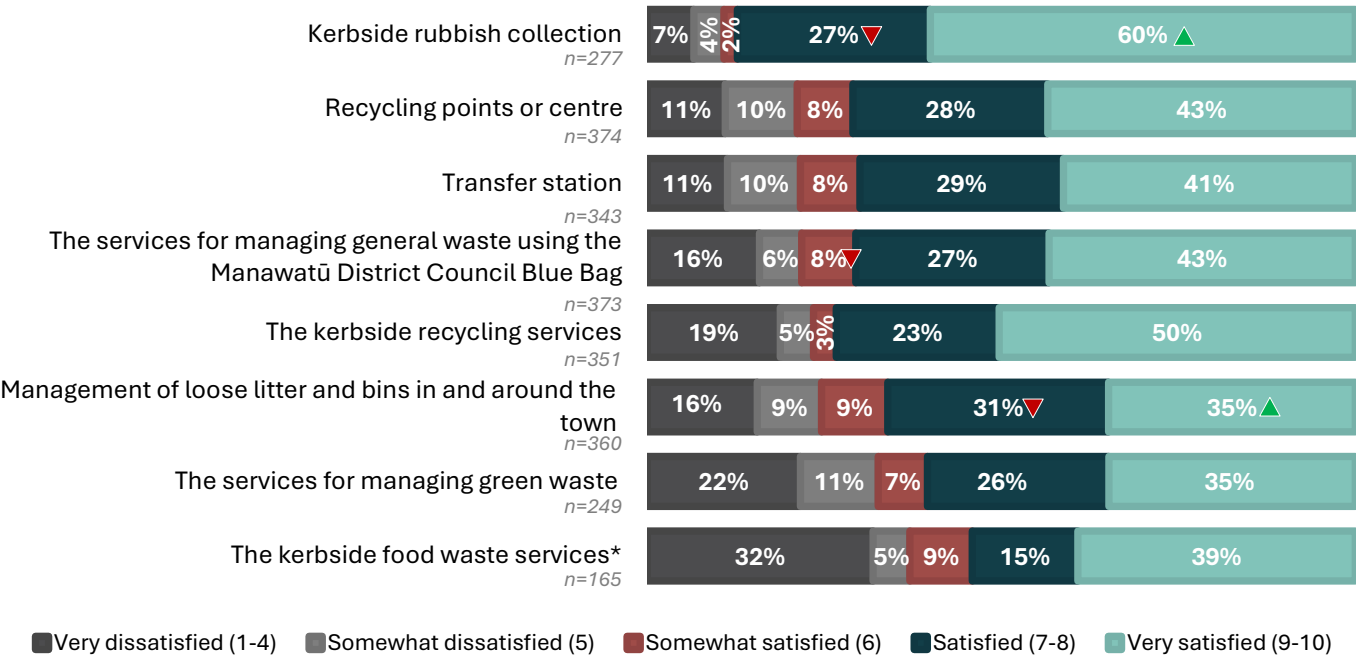
Satisfaction with Waste Disposal Services

TOC

Method of Disposal For Non-recyclable Waste

|                                                |     | 2025 | 2024 |
|------------------------------------------------|-----|------|------|
| Regular kerbside collection                    | 60% | 63%  | 67%  |
| Self-delivery to a transfer station / Landfill | 39% | 39%  | 33%  |
| Private contractors’ collection                | 25% | 22%  | 18%  |
| Burning                                        | 13% | 12%  | 13%  |
| Burying on private property                    | 3%  | 3%   | 2%   |
| Don’t know                                     | <1% | <1%  | 1%   |

Satisfaction with Waste Disposal Services



Notes:

- WR1. Which of the following methods does your household use for disposal of non-recyclable waste? n=459
- WR2. Still using the 1-10 scale, how satisfied are you with Council’s kerbside collection service? n=277
- WR4. How satisfied are you with each of the following services that are provided by Council
- \*New item added to 2025/2026 survey. No historical data available.

Year-on-year  
 ▲ Significantly higher  
 ▼ Significantly lower

Between demographics  
 Significantly higher  
 Significantly lower

# Satisfaction with Waste Disposal Services (continued)

◀ TOC

| Scores with % 6-10                                                                   | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|--------------------------------------------------------------------------------------|------|------|------|------|------|------|
| Kerbside rubbish collection                                                          | 89%  | 93%  | 91%  | 89%  | 91%  | 92%  |
| Recycling points or centre                                                           | 79%  | 76%  | 75%  | 75%  | 79%  | 84%  |
| Transfer station                                                                     | 78%  | 72%  | 73%  | 74%  | 76%  | 82%  |
| The services for managing general waste using the Manawātū District Council Blue Bag | 78%  | 75%  | 79%  | 80%  | 81%  | 84%  |
| The kerbside recycling services                                                      | 76%  | 76%  | 74%  | 77%  | 81%  | 82%  |
| Management of loose litter and bins in and around the town                           | 75%  | 74%  | 78%  | 78%  | 81%  | 83%  |
| The services for managing green waste                                                | 67%  | 64%  | 60%  | 64%  | 67%  | 69%  |
| The kerbside food waste services**                                                   | 63%  | -    | -    | -    | -    | -    |

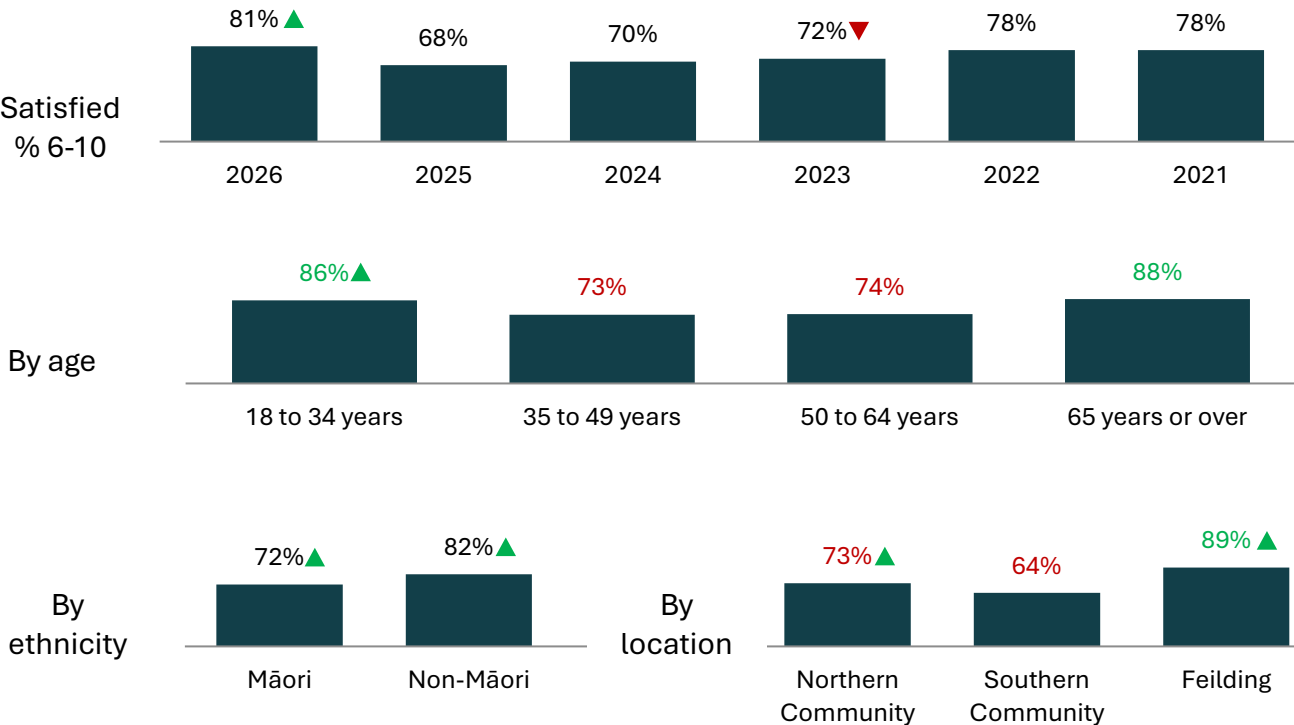
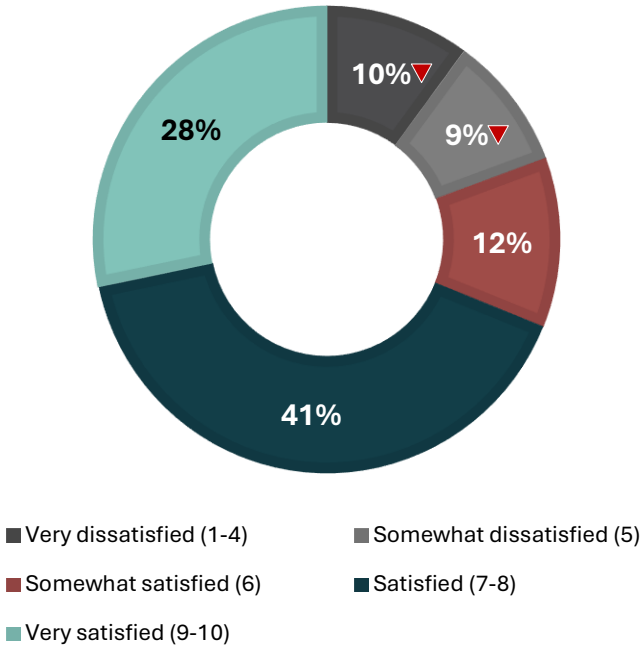
| Scores with % 6-10                                                                   | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|--------------------------------------------------------------------------------------|-------|-----------|--------------------|--------------------|----------|
| Kerbside rubbish collection                                                          | 87%   | 90%       | 93%                | 74%                | 92%      |
| Recycling points or centre                                                           | 74%   | 80%       | 71%                | 66%                | 89%      |
| Transfer station                                                                     | 62%   | 81%▲      | 78%▲               | 71%                | 82%      |
| The services for managing general waste using the Manawātū District Council Blue Bag | 71%   | 79%       | 75%                | 64%                | 86%      |
| The kerbside recycling services                                                      | 68%   | 78%       | 42%                | 38%                | 93%      |
| Management of loose litter and bins in and around the town                           | 73%   | 76%       | 71%                | 67%                | 80%      |
| The services for managing green waste                                                | 74%   | 66%       | 52%                | 51%                | 76%      |
| The kerbside food waste services**                                                   | 54%*  | 65%       | 24%*               | 21%*               | 77%      |

# Water Management

# Overall Water Management

TOC

- Just over eight in ten residents (81%) are satisfied with the Council's *Overall water management*, marking the highest satisfaction level recorded over the past 5 years.
- Satisfaction among residents aged 18 to 34 years has significantly increased since 2025 from 56% to 86%.
- Similarly, satisfaction among the Northern Community (from 57% to 73%) and Feilding residents (from 78% to 89%) has significantly increased year-on-year.



Notes:

1. TW9. When you think about the supply of water, the management and disposal of stormwater and of wastewater, how would you rate your satisfaction with Council overall for its management of water in the Manawātū district? n=377

Year-on-year

Significantly higher

Significantly lower

Between demographics

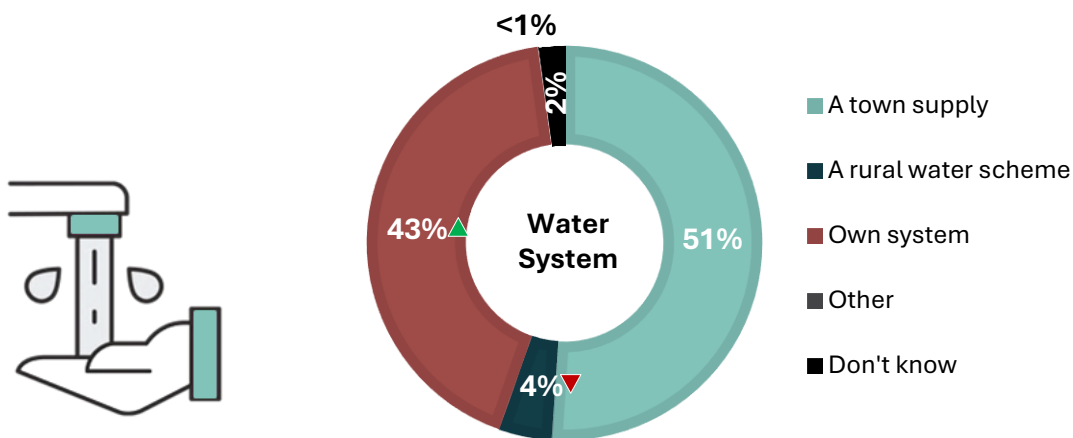
Significantly higher

Significantly lower

## Water Supply

« TOC

- The proportion of households connected to their *Own system* has increased significantly, from 35% in 2025 to 43% in 2026.
- All water supply measures recorded year-on-year increases in satisfaction, with significant improvements reported in *The clarity of the water* (from 78% to 87%), *The pressure of the water* (from 79% to 85%), and *The taste of the water* (from 62% to 72%).



The reliability of the water supply



The clarity of the water



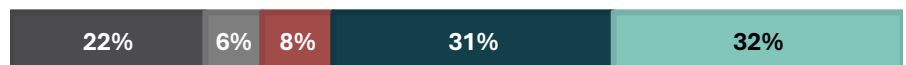
The pressure of the water



The odour of the water



The taste of the water



Very dissatisfied (1-4) Somewhat dissatisfied (5) Somewhat satisfied (6) Satisfied (7-8) Very satisfied (9-10)

### Notes:

1. TW1. Which of the following best describes your water supply connection? n=459
2. TW2. On the scale of 1-10, how would you rate your satisfaction with each of the following?
  - a. The reliability of the water supply n=266
  - b. The taste of the water n=262
  - c. The clarity of the water n=266
  - d. The odour of the water n=262
  - e. The pressure of the water n=268

3. \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

Significantly higher  
Significantly lower

### Between demographics

Significantly higher  
Significantly lower

Water Supply (continued)

◀◀ TOC

| Scores with % 6 - 10                | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|-------------------------------------|------|------|------|------|------|------|
| The reliability of the water supply | 96%  | 92%  | 91%  | 95%  | 96%  | 96%  |
| The clarity of the water            | 87%▲ | 78%  | 81%  | 86%  | 86%  | 85%  |
| The pressure of the water           | 85%▲ | 79%  | 84%  | 86%  | 87%  | 88%  |
| The odour of the water              | 77%  | 74%  | 77%  | 84%  | 78%  | 81%  |
| The taste of the water              | 72%▲ | 62%  | 66%  | 73%  | 70%  | 72%  |

| Scores with % 6 – 10<br>(by ethnicity and location) | Māori* | Non-Māori | Northern Community* | Southern Community* | Feilding |
|-----------------------------------------------------|--------|-----------|---------------------|---------------------|----------|
| The reliability of the water supply                 | 90%    | 97%       | 92%                 | 100%                | 96%      |
| The clarity of the water                            | 76%    | 89%▲      | 80%                 | 85%                 | 88%▲     |
| The pressure of the water                           | 63%    | 89%▲      | 86%                 | 84%                 | 85%      |
| The odour of the water                              | 51%    | 81%       | 58%                 | 62%                 | 79%      |
| The taste of the water                              | 51%    | 75%▲      | 54%                 | 62%                 | 74%▲     |

Notes:

- TW2. On the scale of 1-10, how would you rate your satisfaction with each of the following?
  - The reliability of the water supply n=266
  - The taste of the water n=262
  - The clarity of the water n=266
  - The odour of the water n=262
  - The pressure of the water n=268
- \*Caution: Small sample size (n<30). Results are indicative only.

Year-on-year
 

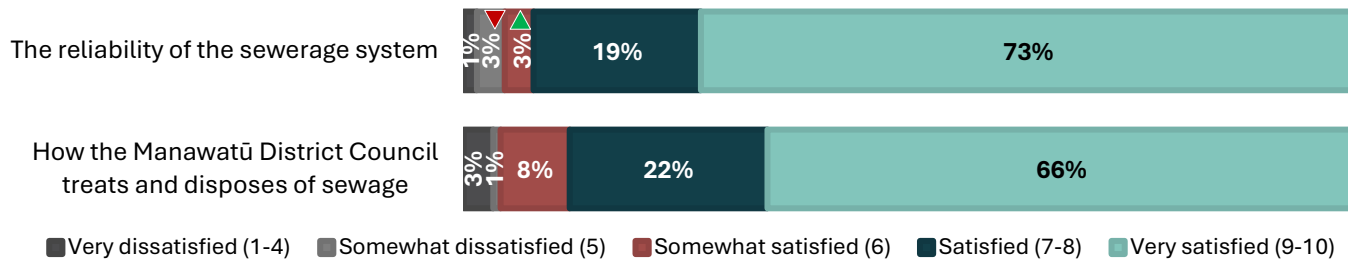
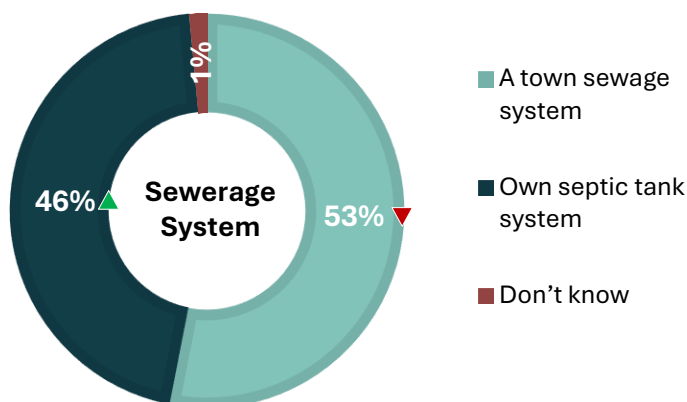
▲ Significantly higher
 ▼ Significantly lower

Between demographics
 

▲ Significantly higher
 ▼ Significantly lower

## Sewerage System

- Almost all residents connected to *A town sewage system* are satisfied with all related measures.
- Satisfaction level with *How the Manawātū District Council treats and disposes of sewage* (96%) has significantly increased since the previous reporting period (89%).



| Scores with % 6 - 10                                            | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|-----------------------------------------------------------------|------|------|------|------|------|------|
| How the Manawatū District Council treats and disposes of sewage | 96%▲ | 89%  | 90%  | 90%  | 92%  | 86%  |
| The reliability of the sewerage system                          | 95%  | 94%  | 95%  | 96%  | 97%  | 96%  |

| Scores with % 6 - 10                                            | Māori* | Non-Māori | Northern Community* | Southern Community* | Feilding |
|-----------------------------------------------------------------|--------|-----------|---------------------|---------------------|----------|
| How the Manawātū District Council treats and disposes of sewage | 84%    | 98% ▲     | 100%                | 54%                 | 96%      |
| The reliability of the sewerage system                          | 77%    | 98%       | 79%                 | 77%                 | 97%      |

Notes:

1. TW4. Which of the following best describes the sewage system that your property is connected to?  
n=459
2. TW5. On the scale of 1-10, how would you rate your satisfaction with each of the following?
  - a. The reliability of the sewage system n=254
  - b. How the Manawātū District Council treats and disposes of sewage n=183
3. \*Caution: Small sample size (n<30). Results are indicative only.

Year-on-year

▲ Significantly higher  
▼ Significantly lower

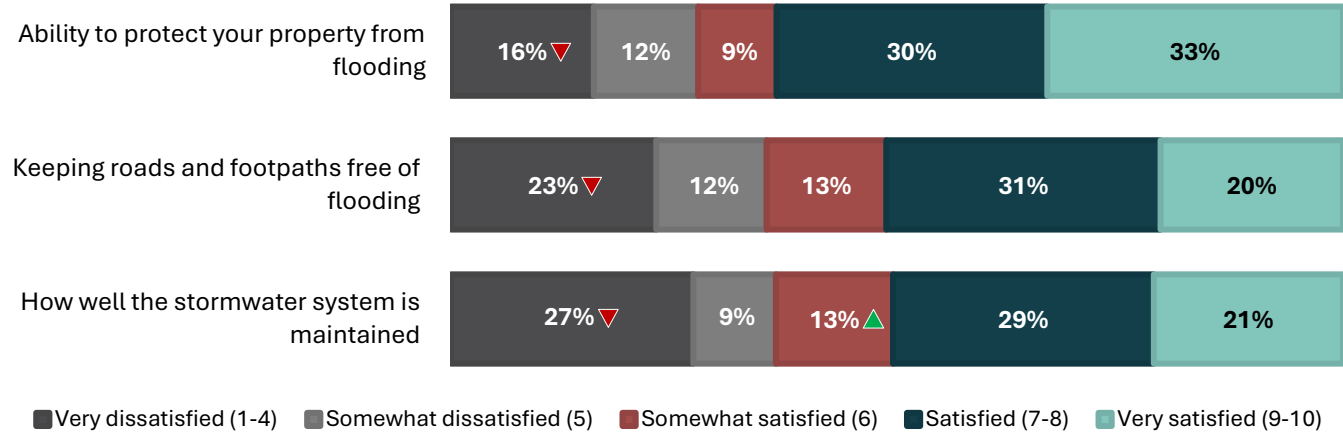
### Between demographics

Significantly higher  
Significantly lower

## Stormwater System

◀ TOC

- Over seven in ten residents (72%) are satisfied with the *Ability to protect property from flooding*, an increase from 66% in 2025.
- The proportion of low ratings (1-4 out of 10) for stormwater system-related measures has decreased significantly since 2025.
- Similarly, satisfaction with *Keeping roads and footpaths free of flooding* (from 55% to 65%) and *How well the stormwater system is maintained* (from 50% to 64%) has significantly increased year-on-year.



| Scores with % 6 - 10                           | 2026  | 2025 | 2024 | 2023  | 2022 | 2021 |
|------------------------------------------------|-------|------|------|-------|------|------|
| Ability to protect your property from flooding | 72%   | 66%  | 66%  | 66%   | 72%  | 74%  |
| Keeping roads and footpaths free of flooding   | 65% ▲ | 55%  | 55%  | 54% ▼ | 63%  | 70%  |
| How well the stormwater system is maintained   | 64% ▲ | 50%  | 48%  | 54% ▼ | 62%  | 64%  |

| Scores with % 6 - 10                           | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|------------------------------------------------|-------|-----------|--------------------|--------------------|----------|
| Ability to protect your property from flooding | 61%   | 74% ▲     | 67%                | 67%                | 76%      |
| Keeping roads and footpaths free of flooding   | 52%   | 67% ▲     | 57%                | 59%                | 70% ▲    |
| How well the stormwater system is maintained   | 60%   | 64% ▲     | 64% ▲              | 46%                | 73% ▲    |

Notes:

1. TW7. On the scale of 1- 10, how would you rate your satisfaction with the stormwater system in terms of the following?

a. Ability to protect your property from flooding n=407

b. Keeping roads and footpaths free of flooding n=420

c. How well the stormwater system is maintained n=349

Year-on-year

▲ Significantly higher

▼ Significantly lower

Between demographics

Significantly higher

Significantly lower

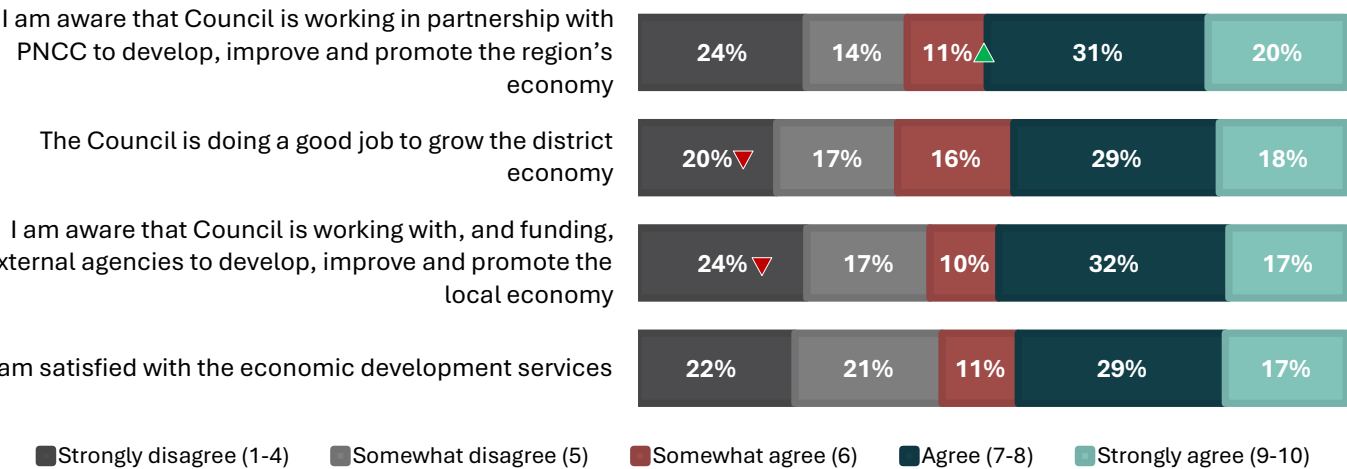
# District Development and Community Funding



## District Development

◀ TOC

- Awareness That Council is working with, and funding, external agencies to develop, improve and promote the local economy, and satisfaction with the Economic development services have both increased significantly among Māori residents, from 36% to 67% and from 29% to 56%, respectively.



| Scores with % 6-10                                                                                                        | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|---------------------------------------------------------------------------------------------------------------------------|------|------|------|------|------|------|
| I am aware that Council is working in partnership with PNCC to develop, improve and promote the region's economy          | 62%  | 61%  | 64%  | 64%  | 69%  | 62%  |
| The Council is doing a good job to grow the district economy                                                              | 63%  | 59%  | 64%  | 69%  | 69%  | 63%  |
| I am aware that Council is working with, and funding, external agencies to develop, improve and promote the local economy | 59%  | 56%  | 60%  | 61%  | 66%  | 61%  |
| I am satisfied with the economic development services                                                                     | 57%  | 56%  | 60%  | 66%  | 70%  | 60%  |

| Scores with % 6-10                                                                                                        | Māori | Non-Māori | Northern Community | Southern Community | Feilding |
|---------------------------------------------------------------------------------------------------------------------------|-------|-----------|--------------------|--------------------|----------|
| I am aware that Council is working in partnership with PNCC to develop, improve and promote the region's economy          | 61%   | 62%       | 63%                | 55%                | 66%      |
| The Council is doing a good job to grow the district economy                                                              | 60%   | 64%       | 56%                | 58%                | 69%      |
| I am aware that Council is working with, and funding, external agencies to develop, improve and promote the local economy | 67%▲  | 57%       | 54%                | 51%                | 65%      |
| I am satisfied with the economic development services                                                                     | 56%▲  | 57%       | 43%                | 51%                | 65%      |

- Notes:
- DD1. On the 10-point scale where 1 is 'strongly disagree' and 10 is 'strongly agree', please rate your level of agreement with the following economic development statements?
    - I am aware that Council is working with, and funding, external agencies to develop, improve and promote the local economy n=301
    - I am aware that Council is working in partnership with Palmerston North City Council (PNCC) to develop, improve and promote the region's economy n=306
    - The Council is doing a good job to grow the district economy n=307
    - I am satisfied with the economic development services n=264
  - \*Caution: Small sample size (n<30). Results are indicative only.

Year-on-year  
 ▲ Significantly higher  
 ▼ Significantly lower

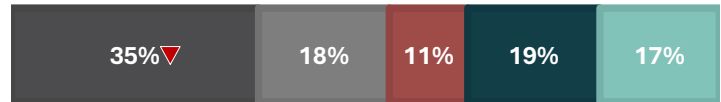
Between demographics  
 ▲ Significantly higher  
 ▼ Significantly lower

## Community Funding

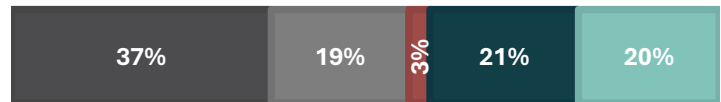
« TOC

- Nearly half (47%) of residents *Find it easy to find out what funding support the Council has available for events and projects.*
- This perception has remained consistent since 2021.

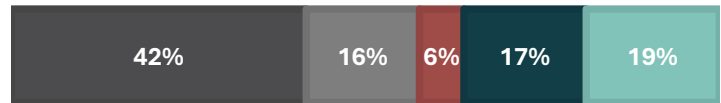
It is easy to find out what funding support Council has available for events and projects



I am satisfied with Community Funding services



The process to apply for funding for events and projects is easy



Strongly disagree (1-4)   Somewhat disagree (5)   Somewhat agree (6)   Agree (7-8)   Strongly agree (9-10)

| Scores with % 6-10                                                                        | 2026 | 2025 | 2024 | 2023 | 2022 | 2021 |
|-------------------------------------------------------------------------------------------|------|------|------|------|------|------|
| It is easy to find out what funding support Council has available for events and projects | 47%  | 43%  | 48%  | 49%  | 47%  | 47%  |
| I am satisfied with Community Funding services                                            | 44%  | 48%  | 59%  | 55%  | 60%  | 46%  |
| The process to apply for funding for events and projects is easy                          | 42%  | 40%  | 48%  | 52%  | 52%  | 37%  |

| Scores with % 6-10                                                                        | Māori | Non-Māori | Northern Community* | Southern Community | Feilding |
|-------------------------------------------------------------------------------------------|-------|-----------|---------------------|--------------------|----------|
| It is easy to find out what funding support Council has available for events and projects | 40%   | 48%       | 35%                 | 41%                | 54%      |
| I am satisfied with Community Funding services                                            | 45%*  | 44%       | 34%                 | 25%*               | 57%      |
| The process to apply for funding for events and projects is easy                          | 34%*  | 45%       | 37%                 | 22%*               | 53%      |

Notes:

- CFU1. On the 10-point scale where 1 is 'strongly disagree' and 10 is 'strongly agree', please rate your level of agreement with the following community funding statements?
  - It is easy to find out what funding support Council has available for events and projects n=174; Asked as "It is easy to find out what Council funding support is available." in 2021-2025
  - The process to apply for funding for events and projects is easy n=99; Asked as "It is easy to find out what Council funding support is available" in 2021-2025
  - I am satisfied with Community Funding services n=126; Asked as "I am satisfied with Community Funding and Development services" in 2021-2025

\*Caution: Small sample size (n<30). Results are indicative only.

81

Year-on-year

▲ Significantly higher  
▼ Significantly lower

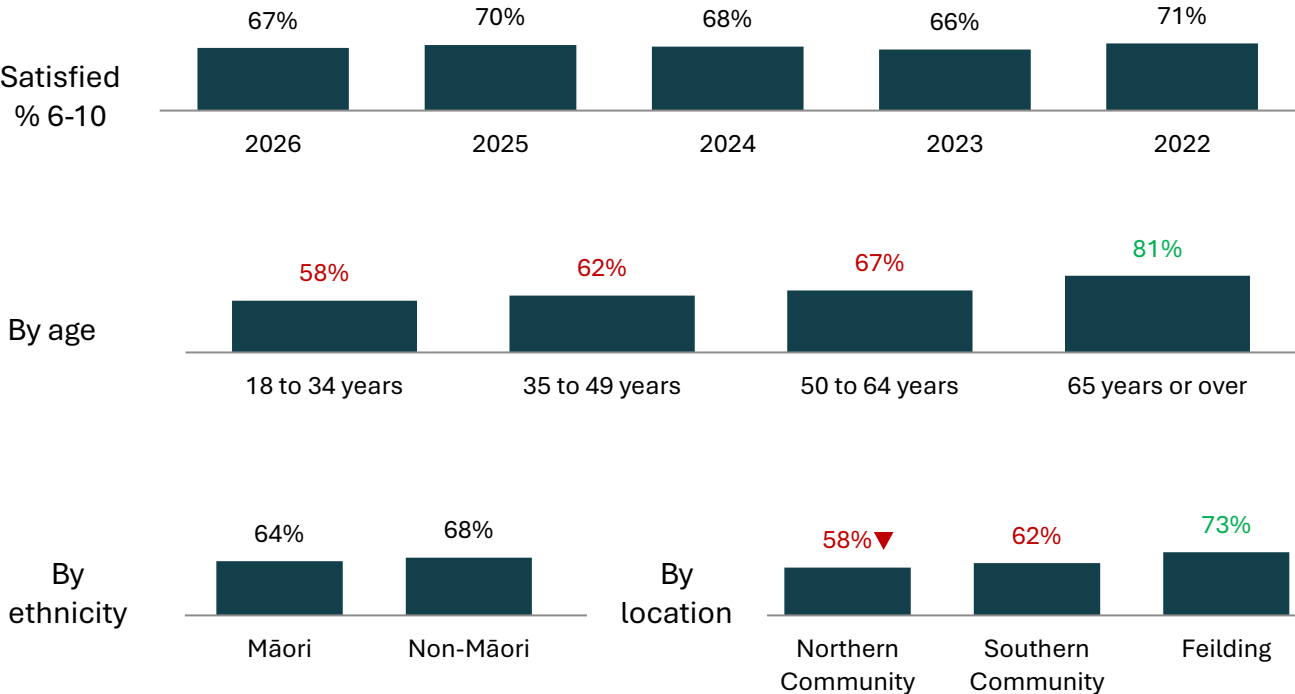
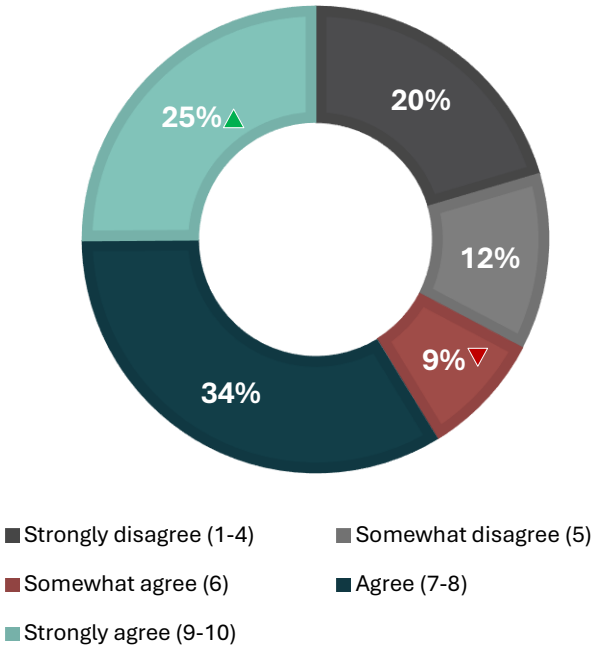
Between demographics

▲ Significantly higher  
▼ Significantly lower

# Sense of Connection with the Neighbourhood

TOC

- 67% of residents feel a *Sense of connection with their neighbourhood or community*, representing a slight decline of 3% points since 2025 (70%)
- Residents aged 65 years or over (81%) continue to record significantly higher levels of *Sense of connection with their neighbourhood or community* than residents in other age groups.
- A significant decrease has been recorded among residents in the Northern community from 72% in 2025 to 58% in 2026.



Notes:

1. DD2. On the 10-point scale where 1 is 'strongly disagree' and 10 is 'strongly agree', please rate your level of agreement with the following statement: I feel a sense of connection with my neighbourhood or community n=436

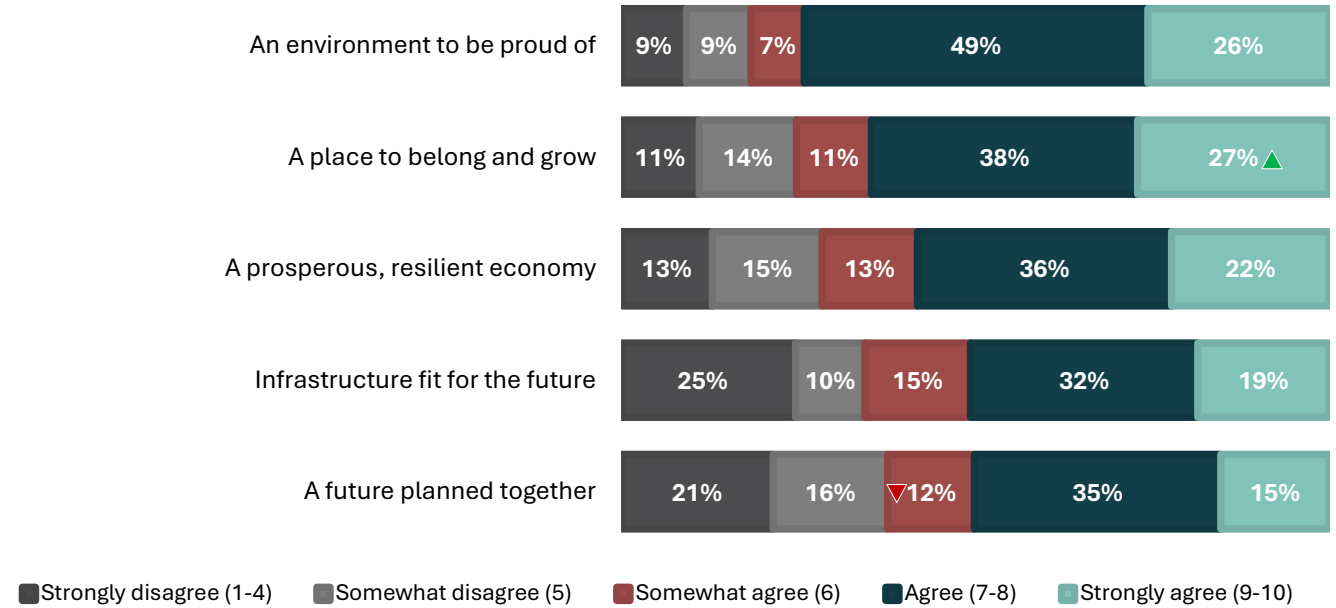
# Community Outcomes



## Community Outcomes Priorities

« TOC

- Over eight in ten residents (82%) agree that the Manawātū District is *An environment to be proud of*, representing a significant increase since 2025 (75%)
- Similarly, the perception that the district has *Infrastructure fit for the future* (66%) has significantly increased year-on-year (56% in 2025).



| Scores with % 6-10                | 2026  | 2025 | 2024 | 2023  | 2022 |
|-----------------------------------|-------|------|------|-------|------|
| An environment to be proud of     | 82% ▲ | 75%  | 77%  | 76%   | 81%  |
| A place to belong and grow        | 75%   | 76%  | 78%  | 75%   | 78%  |
| A prosperous, resilient economy   | 72%   | 70%  | 74%  | 73%   | 78%  |
| Infrastructure fit for the future | 66% ▲ | 56%  | 55%  | 57% ▼ | 65%  |
| A future planned together         | 62%   | 63%  | 57%  | 61%   | 62%  |

### Notes:

- CO1. Priority 1: A place to belong and grow: Council provides and supports community spaces and activities that encourages a sense of belonging for everyone from all walks of life. n=386
- CO3. Priority 2: A future planned together: Council has a plan for the future and has involved the community in creating it. n=315
- CO5. Priority 3: An environment to be proud of: Council takes environmental responsibility seriously. n=397
- CO7. Priority 4: Infrastructure fit for the future: Infrastructure in the Manawātū District (water, roads, etc.) are in good shape and our upgrade plans will serve us well in the future n=385
- CO9. Priority 5: A prosperous, resilient economy: Council works hard to make the Manawātū District a great place to live, visit, and do business. n=379
- \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

▲ Significantly higher  
▼ Significantly lower

### Between demographics

▲ Significantly higher  
▼ Significantly lower

## Community Outcomes Priorities (continued)

[◀ TOC](#)

| Scores with % 6 – 10<br>(by ethnicity) | Māori | Non-Māori |
|----------------------------------------|-------|-----------|
| An environment to be proud of          | 82%   | 82%       |
| A place to belong and grow             | 74%   | 75%       |
| A prosperous, resilient economy        | 71%   | 72%       |
| Infrastructure fit for the future      | 64%   | 66%▲      |
| A future planned together              | 62%   | 62%       |

| Scores with % 6 – 10<br>(by location) | Northern<br>Community | Southern<br>Community | Feilding |
|---------------------------------------|-----------------------|-----------------------|----------|
| An environment to be proud of         | 83%                   | 74%                   | 85%      |
| A place to belong and grow            | 74%                   | 61%                   | 83%      |
| A prosperous, resilient economy       | 72%                   | 60%                   | 78%      |
| Infrastructure fit for the future     | 59%                   | 57%                   | 73%      |
| A future planned together             | 55%                   | 48%                   | 73%      |

### Notes:

- CO1. Priority 1: A place to belong and grow: Council provides and supports community spaces and activities that encourages a sense of belonging for everyone from all walks of life. n=386
- CO3. Priority 2: A future planned together: Council has a plan for the future and has involved the community in creating it. n=315
- CO5. Priority 3: An environment to be proud of: Council takes environmental responsibility seriously. n=397
- CO7. Priority 4: Infrastructure fit for the future: Infrastructure in the Manawātū District (water, roads, etc.) are in good shape and our upgrade plans will serve us well in the future n=385
- CO9. Priority 5: A prosperous, resilient economy: Council works hard to make the Manawātū District a great place to live, visit, and do business. n=379
- \*Caution: Small sample size (n<30). Results are indicative only.

### Year-on-year

▲ Significantly higher  
▼ Significantly lower

### Between demographics

▲ Significantly higher  
▼ Significantly lower

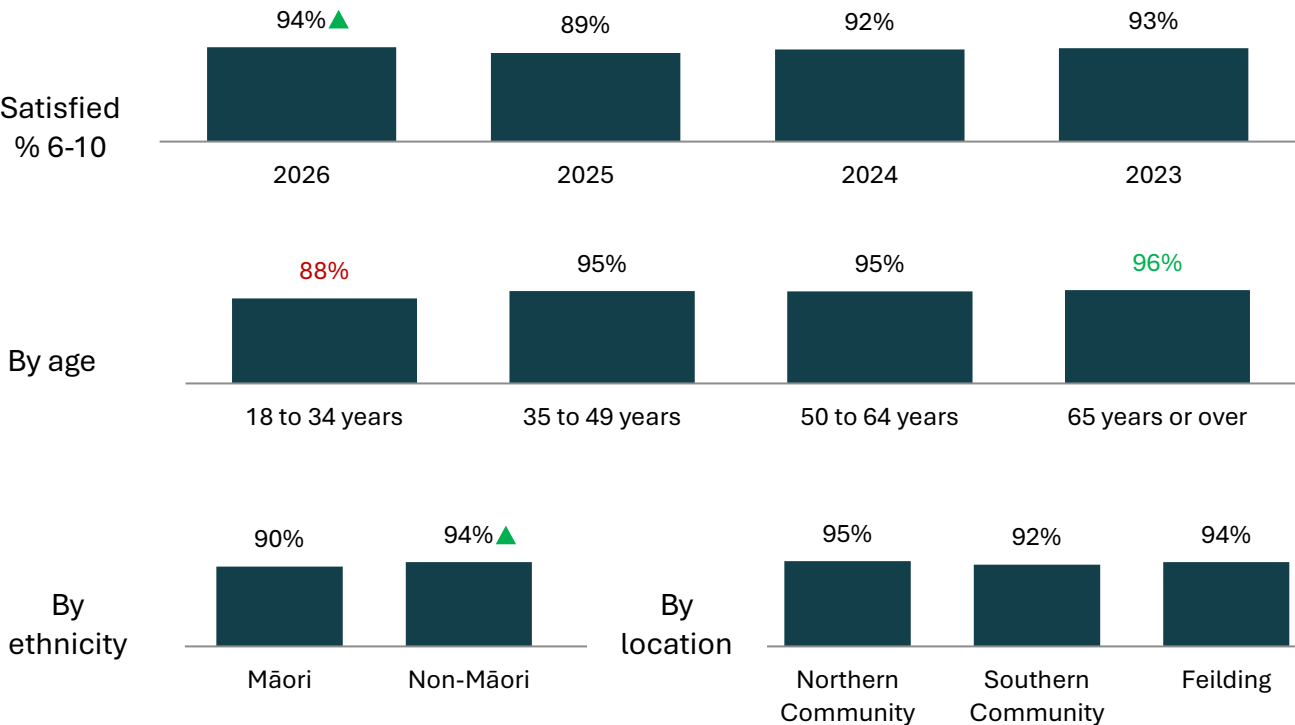
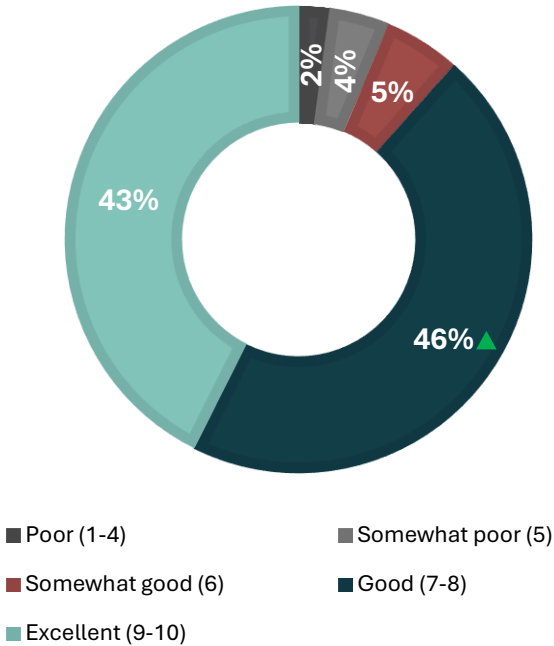
# Quality of Life



# Quality of Life

TOC

- Residents' perception of their *Quality of life* (94%) has significantly increased since 2025 (89%).
- Residents aged 65 years and over are more likely to rate their *Quality of life* higher than those aged 18-34 years (96% compared to 88%).
- This perception is relatively consistent across other sub-groups.



Notes:  
1. QOL1. On a scale of 1 to 10 where 1 is 'extremely poor' and 10 is 'extremely good', how would you rate the overall quality of your life? n=443

Year-on-year

Between demographics

▲ Significantly higher

▼ Significantly lower

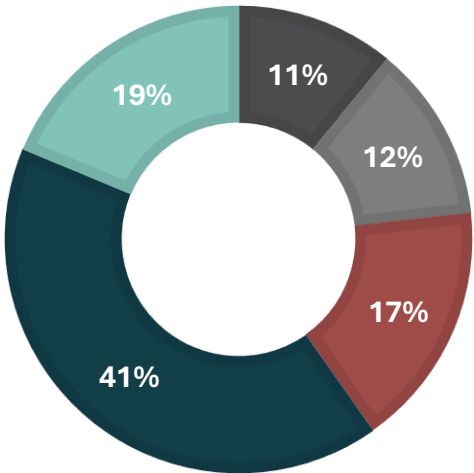
▲ Significantly higher

▼ Significantly lower

District Going in the Right Direction

TOC

- 77% of residents believe the *District is going in the right direction*, a slight increase from the level recorded in 2025 (74%).
- Residents in the Northern community (85%) and Feilding (80%) are significantly more likely to believe the *District is going in the right direction* than those in the Southern community (66%).



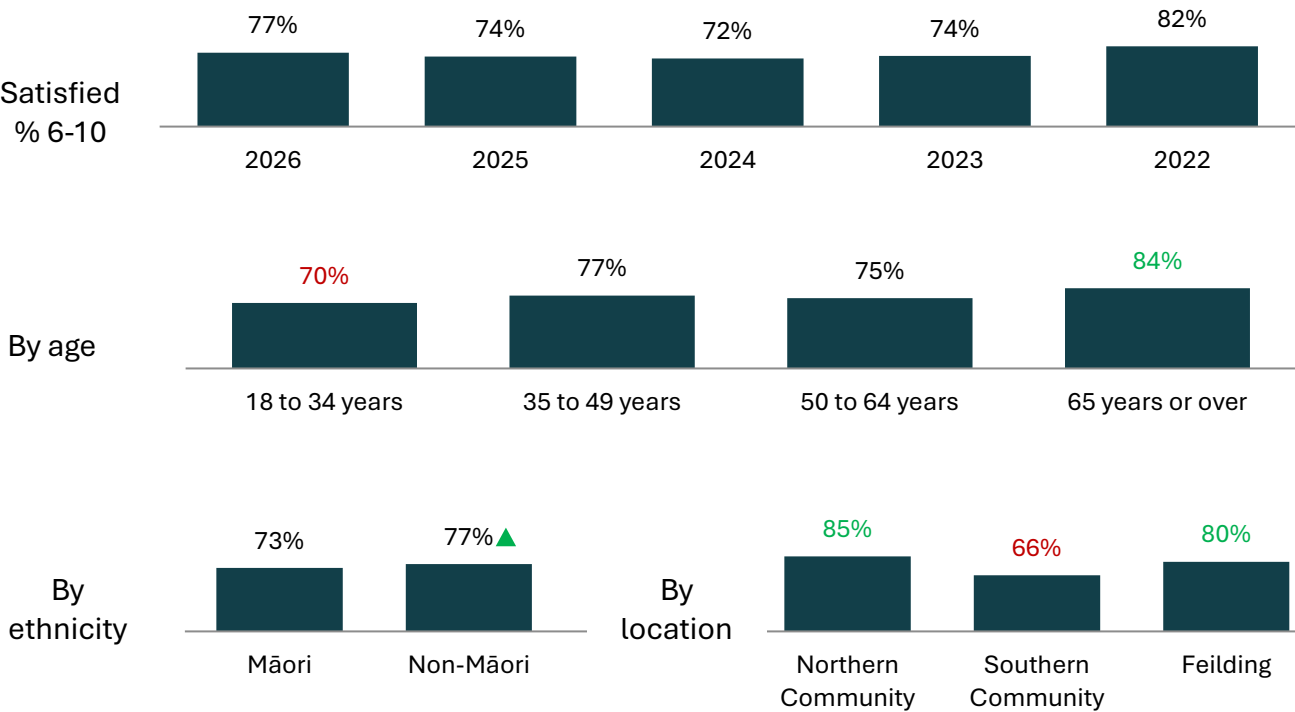
Strongly disagree (1-4)

Somewhat disagree (5)

Somewhat agree (6)

Agree (7-8)

Strongly agree (9-10)

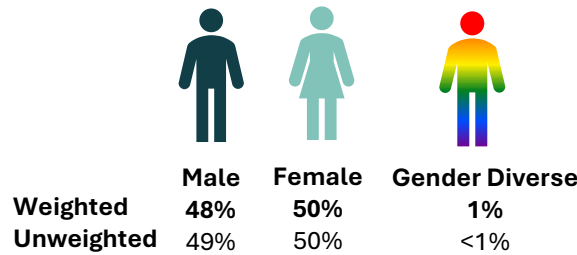


# Sample Profile

# Sample Profile n=459

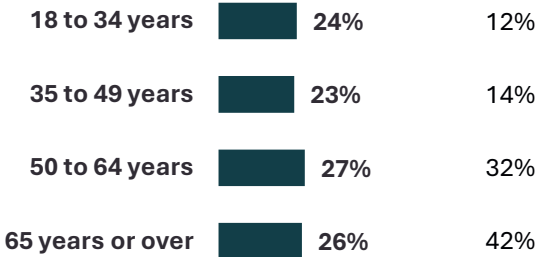
TOC

## Gender



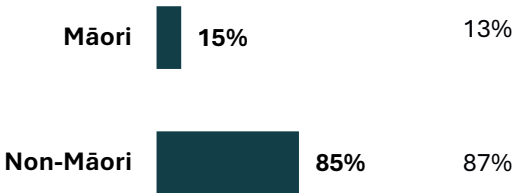
## Age (weighted)

## Unweighted



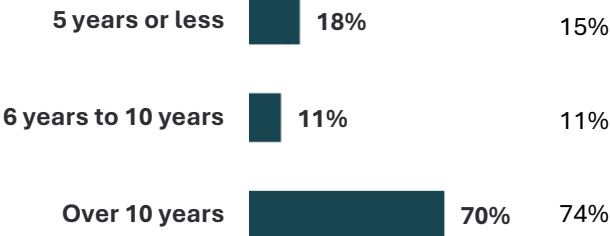
## Ethnicity (weighted)

## Unweighted



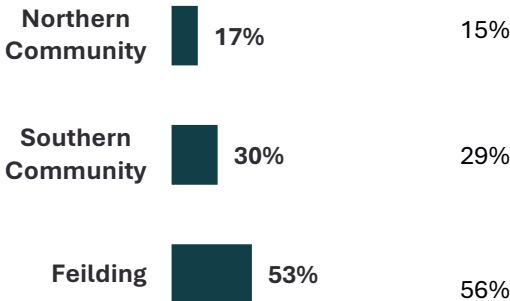
## Length of time lived in Manawātū District (weighted)

## Unweighted



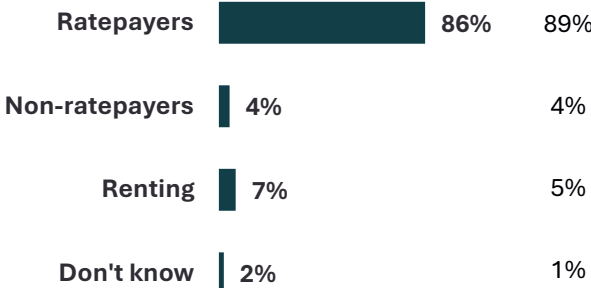
## Location (weighted)

## Unweighted



## Being a ratepayer (weighted)

## Unweighted



Year-on-year

Between demographics

▲ Significantly higher  
▼ Significantly lower

▲ Significantly higher  
▼ Significantly lower

# Appendices – Comments

# Residents' Comments

[<< TOC](#) 

| Comments on the Council's water supply service               | %          |
|--------------------------------------------------------------|------------|
| <b>Satisfied</b>                                             | <b>36%</b> |
| Dissatisfied with taste / smell                              | 23%        |
| Has to be filtered / boiled / poor quality                   | 16%        |
| Chlorine taste / smell                                       | 15%        |
| Dirty and discoloured / cloudy                               | 14%        |
| Low pressure                                                 | 13%        |
| Hard / high level of minerals / scale built-up on appliances | 5%         |
| Have to buy bottled water / don't drink the water            | 4%         |
| Other                                                        | 6%         |

| Comments on the Council's sewage system             | %   |
|-----------------------------------------------------|-----|
| No issues / satisfied with sewage system            | 82% |
| Environmental pollution concerns over discharge     | 9%  |
| Water sewage systems infrastructure is insufficient | 4%  |
| Other                                               | 5%  |

| Comments on the stormwater system in the district                | %   |
|------------------------------------------------------------------|-----|
| Flooding / surface water concerns                                | 43% |
| Blocked drains / need cleaning / maintenance required            | 28% |
| Satisfied / does not affect me                                   | 27% |
| Inadequate system / upgrades required                            | 13% |
| Low quality work / poor contractors / inaction regarding repairs | 8%  |
| No system in place                                               | 5%  |
| Damage to infrastructure                                         | 4%  |
| Open drains                                                      | 1%  |
| Other                                                            | 4%  |

## Notes:

1. TW3. What were the main reasons for the ratings you provided in relation to the Council's water supply services? n=188
2. TW6. What were the main reasons for the ratings you provided in relation to the Council's sewage system? n=125
3. TW8. What were the main reasons for the ratings you provided in relation to the stormwater system in the District? n=302

# Residents' Comments

« TOC

| Comments on the Council's kerbside rubbish collection service                                                       | %   |
|---------------------------------------------------------------------------------------------------------------------|-----|
| Satisfied with service                                                                                              | 71% |
| Dissatisfied with the cost of the service                                                                           | 10% |
| Dissatisfied with bags / size of bags / prefer wheelie bin                                                          | 5%  |
| Dissatisfied with rubbish collection / litter left on street / bins not emptied fully / left in inconvenient places | 5%  |
| Request for change of route / traffic management / pick up location                                                 | 4%  |
| Dissatisfied with limited range of items collected / recycled                                                       | 4%  |
| Don't use service / don't need the service                                                                          | 3%  |
| Missed collections / lack of communication                                                                          | 2%  |
| Frequency of collections                                                                                            | 2%  |
| State of the central drop off / tip site                                                                            | 2%  |
| Inconsistent collection times                                                                                       | 1%  |
| Other                                                                                                               | 2%  |

| Comments on the Council's waste management services                                           | %   |
|-----------------------------------------------------------------------------------------------|-----|
| Don't have / use kerbside rubbish or recycling collection service                             | 29% |
| No complaints / satisfied with service                                                        | 23% |
| Would like food waste service / don't know about food waste service                           | 19% |
| Too expensive / fly tipping, dumping                                                          | 18% |
| Address litter / more public bins / emptied regularly                                         | 14% |
| Green waste service inadequate                                                                | 10% |
| Recycling Centre is not user friendly / untidy / bins need emptying more often                | 6%  |
| Desire for increased range of items to be able to be recycled                                 | 6%  |
| Need more recycling points and transfer stations / too far away / better opening hours        | 4%  |
| Trucks leave mess behind / not always collected / irregular pick up times                     | 2%  |
| Prefer wheelie bins instead of bags / biodegradable bags / bigger bags / bigger bins required | 2%  |
| More information / communication needed                                                       | 2%  |
| Other                                                                                         | 8%  |

Notes:

- WR3. What were the main reasons for the ratings you provided in relation to Council's kerbside rubbish collection service? n=175
- WR5. What were the main reasons for the ratings you provided in relation to Council's waste management service? n=302
- \*Caution: Small sample size (n<30). Results are indicative only.

Residents’ Comments

◀ TOC

| Comments on the roads, footpaths or cycle ways in the district                   | %          |
|----------------------------------------------------------------------------------|------------|
| Footpaths are dangerous / uneven / tree, shrub maintenance needed / no footpaths | 31%        |
| Upgrades required to intersections / crossings / speed bumps                     | 20%        |
| Poor road maintenance / cheaply done / gravel roads/poor drainage                | 20%        |
| Speeding / dangerous driving / safety / signage / lighting                       | 19%        |
| Potholes / uneven roading                                                        | 14%        |
| <b>Satisfied / no issues</b>                                                     | <b>13%</b> |
| Dissatisfied with parking / mobility parking                                     | 13%        |
| Road layouts / roads not wide enough / road verges not maintained                | 12%        |
| Cycleway is a waste of money / doesn't get used / cycling is unsafe              | 11%        |
| Need more cycleways                                                              | 9%         |
| Need more walkways                                                               | 5%         |
| Other                                                                            | 4%         |

| Comments on the parks, reserves, and playgrounds in the district              | %          |
|-------------------------------------------------------------------------------|------------|
| <b>Satisfied with parks, reserves and playgrounds</b>                         | <b>69%</b> |
| Safety concerns / freedom camping concerns / improve dog control              | 12%        |
| Maintenance required                                                          | 10%        |
| More seating / shaded areas / beautification / rubbish bins / parking         | 8%         |
| More facilities / upgrades to current facilities required                     | 7%         |
| More footpaths / walkways / cycleways / maintenance to current paths required | 2%         |
| Other                                                                         | 9%         |

Notes:

- RF2. What were the main reasons for the ratings you provided in relation to the roads, footpaths or cycle ways in the District? n=300
- PR3. What were the main reasons for the ratings you provided in relation to the parks, reserves, and playgrounds in the district? n=189

# Residents' Comments

◀ TOC

| Comments on the public facilities                                                                                 | %          |
|-------------------------------------------------------------------------------------------------------------------|------------|
| <b>Satisfied with facilities</b>                                                                                  | <b>43%</b> |
| Pool upgrades required / dissatisfied with cost, staff, or opening hours / more activities or facilities required | 12%        |
| Need maintenance / upgrading (general)                                                                            | 12%        |
| Don't use the facilities                                                                                          | 12%        |
| Library needs more books / seating / better opening hours                                                         | 8%         |
| Public toilets run down / unclean                                                                                 | 7%         |
| Wasted money / discounts needed for ratepayers / paid for in rates but don't use                                  | 7%         |
| Lack of facilities / expensive to use or hire                                                                     | 4%         |
| Customer service is lacking / not friendly                                                                        | 2%         |
| Safety concerns                                                                                                   | 1%         |
| Dissatisfied with lack of parking                                                                                 | 1%         |
| Other                                                                                                             | 5%         |

| Comments on the Council's regulatory services       | %          |
|-----------------------------------------------------|------------|
| Animal control                                      | 43%        |
| <b>Satisfied / no issues</b>                        | <b>31%</b> |
| Building / resource consents                        | 29%        |
| Take too long / costly / no value for money         | 24%        |
| Council didn't help / staff lack of experience      | 7%         |
| Lack of communication                               | 4%         |
| Licensing                                           | 3%         |
| Encourage growth / types of businesses are not good | 2%         |
| Noise Control                                       | 1%         |
| Rubbish / dog poo                                   | 1%         |
| Other                                               | 1%         |

Notes:

- CF3. What were the main reasons for the ratings you provided in relation to public facilities in the district? n=201
- OS3. What were the main reasons for the ratings you provided in relation to Council's regulatory services? n=101

Residents’ Comments

◀ TOC

| Comments on the community development including community funding                    | %   |
|--------------------------------------------------------------------------------------|-----|
| Do not use / have never used or been involved in community funding                   | 47% |
| Unaware of what is available / where to find information                             | 17% |
| Satisfied with community funding                                                     | 10% |
| Wasteful spending / focus on core services                                           | 10% |
| More advertising / communication of available funding required                       | 7%  |
| Too hard to get funding / too much paperwork / eligibility criteria / takes too long | 6%  |
| Inequal funding / funding is too selective                                           | 5%  |
| Rates are too high / increasing too much                                             | 1%  |
| Other                                                                                | 3%  |

| Comments on Council’s priority: a place to belong and grow                                             | %          |
|--------------------------------------------------------------------------------------------------------|------------|
| <b>Great community / love living here / community feel, great for families / Council has done well</b> | <b>35%</b> |
| Facilities, activities well used / good facilities, groups and activities                              | 15%        |
| Don't feel like I belong / not much provided / treat everyone equally                                  | 11%        |
| <b>Good job / could be better / average</b>                                                            | <b>10%</b> |
| Budget restraints / excess spending / rates / prioritise core services                                 | 9%         |
| More Council supported events                                                                          | 7%         |
| Need age appropriate facilities / free facilities                                                      | 4%         |
| Need more info / Council needs to promote / Council to engage with people                              | 3%         |
| Security concerns / more police presence required                                                      | 2%         |
| Roads / footpaths                                                                                      | 1%         |
| Investments and upgrades have improved the community                                                   | 1%         |
| Fast growth of community / infrastructure not keeping up                                               | <1%        |
| Other                                                                                                  | 7%         |

Notes:

- CFU3. What were the main reasons for the ratings you provided in relation to community funding? n=144
- CO2. Why did you provide this rating for ‘a place to belong and grow’? n=155

## Residents' Comments

[<< TOC](#) 

| Comments on Council's priority: a future planned together                                 | %         |
|-------------------------------------------------------------------------------------------|-----------|
| Was not involved / didn't know about it / not sure of plans / cannot give opinion         | 37%       |
| Council has their own agenda / do what they want                                          | 16%       |
| More consultation with community / better communication / listen to the community         | 13%       |
| <b>Satisfied with future planning</b>                                                     | <b>9%</b> |
| Felt included / knew of plans / info in rates / lots of consultation / good communication | 9%        |
| Council can do better / they are ok                                                       | 6%        |
| Rates are too high / focus on core services / infrastructure                              | 4%        |
| Other                                                                                     | 7%        |

| Comments on Council's priority: an environment to be proud of                         | %          |
|---------------------------------------------------------------------------------------|------------|
| <b>Is beautiful / good job / love our town / confident in Council</b>                 | <b>47%</b> |
| More work can be done / Council is working on improving / no support                  | 12%        |
| Not Councils responsibility / focus on core services / don't waste money              | 6%         |
| Need more planting of natives/trees                                                   | 6%         |
| Too much rubbish / fly tipping / tip is expensive / more rubbish bins / bins not bags | 5%         |
| Recycling / recycling plant                                                           | 5%         |
| Need to look after the environment / farming concerns                                 | 4%         |
| Sewerage / pollution in rivers and waterways                                          | 3%         |
| Improve communication and information in this area                                    | 2%         |
| Increase alternative transport options                                                | 1%         |
| Roadsides mowing needed / maintenance of berms                                        | 1%         |
| Flood prevention work                                                                 | 1%         |
| Bush and weeds need clearing from waterways / dredging / stop spraying                | 1%         |
| Dissatisfied with air quality                                                         | 1%         |
| Crime / vandalism / safety concerns                                                   | <1%        |
| Plant and animal pest control                                                         | <1%        |
| Other                                                                                 | 6%         |

### Notes:

- CO4. Why did you provide this rating for 'a future planned together'? n=144
- CO6. Why did you provide this rating for 'an environment to be proud of'? n=140

# Residents' Comments

◀ TOC

| Comments on Council's priority: infrastructure fit for the future                | %   |
|----------------------------------------------------------------------------------|-----|
| Roads need fixing / traffic issues / parking                                     | 27% |
| <b>Council are doing well / infrastructure is coping / satisfied</b>             | 23% |
| There is room for improvement / financial constraints / don't know plans         | 15% |
| Infrastructure not keeping up with growth                                        | 10% |
| Water concerns / flooding / rivers / stormwater                                  | 9%  |
| Need to future proof infrastructure / long-term planning required                | 8%  |
| Footpaths / cycleways maintenance / more required                                | 7%  |
| Unnecessary work / bad contractors / repairs take too long / poor maintenance    | 6%  |
| Badly organised / bad decisions / wasted money / investment not allocated evenly | 5%  |
| Too many new builds / population growth an issue                                 | 4%  |
| Safety concerns                                                                  | 2%  |
| Other                                                                            | 5%  |

| Comments on Council's priority: a prosperous, resilient economy                                                  | %   |
|------------------------------------------------------------------------------------------------------------------|-----|
| <b>Is a great place / making it a better place</b>                                                               | 23% |
| <b>Is strong economically / business is good / businesses are supported</b>                                      | 13% |
| Need more businesses / shops to encourage people to spend here / closed shops / more activities                  | 10% |
| Need input from Government / not sure how much Council does                                                      | 10% |
| Trying but could do better / room for improvement / versatile                                                    | 9%  |
| Not sure of plans / cannot give opinion / am neutral                                                             | 6%  |
| Do not agree that Council works hard to make the Manawatū District a great place to live, visit, and do business | 5%  |
| Town needs an upgrade / improve safety and facilities / address parking issues                                   | 5%  |
| Rates too high and infrastructure is lacking                                                                     | 5%  |
| Spend wisely / focus on core services / not Councils job                                                         | 4%  |
| Hard to measure / opinion is based on what I have seen or heard                                                  | 3%  |
| Improve promotion / communication / and information in this area                                                 | 2%  |
| Improve consent processes so it's easier to open a business or provide a service                                 | 2%  |
| Rural communities are isolated / some areas benefit more than others                                             | 2%  |
| Population growth / housing support required                                                                     | 1%  |
| Other                                                                                                            | 7%  |

Notes:

- CO8. Why did you provide this rating for 'infrastructure fit for the future'? n=186
- CO10. Why did you provide this rating for 'a prosperous, resilient economy'? n=124

# Residents' Comments

[<< TOC](#) 

| Comments on value for money and excellence in local government                                               | %          |
|--------------------------------------------------------------------------------------------------------------|------------|
| Rates are too expensive / keep going up / more houses means more rates for Council / expensive place to live | 43%        |
| Don't get or use services / only get basic services                                                          | 27%        |
| <b>Satisfied / get value for money / Council working hard / great staff</b>                                  | <b>15%</b> |
| Wasted money                                                                                                 | 12%        |
| Don't see work being done / services have not improved                                                       | 5%         |
| Invest in transport / roading / footpaths / cycleways / streetlighting                                       | 4%         |
| Payments are easy / payment improvements                                                                     | 3%         |
| User-pay system / discounts at facilities for ratepayers or residents                                        | 3%         |
| Invest in water / stormwater / wastewater / drainage                                                         | 3%         |
| Financial rate breakdown                                                                                     | 2%         |
| Don't agree / don't pay rates                                                                                | 2%         |
| No value for money / room for improvement / need to listen                                                   | 2%         |
| Parks and reserves / dog parks                                                                               | 1%         |
| Improve recycling / rubbish                                                                                  | 1%         |
| <b>Generally okay / good / average</b>                                                                       | <b>1%</b>  |
| Other                                                                                                        | 3%         |

| Comments on how Council handled enquiry or complaint                                 | %   |
|--------------------------------------------------------------------------------------|-----|
| Satisfied                                                                            | 49% |
| Nothing was done after request or complaint/unresolved/no follow up/no communication | 19% |
| Problems take too long to fix                                                        | 7%  |
| Staff are ill informed / unqualified staff / not enough staff / conflicting advice   | 5%  |
| They could not help / private property / out of their control                        | 2%  |
| Bad service / do not return calls / don't take it seriously / not interested         | 2%  |
| No time to investigate / no money to fix problem                                     | 1%  |
| No clean up after work completed / poor quality work                                 | 1%  |
| Other                                                                                | 7%  |

## Notes:

- CO11. Why did you provide these ratings for 'value for money and excellence in local government'? n=227
- RS4. What were the main reasons for the ratings you provided in relation to how Council handled your enquiry or complaint? n=101

## Key Research Head Office

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Tauranga 3141

**Website:** [www.keyresearch.co.nz](http://www.keyresearch.co.nz)

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# Councils' Annual Residents Surveys Benchmarking Report 2025/2026



## Research background



### Research Objectives

The specific objectives of this research were:

- To understand residents' satisfaction with services and facilities provided by Councils across New Zealand.
- To benchmark the key performance indicators against other Councils.



### Method

- Surveys were undertaken with 23 different Councils across New Zealand in 2025/26, including 20 District Councils and 3 City Councils.
- Respondents were selected at random from the Electoral Roll, ratepayers database, and/or email contacts collected through previous years' surveys.
- The questionnaires were designed in consultation with Councils and were structured to provide a comprehensive set of measures relating to core activities, services, and infrastructure, and to provide a wider perspective of performance. This includes assessment of reputation and knowledge of Council's activities.
- Post data collection, the samples were weighted to be exactly representative of key population demographics for each area based on the 2023 Census.
- At an aggregate level the surveys have an expected 95% confidence interval (margin of error) of between +/- 3.2% and +/-4.8%.
- Maximum, minimum and average scores for key performance indicators are shown and benchmarked based on 23 Council's performances. Questions used are either identical or closely related, allowing for comparison.
- To allow for better and more extensive benchmarking, several measures are presented as an average score of all related measures in the relevant section.
- Please note: if minimum, average, or maximum values are not visible in a chart, it means that your Council results are equal to that value. For clarity, please view the table on the page following each chart.

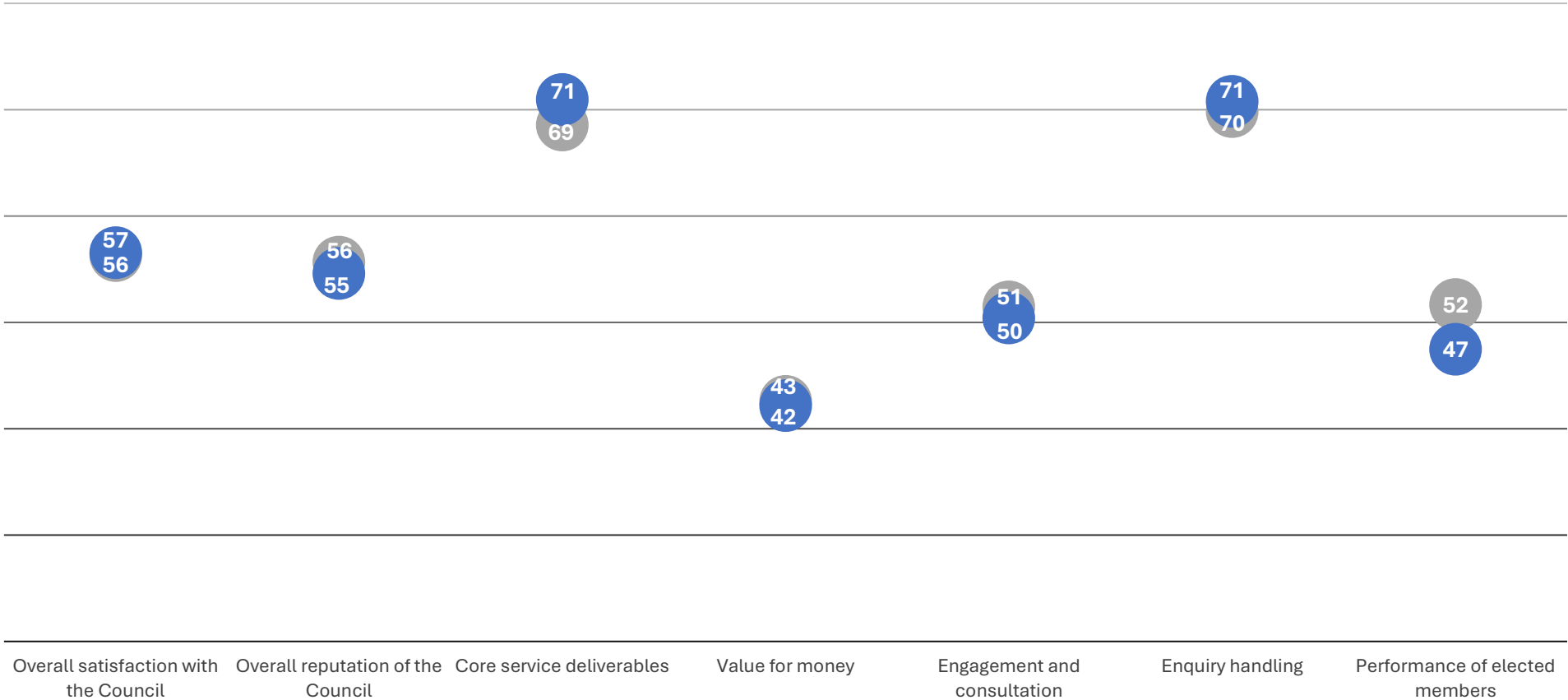
## Councils included in 2025/26 Benchmarking report

- Far North District Council
- Gisborne District Council
- Hauraki District Council
- Kaipara District Council
- Manawatū District Council
- Matamata-Piako District Council
- Masterton District Council
- Nelson City Council
- New Plymouth District Council
- Palmerston North City Council
- Queenstown Lakes District Council
- Rotorua Lakes District Council
- South Waikato District Council
- Stratford District Council
- Tasman District Council
- Tauranga City Council
- Timaru District Council
- Thames-Coromandel District Council
- Waikato District Council
- Waimakariri District Council
- Waipā District Council
- Waitaki District Council
- Waitomo District Council

Year on year change – Overall

2025/2026 Council Benchmarking

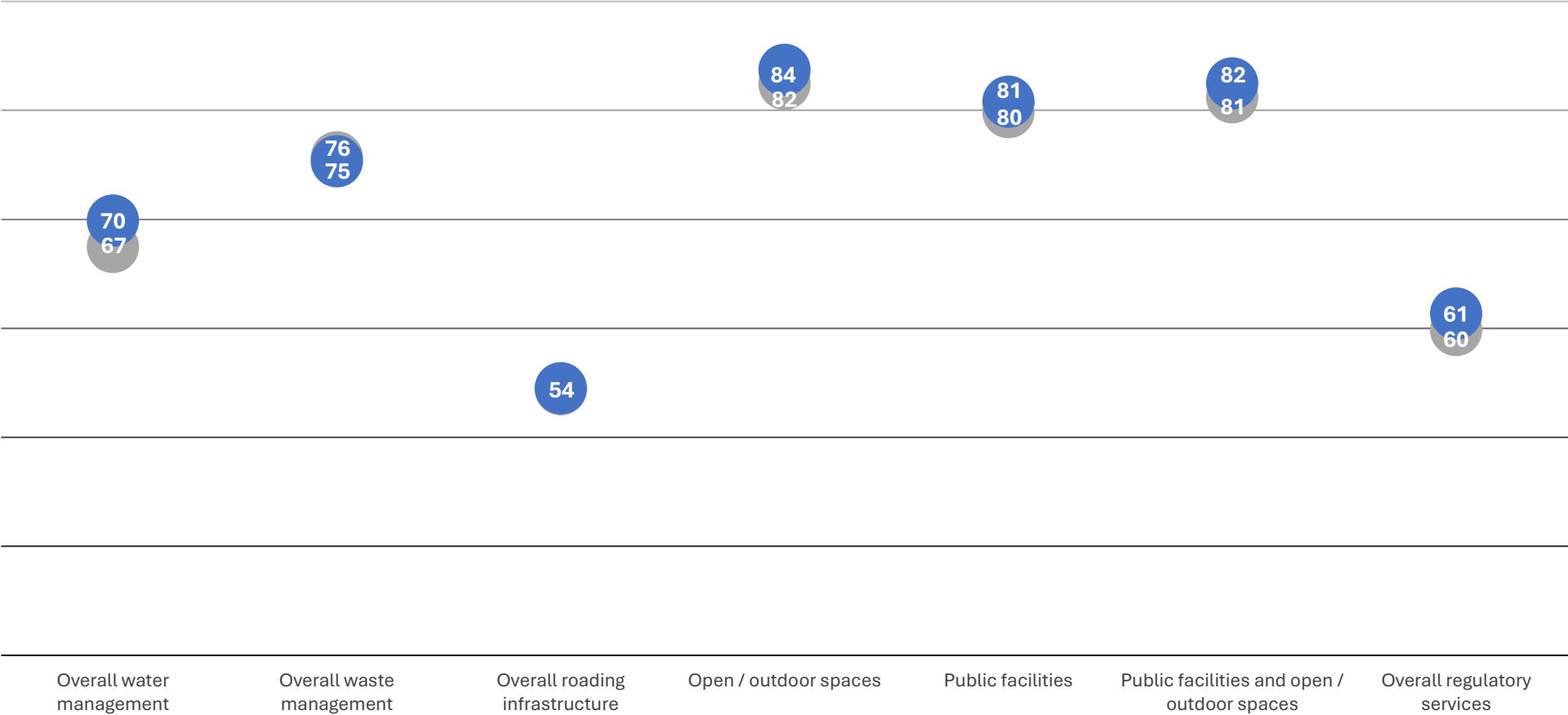
● All Councils' Average 2024/25    ● All Councils' Average 2025/26



Year on year change – Core service deliverables

2025/2026 Council Benchmarking

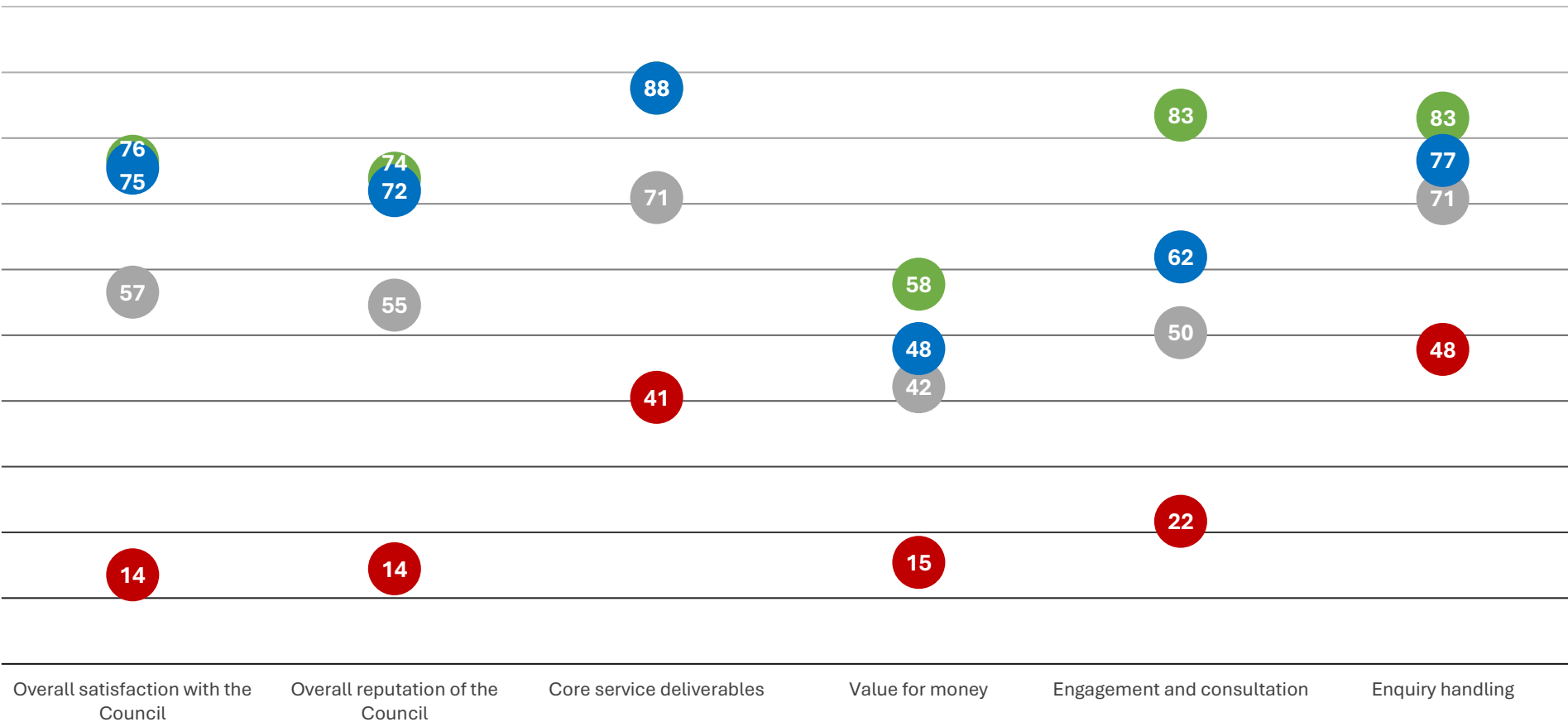
● All Councils' Average 2024/25      ● All Councils' Average 2025/26



## Overall measures

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



## Overall measures

| % 6-10                                | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall satisfaction with the Council | 75             | 57                             | +18          | 76                | -1           | 14                   | +61          |
| Overall reputation of the Council     | 72             | 55                             | +17          | 74                | -2           | 14                   | +58          |
| Core service deliverables             | 88             | 71                             | +17          | 88                | -            | 41                   | +47          |
| Value for money                       | 48             | 42                             | +6           | 58                | -10          | 15                   | +33          |
| Engagement and consultation           | 62             | 50                             | +12          | 83                | -21          | 22                   | +40          |
| Enquiry handling                      | 77             | 71                             | +6           | 83                | -6           | 48                   | +29          |

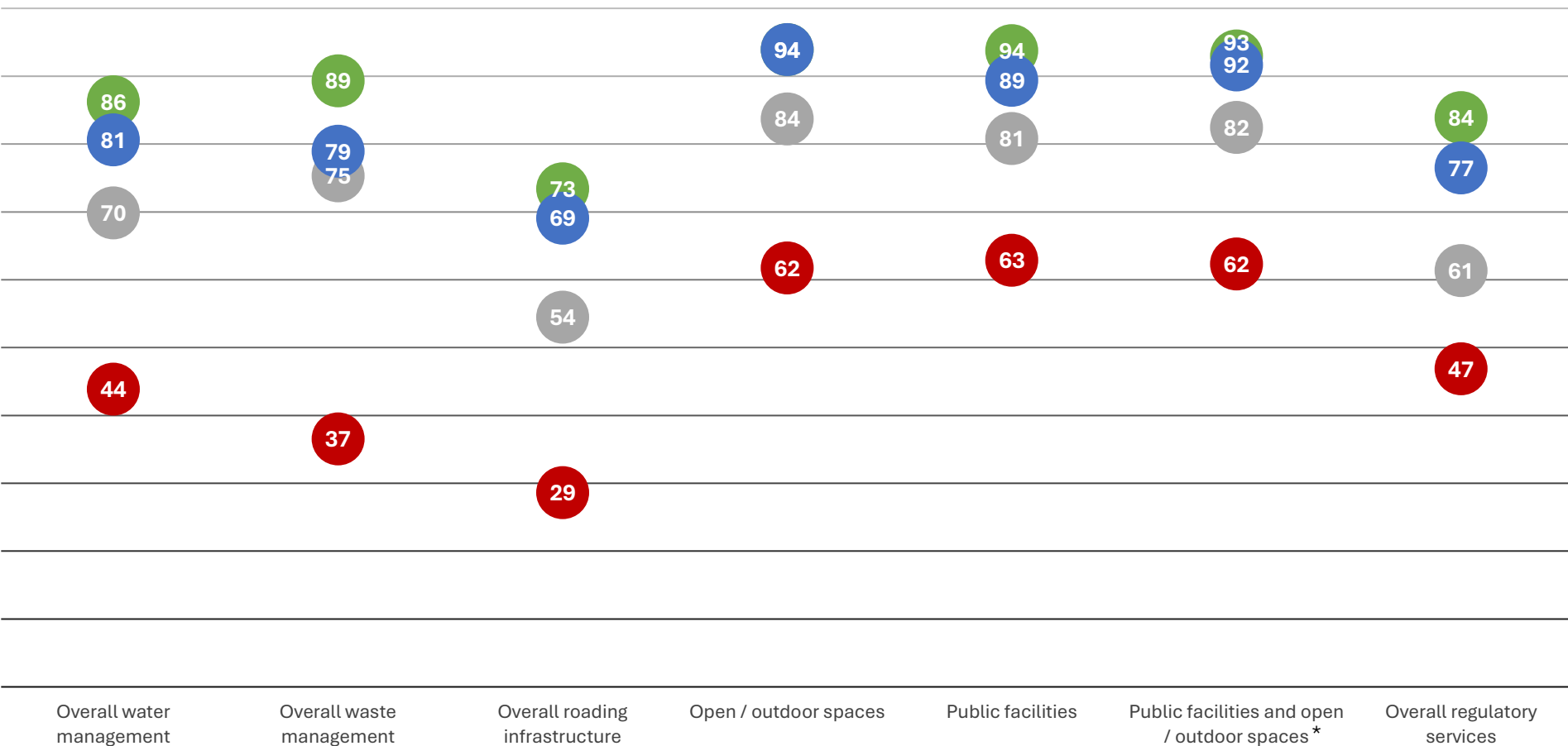
## Overall measures – District Councils only

| % 6-10                                | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall satisfaction with the Council | 75             | 55                             | +20          | 75                | -            | 14                   | +61          |
| Overall reputation of the Council     | 72             | 55                             | +17          | 74                | -2           | 14                   | +58          |
| Core service deliverables             | 88             | 70                             | +18          | 88                | -            | 41                   | +47          |
| Value for money                       | 48             | 41                             | +7           | 58                | -10          | 15                   | +33          |
| Engagement and consultation           | 62             | 50                             | +12          | 83                | -21          | 22                   | +40          |
| Enquiry handling                      | 77             | 70                             | +7           | 83                | -6           | 48                   | +29          |

## Core service deliverables

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



\* To allow for better and more extensive benchmarking, these measures are presented as an average score of all related measures.

## Core service deliverables

| % 6-10                                      | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall water management                    | 81             | 70                             | +11          | 86                | -5           | 44                   | +37          |
| Overall waste management                    | 79             | 75                             | +4           | 89                | -10          | 37                   | +42          |
| Overall roading infrastructure              | 69             | 54                             | +15          | 73                | -4           | 29                   | +40          |
| Open / outdoor spaces                       | 94             | 84                             | +10          | 94                | -            | 62                   | +32          |
| Public facilities                           | 89             | 81                             | +8           | 94                | -5           | 63                   | +26          |
| Public facilities and open / outdoor spaces | 92             | 82                             | +10          | 93                | -1           | 62                   | +30          |
| Overall regulatory services                 | 77             | 61                             | +16          | 84                | -7           | 47                   | +30          |

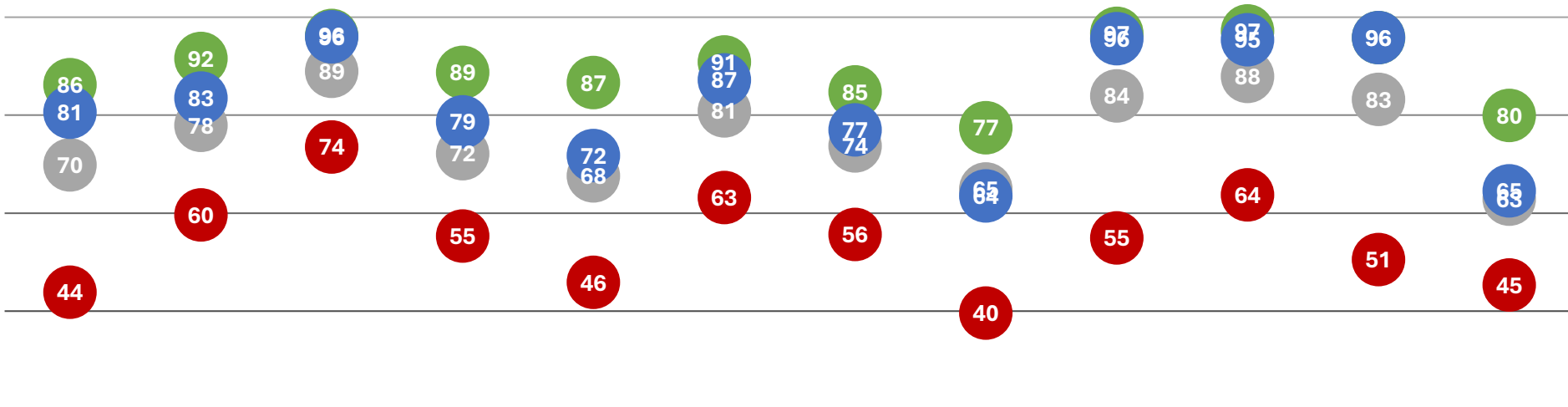
## Core service deliverables – District Councils Only

| % 6-10                                      | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall water management                    | 81             | 68                             | +13          | 86                | -5           | 44                   | +37          |
| Overall waste management                    | 79             | 74                             | +5           | 89                | -10          | 37                   | +42          |
| Overall roading infrastructure              | 69             | 54                             | +15          | 73                | -4           | 29                   | +40          |
| Open / outdoor spaces                       | 94             | 84                             | +10          | 94                | -            | 62                   | +32          |
| Public facilities                           | 89             | 81                             | +8           | 94                | -5           | 63                   | +26          |
| Public facilities and open / outdoor spaces | 92             | 83                             | +9           | 93                | -1           | 62                   | +28          |
| Overall regulatory services                 | 77             | 61                             | +16          | 84                | -7           | 47                   | +30          |

## Water management

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



|                          |                        |                               |                                                                 |                |                  |                |                           |                                         |                                |                                  |                  |
|--------------------------|------------------------|-------------------------------|-----------------------------------------------------------------|----------------|------------------|----------------|---------------------------|-----------------------------------------|--------------------------------|----------------------------------|------------------|
| Overall water management | Overall water supply * | Reliability of water supply * | Overall quality of water (including taste, clarity and odour) * | Taste of water | Clarity of water | Odour of water | Overall stormwater system | Overall sewerage / wastewater systems * | Reliability of sewerage system | Treating and disposing of sewage | Flood protection |
|--------------------------|------------------------|-------------------------------|-----------------------------------------------------------------|----------------|------------------|----------------|---------------------------|-----------------------------------------|--------------------------------|----------------------------------|------------------|

\* To allow for better and more extensive benchmarking, these measures are presented as an average score of all related measures.

## Water management

| % 6-10                                                        | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall water management                                      | 81             | 70                             | +11          | 86                | -5           | 44                   | +37          |
| Overall water supply                                          | 83             | 78                             | +5           | 92                | -9           | 60                   | +23          |
| Reliability of water supply                                   | 96             | 89                             | +7           | 96                | -            | 74                   | +22          |
| Overall quality of water (including taste, clarity and odour) | 79             | 72                             | +7           | 89                | -10          | 55                   | +24          |
| Taste of water                                                | 72             | 68                             | +4           | 87                | -15          | 46                   | +26          |
| Clarity of water                                              | 87             | 81                             | +6           | 91                | -4           | 63                   | +24          |
| Odour of water                                                | 77             | 74                             | +3           | 85                | -8           | 56                   | +21          |
| Overall stormwater system                                     | 64             | 65                             | -1           | 77                | -13          | 40                   | +24          |
| Overall sewerage / wastewater systems                         | 96             | 84                             | +11          | 97                | -1           | 55                   | +41          |
| Reliability of sewerage system                                | 95             | 88                             | +7           | 97                | -2           | 64                   | +31          |
| Treating and disposing of sewage                              | 96             | 83                             | +13          | 96                | -            | 51                   | +45          |
| Flood protection                                              | 65             | 63                             | +2           | 80                | -15          | 45                   | +20          |

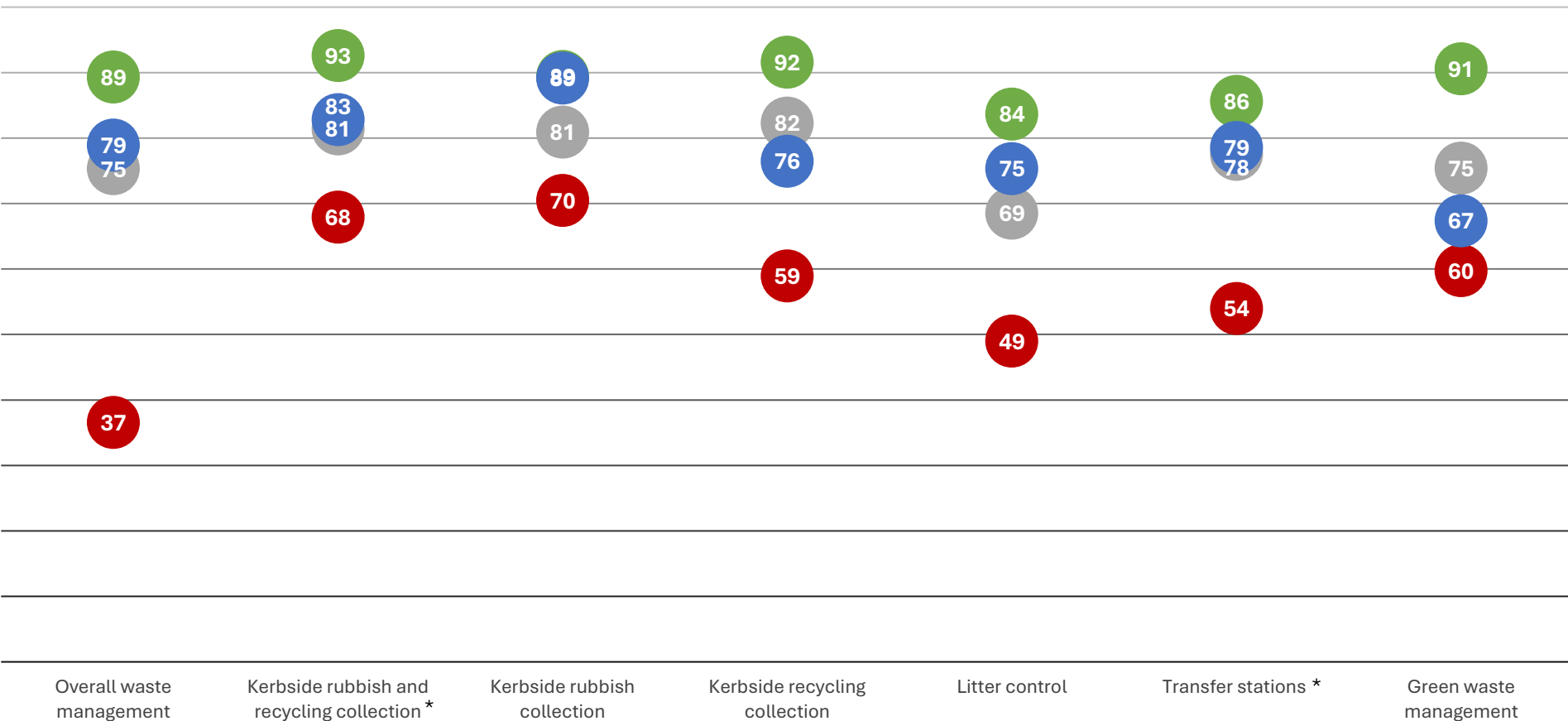
## Water management – District Councils Only

| % 6-10                                                        | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall water management                                      | 81             | 68                             | +13          | 86                | -5           | 44                   | +37          |
| Overall water supply                                          | 83             | 77                             | +6           | 92                | -9           | 60                   | +23          |
| Reliability of water supply                                   | 96             | 89                             | +7           | 96                | -            | 74                   | +22          |
| Overall quality of water (including taste, clarity and odour) | 79             | 72                             | +7           | 89                | -10          | 55                   | +24          |
| Taste of water                                                | 72             | 68                             | +4           | 87                | -15          | 46                   | +26          |
| Clarity of water                                              | 87             | 81                             | +6           | 91                | -4           | 63                   | +24          |
| Odour of water                                                | 77             | 74                             | +3           | 85                | -8           | 56                   | +21          |
| Overall stormwater system                                     | 64             | 64                             | -            | 77                | -13          | 40                   | +24          |
| Overall sewerage / wastewater systems                         | 96             | 83                             | +13          | 97                | -1           | 55                   | +41          |
| Reliability of sewerage system                                | 95             | 88                             | +7           | 97                | -2           | 64                   | +31          |
| Treating and disposing of sewage                              | 96             | 83                             | +13          | 96                | -            | 51                   | +45          |
| Flood protection                                              | 65             | 61                             | +4           | 74                | -11          | 45                   | +20          |

## Waste management

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



\* To allow for better and more extensive benchmarking, these measures are presented as an average score of all related measures.

## Waste management

| % 6-10                                    | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall waste management                  | 79             | 75                             | +4           | 89                | -10          | 37                   | +42          |
| Kerbside rubbish and recycling collection | 83             | 81                             | +2           | 93                | -10          | 68                   | +15          |
| Kerbside rubbish collection               | 89             | 81                             | +8           | 89                | -            | 70                   | +19          |
| Kerbside recycling collection             | 76             | 82                             | -6           | 92                | -16          | 59                   | +17          |
| Litter control                            | 75             | 69                             | +6           | 84                | -9           | 49                   | +26          |
| Transfer stations                         | 79             | 78                             | +1           | 86                | -7           | 54                   | +25          |
| Green waste management                    | 67             | 75                             | -8           | 91                | -24          | 60                   | +7           |

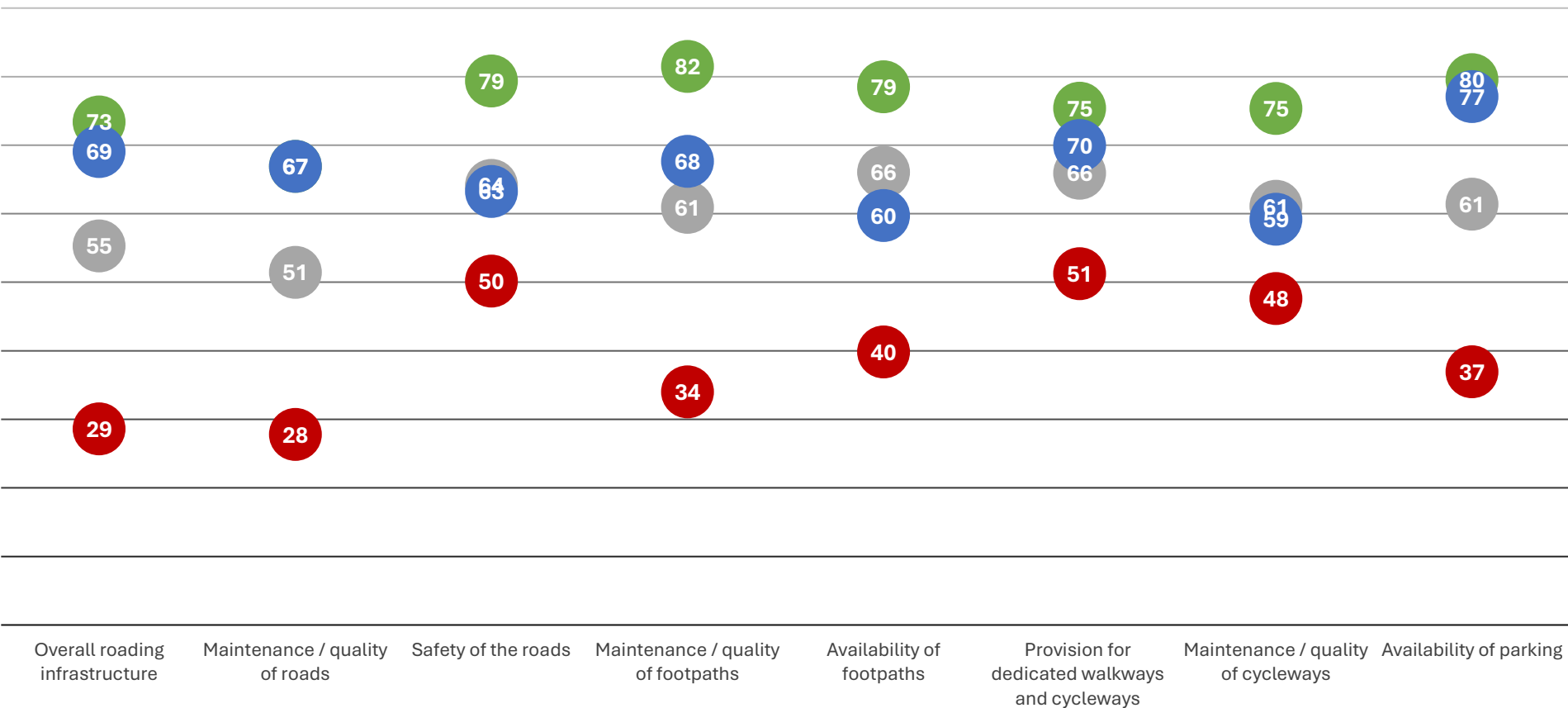
## Waste management – District Councils Only

| % 6-10                                    | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall waste management                  | 79             | 74                             | +5           | 89                | -10          | 37                   | +42          |
| Kerbside rubbish and recycling collection | 83             | 80                             | +3           | 87                | -4           | 68                   | +15          |
| Kerbside rubbish collection               | 89             | 81                             | +8           | 89                | -            | 70                   | +19          |
| Kerbside recycling collection             | 76             | 82                             | -6           | 92                | -14          | 59                   | +17          |
| Litter control                            | 75             | 67                             | +8           | 75                | -            | 49                   | +26          |
| Transfer stations                         | 79             | 77                             | +2           | 86                | -7           | 54                   | +25          |
| Green waste management                    | 67             | 75                             | -7           | 91                | -23          | 60                   | +7           |

## Roading infrastructure

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



## Roading infrastructure

| % 6-10                                         | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|------------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall roading infrastructure                 | 69             | 55                             | +14          | 73                | -4           | 29                   | +40          |
| Maintenance / quality of roads                 | 67             | 51                             | +16          | 67                | -            | 28                   | +39          |
| Safety of the roads                            | 63             | 64                             | -1           | 79                | -16          | 50                   | +13          |
| Maintenance / quality of footpaths             | 68             | 61                             | +7           | 82                | -14          | 34                   | +34          |
| Availability of footpaths                      | 60             | 66                             | -6           | 79                | -19          | 40                   | +20          |
| Provision for dedicated walkways and cycleways | 70             | 66                             | +4           | 75                | -5           | 51                   | +19          |
| Maintenance / quality of cycleways             | 59             | 61                             | -2           | 75                | -16          | 48                   | +11          |
| Availability of parking                        | 77             | 61                             | +16          | 80                | -3           | 37                   | +40          |

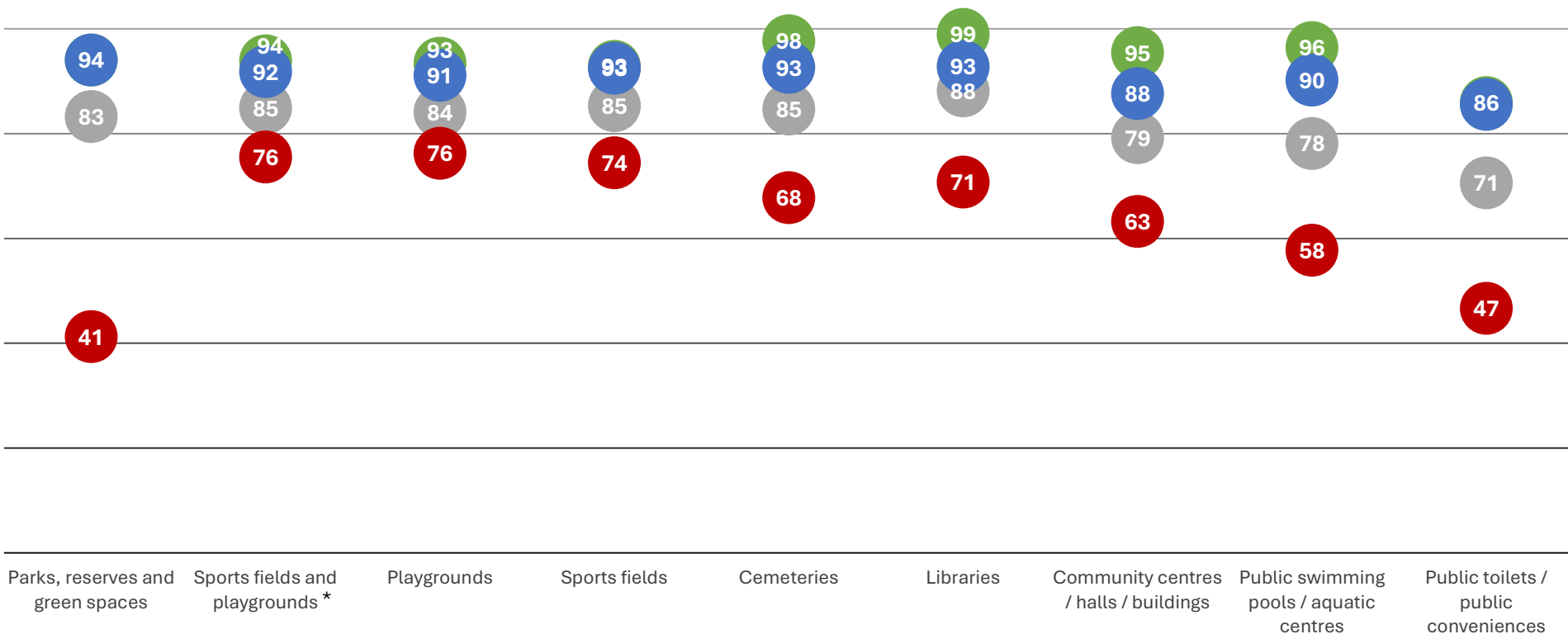
## Roading infrastructure – District Councils Only

| % 6-10                                         | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|------------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall roading infrastructure                 | 69             | 54                             | +15          | 73                | -4           | 29                   | +40          |
| Maintenance / quality of roads                 | 67             | 51                             | +16          | 67                | -            | 28                   | +39          |
| Safety of the roads                            | 63             | 61                             | +2           | 75                | -12          | 50                   | +13          |
| Maintenance / quality of footpaths             | 68             | 60                             | +8           | 75                | -8           | 34                   | +34          |
| Availability of footpaths                      | 60             | 66                             | -6           | 79                | -19          | 40                   | +20          |
| Provision for dedicated walkways and cycleways | 70             | 66                             | +4           | 75                | -5           | 51                   | +19          |
| Maintenance / quality of cycleways             | 59             | 60                             | -1           | 75                | -16          | 48                   | +11          |
| Availability of parking                        | 77             | 62                             | +15          | 80                | -3           | 37                   | +40          |

## Public facilities and open / outdoor spaces

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



\* To allow for better and more extensive benchmarking, these measures are presented as an average score of all related measures.

## Public facilities and open / outdoor spaces

| % 6-10                                  | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-----------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Parks, reserves and green spaces        | 94             | 83                             | +11          | 94                | -            | 41                   | +53          |
| Sports fields and playgrounds           | 92             | 85                             | +7           | 94                | -2           | 76                   | +16          |
| Playgrounds                             | 91             | 84                             | +7           | 93                | -2           | 76                   | +15          |
| Sports fields                           | 93             | 85                             | +8           | 93                | -            | 74                   | +19          |
| Cemeteries                              | 93             | 85                             | +8           | 98                | -5           | 68                   | +25          |
| Libraries                               | 93             | 88                             | +5           | 99                | -6           | 71                   | +22          |
| Community centres / halls / buildings   | 88             | 79                             | +9           | 95                | -7           | 63                   | +25          |
| Public swimming pools / aquatic centres | 90             | 78                             | +12          | 96                | -6           | 58                   | +32          |
| Public toilets / public conveniences    | 86             | 71                             | +15          | 86                | -            | 47                   | +39          |

## Public facilities and open / outdoor spaces – District Councils Only

| % 6-10                                  | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-----------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Parks, reserves and green spaces        | 94             | 83                             | +11          | 94                | -            | 41                   | +53          |
| Sports fields and playgrounds           | 92             | 86                             | +6           | 94                | -2           | 76                   | +16          |
| Playgrounds                             | 91             | 85                             | +6           | 93                | -2           | 77                   | +14          |
| Sports fields                           | 93             | 85                             | +8           | 93                | -            | 74                   | +19          |
| Cemeteries                              | 93             | 86                             | +7           | 98                | -5           | 70                   | +23          |
| Libraries                               | 93             | 89                             | +4           | 99                | -6           | 71                   | +22          |
| Community centres / halls / buildings   | 88             | 81                             | +7           | 95                | -7           | 75                   | +13          |
| Public swimming pools / aquatic centres | 90             | 78                             | +12          | 96                | -6           | 58                   | +32          |
| Public toilets / public conveniences    | 86             | 71                             | +15          | 86                | -            | 47                   | +39          |

## Regulatory services

### 2025/2026 Council Benchmarking

● All Councils' Average 2025/26 ● Max ● Min ● Manawātū DC



\* To allow for better and more extensive benchmarking, these measures are presented as an average score of all related measures.

## Regulatory services

| % 6-10                            | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-----------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall regulatory services       | 77             | 61                             | +16          | 84                | -7           | 47                   | +30          |
| Dog and animal control            | 78             | 56                             | +22          | 81                | -3           | 29                   | +49          |
| Resource consents                 | 51             | 45                             | +6           | 68                | -17          | 26                   | +25          |
| Building consents                 | 61             | 55                             | +6           | 87                | -26          | 37                   | +24          |
| Food safety and alcohol licensing | 87             | 69                             | +18          | 89                | -2           | 35                   | +52          |

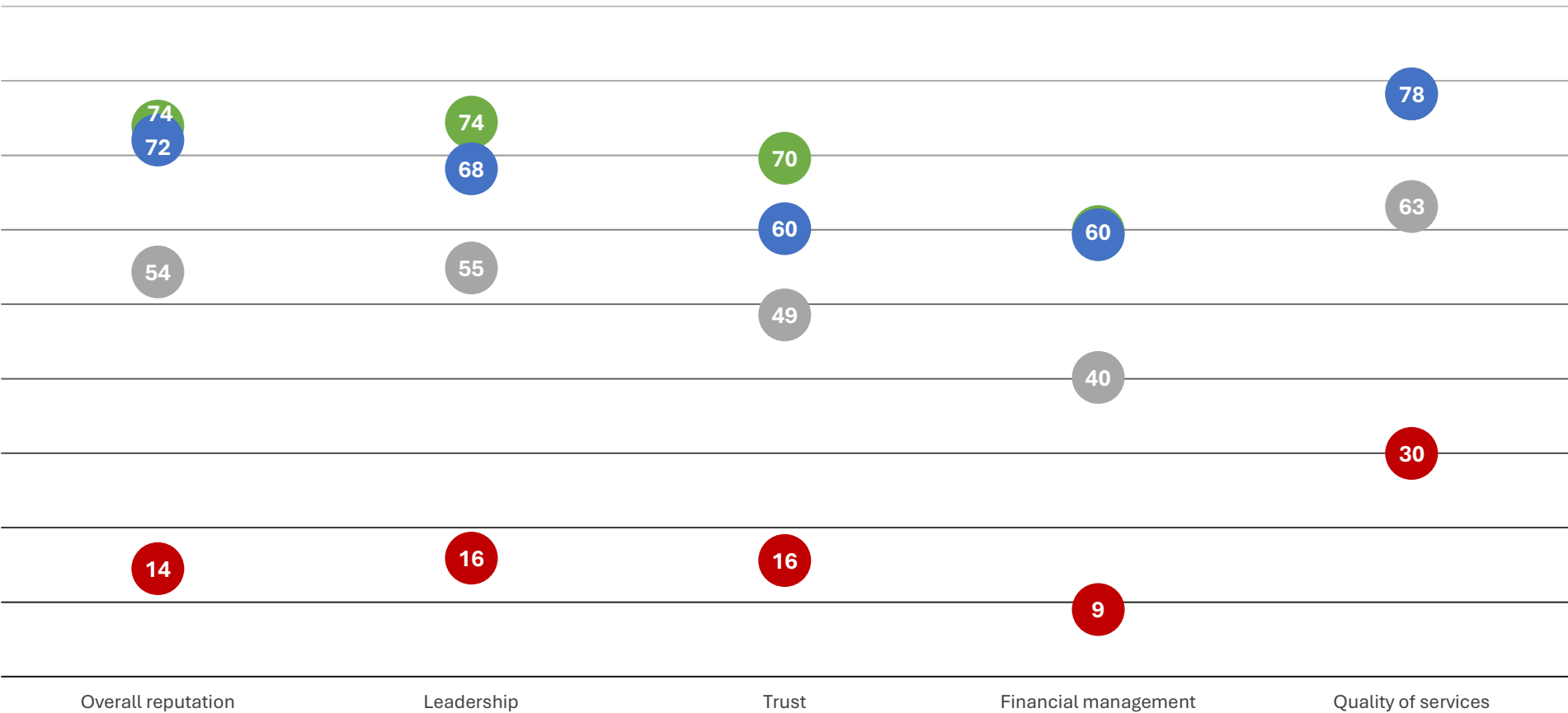
## Regulatory services – District Councils Only

| % 6-10                            | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-----------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall regulatory services       | 77             | 61                             | +16          | 84                | -7           | 47                   | +30          |
| Dog and animal control            | 78             | 56                             | +22          | 81                | -3           | 29                   | +49          |
| Resource consents                 | 51             | 45                             | +6           | 68                | -17          | 26                   | +25          |
| Building consents                 | 61             | 55                             | +6           | 87                | -26          | 37                   | +24          |
| Food safety and alcohol licensing | 87             | 69                             | +18          | 89                | -2           | 35                   | +52          |

Reputation

2025/2026 Council Benchmarking

● All Councils' Average 2025/26   ● Max   ● Min   ● Manawātū DC



## Reputation

| % 6-10               | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|----------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall reputation   | 72             | 54                             | +18          | 74                | -2           | 14                   | +58          |
| Leadership           | 68             | 55                             | +13          | 74                | -6           | 16                   | +52          |
| Trust                | 60             | 49                             | +11          | 70                | -10          | 16                   | +44          |
| Financial management | 59             | 40                             | +19          | 60                | -1           | 9                    | +50          |
| Quality of services  | 78             | 63                             | +15          | 78                | -            | 30                   | +48          |

## Reputation – District Councils Only

| % 6-10               | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|----------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Overall reputation   | 72             | 55                             | +17          | 74                | -2           | 14                   | +58          |
| Leadership           | 68             | 55                             | +13          | 74                | -6           | 16                   | +52          |
| Trust                | 60             | 49                             | +11          | 70                | -10          | 16                   | +44          |
| Financial management | 59             | 41                             | +19          | 60                | -1           | 9                    | +50          |
| Quality of services  | 78             | 63                             | +15          | 78                | -            | 30                   | +48          |

Reputation profile

2025/2026 Council Benchmarking

● All Councils' Average 2025/26   ● Max   ● Min   ● Manawātū DC



Value for money

2025/2026 Council Benchmarking

● All Councils' Average 2025/26   ● Max   ● Min   ● Manawātū DC



## Value for money

|                                 | <b>% 6-10</b> | <b>Your Council %</b> | <b>Average based on 23 Councils %</b> | <b>point diff %</b> | <b>Top performance %</b> | <b>point diff %</b> | <b>Lowest performance %</b> | <b>point diff %</b> |
|---------------------------------|---------------|-----------------------|---------------------------------------|---------------------|--------------------------|---------------------|-----------------------------|---------------------|
| Value for money                 |               | 48                    | 42                                    | +6                  | 58                       | -10                 | 15                          | +33                 |
| Rates being fair and reasonable |               | 45                    | 35                                    | +10                 | 48                       | -3                  | 12                          | +33                 |

## Value for money – District Councils Only

| % 6-10                          | Your Council % | Average based on 20 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|---------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| Value for money                 | 48             | 41                             | +7           | 58                | -10          | 15                   | +33          |
| Rates being fair and reasonable | 45             | 34                             | +11          | 48                | -3           | 12                   | +33          |

Sentiment questions

2025/2026 Council Benchmarking

● All Councils' Average 2025/26   ● Max   ● Min   ● Manawatū DC

77

57

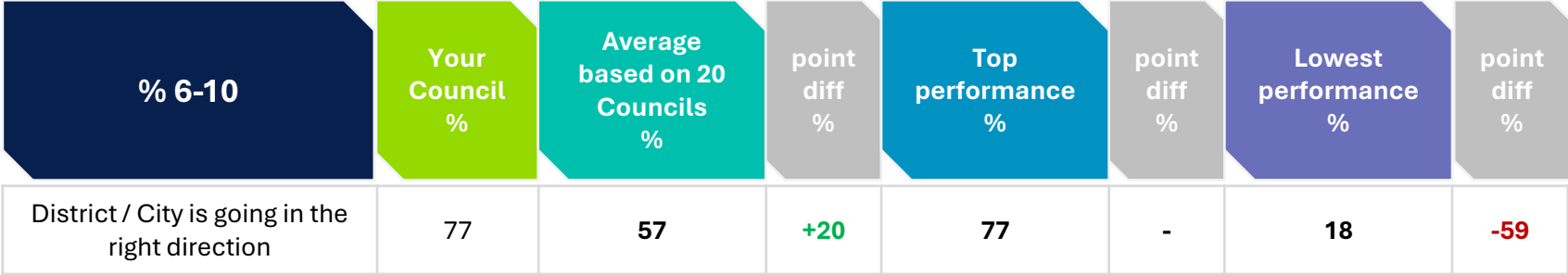
18

District / City is going in the right direction

# Sentiment questions

| % 6-10                                          | Your Council % | Average based on 23 Councils % | point diff % | Top performance % | point diff % | Lowest performance % | point diff % |
|-------------------------------------------------|----------------|--------------------------------|--------------|-------------------|--------------|----------------------|--------------|
| District / City is going in the right direction | 77             | 57                             | +20          | 77                | -            | 18                   | -59          |

# Sentiment questions – District Councils Only



## Key contact details

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## Actionable comments

**Never had an issue with it. I have no idea what happens to the sewage. Presume a treatment plant is nearby. Maybe you should include in your rates info brochure.**

Council continues to look for opportunities to share information with the community about how wastewater is managed and treated. The potential for future public tours of Council's wastewater treatment facilities is also being considered.

**Generally, I have no complaints. However, some areas could do with more bins such as Herlihy Reserve.**

Green By Nature regularly collect fly-tipping from the area, there are no current plans to add a bin to the area, but we are monitoring usage/demand and CCRs - with recent work (tree clearing, planting, quarterly mowing and 2<sup>nd</sup> hand seat installed) by Keep Feilding Beautiful & MDC, the area is becoming more popular.

**The baby, preschool and early primary section of the Kowhai Park playground need sun shelter. The playground gets too hot outside winter months.**

Council is currently working with Lions (Wayne Ellery) and Straitline Canvas to develop a shade plan and raise funds for a shade sail. MDC will cover the cost of installation. This follows on from the large aluminum slide shade sail project where Lion's funded the sail.

## Resident perceptions of Council spending 2025-26

**Overview** In 2025-26, the Resident Satisfaction Survey included five new questions asking residents whether they considered the amount Council spends on selected service areas to be too much, about right or too little. The tables provides the first-year results and an additional breakdown by respondent location.

*Percentages for Too much, About right and Too little exclude respondents who selected Don't know. The number of valid responses therefore varies by service area. Location results, particularly for village areas, should be interpreted with caution because respondent numbers are small.*

### District-wide results

| Service area                                                               | Too much | About right | Too little | Valid responses | Don't know |
|----------------------------------------------------------------------------|----------|-------------|------------|-----------------|------------|
| Water management: water supply, wastewater and stormwater                  | 10%      | 73%         | 17%        | 256             | 200 (44%)  |
| Waste and rubbish disposal services                                        | 6%       | 78%         | 16%        | 301             | 155 (34%)  |
| Roads, footpaths and cycleways                                             | 6%       | 40%         | 54%        | 332             | 124 (27%)  |
| Parks, reserves and sportsgrounds                                          | 6%       | 86%         | 8%         | 307             | 149 (33%)  |
| Libraries, pools, public toilets, halls and other Council-owned facilities | 20%      | 72%         | 8%         | 320             | 136 (30%)  |

### Key observations

- Across four of the five service areas, the majority of respondents who expressed a view considered Council spending to be about right.
- Roads, footpaths and cycleways was the exception: 54% considered spending to be too little, while 40% considered it about right.
- Parks, reserves and sportsgrounds had the highest proportion considering spending about right (86%), followed by waste and rubbish disposal services (78%).
- Libraries, pools, public toilets, halls and other Council-owned facilities had the highest proportion considering spending to be too much (20%).
- The proportion selecting Don't know ranged from 27% for roads, footpaths and cycleways to 44% for water management.

## Results by location

The table below shows the distribution of views among respondents who expressed an opinion. Each cell is shown as Too much / About right / Too little. “Don’t know” responses are excluded from the percentages.

| Service area                                                               | Feilding                  | Rural Northern            | Rural Southern            | Village Northern          | Village Southern          |
|----------------------------------------------------------------------------|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| Water management: water supply, wastewater and stormwater                  | 7% / 80% / 13%<br>(n=159) | 22% / 52% / 26%<br>(n=23) | 9% / 68% / 23%<br>(n=53)  | 18% / 64% / 18%<br>(n=11) | 30% / 40% / 30%<br>(n=10) |
| Waste and rubbish disposal services                                        | 6% / 88% / 6%<br>(n=176)  | 3% / 69% / 28%<br>(n=29)  | 6% / 65% / 29%<br>(n=69)  | 13% / 53% / 33%<br>(n=15) | 0% / 58% / 42%<br>(n=12)  |
| Roads, footpaths and cycleways                                             | 6% / 44% / 50%<br>(n=187) | 9% / 28% / 63%<br>(n=32)  | 2% / 39% / 59%<br>(n=85)  | 13% / 31% / 56%<br>(n=16) | 8% / 25% / 67%<br>(n=12)  |
| Parks, reserves and sportsgrounds                                          | 5% / 87% / 8%<br>(n=178)  | 9% / 82% / 9%<br>(n=33)   | 4% / 89% / 7%<br>(n=74)   | 17% / 75% / 8%<br>(n=12)  | 20% / 80% / 0%<br>(n=10)  |
| Libraries, pools, public toilets, halls and other Council-owned facilities | 21% / 71% / 8%<br>(n=192) | 21% / 76% / 3%<br>(n=34)  | 14% / 76% / 10%<br>(n=71) | 31% / 62% / 8%<br>(n=13)  | 30% / 70% / 0%<br>(n=10)  |

### What the location breakdown indicates

- Roads, footpaths and cycleways was the service area most commonly viewed as receiving too little spending across every location. The proportion ranged from 50% in Feilding to 67% in Village Southern among respondents who expressed a view.
- For parks, reserves and sportsgrounds, “about right” was the dominant response in every location, ranging from 75% in Village Northern to 89% in Rural Southern.
- Perceptions of water management and waste and rubbish disposal show more variation between Feilding and rural/village respondents. These differences should be treated as indicative only because of the smaller respondent bases outside Feilding.
- For libraries, pools, public toilets, halls and other Council-owned facilities, “about right” remained the most common response in every location, although around 20% of valid responses district-wide considered spending to be too much.

### Response base

The survey included 456 respondents: Feilding 253, Rural Northern 51, Rural Southern 115, Village Northern 18 and Village Southern 19. Because “Don’t know” responses are excluded from the percentages above, the valid response base shown in each cell is lower and varies by question.

## Council

Meeting of 21 October 2026

Business Unit: Corporate

Date Created: 05 October 2026

## Voting and Quorum for non-elected members - Exception Requests

### Purpose Te Aronga o te Pūrongo

The purpose of this report is to seek Council approval to request two exceptions under section 260A of the Local Government Act 2002, to enable non-elected members of the Finance & Performance Committee and Manawātū Water Services Committee to continue to vote and be counted towards quorum.

### Recommendations Ngā Tūtohunga

That the Council:

1. Approves an application to the Minister of Local Government seeking an exception from clauses 23(4) and 31A(1) of Schedule 7 of the Local Government Act for non-elected members of the Finance & Performance Committee, to enable those members to continue to vote and be counted towards quorum.
2. Approves an application to the Minister of Local Government seeking an exception from clauses 23(4) and 31A(1) of Schedule 7 of the Local Government Act for non-elected members of the Manawātū Water Services Committee, to enable those members to continue to vote and be counted towards quorum.
3. Authorises the Mayor and Chief Executive to finalise and submit the exception applications to the Minister of Local Government.

**OR**

4. Does not approve applications for exceptions to the Minister of Local Government.

Report prepared by:

Ash Garstang

Governance and Assurance Manager

## 1 Background Ngā Kōrero o Muri

- 1.1 The Local Government (System Improvements) Amendment Act 2026 received Royal assent on 18 September 2026. Among other changes, the Amendment Act introduced new restrictions on the voting and quorum rights of non-elected members appointed to local authority committees. Changes to quorum and voting come into effect 18 March 2027.
- 1.2 The Amendment Act inserted two key clauses into Schedule 7 of the Local Government Act 2002 (LGA).
  - Clause 23(4) states that non-elected members are not to be counted when determining the number required for a quorum and are not to be counted towards meeting that quorum.
  - Clause 31A(1) states that non-elected members cannot vote.
- 1.3 Section 260A of the LGA enables the Governor-General to approve exceptions for specific committees, or types of committees, upon the recommendation of the Minister of Local Government. Exceptions can be indefinite or for a specific period of time.
- 1.4 The Minister wrote to councils on 29 September 2026 (Attachment 1), advising of the process to request an exception. Councils can make applications for exceptions to the Minister by 18 November 2026 and these should be supported by a Council resolution.
- 1.5 MCERT officials have confirmed that, at this stage, they have not been directed to undertake work on potential exceptions for particular types or classes of committees. Council should therefore not assume that a broader exception will be made that would apply to either of its committees.
- 1.6 The Minister has advised in his letter that applications should include:
  - Information about the role and purpose of the relevant committee.
  - Why removing voting and quorum rights from non-elected members would create an issue, and how the committee would operate without an exception.
  - What safeguards will be in place to protect democratic accountability, should the exception be approved.
  - Information about how the exception fits within the broader statutory framework, including any comparable precedents.

## 2 Strategic Fit Te Tautika ki te Rautaki

2.1 Not applicable.

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

3.1 Council has two committees with non-elected members:

- Finance & Performance Committee – there are two non-elected members, being the Chair and Deputy Chair.
- Manawatū Water Services Committee – there is one non-elected member, being the Chair.

3.2 Council should determine whether to seek exceptions under section 260A to enable non-elected members appointed to these committees to continue to vote and be counted towards quorum.

### **Finance & Performance Committee**

3.3 Finance & Performance has a broad assurance and oversight role, including responsibilities relating to financial reporting, risk management, internal controls, internal and external audit, legislative compliance and Council's organisational performance.

3.4 Council has appointed two non-elected members onto the Committee, who hold the positions of Chairperson and Deputy Chairperson. The purpose of these appointments is to provide independent leadership and specialist expertise.

3.5 The Chairperson is a Chartered Accountant and the Deputy Chairperson has a law degree and extensive legal experience, providing skillsets that strongly complement the Committee's financial, risk and assurance responsibilities.

### **Manawatū Water Services Committee**

3.6 The Manawatū Water Services Committee provides dedicated governance oversight of Council's water services activities, including operational and financial performance, asset management, project delivery, risk and regulatory compliance.

3.7 Council currently has one non-elected member on the Committee, who holds the position of Chairperson. The purpose of this appointment is to provide dedicated governance leadership and an external perspective over the delivery and development of Manawatū Water Services.

3.8 The Chairperson's role is broader than that of an adviser or technical expert. The Chairperson is responsible for leading the Committee, facilitating its consideration of matters and participating in its collective governance and decision-making.

3.9 If the exceptions are not granted, Council could retain the non-elected members of both committees in their Chairperson or Deputy Chairperson roles. They could continue to lead meetings, contribute to discussion and provide expertise, but could not vote or count towards quorum. Removing voting rights would create a distinction between their responsibility for leading the Committee's functions and their ability to participate in formal decision-making.

3.10 If exceptions are granted, democratic accountability would continue to be maintained through elected member representation on both committees. Council would also continue to determine committee membership, terms of reference and delegations, with matters reserved to Council continuing to be determined by elected members.

3.11 Council is asked to either:

- Approve the recommendation for officers to draft two exception requests: one for the Finance & Performance Committee and one for the Manawātū Water Services Committee, subject to the wording being approved by the Mayor and Chief Executive.

OR

- Not approve applications for exceptions to the Minister.

#### 4 Risk Assessment Te Arotake Tūraru

4.1 If Council approves applications for exceptions, the principal risk is that one or both applications are declined. The Minister has advised that exceptions are expected to be rare, and there is no assurance that either application will satisfy the statutory test.

4.2 While this risk is obviously unavoidable, care will be taken to ensure that the letter requests explicitly provide all information requested by the Minister.

4.3 If the exceptions are not granted, the affected non-elected members will by default remain members on the committees. Any necessary amendments to quorum arrangements will be brought back to Council for approval.

#### 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.

##### Community Engagement

5.3 No community engagement is warranted.

#### 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. Remuneration for non-elected members is managed separately and there is no requirement to revisit these arrangements based on the voting or quorum status of these members.

## 8 Statutory Requirements Ngā Here ā-Ture

- 8.1 Statutory requirements are referenced in other parts of the report, as necessary.

## 9 Next Steps Te Kokenga

- 9.1 If approved, officers will draft the applications for exceptions for the Mayor and Chief Executive's approval.

## 10 Attachments Ngā Āpitihanga

- Letter from Minister of Local Government – 29 September 2026



29 SEP 2026

Mayors and regional council chairs  
*By email*

Dear Mayors and Chairs

## **Voting at council committee meetings**

On 18 September 2026, the Local Government (System Improvements) Amendment Act 2026 received Royal assent. The Act reserves voting rights on council committees, joint committees, subcommittees, and other subordinate decision-making bodies (“specified committees”) for elected members only.

As I have stated previously, the purpose of this change is to strengthen democratic accountability. Councils may continue to appoint non-elected members to specified committees to provide expertise, stakeholder perspectives, or community representation. However, unless an exception applies, non-elected members must not vote and are not counted toward the quorum of the meeting.

Your council must comply with the Act from 18 March 2027. The purpose of this transition period is to ensure you have enough time to change the structure of or delegations to your council’s specified committees, if required.

The Act also provides for certain exceptions. These include committees or appointments that are required under or for the purposes of another enactment and arrangements required to give effect to Treaty settlements.

Additionally, the Act provides for the Governor-General, on the recommendation of the Minister of Local Government, to grant exceptions where the Minister is satisfied these are necessary or desirable. Exceptions may be time-limited or indefinite, and with or without conditions.

My expectations are that exceptions will be granted rarely. The Government’s policy is that non-elected members should generally be non-voting. Councils seeking an exception will therefore need to demonstrate a clear and specific justification that supports the statutory test that the exception is necessary or desirable.

The next page of this letter contains information on how requests for exceptions will be considered.

If your council considers that an exception may be required, I encourage you to submit a request in writing to the Minister of Local Government by 18 November 2026 enclosing:

- A copy of a resolution from your council in support of the exception.
- Information about the issue the exception would address, why existing governance arrangements would not adequately address the issue, and how the council would manage the issue without an exception.
- Information about the role of the committee, the proposed role of non-elected members, and the steps that would be taken to maintain democratic legitimacy and public accountability.
- Information about how the exception fits within the broader statutory framework, including any comparable precedents.

Requests regarding a joint committee should ideally have the support of all councils who are members of the joint committee.

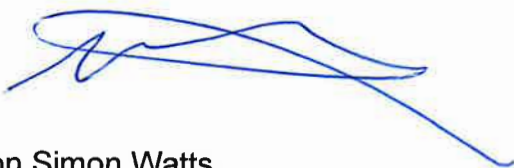
Requests should contain sufficient information for the Minister to recommend the exception to the Governor-General.

Officials at the Ministry for Cities, Environment, Regions and Transport (MCERT) will assess any requests received and provide advice to the Minister of Local Government after the election. It is my intention that decisions will be made and communicated early next year, and exceptions will come into force at the end of the transition period.

If you require more information:

- Visit the MCERT website at [www.mcert.govt.nz/our-work/local-government/local-government-system-improvements/](http://www.mcert.govt.nz/our-work/local-government/local-government-system-improvements/).
- Contact your MCERT Local Government Partnership Director.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Simon Watts', with a long, sweeping underline.

Hon Simon Watts  
**Minister of Local Government**

## Council

Meeting of 21 October 2026

Business Unit: Corporate

Date Created: 28 September 2026

### Submissions made on behalf of Council 05 June to 18 September 2026

#### Purpose Te Aronga o te Pūrongo

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

#### Recommendations Ngā Tūtohinga

That the Council receives and notes the following submissions lodged on behalf of Manawātū District Council between 5 June and 18 September 2026:

1. Ring-fencing Revenue for Water Entities
2. Better Regional Boundaries Bill
3. Climate Change Response (Tort Liability) Amendment Bill
4. Conservation Amendment Bill
5. Consultation on Groups of Activities
6. Resilience Principles for Infrastructure Providers
7. Environmental Reporting Amendment Bill
8. International Visitors Levy (IVL) Investment framework for tourism
9. National Engineering Design Standards
10. Local Government (Management of Local Authorities) Amendment Bill

Report prepared by:

Steph Skinner

Governance and Strategy Officer

Approved for submission by:

Ash Garstang

Acting General Manager – Corporate

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## 1 Background Ngā Kōrero o Muri

- 1.1 Completed submissions lodged on behalf of MDC are reported regularly to Council for receipt and noting.
- 1.2 Submissions are prepared on behalf of the Manawātū District Council and, depending on the nature of the topic, are intended to reflect the views and needs of the wider Manawātū community.
- 1.3 Due to the often limited time available to consider Council responses to regional and national matters, the Submissions Assessment Panel has delegated authority to consider and approve submissions for lodgement.
- 1.4 The Panel is made up of elected members and members of the executive leadership team. Feedback from Submissions Assessment Panel members is considered and incorporated where appropriate prior to the final submission being approved by the Mayor for lodgement. This collaborative approach helps ensure that submissions reflect the collective views of Council.
- 1.5 Where submissions relate to matters of broad Council interest, officers will involve all elected members. Where time allows, officers will hold workshop sessions and invite feedback on the draft submission prior to it being finalised.

## 2 Strategic Fit Te Tautika ki te Rautaki

- 2.1 Not applicable as this is an operational reporting 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 its meeting on 03 June 2026:

| Attach # | Submission topic:                                                 | Date lodged:   |
|----------|-------------------------------------------------------------------|----------------|
| 1        | Ring-fencing Revenue for Water Entities                           | 5 June 2026    |
| 2        | Better Regional Boundaries Bill                                   | 24 June 2026   |
| 3        | Climate Change Response (Tort Liability) Amendment Bill           | 13 July 2026   |
| 4        | Conservation Amendment Bill                                       | 2 July 2026    |
| 5        | Consultation on Groups of Activities                              | 31 July 2026   |
| 6        | Resilience Principles for Infrastructure Providers                | 12 August 2026 |
| 7        | Environmental Reporting Amendment Bill                            | 18 August 2026 |
| 8        | IVL Investment framework for tourism                              | 1 Sept 2026    |
| 9        | National Engineering Design Standards                             | 9 Sept 2026    |
| 10       | Local Government (Management of Local Authorities) Amendment Bill | 18 Sept 2026   |

## 4 Risk Assessment Te Arotake Tūraru

- 4.1 The primary risk associated with making submissions on behalf of Council is reputational. Submissions may address matters on which members of the community hold differing views, creating a risk that Council's stated position may attract criticism or disagreement. Council adopts a cautious approach to reputational risk.
- 4.2 Reputational risk is managed via an informed and collaborative approach to preparing submissions. Officers draft submissions with the input of 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, Submissions Assessment Panel, or the Mayor, prior to lodging.

## 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 specific Māori or cultural engagement requirements arising from Council receiving and noting this report. Engagement with Māori may be undertaken as part of the development of individual submissions where relevant.

### Community Engagement

- 5.3 No community engagement is required for this item. Community engagement may be undertaken, if necessary and where time allows, for significant submissions.

## 6 Operational Implications Ngā Pānga Whakahaere

- 6.1 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 arising from this report.

## 8 Statutory Requirements Ngā Here ā-Ture

- 8.1 There are no specific statutory requirements associated with receiving and noting this report.

## 9 Next Steps Te Kokenga

- 9.1 There are no next steps required.

## 10 Attachments Ngā Āpitihanga

Lodged Submissions attached:

1. Ring-fencing Revenue for Water Entities
2. Better Regional Boundaries Bill
3. Climate Change Response (Tort Liability) Amendment Bill
4. Conservation Amendment Bill
5. Consultation on Groups of Activities
6. Resilience Principles for Infrastructure Providers
7. Environmental Reporting Amendment Bill
8. IVL Investment framework for tourism
9. National Engineering Design Standards
10. Local Government (Management of Local Authorities) Amendment Bill

| <b>Attach<br/>#</b> | <b>Submission topic:</b>                                          | <b>Date lodged:</b> |
|---------------------|-------------------------------------------------------------------|---------------------|
| 1                   | Ring-fencing Revenue for Water Entities                           | 5 June 2026         |
| 2                   | Better Regional Boundaries Bill                                   | 24 June 2026        |
| 3                   | Climate Change Response (Tort Liability) Amendment Bill           | 13 July 2026        |
| 4                   | Conservation Amendment Bill                                       | 2 July 2026         |
| 5                   | Consultation on Groups of Activities                              | 31 July 2026        |
| 6                   | Resilience Principles for Infrastructure Providers                | 12 August 2026      |
| 7                   | Environmental Reporting Amendment Bill                            | 18 August 2026      |
| 8                   | Investment framework for tourism                                  | 1 Sept 2026         |
| 9                   | National Engineering Design Standards                             | 9 Sept 2026         |
| 10                  | Local Government (Management of Local Authorities) Amendment Bill | 18 Sept 2026        |

05 June 2026

Infrastructure Regulation Branch

Commerce Commission

By email: [wai@comcom.govt.nz](mailto:wai@comcom.govt.nz)

Dear Commissioners,

**Submission on Ring-fencing revenue for regulated water services (22 April 2026 discussion paper)**

The Manawatū District Council (MDC) thanks the Commerce Commission for the opportunity to provide feedback on the discussion paper on ring-fencing revenue for regulated water services.

MDC supports stronger transparency and accountability around how water service revenue and funding is used. We agree that revenue collected for water services should be used for water services. At the same time, MDC considers any new requirements need to remain workable and flexible, particularly while local government reform discussions are underway. Since the discussion paper was released, the Government has invited councils to develop potential amalgamation proposals within a short timeframe. The future structure of local government in our region is therefore uncertain.

MDC asks the Commission to ensure any new ring-fencing requirements can operate sensibly through future governance or structural changes, including any lawful transfer of assets, debt, reserves, or funding arrangements.

**Executive summary**

MDC generally supports the direction of the discussion paper. We support clearer service-level reporting for drinking water and wastewater services, improved disclosure of transfers and loans between activities, and greater visibility of reserves and earmarked funding. We also support reporting arrangements that align with audited financial statements and existing obligations under the Local Government (Water Services) Act 2025.

However, MDC does not support a rigid “lock-box” approach that prevents practical or temporary movements of funding between activities. Water infrastructure projects often span several years, and councils need enough flexibility to manage funding efficiently over time.

MDC considers the Commission should take a staged and evidence-based approach. Monitoring and disclosure should occur first, with stricter controls only introduced if there is evidence that significant problems or inappropriate use of funds are occurring.

MDC also seeks practical guidance on how ring-fencing requirements would apply during future governance or structural changes.

### **Summary of position**

MDC agrees that tracking significant cash movements between services is an important part of providing clear visibility over how water service revenue and funding is managed. However, we consider that this should complement existing accounting separation and audited reporting requirements, rather than replace them.

MDC supports service-level reporting for drinking water and wastewater services because this provides clearer information about how revenue and funding is being applied. We also support disclosure of material transfers, internal loans, and reserve movements where these are significant enough to affect understanding of the financial position of the services.

At the same time, MDC does not support overly restrictive rules that prevent councils from managing long-term infrastructure investment efficiently. Temporary transfers may sometimes be necessary to manage project timing, growth pressures, or short-term cash flow requirements. In our view, the key issue is that these arrangements are transparent, properly documented, and appropriately disclosed.

MDC also supports aligning any new reporting requirements with the existing Funding Impact Statement and annual reporting frameworks being developed under the Local Government (Water Services) Act 2025. This will reduce duplication and avoid unnecessary compliance costs.

### **Approach to and scope of the ring-fence (DP Q1–4)**

- 1. In the context of promoting the s 52A purpose, should compliance monitoring focus solely on accounting separation, or also on trackable cash flows?*

MDC agrees that tracking significant cash movements between services is useful and can support transparency. However, we do not consider that cash flow tracking should replace existing accounting separation and audited reporting requirements. Rather, it should support and supplement existing accounting separation arrangements.

We support visibility of material transfers and reserve movements, while still allowing councils enough flexibility to manage multi-year infrastructure programmes efficiently.

- 2. Should temporary cash transfers between services be allowed, and if so on what basis?*

MDC considers that temporary transfers between services should be permitted where they are transparent, documented, and intended to address short-term funding or cash flow requirements. In practice, councils sometimes need flexibility to manage project timing, growth-related expenditure, or temporary cash flow pressures.

However, these arrangements should not become indefinite or operate as hidden subsidies between unrelated activities. Where temporary transfers occur, there should be clear approval processes, documentation of the purpose of the transfer, and appropriate repayment arrangements. MDC considers that temporary transfers should

generally be repaid within the same financial year to avoid effectively becoming internal loan arrangements over time.

*3. Should disclosure be at individual service-level or combined?*

MDC supports service-level reporting for drinking water and wastewater services separately. We consider this will provide clearer accountability and more useful information for both regulators and communities.

While a combined overview may still have value, separate reporting better reflects the distinct funding and investment needs of each service. Separate reporting also reduces the risk that ongoing transfers or cross-subsidisation between drinking water and wastewater services remain obscured within a combined reporting framework.

*4. How should stormwater be treated?*

Stormwater services are subject to the financial principles under the Local Government (Water Services) Act 2025 but are not currently regulated services under the Commerce Act water services regime.

MDC considers that stormwater should be included in service level transparency arrangements, even if it is not currently subject to Commerce Act economic regulation. Stormwater is a core water service, and MDC's Water Services Delivery Plan treats stormwater as part of the Council's integrated water services planning and investment framework. This reflects the practical reality that stormwater investment is closely connected to wider three-waters planning, growth, resilience, and infrastructure delivery.

MDC is also making significant investment in stormwater infrastructure, including detention ponds and capital works in rural villages, and collects stormwater rates to support these activities. In principle, revenue and funding collected for stormwater should be applied to stormwater services, including maintenance, renewals, upgrades, growth, resilience, and debt servicing associated with stormwater infrastructure.

MDC therefore supports a staged approach. Stormwater revenue, expenditure, reserves, borrowing, and material transfers should be separately identifiable through reporting in the first instance. This would improve transparency and community confidence without prematurely imposing the full economic regulation framework on stormwater.

However, MDC considers that any extension of the economic regulation framework to stormwater services should occur through a clear legislative process and with appropriate consideration of the operational and funding differences associated with stormwater infrastructure. These differences include stormwater's close relationship with land drainage, roading, growth planning, flood risk management, climate resilience, and the management of public and private land impacts.

If stormwater services are brought within the regulated water services framework in future, MDC supports stormwater being considered for ring-fencing, provided the approach remains practical, proportionate, and aligned with existing planning and reporting obligations.

### **Treatment of specific revenue/expenditure (DP Q5)**

5. *Are any categories of revenue/expenditure already ring-fenced by law (e.g. IFF, DCs)?*

MDC considers that some funding sources already have clear legal or contractual restrictions around how they may be used. This may include development contributions, targeted rates, Infrastructure Funding and Financing levies, and insurance proceeds associated with specific projects. As such, MDC does not consider there is a need for any further separation or ring-fencing requirements for these funding sources.

### **One-way direction of ring-fence (DP Q6)**

6. *Should all revenue for water services be spent on water, or can it flow one-way to water?*

MDC agrees that revenue collected for water services should be used for water services. At the same time, councils may sometimes use general funding, borrowing, or temporary support to help deliver water infrastructure projects, particularly where there are growth pressures or urgent infrastructure needs.

Where this occurs, the arrangements should be transparent, clearly documented, and supported by a demonstrated exceptional need. MDC does not support the routine or permanent diversion of water-service revenue to unrelated non-water activities, as there is a risk that temporary arrangements could otherwise become standard practice over time.

### **Periodic balancing of fund flows (DP Q7)**

7. *Should fund-flow balancing be reported annually or with a rolling context?*

MDC supports annual reporting supported by a multi-year context. Large infrastructure projects frequently span several years, and a single-year snapshot may not accurately reflect the purpose or timing of reserves, borrowing, or transfers.

A rolling multi-year approach would better reflect the realities of multi-year infrastructure delivery and financial planning.

### **Record-keeping requirements (DP Q8)**

8. *What minimum records should suppliers keep?*

MDC supports practical and auditable record-keeping requirements that build on existing financial systems wherever possible. Suppliers should maintain sufficient records to identify material transfers between services, reserve balances, and any internal lending arrangements.

This may include transfer registers, reserve schedules, records of internal loans or borrowing arrangements, and other authorised supporting documentation. MDC also considers that these requirements should be supported through existing accounting processes wherever possible. However, requirements should remain proportionate and should avoid duplicating information already captured through existing audit and

reporting processes. Records should also identify the source, destination, purpose, and expected repayment or reconciliation pathway for any material transfer.

### **Time limits on temporary transfers (DP Q9–Q10)**

#### *9. At what point is a transfer effectively financing?*

MDC considers that transfers which remain unresolved beyond a financial year, or which are repeatedly rolled over without clear repayment arrangements, should generally be treated as financing arrangements and disclosed accordingly. Where transfers occur outside of water activities, MDC supports the use of formal agreements to ensure the purpose, repayment terms, and funding pathway are transparent and clearly documented. At the same time, councils should retain enough flexibility to manage legitimate long-term infrastructure funding arrangements.

#### *10. Should there be hard limits on transfer duration or size?*

MDC does not support strict hard limits on transfer duration or size. Instead, MDC supports a principles-based approach with clear conditional criteria around the purpose, transparency, and repayment of transfers. Where temporary transfers occur, there should be a clear pathway for repayment or financial rebalancing over time. In MDC's view, the focus should be on ensuring transfers are appropriately documented, justified, and recoverable, rather than applying rigid thresholds that may not reflect the realities of long-term infrastructure funding and delivery.

### **Borrowing charges for inter-service lending (DP Q11–Q12)**

#### *11. Should internal lending attract an interest charge?*

MDC agrees that where lending occurs between activities, a reasonable interest rate or pricing approach should apply. This helps ensure transparency and avoids hidden subsidies between activities. Any pricing approach should remain practical and proportionate to the scale and complexity of the arrangement. MDC also notes that internal borrowing can ultimately contribute to external debt requirements and therefore supports a fair accounting charge to reflect the cost of internal lending arrangements.

#### *12. What should be disclosed about internal loans?*

Where internal lending arrangements exist, MDC supports disclosure of the purpose of the arrangement, the balances involved, the repayment terms, and the pricing or interest basis used. The focus should remain on material arrangements that are relevant to understanding the financial position of the services, and these disclosures could be included as a note within the annual report.

### **Timely application of accumulated funds (DP Q13–Q16)**

#### *13. Should saved funding for renewals/investment be time-limited?*

MDC does not support strict limits on how long funds may accumulate before being applied to water infrastructure. Councils often need to accumulate funding over time for

renewals, resilience, debt servicing, and major capital projects. Imposing rigid limits could undermine prudent long-term financial planning and infrastructure delivery.

However, MDC agrees there should be a clear and demonstrable intention for how accumulated funds will be applied over time, particularly where reserves are being held for significant future investment or renewal programmes. This intention should preferably be supported through approved planning documents such as asset management plans, infrastructure strategies, long-term plans, or approved capital programmes

*14. Are strict time or interest-use limits appropriate?*

MDC considers that overly strict limits are unlikely to reflect the realities of long-term renewals and capital investment. Water infrastructure projects are often planned and funded over extended timeframes, and councils need flexibility to manage funding responsibly across those periods. Overly rigid limits could distort long-term planning and reduce councils' ability to ensure future investment appropriately matches the infrastructure needs of the communities those services support.

*15. Should transactions involving accumulated funds be recorded specially?*

MDC does not have a strong or fixed view on this issue. However, MDC supports separately identifying and explaining material reserve movements or transfers involving accumulated funds. In our view, this improves transparency while still allowing councils to manage reserves appropriately and plan for future infrastructure investment. Where accumulated funds are applied to another activity, the original purpose for which those funds were retained should also be disclosed.

*16. Should any revenue be strictly reserved?*

MDC considers that funding collected for specific purposes should remain clearly earmarked and separately tracked. This is particularly important where funding has been collected for defined infrastructure or growth-related purposes.

**Differential rules by scale, complexity or risk (DP Q17–Q18)**

*17. Should smaller or simpler providers face lighter requirements?*

MDC supports a proportionate approach to regulation. Smaller standalone councils should not face the same level of compliance burden as large multi-council entities, provided material fund movements remain transparent and appropriately documented. A flexible approach will help ensure compliance costs remain reasonable while still supporting accountability, with reporting and compliance expectations appropriately reflecting the size, scale, and complexity of the provider.

*18. What fund flows are highest risk?*

MDC considers that the key concern is ensuring transparency and avoiding inappropriate cross-subsidisation between activities. Particular attention should therefore be given to transfers between water and non-water activities, shared-cost allocations, internal lending arrangements, and significant reserve transfers where these are not clearly documented or explained.

## **Fit-for-purpose reporting (DP Q19–Q22)**

### *19. What disclosures would help demonstrate ring-fencing?*

MDC supports reporting arrangements that provide clear visibility of service-level revenue, expenditure, reserves, transfers, and internal lending arrangements where material. Reporting should also reconcile clearly with audited financial statements so the relationship between service-level reporting and Council accounts is transparent, including making any lending arrangements visible and clearly identifiable. MDC's preference is for ring-fencing disclosures to be incorporated into existing reporting frameworks wherever possible, rather than creating a separate reporting regime.

### *20. Should a standard FIS template be required?*

Yes. MDC considers that a standard template would improve consistency and reduce unnecessary complexity.

Where possible, reporting requirements should align with the Funding Impact Statement and annual reporting frameworks already being developed under the Local Government (Water Services) Act 2025.

### *21. Should the FIS include extra line items?*

Yes. MDC supports including additional line items where they improve transparency around transfers, lending arrangements, goods and services provided between activities, and related-party transactions. This may include disclosure of transfer balances and internal loan balances where relevant. However, MDC does not support creating an overly detailed or duplicative reporting framework.

### *22. What additional GAAP review is needed?*

MDC considers that clear guidance is needed, framed specifically for water entities and the operating environment they work within. MDC also considers that existing audit processes already provide substantial oversight. Any additional review requirements should focus on material transfers, reserves, and related-party arrangements that are relevant to understanding compliance with the ring-fencing principle, rather than creating a separate audit framework.

## **Potential rules for restricting movements (DP Q23)**

### *23. What, if any, permanent restrictions should apply?*

MDC considers the Commission should take a staged and evidence-based approach before introducing restrictions on fund movements.

Monitoring and disclosure should occur first, with additional controls introduced only where there is evidence that they are needed. The Commission should also provide practical guidance on how ring-fencing requirements would apply during future governance or structural changes, including any lawful transfer of assets, liabilities, reserves, or service responsibilities.

## Other comments

MDC strongly encourages the Commission to align any new requirements with the reporting frameworks already being developed under the Local Government (Water Services) Act 2025. Avoiding duplication will reduce compliance costs and improve consistency across the sector.

MDC's priority remains delivering safe, reliable, and affordable water infrastructure for our communities. Any new reporting framework should support transparency while still allowing councils to plan and deliver long-term infrastructure investment efficiently.

MDC appreciates the opportunity to provide feedback and would welcome further engagement as the framework develops.

## Decisions sought

In summary, MDC recommends:

1. MDC recommends that the Commission require service-level reporting for drinking water and wastewater services, supported by disclosure of material transfers, reserves, and internal loans where relevant.
2. MDC also recommends that any reporting framework align closely with the Funding Impact Statement and annual reporting requirements under the Local Government (Water Services) Act 2025, rather than creating a separate parallel reporting system.
3. MDC further recommends that the Commission adopt a staged and evidence-based approach before introducing restrictive controls on fund movements. Monitoring and disclosure should occur first, with additional restrictions considered only if evidence demonstrates they are necessary.
4. Finally, MDC asks the Commission to provide guidance on how ring-fencing requirements would apply during lawful governance or structural changes, including future council reorganisations and associated transfers of assets, liabilities, reserves, or service responsibilities.

Thank you for considering MDC's views. We look forward to further engagement as needed.

Yours sincerely,



Frances Smorti  
**Acting Chief Executive**

24/06/2026

Committee Secretariat  
Governance and Administration Committee  
Parliament Buildings  
Wellington

**Submission from the Manawātū District Council on Better Regional Boundaries Bill**

Dear Members of the Committee

Manawātū District Council (MDC) thanks the Governance and Administration Committee for the opportunity to submit on the Better Regional Boundaries Bill.

MDC supports the intent of the Better Regional Boundaries Bill and recognises the benefits that greater alignment of administrative boundaries across government agencies could provide. A more consistent approach to regional boundaries would improve clarity for residents, businesses, and community organisations when engaging with government services. It would reduce confusion created by differing administrative boundaries and support more effective coordination between central and local government agencies.

MDC supports the Bill's objective of creating clearer responsibilities, improved coordination, and more effective service delivery where these changes benefit communities. The Council acknowledges that the current arrangement of differing administrative boundaries across government agencies can create confusion for residents and make it more difficult to understand responsibilities, access services, and engage with public agencies. Greater alignment has the potential to improve accountability, support regional planning, and strengthen collaboration between agencies operating within the same communities.

However, MDC considers that boundary alignment should not be viewed as an end in itself. Simply changing administrative boundaries will not automatically result in lower costs, greater efficiency, improved service delivery, stronger accountability, or better-informed decision-making. Any future boundary changes should be assessed against the extent to which they deliver tangible benefits for communities and improve the accessibility and effectiveness of government services.

MDC also considers it important that administrative boundaries reflect communities of interest and existing social, economic, and service connections. Boundary changes

should not be driven solely by operational efficiencies, population size, or the centralisation of services and decision-making. Government policy and resource allocation should continue to support all communities equitably, regardless of whether they are rural, provincial, or metropolitan. Any implementation of the Bill should ensure that regional communities continue to have an appropriate voice in decision-making and equitable access to government services.

While MDC supports the overall objectives of the Bill, the Council is concerned about the proposed timing for implementation. The local government sector is currently facing a period of significant review and potential reform, with discussions underway regarding future local government structures, functions, funding arrangements, and boundary configurations. There is a possibility that territorial authority and regional boundaries may change within the next several years. Requiring government agencies to align their administrative areas with existing local authority boundaries before these matters are resolved could create unnecessary duplication of effort, additional implementation costs, and administrative disruption if boundaries subsequently change.

Accordingly, MDC recommends that the Government carefully consider both the implementation timeframe and the principles that should guide any boundary realignment. In particular, the Council suggests that the five-year transition period for compliance should not begin until there is greater certainty regarding any future local government boundary changes. Deferring the commencement of the transition period until after 2028 would help ensure that agencies are aligning with a more stable local government framework, reducing the risk of repeated boundary realignments and enabling the intended benefits of the legislation to be achieved more efficiently and effectively.

MDC also recommends that any future boundary changes demonstrably improve outcomes for communities, reflect communities of interest, and maintain equitable access to government services and resources across rural, provincial, and metropolitan New Zealand. Boundary alignment should support stronger community outcomes and improved service delivery, rather than being pursued as an objective in itself.

Yours sincerely,



Michael Ford

**Mayor**

10 July 2026

Committee Secretariat,  
Justice Committee,  
Parliament Buildings,  
Wellington.

Submitted via:

Tēnā koutou,

**Submission of Manawātū District Council on the Climate Change Response (Tort Liability) Amendment Bill**

Manawātū District Council (MDC) thanks the Justice Committee for the opportunity to submit on the Climate Change Response (Tort Liability) Amendment Bill.

**Introduction**

Council makes this submission from the perspective of local government as a steward for its residents, infrastructure, and district-wide resilience. Council's interest is not in the merits of any individual court proceeding. Nor does Council suggest that national emissions policy should be determined primarily through litigation.

Council's concern is more direct: if Parliament removes one legal pathway for accountability for emissions-related climate harm, it must also be clear about where the costs and consequences of that harm will fall. Local authorities and ratepayers should not be left carrying a disproportionate share of the financial, infrastructural and social burdens arising from climate change and future extreme weather events.

Council submits that the Bill should not proceed in its current form without further assessment of its implications for local government, ratepayers, iwi, hapū, and affected communities.

The Bill as drafted would create a broad statutory bar preventing tort claims for emissions-related climate change effects. It would apply to direct and indirect emissions, activities occurring inside and outside New Zealand, and conduct occurring before and after commencement. It would also apply retrospectively to existing proceedings that have not yet been finally determined.

Council acknowledges the Government's rationale that climate change policy should be set through Parliament and existing legislation, rather than through the courts, and that New Zealand already has a national statutory framework for emissions reduction through the Climate Change Response Act 2002 and the Emissions Trading Scheme.

However, removing a legal pathway does not remove climate-related impacts. Those impacts will still need to be managed, funded and absorbed somewhere in the system. In practice, many of those consequences are experienced locally and are already falling on councils, communities and ratepayers.

If the Bill is to advance, Council submits that the Government should establish the following:

1. That there is a clearly evidenced policy problem requiring immediate legislative intervention.
2. That the implications for local government and communities have been properly assessed.
3. That the retrospective application of the Bill is necessary and justified.
4. How the Bill may affect the share of climate-related costs borne by communities and local authorities
5. That the Bill is consistent with maintaining public trust in the wider climate adaptation and legal system.

#### **Local government's direct interest in the allocation of climate-related costs.**

District councils are responsible for managing many of the practical consequences of climate change. These include infrastructure planning and investment, natural hazard management, land-use planning, emergency management, community resilience, and recovery following extreme weather events.

For councils, climate change is not an abstract legal issue. It is experienced through stormwater pressure, road damage, flooding, slips, drought, coastal hazards, insurance pressure, infrastructure renewal costs, and complex decisions with communities about future risk. The longer-term costs can be even more difficult. Where communities are required to retreat or relocate from increasingly high-risk areas, the financial, social, cultural, and emotional costs do not simply disappear. In many cases, these costs and responsibilities fall largely on local communities, marae, and hapū.

Loss of insurability is also a material risk. Reduced access to insurance for private property can affect household security, lending, property values and community confidence. Loss of insurability for public infrastructure and assets would place further pressure on councils and ratepayers and could affect the long-term viability of local services and infrastructure investment.

Those responsibilities remain regardless of whether emitters can be subject to civil claims for emissions-related climate harm.

Council is concerned that the Bill may reduce one accountability pathway for emitters while leaving local authorities and communities to continue managing the consequences. That is not only a legal question. It is a question of public finance, fairness and community resilience.

Council submits that Parliament should expressly consider whether the Bill risks further socialising the costs of climate change through local government expenditure, ratepayer

funding, central government recovery assistance, insurance pressure, and direct impacts on affected households and businesses.

### **Insufficient evidence for the policy case for immediate intervention.**

The Regulatory Impact Statement (RIS) records that officials undertook very limited engagement with legal experts, no engagement with business, and had not identified evidence that the ongoing court proceedings had produced a measurable impact on business confidence.

This is significant because the Bill is justified largely on the basis of providing business and investment certainty. If that is the central policy problem, Parliament should be satisfied that the problem has been clearly evidenced before removing an existing legal pathway for affected parties.

Council also notes that the Ministry of Justice's preferred option in the RIS was no regulatory intervention at this time, not the immediate statutory bar preferred by the Minister. Officials considered that, on the limited evidence gathered, it was unclear whether there was a problem requiring legislative intervention before the High Court had issued its decision.

The Bill would make a notable change to the legal landscape before the courts have determined whether any liability exists. The Supreme Court has not found the defendants liable. It has only allowed the claim to proceed to trial.

Council is also concerned about the timing of the Bill. Council is also concerned that the Bill is being progressed while wider reform of New Zealand's planning and environmental protection system is still being settled. In that context, Council considers there is a risk in removing an existing legal pathway before the effectiveness of the wider statutory framework for managing climate and environmental risk has been fully tested.

Council submits that the Committee should consider whether immediate legislative intervention is premature.

### **Further assessment of implications for iwi, hapū and affected communities required.**

The Bill may also have implications for iwi, hapū and communities already exposed to climate-related risks. Climate change impacts are not experienced evenly. Some communities face greater exposure to flooding, erosion, infrastructure disruption, housing vulnerability, insurance pressure and recovery costs. For Māori, climate-related harm may also affect whenua, taonga, wāhi tapu, mahinga kai, whakapapa connections and the ability to exercise kaitiakitanga.

The RIS records that the claim in *Smith v Fonterra* relies in part on tikanga Māori and climate change in an area where Māori have consistently expressed significant concern. It also records that there was no engagement with Māori during policy development and that this may be criticised as inconsistent with Treaty obligations.

Council does not take a position on the merits of that individual claim. However, where legislation removes a potential pathway for communities to seek remedies for climate-related harm, Parliament should consider how that will be perceived by those already carrying climate risk.

**A coherent climate system must address who pays.**

Council agrees that New Zealand needs a coherent national framework for emissions reduction and climate adaptation. However, coherence should not be assessed only from the perspective of emitters or central government. From a local government perspective, a coherent system must also answer the following questions:

- How will climate-related infrastructure costs be funded?
- How will communities exposed to increasing natural hazard risk be supported?
- How will adaptation costs be shared between central government, local government, private property owners, insurers and those whose activities have contributed to climate change?
- How will the Crown ensure that councils and ratepayers are not left with costs that cannot be managed through local funding tools alone?

The Bill addresses one part of the system: civil liability for emissions-related climate harm. It does not address the corresponding question of who should bear the costs once that pathway is removed.

Council submits that this is a significant gap.

**Recommendations**

MDC recommends that the Justice Committee does not proceed with the Bill in its current form unless further analysis is undertaken on the implications for local government, communities, ratepayers, iwi and hapū. Significant weight must be given to the RIS' conclusion that the Ministry of Justice's preferred option was no regulatory intervention at this time.

MDC seeks specific advice on the implications for local government, including potential impacts on infrastructure funding, adaptation planning, emergency management, community recovery, insurance pressure and ratepayer affordability.

**Conclusion**

MDC recognises the importance of clear and coherent national climate policy. Council also recognises that Parliament may decide that emissions reduction obligations should be set through legislation rather than through tort law.

However, the consequences of climate events are already being managed locally. Councils are responsible for infrastructure, land-use planning, natural hazard

management, emergency management, adaptation planning and community resilience. Ratepayers are increasingly being asked to fund the response.

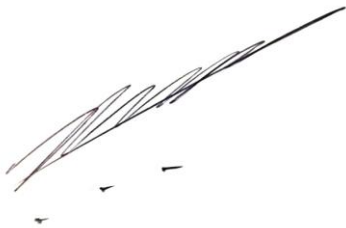
Council's concern is that the Bill may provide certainty for emitters without providing equivalent certainty about how climate-related costs will be fairly allocated across the system.

If Parliament removes one avenue for legal accountability, it should also be clear about how communities, local authorities and ratepayers will be protected from carrying a disproportionate share of the financial, infrastructural and social burdens arising from extreme climate events.

MDC further recommends that, if the Bill proceeds, the Committee consider whether a narrower and better-evidenced approach would address the Government's policy concern without creating unnecessary uncertainty about the allocation of climate-related costs.

Council requests the Justice Committee to consider these matters before the Bill proceeds.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Ford', with a stylized flourish extending upwards and to the right.

Michael Ford

**Mayor**

02 July 2026

Committee Secretariat,  
Environment Committee,  
Parliament Buildings,  
Wellington.

Submitted via: [en.legislation@parliament.govt.nz](mailto:en.legislation@parliament.govt.nz)

Tēnā koutou,

**Submission of Manawatū District Council on the Conservation Amendment Bill.**

Manawatū District Council (MDC) thanks the Environment Committee for the opportunity to submit on the Conservation Amendment Bill. This submission builds on MDC's previous submissions on the Consultation on Modernising Conservation Land Management and Exploring Charging for Access to Some Public Conservation Land.

**Background**

The Manawatū District is characterised by diverse landscapes spanning the rugged Ruahine Ranges, the Pohangina Valley, and the fertile plains of the Manawatū River. As a predominantly rural territorial authority, the district includes and adjoins significant areas of public conservation land managed by DOC, encompassing the western edge of the Ruahine Forest Park, the Tāwhirihoē Scientific Reserve at Tangimoana, the Ototara Scientific Reserve near Himatangi, Pukepuke Lagoon (a nationally significant wetland complex on the west coast) public conservation land on the northern side of the Manawatū Gorge, areas around Awahou North, and several sites along the Pohangina River

The Ruahine Forest Park and the Rangiwahia Scenic Reserve are widely used for tramping and hunting, and the Pohangina Valley serves as a gateway to the Ruahine Range, attracting visitors from across New Zealand and abroad. These areas are not merely ecological assets as they are central to the identity and economic vitality of our communities, supporting tourism, outdoor recreation, and the cultural traditions of tangata whenua. For tangata whenua, these places are whenua with cultural, spiritual, historical and whakapapa connections extending across generations, including wāhi tapu, wāhi tūpuna, traditional travel routes, mahinga kai, and landscapes that remain central to the identity and wellbeing of local iwi and hapū.

The district's scientific reserves and wetlands, including Ototara and Pukepuke Lagoon, also contain regionally and nationally important ecological and geological values. The vegetated conservation areas in the upper catchments of the district, including the Ruahine Ranges and the upper Pohangina Valley, also play a role in stabilising soils,

reducing erosion, and improving water quality downstream, providing significant benefits to rural communities, agricultural land, and the wider river system that extend well beyond their recreational, scenic, and indigenous biodiversity values. These established indigenous ecosystems also contribute to climate and catchment resilience by absorbing rainfall, moderating flood peaks, sequestering carbon, regulating local climate, and supporting clean air. They provide accessible natural spaces for physical activity, restoration, and connection to place, with consequent benefits for physical health, mental wellbeing, and community resilience.

These conservation areas intersect with Council responsibilities for rural roads, local amenity, public safety, emergency management coordination, infrastructure planning, reserves, and district-wide destination management. MDC considers that decisions made under this Bill will directly affect these areas and the rights and interests of our iwi partners.

These responsibilities are also relevant to the potential transfer of costs and risks to ratepayers where increased visitor activity, changed access arrangements, or commercial development, creates additional demand on rural roading, public safety, emergency management, or local amenities without early Council involvement in the decision-making process.

This submission addresses seven thematic areas arising from the Bill: (1) the shift to a National Conservation Policy Statement and area plans; (2) the functions of the Department; (3) the new concessions regime; (4) the international visitor access levy; (5) visitor amenities areas; (6) land exchanges and disposals; and (7) Treaty obligations and iwi partnership. For each theme, MDC identifies where the Bill's provisions either interact with or diverge from positions we have previously advanced, and where new issues of significance to the district arise.

MDC is generally supportive of the objective of modernising and streamlining conservation land management. However, we have significant concerns regarding several provisions of the Bill, and we strongly urge the Select Committee to consider the amendments and recommendations set out in this submission.

### **The New Planning Hierarchy (Clauses 5, 15, and Associated Provisions)**

The Bill's replacement of the existing hierarchy of general policies, conservation management strategies (CMS), and conservation management plans with a single National Conservation Policy Statement (NCPS) and non-overlapping area plans represents the most structurally significant change in the legislation. Clause 15 inserts new sections 13A to 13I, which together create the architecture of this new two-tier system. The NCPS, as secondary legislation approved by the Minister, will set binding national policy, and area plans will provide the regional and local expression of that policy.

MDC expressed qualified support for a single national-level document, in our previous submission, provided it was evidence-based rather than driven by the political priorities of the government of the day. We maintain that position. New section 13D empowers the

Minister to make the NCPS, with its purpose including recognising the economic opportunities arising from the use and development of conservation land. MDC remains concerned that this framing risks shifting the fundamental character of the conservation estate from an ecological and cultural asset into primarily an economic resource - a concern we raised explicitly in our earlier submission in response to what we perceived as an undue emphasis on the DOC estate as an economic instrument.

### **Functions of the Department (enabling commercial development)**

The Bill also provides, in new section 6(ea), that a new function of the Department will be to recognise economic opportunities and enable the use and development of land to the greatest extent practicable. MDC notes that this is a new, small-but-significant, proposal which was not publicly consulted on as part of the original discussion document (although the intent was signalled in 2014 press releases).

Taken together with the NCPS purpose provision, this creates a statutory framework that systematically elevates commercial development as a conservation value. MDC urges the Select Committee to ensure that conservation values including indigenous biodiversity protection, ecological integrity, and cultural significance, are explicitly affirmed as the primary purpose of the conservation estate, with economic enablement treated as a subordinate and conditional consideration.

### **Absence of Local Authority Representation**

MDC is concerned about the continuing absence of any meaningful role for territorial authorities in the making and amendment of the NCPS and area plans. New Schedule 2 and Schedule 3, inserted by clause 45, set out the processes for making or amending these instruments. The consultation requirements acknowledge iwi authorities and the Conservation Authority and Conservation Boards, but no equivalent recognition is given to local government.

MDC has highlighted the omission of local government considerations in our previous submission, and it has not been addressed in the Bill. District and city councils are significant stakeholders in area plan development. As the Bill itself acknowledges, DOC's conservation land sits alongside and interconnects with local roads, infrastructure, and community services. Decisions made in area plans have direct consequences for local government assets, pest management responsibilities, and the delivery of visitor services.

It is incongruous that territorial authorities, which in many cases co-manage conservation areas or hold adjacent land, are afforded no more influence in the area plan process than members of the general public. This omission is particularly concerning in a district such as the Manawātū, where decisions on the use of public conservation land can have direct implications for ratepayer-funded infrastructure and for rural communities expected to absorb the downstream effects of visitor growth, commercial development, or changed access arrangements without any corresponding role in the upstream statutory process.

MDC therefore considers that local government involvement is not merely desirable as a matter of process; it is a practical safeguard to ensure that economic drivers are not pursued at the expense of the environmental qualities, rural character, indigenous ecosystems, and community values that make the district distinctive.

MDC calls on the Select Committee to insert a formal consultation requirement with affected territorial authorities into both the Schedule 2 and Schedule 3 processes.

### **The Relationship with RMA Plans**

The Bill makes a consequential amendment to the Resource Management Act 1991 (clause 127), providing that section 9(3) of the RMA does not apply to Crown work on public conservation land that is consistent with the NCPS or an area plan. However, the Bill does not adequately address the potential for conflict or duplication between area plans and district plans or regional plans under the RMA. This issue is especially acute where Crown works, visitor infrastructure, or concession-related development may intersect with district planning matters such as land stability, stormwater, traffic safety, indigenous biodiversity corridors, water quality, and the cumulative effects of development on adjacent rural communities. This was a gap we identified in our earlier submission, and it remains unresolved. MDC recommends that the Bill include a clear provision establishing how inconsistencies or overlaps between area plans and RMA plans are to be resolved, and that DOC be required to notify affected local authorities when developing or amending area plans that may affect land-use planning outcomes in the district.

### **The New Concessions Regime (Clauses 23 and 40 — New Part 3B and Section 60BA)**

MDC broadly supports the objective of streamlining concession processing. In our January 2025 submission, we supported the introduction of clearer classes of activities, the reduction of administrative burdens, and the acceleration of decision-making for low-impact activities. The Bill's new Part 3B, inserted by clause 23, introduces a structured three-pathway approach— individual concessions, allocation, and pre-approved concessions which has merit. The pre-approved concessions pathway in new subpart 4 (sections 14ZI to 14ZK), enabling applicants to obtain concessions by completing a form and paying a fee for NCPS classified activities, has the potential to significantly reduce processing time for routine and low-impact activities, to the benefit of local operators.

### **Concerns Regarding the Removal of Public Hearing Rights**

MDC has concerns about the removal of automatic hearing rights for submitters on publicly notified concession applications (new section 14S). The right for affected parties, including local authorities, to be heard on concession applications that may materially affect their infrastructure, assets, or communities is an important safeguard. The removal of hearings in favour of a purely written process risks reducing the quality of decision-

making, particularly for complex or contested applications in areas such as the Ruahine Forest Park where multiple interests converge. Similarly, the Bill removes public notification requirements for grazing licence applications and for applications that are intended to be declined (new section 14R). While the latter has practical logic, the former is concerning. Grazing concessions can have significant ecological impacts and can affect the interests of adjacent landowners and local communities. MDC urges the Select Committee to retain public notification requirements for grazing licences and to provide a discretion, at minimum, for the Minister to convene a hearing where an application has generated substantive written submissions from affected parties.

### **Cost Recovery and Small Operators**

New section 60BA (inserted by clause 40) enables the Director-General to recover costs from applicants during the processing of a concession application, rather than only at its conclusion. Furthermore, these costs are non-refundable even if the application is unsuccessful. MDC's concern, previously raised in its previous submission, is that this approach will disproportionately disadvantage small operators and community-based organisations including those in the Manawatū district who operate local recreational and eco-tourism ventures in and around the Ruahine Forest Park. We recommend that the Bill include a provision enabling the Director General to waive or reduce cost recovery obligations for small operators, community groups, and iwi or hapū undertaking activities consistent with Treaty settlement arrangements.

### **Competitive Allocation Processes**

New subpart 3 (sections 14ZF to 14ZH) introduces a framework for competitive allocation of concession opportunities. In our previous submission, MDC raised reservations about competitive allocation processes, noting the practical difficulties of ensuring all parties are equally positioned to submit bids simultaneously, and the challenges of establishing stable criteria in the context of evolving environmental understanding. These concerns are not resolved by the Bill. MDC reiterates that competitive allocation should not apply to small-scale, low-impact operations supporting local communities, to traditional or cultural activities of iwi, or to scientific and conservation activities. We recommend that regulations made under new section 48E(1) provide explicit exemptions for these categories.

### **International Visitor Access Levy Implementation Concerns**

The Bill provides that levy areas may be applied to specific conservation areas, national parks, reserves, or geographic areas including specific paths, tracks, or roads (new section 48D(3) to (5)). MDC notes that the Ruahine Forest Park, given its multiple access points integrated into the broader transport network, presents significant enforcement challenges under any charging regime. MDC has also previously noted about the practicality of enforcing collection where public roads pass through conservation areas such as national parks.

The Bill's regulation-making power (section 48D(6)) allows for collection by third parties, which may offer a practical solution in some contexts, but the broader question of enforcement in areas with diffuse access points is not resolved. New section 11 and clause 35 (new section 51UA) create an offence and infringement regime for international visitors who fail to pay the levy, with a maximum fine of \$5,000 and an infringement fee of \$200. MDC considers that the practical enforceability of these provisions in remote areas of conservation land warrants careful consideration. We recommend that the Select Committee seek detailed advice from DOC and the New Zealand Police on their respective enforcement roles before the Bill is passed.

### **Local Authority Involvement in Levy Setting**

New section 48D(7) requires the Minister to consult Māori groups with relevant interests, local communities, and affected concession holders before recommending levy regulations. MDC is encouraged by the inclusion of 'local communities' but notes that this falls short of a formal requirement to consult territorial authorities (which may be particularly relevant where a local authority shares some responsibility for assets within a conservation area). Given that the implementation of access levies will have direct consequences for destination marketing, visitor management, and local transport (and other) infrastructure, MDC recommends that the Bill explicitly require consultation with affected territorial authorities as part of the levy-setting process.

MDC also reiterates its previous position that access charging should not be applied in areas of particular cultural significance to iwi or in locations where charges might displace visitors to more ecologically sensitive areas. We recommend that the regulations made under section 48D include explicit criteria prohibiting levy designation in these circumstances.

### **Visitor Amenities Areas (Clause 23 — New Part 3D, Sections 16 to 16I)**

The Bill introduces a new category of land designation, visitor amenities areas, which permits the Minister to set apart areas within conservation parks, stewardship areas, national parks, and reserves for the development and operation of recreational and public amenities including toilets, visitor centres, accommodation, car parks, restaurants, cafes, and commercial tourism services.

MDC acknowledges that well-designed visitor infrastructure is essential to managing increasing visitor pressures sustainably and to generating the conservation revenue that underpins the ecological work of the Department. The Pohangina Valley and Ruahine Forest Park already experience significant visitor demand, and the absence of adequate facilities has at times resulted in adverse environmental outcomes and a poor visitor experience. To that extent, the concept of visitor amenities areas has merit.

However, MDC is concerned that new section 16G provides that activities within a visitor amenities area may be authorised even if doing so would be inconsistent with the wider area plan, with the purposes for which the land is held applying only so far as they are

compatible with that authorisation. This is a significant departure from the existing conservation values framework. The provision effectively allows a visitor amenities area designation to override conservation objectives within the parent land. In the Manawatū district, the relevant issue is not whether visitor facilities are sometimes needed, but whether the scale and location of commercial amenities could place pressure on rural communities, local infrastructure, and catchment values that have been carefully improved over time.

MDC urges the Select Committee to introduce a clearer and more robust test for the conservation limits of visitor amenities area development, including an explicit requirement that designation not result the creation of de facto commercial precincts of a scale inconsistent with the primary conservation values of the area, or result in irreversible loss of indigenous biodiversity or ecological integrity in the affected area.

MDC notes that new section 16B requires the Minister to invite comments from relevant iwi authorities (and the Conservation Authority where the area is within a national park) when considering a visitor amenities area proposal, and that public consultation is required under new section 16C. However, consistent with our broader submissions, there is no formal requirement to consult territorial authorities, whose infrastructure and services will be directly affected by the development of commercial amenities on adjacent conservation land. MDC requests that this is amended.

### **Land Exchanges and Disposals (Clause 23 — New Part 3C, Sections 15 to 15ZB)**

MDC expressed support for a simpler and more expansive land exchange system, noting that the previous requirement for exchanges to be contiguous with existing conservation areas had in some cases prevented outcomes with a clear net conservation benefit. The Bill's approach in new section 15A that will enable exchanges where there is a net conservation benefit as measured by the natural and historic resources of the incoming land compared with the outgoing land, is consistent with the principle we advocated.

However, MDC maintains the reservation expressed in our earlier submission that the assessment of net conservation benefit involves inherently subjective judgements, for example, whether the habitat of one species is more ecologically significant than that of another, or how a loss of wetland should be weighed against a gain of native bush. The Bill vests this determination in the Minister (new section 15C), with the Director-General required to produce a report following consultation (new section 15B). MDC considers that this process would benefit from independent ecological input and recommends that the Bill require the Director-General's report to include an assessment by a suitably qualified and independent ecologist before the Minister decides on any proposed exchange.

Regarding land disposals, MDC called for clearer safeguards against potential misuse of expanded disposal powers, a robust public consultation process, and mechanisms for ongoing monitoring of disposed land's conservation status. MDC notes that the Bill incorporates a public notification and comment process (new section 15L) and a

requirement for the Director-General's recommendation (without which disposal cannot proceed under section 15K(2)(f)), which provides some protection. However, new section 15M provides that public submitters have no right to be heard on their submissions regarding a proposed disposal. This is directly inconsistent with the safeguard MDC recommended. The removal of hearing rights for land disposal proposals, which are decisions of significant and permanent consequence, is not justified by administrative efficiency alone.

MDC recommends that the Select Committee reinstate hearing rights for submitters on land disposal proposals, or at minimum provide a discretionary power for the Minister to convene a hearing where submissions raise substantive conservation, cultural, or public interest concerns. MDC is further concerned by the absence of any provision for ongoing monitoring of the conservation status of disposed land. Once conservation land is disposed of and enters private ownership, there is no mechanism in the Bill to assess whether the ecological values that were present at the time of disposal continue to be protected. We recommend the inclusion of a monitoring provision, and where appropriate, the use of covenant conditions under new section 15Q to protect residual conservation values on disposed land.

### **Treaty Obligations, Iwi Partnership, and the Rangitāne o Manawatu Settlement**

The Bill's insertion of new section 4A (clause 5) prescribes how Treaty principles must be applied in specific land management processes, moving from the broad interpretive obligation in the current section 4, which requires the Conservation Act to be "so interpreted and administered as to give effect to the principles of the Treaty of Waitangi" , to a more procedural and codified approach. While MDC acknowledges that this offers some degree of process clarity, we are concerned that it may in practice weaken the breadth and strength of the existing Treaty clause.

This concern is particularly acute in the Manawātū District context. The remnant areas of high-quality natural environment within our district- including the Ruahine Ranges, Pukepuke Lagoon, and the district's scientific reserves- are of deep cultural significance to local iwi. These areas contain ancestral connections, mahinga kai, wāhi tapu, and taonga species. Indigenous biodiversity is inseparable from these cultural values: the health of native species, habitats, ecosystems, whenua, wai and ngāhere supports mātauranga Māori, customary relationships with the environment, and the exercise of kaitiakitanga. Loss or degradation of these environments is therefore both an ecological loss and a cultural loss. It is therefore essential that iwi participation in the management of these areas is not reduced or constrained by a narrower, more procedural Treaty framework. MDC's concern is not only about legal process but about substantive outcomes: iwi participation in conservation management must be adequately resourced to be meaningful and must not place participating iwi, hapū, or other Māori groups at a disadvantage.

This concern is compounded by the Bill's new section 14T, which imposes statutory timeframes on Māori groups consulted on concession applications, while the resourcing provisions for iwi and hapū to participate effectively in the streamlined system remain entirely unaddressed. MDC is also concerned that provisions designed to streamline decision-making, when combined with reduced hearing rights or compressed consultation timeframes, may reduce the ability of iwi, hapū and Māori communities to influence decisions affecting places of cultural significance. Imposing participation timeframes without providing resourcing support risks producing rushed or inadequate consultation, particularly where Treaty partners are expected to advise on multiple competing applications under the new allocation framework.

MDC therefore seeks that section 4 of the Conservation Act 1987 be retained in its current form, unchanged, to ensure that the obligation to give effect to the principles of the Treaty of Waitangi remains broad and substantive, and that the ability of iwi to participate meaningfully in the management of culturally significant conservation lands is not weakened by the procedural codification proposed in new section 4A.

### **Rangitāne o Manawatu Settlement Act — Schedule 6 Amendments**

Schedule 6 of the Bill makes consequential amendments to several Treaty settlement Acts. This includes specific amendments to the Rangitāne o Manawatu Claims Settlement Act 2016, which is of direct relevance to MDC given our longstanding relationship with Rangitāne o Manawatu.

The Schedule 6 amendments to that Act repeal section 70(4)(c), amend section 75(3)(a), repeal section 97(2)(c), and update the reference in section 124(b) from 'section 16A' to 'section 15A'. These are listed as consequential amendments, but MDC urges the Select Committee to seek confirmation from both DOC and Rangitāne o Manawatu that these amendments preserve the full substance and effect of the existing settlement redress arrangements, particularly those relating to overlay classifications and the iwi's role in conservation management decision-making within their rohe.

More broadly, the Bill's transitional provisions (new clauses 24 and 25 of Schedule 1AA, inserted by clause 44) commit the Crown to work with post-settlement governance entities (PGSEs) to seek agreement on how Treaty settlement redress will operate in the new system, with a two-year window applying. MDC notes that this two-year period, while providing initial structure, may be insufficient for all PSGEs to work through the implications of the new framework, particularly given the scale of the changes to the concessions and planning regimes. We recommend that the Select Committee consider whether a longer transitional period, or a bespoke process for PSGEs with particularly complex settlement arrangements, would better serve the Crown's Treaty obligations.

### **Cultural Significance and Access Charging**

MDC reiterates the position advanced in our February 2025 submission that access charging should not apply to areas of cultural or spiritual significance to iwi, or to areas

used for traditional food gathering or customary practices. That position reflects MDC's view that conservation land is not simply a public asset, but also whenua with enduring whakapapa, tikanga and kaitiaki relationships that should not be constrained by charging settings. The Bill's levy provisions (new section 48D) do not explicitly protect such areas from levy designation. MDC recommends the inclusion of an explicit statutory exemption from levy designation for areas identified as having particular cultural significance to iwi or hapū, determined in consultation with the relevant Māori groups.

## **Conclusion**

MDC supports the modernisation of the Conservation Act where it improves clarity, efficiency, and the administration of conservation land. The natural environment, landscapes, and recreational opportunities provided by conservation land, and the district's coastal and wetland reserves, are central to the identity and wellbeing of our communities, and MDC is supportive of reforms that better protect and sustainably manage these taonga. The Bill contains provisions that Council can support: a more coherent planning framework, proportionate treatment of low-risk activities, improved concession administration, a targeted international visitor levy, and a more workable approach to land exchange where net conservation benefit is demonstrated.

However, the Bill in its current form risks elevating economic opportunity above conservation purpose without adequate statutory qualification. It reduces local and public participation in significant decisions, creates broad and insufficiently constrained visitor amenities powers, and fails to provide a sufficiently clear or meaningful role for territorial authorities in planning and decision-making processes.

Above all, the Council urges the Committee to ensure that the Bill does not dilute the fundamental conservation purpose of the legislation. The conservation estate must not be recast primarily as a commercial or economic resource. The landscapes, indigenous biodiversity, and cultural connections it protects are not renewable, and the communities of the Manawatū District, like communities across New Zealand, depend on their enduring stewardship.

Yours sincerely,



Michael Ford

**Mayor**

31 July 2026

LG Data Team

Ministry for Cities, Environment, Regions & Transport

Emailed to: LGdata@mcert.govt.nz

Dear members of the Local Government data team

**Submission from the Manawatū District Council on the Regulations for groups of activities for councils' planning and reporting – draft guidance**

The Manawatū District Council (MDC) thanks the members of the LG data team for the opportunity to provide feedback on the draft guidance for the Regulations for groups of activities for councils' planning and reporting. However, MDC considers that the purpose of reporting guidance should be to classify activities consistently, rather than signal which activities government considers to be priorities for local investment.

MDC notes that this consultation is on the guidance associated with the grouping of activities, rather than the regulations that confirm these mandatory groups. MDC would like to know whether local authorities will also be given an opportunity to provide feedback on the regulations for groups of activities themselves, or if the reference to "Cabinet approval" in relation to the proactive release of Cabinet materials means that the groups are largely fixed, with feedback limited to how this classification is to be interpreted and implemented.

Timing of these regulations is critical. Councils are already well underway with the development of their LTPs. The grouping of activities is relevant to our financial statements, the design of our revenue and financing policy, as well as our activity statements and performance frameworks (i.e. our levels of service measures and targets). Our LTP project schedule includes budget setting in September 2026, with budgets finalised for audit and consultation by December 2026. If the regulations are not notified until October 2026, this will significantly impact on our ability to meet these deadlines, particularly if the new groupings mean that MDC has to revisit its revenue and financing policy.

Like many councils across New Zealand, MDC is in the process of replacing its Enterprise Resource Planning (ERP) system as our current system has reached end of life. These regulations have implications for how MDC structures the financial module of our ERP system to enable this reporting to align with the new reporting architecture prescribed in the draft regulations.

Significant or late changes to the proposed activity groups may result in additional costs and complexity for councils as they update planning, reporting and financial systems to

give effect to the new requirements. Councils therefore require certainty on the final activity groupings and supporting guidance as early as possible.

MDC also notes that, while nationally consistent activity groupings may improve consistency of planning and reporting, differences in the characteristics of metropolitan, provincial and rural councils will continue to influence the way services are delivered and the resulting patterns of investment across activities. For example, rural and provincial councils may reasonably be expected to invest more in supporting a network of community halls (described in the draft guidance as “heritage and village halls”) than more metropolitan councils. These facilities often play an important role in supporting community connection and emergency response in dispersed rural communities. This context should be taken into account when interpreting comparisons between councils based on these activity groups.

### **Support for the Submission of Taituarā – Local Government Professionals Aotearoa**

MDC generally supports the submission prepared by Taituarā on behalf of the Local Government Sector. Many of the recommendations contained in this submission echo their feedback. In particular, MDC agrees with the following key points from the Taituarā submission:

- 1) That there is a balance to be struck between standardising the presentation of information, and giving local authorities the flexibility and freedom to present information in a manner that supports the overall ‘story’ their accountability documents are telling.
- 2) The pending re-organisation of local government via the ‘Head Start’ and ‘Back Stop’ proposals mean that local authorities will likely have to revisit their activity groupings very shortly (fifteen months at most) of these being confirmed in the 2027 Long-term Plans.
- 3) That the Ministry develop a single methodology for the allocation of support activities to groups of activities and to individual activities. This methodology should be specified in the regulations.
- 4) Differences in council judgements in matters such as allocation of ‘support services’ will add to the ongoing cost of the regime, such as in justifying the approach to the auditors.
- 5) That the Ministry develop a data dictionary to supplement the regulations.
- 6) That the Ministry engage further with regional and unitary councils to ensure that proposed framework appropriately reflects those activities currently delivered at regional levels.
- 7) That the broadness of the ‘other’ category be reconsidered.

### **Feedback on the draft guidance**

#### **a) Are there any activities missing from the list that should be added?**

Within group 1 (Adaptation and emergency management), it is assumed that ‘adaptation’ includes increasing the resilience of existing infrastructure to climate impacts, even though this term is not explicitly included. For example, where MDC invests in improvements to roadside drainage to reduce the likelihood of that asset being damaged in an extreme weather event is more readily conceived as being a

resilience investment, rather than ‘adaptation.’ Given the description within this guidance document, such investments would likely be included within the roading and transport activity anyway, so the impact of any uncertainty is likely to be minimal.

### **Group 5 – Fly Tipping**

Fly tipping is an activity that is currently not listed within the draft guidance. MDC considers the best fit for this activity is within Group 5 – Public regulatory services. While this activity is closely related to waste management, it is managed via our regulatory compliance officers.

#### ***Decision sought***

- That fly tipping be added to the list of activities within Group 5 – Public regulatory services

### **Group 7 – Transfer stations**

MDC agrees with the submission by Taituarā that transfer stations have been missed from the list of activities within Group 7 – Waste management and minimisation. MDC’s Manawatū Resource Recovery Centre in Feilding manages Council-controlled waste streams, and provides refuse, recycling, food waste and green waste drop-off to the community.

#### ***Decision sought:***

- That resource recovery centres be added to the list of activities within Group 7- Waste management and minimisation.

## **b) Are there activities that have been mis-grouped/belong in another group from where they’ve been allocated?**

### **Group 1 – Adaptation and Emergency Management**

MDC requests clarification as to what is meant by reference to “drought and fire protection” in Group 1. MDC’s responsibilities in relation to drought are to support the welfare response led by national government agencies. Drought protection is not something that councils actively invest in. While Councils’ have some responsibilities in relation to the provision of water for fire-fighting capability (within the water services activity), fire protection is generally a responsibility of Fire and Emergency New Zealand (FENZ).

MDC considers that “flood protection” should be renamed “river management and flood protection” and be relocated from Group 1 (Adaptation and emergency management) to Group 6 (Roading and Transport). The transportation network is built around the river network, and therefore, should be managed together. Alternatively, “flood protection” could be reframed under the umbrella of “Lifelines utilities” to help provide clarity that this activity is about preparedness and maintenance of flood protection infrastructure, to differentiate it from emergency response, which sits within the Adaptation and Emergency Management function.

Adaptation has both a Capital (Capex) component and an ongoing operational (Opex) cost associated with it. It is possible that the cost of investing in adaptation, such as increasing the freeboard of a new bridge to account for anticipated increases in extreme weather events, could be classified as an adaptation activity, while the maintenance of the ongoing benefits that asset provides better fits within the activity group to which it more directly relates (such as a bridge being budgeted for within the Roothing and Transport activity).

**Decisions sought:**

- That further consideration be given to the reference to “drought and fire protection,” particularly in relation to potential overlap in legislative responsibilities with FENZ and other central government agencies.
- That “flood protection” be renamed “river management and flood protection” or “Lifelines utilities” and be relocated to Group 6, out of recognition of its ongoing management alongside roading infrastructure.
- That the Ministry provide clarification of the context in which they want councils to report on adaptation, that is, in terms of capital expenditure or ongoing operational expenditure.

**Group 2 – Community and Recreational Facilities**

MDC agrees with the submission by Taituarā and others that the “Cemeteries” activity should be relocated from its current location in Group 2 to Group 4 – Parks and reserves. Cemetery management at MDC is administered alongside parks, open spaces and reserve maintenance activities.

***Decision Sought:***

- That the “Cemeteries” activity be relocated from Group 2 to Group 4.

**Group 3 – Governance, planning and reporting**

MDC questions the inclusion of several activity-specific plans and strategies within Group 3. While corporate governance documents such as the Long-term Plan, Annual Plan and Annual Report are appropriately included within Governance, planning and reporting, many activity-specific plans and strategies are prepared, implemented and monitored by the business area responsible for delivering those services.

The draft guidance appears to group activities by document type rather than function. For example, the Infrastructure Strategy, Financial Strategy and Revenue and Financing Policy are all prepared as part of the Long-term Plan. MDC seeks clarification on whether the Ministry expects councils to separately account for the preparation of these supporting documents within Group 3, or whether they should form part of the overall Long-term Plan activity.

Similarly, activity-specific plans and strategies, such as the Water Services Strategy and reporting on CCO community and economic development plans, are integral to the

delivery of those activities. For many councils, particularly smaller councils, these documents are prepared, implemented and monitored by the same staff who deliver the activity itself. Separating planning from delivery introduces unnecessary complexity, requires councils to artificially allocate staff resources across multiple activity groups, and reduces the consistency and comparability that the guidance is intended to achieve.

This issue is particularly evident for in-house water services providers. MDC is required to ring-fence all costs associated with its water services activity. It is therefore unclear how the inclusion of the Water Services Strategy within Group 3 is intended to operate alongside those ring-fencing requirements.

***Decisions Sought:***

- MDC requests that the guidance be amended so that “reporting on CCOs community and economic development plans” is included in Group 8 (Other activities), alongside community and economic development.
- MDC requests that the Ministry clarify whether activity-specific plans and strategies are intended to be separately accounted for within Group 3, or whether they should be reported as part of the activity to which they relate.
- MDC requests that the Ministry clarify how the "Water Services Strategy" activity should be reported by territorial authorities that continue to provide water services in-house. Specifically:
  1. Should the cost of preparing the Water Services Strategy be accounted for within the Long-term Plan activity rather than within the water services activity? If so, how does this align with the ring-fencing requirements?
  2. Is this reference intended to apply only to councils that have transferred water services to a CCO? If so, should the guidance instead refer to Statements of Intent for Water Services rather than the Water Services Strategy?

**Group 6 - Roading and Transport**

MDC introduced time-limited parking within areas of the Feilding Town Centre from 1 July 2024. Enforcement of these restrictions, together with responding to complaints about abandoned vehicles, is undertaken by Compliance and Enforcement Officers. These officers are part of Council's regulatory team and undertake a broad range of functions, including bylaw enforcement, permitting, parking enforcement and responding to customer requests.

While the guidance allocates parking services and abandoned vehicles to the Roading and Transport group, the staff delivering these functions are not dedicated transport officers. This reflects the way many smaller councils operate, where staff routinely undertake work across multiple activity groups. Requiring councils to separately attribute staff costs for individual tasks would create a significant administrative burden

and is likely to result in inconsistent allocation methodologies being applied across the sector.

***Decision sought:***

- That the Ministry relocate parking enforcement and abandoned vehicles from Group 6 to Group 5 (Public regulatory Services).
- Alternatively, if parking enforcement and abandoned vehicles are to remain in Group 6, MDC requests that the Ministry develop nationally consistent allocation methodologies for staff and corporate support functions that work across multiple activity groups. These methodologies should enable councils to consistently allocate shared costs without requiring detailed time recording or attribution of staff time between activity groups.

**c) Is there further information that DIA could provide that would be helpful?**

**Group 2**

MDC seeks additional advice in relation to Group 2 – Community and recreational facilities. MDC’s “Community Facilities” group of activities currently contains:

- Aquatics
- Community Hub Libraries
- Property
- Halls and Recreational Complexes
- Parks, Reserves and Sports Grounds
- Cemeteries
- Public Conveniences

Oftentimes our facilities and land are captured as one entire asset. For example, there are a number of cases where Council doesn’t own all of the facilities but owns the land they sit on i.e. Johnston Park – the rugby clubs own some of the facilities and Council owns the rest. Obviously MDC does not capture the value of the asset that is owned by another entity.

The proposed reporting groups do not align well with the way many councils currently manage or account for integrated land and facility assets. Determining how to separate facilities and land assets will be complex and time consuming, and will involve cost to achieve given the way that MDC currently accounts for these activities.

MDC owns a number of properties where the physical asset is managed by a CCO or a Community Committee or Trust on Council’s behalf (e.g. the Feilding Civic Centre that is managed by the Feilding Civic Centre Trust).

***Decision sought:***

- MDC requests that the Ministry provide guidance on the classification of community and recreational facilities where ownership, management or operational responsibilities differ from the underlying land ownership, including where facilities are managed by CCOs, trusts or community committees on Council's behalf.

### **Group 3 – Mandatory Reporting Requirements**

The exposure draft for the Regulations for groups of activities for councils' planning and reporting included reference to "Government mandatory reporting requirements" within the Governance, planning and reporting group. The draft guidance document does not include mandatory reporting within the activities and description for this group (Group 3). However, "Government mandatory reporting requirements" is still assigned to this group within the "Index of activities and their groups" in Appendix A.

MDC has questions in relation to the reference to 'Government mandatory reporting.' Is this a reference to the future performance measurement framework that this architecture is designed to support? Does this include mandatory reporting council-wide? What about the mandatory reporting that MDC does for water services (e.g. reporting to the Water Services Authority Taumata Arowai)? Is this separate?

#### ***Decision Sought:***

- MDC request that the Ministry define 'Government mandatory reporting requirements' and provide examples of the activities intended to be included.

### **Group 3 - Marketing and Communications**

MDC treats marketing and communications as a shared corporate support function that provides services across the organisation. While individual project budgets may include communications expenditure for items such as consultation materials, advertising or design, the staff costs associated with the communications team are not currently recorded or charged back to the activities they support.

If the Ministry expects these support costs to be allocated across the prescribed activity groups, councils will need to develop methodologies to attribute communications staff costs across multiple activities. In the absence of nationally consistent methodologies, councils are likely to adopt different approaches. Alternatively, if councils account for all communications costs within a single activity group, the resulting information may not consistently reflect the resources supporting each activity. Either approach has the potential to reduce the comparability of published information between councils.

MDC agrees with the submission by Taituarā that it is unclear what is meant by 'marketing', especially as it is distinct from communications. We share Taituarā's view that reference to marketing is unnecessary and is difficult to differentiate from economic development and tourism activities, which are already specified in the guidance.

***Decision Sought:***

- MDC requests that the Ministry clarify whether shared communications staff costs are intended to be allocated across the prescribed activity groups and, if so, provide nationally consistent guidance on how those costs should be allocated.
- That reference to “marketing” within Group 3 be deleted.

**Group 4 (Parks and Reserves) and 6 (Roading and Transport)**

Group 4 includes reference to “walking tracks,” while Group 6 includes “footpaths.” Without clear definition, there is potential for some confusion in how to differentiate between these two activities. MDC currently considers any footpath or walkway that is located within the road reserve as a land transport asset, and any off-road walkway as a community facility asset. Providing a clear definition will help ensure that all councils are consistent in how these assets are accounted for.

The guidance in relation to differentiating between community facilities located on reserve land that support the use of the reserve (Group 4) and those that are not part of the use of the reserve (Group 2) is helpful. However, even with this guidance, the separation of some reserves into these different functions will be problematic, particularly for those reserves where there are mixed functions and ownership arrangements. For example, Kowhai Park contains community facilities including the Old Tote Building (Council-owned recreational complex), public conveniences and the Feilding Cricket Pavilion (privately owned). Kowhai Park also contains sports fields (Kōwhai cricket area), playgrounds, walkways and gardens.

Further guidance is needed in relation to how to group community facilities that are in community or private ownership that are located on Council-owned land. Within the Manawātū District there are four community-owned halls located on Council land. These are technically land assets (Group 4) but their primary purpose is as a community and recreational facility (Group 2). Council supports these community-owned halls by contributing to structural and compliance works.

***Decision Sought:***

- MDC requests that the Ministry provide further guidance on how community and recreational facilities should be grouped where ownership, management or operational arrangements differ between the land and the associated facilities.

**Group 5 – Public Regulatory Services**

MDC seeks assurance that the “resources consent/planning compliance” description means both our resource consent processing function as well as our planning compliance. It is not clear in the current wording if this means only the compliance function.

MDC assumes that ‘building control’ means building consent processing and inspections, as well as building compliance activities (BWO’s, NTF, PIM’s, etc)? Much

of our PIM work is currently completed by our data management team. This is a corporate overhead function.

***Decisions sought:***

- MDC requests that the Ministry clarify what is meant by “resources consent/planning compliance,” including whether this includes the resource consent processing functions of council.
- MDC requests that the Ministry clarify the full range of activities included within the term “Building Control.”

**Sustainability (Group 8 – Other activities)**

MDC generally supports this new group of activities. However, MDC requests that the Ministry expand on what is meant by “sustainability” in this context. Some examples would be useful for us to understand what types of activities this would encompass.

**Group 8 – Forestry**

MDC considers the reference to “forestry” in group 8 unusual. Is this intended to mean commercial forestry where Council may have a commercial interest? Or forestry set aside for biodiversity purposes? Some further guidance or worked examples might be useful here.

**Activities that support specific activities**

The guidance notes state that councils should “bunch the services that support an activity together as much as possible” and that cross-council support services, such as HR, IT, finance, iwi liaison, should either be allocated to the activity they most directly support, or otherwise be reported within Governance, planning and reporting. However, these corporate support functions are not themselves identified as activities within the prescribed groups.

It is therefore unclear whether these functions are intended to form part of the prescribed activity groups or simply provide examples of how councils should allocate internal support costs. Further guidance is also needed on how other shared corporate support functions, such as communications, customer services, legal services, governance support, data management and LGOIMA administration, should be treated to ensure consistent reporting across councils.

MDC recognises that some flexibility in how to account for these cross-council support services is beneficial as, depending on the size of the council, some councils may have dedicated support services for different activities, while others may have support staff that work across all of council. However, this flexibility will significantly affect the comparability of published information unless councils apply a common allocation methodology and may result in differences in accounting practices being interpreted as differences in organisational performance.

### ***Decision sought:***

- If cross-council support functions are intended to be included within the prescribed activity groups, MDC requests the following:
  - (a) Clear methodologies to ensure national consistency in how these cross-council support functions are to be divided amongst the other groups (e.g. allocated based on revenue? Office footprint? FTEs?).
  - (b) Clarification on whether government (and the Audit Office) expect councils to include such activities in activity statements. That is, do councils have to identify the rationale for delivery of these activities within the group, outline any significant negative effects that this activity may have on the local community, and set performance measures and targets? (i.e. subject to clauses 2-5 of Part 1, Schedule 10 of the Local Government Act 2002).

### **d) Any other comments?**

Within group 1 (Adaptation and emergency management) the reference to “improvements or upgrades to accommodate climate impacts...should be recorded against the activities to which they most directly relate” is helpful in understanding how councils should differentiate between projects that include an adaptation component. One recent example specific to the Manawātū District Council is the replacement of the Churchill Road Bridge that failed during Cyclone Gabrielle. Rather than replacing like-for-like, the freeboard of the new bridge was elevated to increase its resilience to future emergency events.

While MDC generally supports activities that include an adaptation component being recorded against the activity to which they most directly relate (e.g. Churchill Road Bridge being recorded within the “Roading and Transport” activity), MDC recognises that this may result in underestimating or under-reporting in relation to adaptation investment made by councils in response to climate impacts. If this is of concern, it may be worth the Ministry considering alternative ways that investments in adaptation could be recorded.

### **LGOIMA Information Requests (Group 5)**

MDC does not currently charge for LGOIMA requests, in an effort to be as customer-friendly as possible. The administration involved in receiving, allocating and coordinating requests is undertaken as a corporate support function. The time spent preparing responses is generally absorbed within the business areas to which the requests relate, rather than being separately attributed to individual requests.

MDC seeks clarification on how these costs are intended to be accounted for within the prescribed activity groups. If councils are expected to separately record staff time associated with administering and responding to LGOIMA requests, this would create a significant additional administrative burden that is unlikely to improve the quality or comparability of reporting.

**Decision Sought:**

- MDC requests that the Ministry clarify how the costs associated with LGOIMA requests should be allocated within the prescribed activity groups and develop a nationally consistent approach that supports comparable reporting without requiring disproportionate administrative effort.

**Roading and Transport (Group 6)**

Public transport services are currently a function of Horizons Regional Council (Horizons). MDC supports this activity through representation on governance groups, and advocacy on behalf of our community at the regional and national level. MDC is also responsible for the installation of new bus stop infrastructure to support bus services operating within our District.

**Group 8 – Characterisation of "Other activities"**

MDC supports the introduction of a standard "Other activities" group for the purposes of consistent planning and reporting. However, the statement that Group 8 is intended for activities "not considered core services" is not necessary to achieve that objective. Councils can consistently classify these activities without the guidance characterising their relative importance.

Many activities within this group, including social housing, economic development, community grants, events and festivals, play a critical role in creating prosperous, connected and attractive communities. At MDC, many of these services are delivered through council-controlled organisations, including the Manawātū Community Trust, Feilding and District Promotion, and the Central Economic Development Agency (CEDA). Funding provided to these organisations would be reported within this group.

While these activities fall outside the Government's legislative definition of "core services", they remain important investments for many communities. They support local economic growth, attract people and investment, strengthen community capacity, and respond to local priorities identified through democratic decision-making.

MDC is particularly concerned that, in the context of the Government's proposed rates capping regime, describing these activities as "non-core" may unintentionally signal that they are lower priorities for council investment or the first areas in which expenditure should be reduced. This risks influencing public perceptions and future funding decisions in a way that extends beyond the purpose of reporting guidance.

Decisions about the level of investment in these activities should remain matters for locally elected councils, following consultation with their communities. The Local Government Act 2002 recognises local authorities as democratically elected bodies responsible for identifying and responding to the current and future needs of their communities. Accordingly, councils should retain the flexibility to determine the appropriate level of investment in these activities based on local priorities, rather than being influenced by a one-size-fits-all characterisation of them as "non-core".

***Decision sought:***

- MDC requests that the guidance be amended to describe Group 8 as capturing activities that do not fall within the other prescribed groups, without referring to them as "non-core" or "not considered core services".

This would achieve the objective of consistent reporting while remaining neutral and respecting local democratic decision-making.

**Reporting on recovery costs**

**Should costs associated with the disposal of debris during emergency recovery be recorded against the 'adaptation and emergency management' category or as part of 'waste management'?**

MDC considers that costs associated with the disposal of debris arising from an emergency event are most appropriately recorded within the Adaptation and Emergency Management group where the disposal forms part of the emergency response or recovery effort. For example, following significant weather events, councils may be required to clear and dispose of landslide debris, forestry slash or other material as part of restoring access and community safety. These activities are undertaken as part of the emergency response and recovery rather than as part of the routine delivery of waste management services. Recording these costs within Adaptation and Emergency Management would more accurately reflect the purpose for which the expenditure was incurred.

Thank you again for the opportunity to comment on the draft guidance. Should the Ministry wish to discuss any of the matters raised in this submission, MDC would be pleased to provide further information or clarification.

Yours sincerely,



Michael Ford

**Mayor**

12 August 2026

Infrastructure Regulation Branch

Commerce Commission

By email: [infrastructure.regulation@comcom.govt.nz](mailto:infrastructure.regulation@comcom.govt.nz)

Dear Commissioners,

### **Submission on Resilience principles for investment decision-making**

The Manawātū District Council (MDC) welcomes the opportunity to provide feedback on the Commerce Commission's draft guidance *Resilience Principles: Decision-making Framework for Critical Infrastructure Providers*.

MDC is responsible for planning, delivering and maintaining a diverse portfolio of critical infrastructure and community assets that support the social, economic and environmental wellbeing of our district. Resilience considerations are already embedded across many aspects of Council's governance, asset management, infrastructure planning, emergency management and investment decision-making.

MDC supports the Commission's objective of promoting consistent, transparent and evidence-based resilience investment decisions. We particularly support the draft guidance's emphasis on proportionality and its recognition that infrastructure providers differ in size, complexity, asset portfolios and organisational maturity. These principles provide an appropriate foundation for strengthening resilience while allowing organisations to progressively improve over time.

MDC considers the guidance should complement and build upon existing planning and asset management processes rather than create a separate resilience planning framework. We encourage the Commission to continue developing practical implementation guidance that enables infrastructure providers to integrate resilience considerations into existing decision-making processes in a way that is both proportionate and achievable.

### **Executive Summary**

MDC is broadly supportive of the proposed resilience decision-making framework.

In particular, MDC supports:

- integrating resilience into existing governance, asset management, risk management and investment decision-making processes;
- recognising that infrastructure providers have differing levels of organisational maturity;

- applying a proportionate, risk-based approach to resilience investment;
- acknowledging uncertainty as an inherent feature of long-term infrastructure planning; and
- encouraging continuous improvement rather than prescribing a single methodology.

To further strengthen the guidance, MDC recommends that the Commission:

- provide additional implementation guidance and worked examples for different infrastructure sectors;
- demonstrate how the resilience principles can be integrated with existing planning frameworks such as Asset Management Plans, Long-term Plans, Water Services Delivery Plans and emergency management planning;
- develop further guidance on identifying and assessing cross-sector interdependencies;
- recognise that resilience investments must balance technical feasibility, affordability, service levels and community expectations; and
- continue supporting flexibility by recognising existing asset management frameworks and sector-specific methodologies rather than prescribing a single approach.

MDC also considers that resilience should be viewed as an integral component of broader infrastructure planning rather than a standalone activity. In practice, resilience outcomes are frequently delivered through asset renewals, network improvements, climate adaptation initiatives, growth planning and service-level investments. Effective resilience decision-making therefore involves balancing resilience objectives with affordability, competing investment priorities and long-term community outcomes.

The following responses address each of the Commission's twelve consultation questions.

**Q1 Is the draft guidance clear about its purpose and practical status, including the level of analysis and rigour the Commission expects for more material resilience expenditure proposals?**

MDC supports the overall direction of the draft guidance.

The document provides a practical and well-structured framework for resilience investment decision-making and appropriately recognises that resilience should be integrated into ordinary asset management, governance, risk management and investment planning rather than treated as a separate activity. MDC particularly supports the emphasis on proportionality and the recognition that infrastructure providers are at different stages of asset management and resilience maturity. These themes make the guidance applicable across a wide range of providers while allowing organisations to progressively improve their practices over time.

**Q2 Is it clear how the draft guidance should be applied proportionately across sectors with different levels of maturity?**

MDC considers the guidance appropriately recognises the differing maturity levels that exist across infrastructure sectors. We support the Commission's acknowledgement that providers should continue incorporating resilience considerations while progressively improving capability, rather than delaying investment until maturity is achieved.

MDC suggests the guidance also acknowledge that many local authorities are simultaneously implementing Local Water Done Well reforms and strengthening their asset management systems. During this transition, the Commission should continue applying a proportionate approach to expectations and evidence requirements.

**Q3 Are there implementation barriers, overlaps, or accountability issues in the wider resilience and regulatory landscape that may affect how this guidance is applied in practice?**

MDC considers the greatest implementation challenges are likely to be:

- availability of consistent hazard information;
- differing levels of asset management maturity;
- capability and specialist resourcing;
- integration of resilience analysis into existing business case processes;
- coordination across multiple regulatory authorities.

While the guidance recognises maturity, additional practical implementation advice would assist providers in moving from existing asset management practices to the more comprehensive resilience assessments envisaged by the guidance. Practical implementation is also affected by the difficulty of determining an appropriate and affordable level of resilience. For some hazards, such as flooding, design and investment decisions can be informed by flood-hazard information, climate-change allowances and relevant technical standards. For other hazards, particularly major earthquakes, the timing and severity of an event are inherently uncertain and it may not be practicable to design infrastructure to avoid all disruption.

These decisions therefore require providers to balance risk, consequences, technical feasibility and affordability, including the level of additional resilience that communities are willing and able to fund. Multi-agency coordination is also important, as actions intended to protect or restore one asset or service may transfer risk to other infrastructure, communities or natural systems.

**Q4 What areas should the Commission prioritise in further work (for example, business case guidance, resilience measures, maturity assessment, interdependency information, or reporting)?**

MDC supports the Commission continuing to develop practical implementation guidance to accompany the resilience principles. In particular, we consider future work should focus on practical business case guidance, worked examples from different

infrastructure sectors, and tools that assist providers to progressively improve resilience maturity.

Additional guidance on infrastructure interdependencies would also be valuable. Local authorities operate interconnected water, transport and community infrastructure networks, and resilience investment decisions are often influenced by dependencies across sectors. Further guidance on identifying, assessing and incorporating those interdependencies into investment decision-making would assist providers.

MDC also encourages the Commission to develop guidance demonstrating how the resilience principles can be integrated with existing planning frameworks, including Asset Management Plans, Long-term Plans, Water Services Delivery Plans and emergency management planning, rather than creating separate resilience planning processes.

Further guidance would also be useful on critical-asset mapping, identifying alternative service and transport routes, and transparently balancing hazard likelihood, service consequences, affordability and the community's willingness to fund increased resilience.

**Q 5. Which aspects of the draft guidance are most helpful for informing your investment decision making, and why?**

MDC considers the draft guidance to be particularly helpful in recognising that resilience is not a standalone activity, but should be integrated into existing governance, asset management, risk management and investment decision-making processes. We also support the emphasis on proportionality, recognising that infrastructure providers differ in size, complexity and organisational maturity.

The guidance appropriately encourages decision-makers to consider resilience alongside affordability, service levels and long-term community outcomes, rather than treating resilience as an isolated objective. This integrated approach is particularly helpful because resilience is not always the sole or primary driver of an infrastructure investment. Projects may be initiated because of renewal needs, capacity constraints, safety, compliance, growth, climate adaptation or service-level requirements while also delivering resilience benefits. MDC also welcomes the recognition that resilience decisions often need to be made in the face of uncertainty and that continuous improvement should be expected rather than immediate perfection.

**Q6. Which parts of the draft guidance are unclear, unnecessary, or could be improved? Please explain.**

Overall, MDC considers the guidance to be clearly written and well structured.

There are, however, opportunities to further improve its practical application. In particular, the guidance could provide additional worked examples illustrating how the principles might be applied to different infrastructure sectors and to investments of varying scale. This would help smaller organisations apply the framework consistently while reinforcing the principle of proportionality.

MDC also suggests more clearly distinguishing between examples of good practice and regulatory expectations. While the document appropriately states that it is guidance,

some sections headed "*What we expect to see*" could be interpreted as minimum compliance requirements. Clarifying that expectations should remain proportionate to the scale, complexity and criticality of the investment would improve consistency throughout the document.

Finally, the guidance could more explicitly acknowledge that many infrastructure providers already consider resilience through existing statutory planning and asset management processes. The framework should build upon these processes rather than be interpreted as creating an additional planning framework.

**Q7. Are any principles missing? Are there areas of overlap where the principles could be simplified or streamlined?**

MDC does not consider any fundamental resilience principles to be missing from the framework.

However, consideration could be given to placing greater emphasis on organisational learning and continuous improvement following disruptive events. While these concepts are reflected throughout the guidance, highlighting the importance of post-event evaluation and lessons learned would reinforce the iterative nature of resilience planning and support continual improvement over time.

**Q8. Are there any missing frameworks or evaluation tools that should be included or referenced?**

The draft guidance appropriately references a range of recognised decision-making approaches and provides sufficient flexibility for infrastructure providers to adopt methodologies appropriate to their circumstances.

MDC considers that additional references to established local government asset management guidance, such as the International Infrastructure Management Manual (IIMM), ISO 55000 Asset Management standards, and Treasury's Better Business Case guidance, would further strengthen the document. These frameworks are already widely used across local government and would assist providers in integrating resilience considerations into existing investment planning processes.

The guidance should continue encouraging the use of recognised frameworks rather than prescribing a single methodology. The guidance should continue encouraging the use of recognised frameworks rather than prescribing a single methodology. It could also recognise practical evaluation tools already used by infrastructure providers, including hazard and flood mapping, climate-change projections, asset-criticality assessments, network vulnerability mapping and analysis of alternative service or transport routes. This flexibility is important because different infrastructure activities are subject to different technical standards, statutory planning requirements and investment-assessment processes.

**Q9. To what extent do you already apply these principles in your resilience-related decision making processes? If not, what currently guides your resilience-related investment decisions?**

MDC applies many of the principles outlined in the draft guidance through its asset management planning, long-term infrastructure planning, emergency management arrangements, climate adaptation work and Water Services Delivery Plan.

In practice, resilience is often incorporated through existing technical and investment processes rather than identified as a standalone objective. Examples include considering flood-hazard information and climate-change effects in infrastructure design and procurement, assessing the criticality of assets, and identifying alternative transport or service routes. However, identifying a resilience vulnerability does not automatically result in additional investment. Decisions must also take account of risk, consequences, competing priorities, practicability, affordability and the community's willingness to fund higher levels of resilience. The draft guidance's integrated approach is therefore consistent with current local government planning practice.

**Q10. Do you have practical examples of applying these principles - in a specific sector, or cross-sector - that could be shared to support other users of the guidance?**

MDC considers this an important opportunity to demonstrate how resilience principles are applied in practice.

Practical examples include incorporating flood-hazard information and climate-change allowances into stormwater planning, infrastructure design and procurement; identifying critical transport assets and alternative routes to support access and network recovery following disruptive events; and coordinating with regional and emergency management partners where actions affecting flood flows, roads and other critical assets need to be considered collectively.

These examples demonstrate that resilience is commonly delivered through wider renewal, safety, capacity, climate-adaptation and network-planning programmes, even where resilience is not the sole or primary investment driver. They also illustrate that identifying a critical asset, network vulnerability or alternative route is an important first step, but does not by itself establish that additional investment is justified. Providers must still assess consequences, options, affordability and competing investment priorities.

**Q11. How should the framework recognise and reflect iwi, hapū, and Māori perspectives, including capability, resources, and relationships that support resilience, particularly in smaller or more isolated communities?**

MDC supports recognising the important role that iwi, hapū and Māori organisations can play in understanding local hazards, environmental values and community resilience.

The guidance should encourage meaningful engagement while recognising that statutory engagement requirements already exist under a range of legislation. Wherever possible, the Commission's guidance should complement existing engagement processes rather than create parallel consultation expectations.

MDC also encourages recognition of mātauranga Māori alongside technical and engineering evidence where this contributes to understanding long-term resilience and community wellbeing.

**Q12. Which cross-sector vulnerabilities and interdependencies should the framework place the greatest emphasis on, and expect infrastructure providers and the Commission to pay closest attention to?**

The framework should place particular emphasis on the interdependencies between electricity, telecommunications, transport, drinking water, wastewater, stormwater, flood-management systems and emergency access. Disruption to one system can significantly affect the operation and recovery of others. For example, water and wastewater services may depend on electricity and communications, while repairs and emergency response depend on functioning roads, bridges, fuel supplies and access routes.

Particular attention should also be given to the interaction between infrastructure and natural systems. During a flood or other emergency, actions taken by one agency to manage river flows, protect infrastructure or restore access may alter risks for other assets and communities. Effective resilience planning therefore requires coordinated decision-making among territorial authorities, regional councils, emergency management agencies, lifeline utilities and transport providers. Providers should consider not only economic impacts but also public health, community isolation, accessibility, recovery capability and the disproportionate effects of service disruption on vulnerable populations.

At the same time, resilience decisions must continue to balance community expectations with affordability and long-term financial sustainability. Local government is well placed to make these decisions through existing democratic processes, including Long-term Plans and Annual Plans, where communities can express their preferences regarding service levels and investment priorities.

Yours sincerely,



Michael Ford

**Mayor**

18 August 2026

Committee Secretariat,  
Environment Committee,  
Parliament Buildings,  
Wellington.

Submitted via: [en.legislation@parliament.govt.nz](mailto:en.legislation@parliament.govt.nz)

Tēnā koutou,

### **Submission of Manawātū District Council on the Environmental Reporting Amendment Bill**

Manawātū District Council (MDC) thanks the Environment Committee for the opportunity to submit on the Environmental Reporting Amendment Bill (the Bill).

#### **Introduction**

MDC supports the Bill's objective of ensuring that New Zealanders and decision-makers have access to independent, authoritative and useful information about the state of the environment. MDC therefore supports the amended purpose proposed by the Bill.

Council also supports several elements of the Bill in principle, including the addition of drivers and outlooks to environmental reports, a clearer definition of 'pressures,' the ability to examine interconnected environmental issues, improved environmental indicators and monitoring standards, and the establishment of a standing expert panel.

However, Council has concerns about whether the Bill, as currently drafted, will provide the timely, comprehensive and independent environmental evidence needed by local government. In particular, Council is concerned that the proposed move from three-yearly to six-yearly state-of-environment reporting is not accompanied by sufficient statutory safeguards between reports, including a mid-cycle integrated stocktake; that the commentary regime leaves considerable discretion over topic and timing; that there is no formal government response to environmental findings and data gaps; and that the institutional arrangements for the Strategic Evidence Panel do not fully secure its transparency and independence.

It is further noted that the six-year cycle proposed equates to two full parliamentary terms, such that the ability to objectively evaluate the impact of government environmental policy change made within the first three years may be diluted or obscured by changes to policy made by an incoming government over the second half of the reporting period.

These concerns need to be considered in the context of the wider environmental, planning, climate adaptation and local government reform programme. The importance of reliable environmental information is increasing at the same time as the Bill proposes to reduce

the frequency of New Zealand's principal integrated assessment of environmental conditions.

## **Background**

Manawatū District is a provincial district comprising Feilding, rural settlements and extensive productive rural land. The district extends from the Ruahine Ranges in the east to the Tasman Sea in the west and encompasses hill country, river valleys, fertile plains and coastal environments. Its landscape is shaped by significant river systems, including the Rangitikei, Ōroua, Pohangina and Manawatū rivers and their tributaries. This geographic diversity contributes to the district's productive strengths, but also means that environmental conditions and risks can vary considerably across the district. The primary sector is a significant part of the district's economy and identity, with land, water, weather and environmental conditions directly affecting households, rural communities, businesses and the wider local economy.

In exercising its responsibilities for district planning, drinking water, wastewater, stormwater, local roads, emergency management, infrastructure strategy, asset management and long-term financial planning, MDC must assess how environmental conditions and natural hazards may affect communities, services and investment over several decades. These decisions must be evidence-based and publicly defensible, particularly where they create long-term costs for a provincial and substantially rural rating base.

The district is exposed to interconnected environmental pressures and states, including river and surface flooding, drought and water-security risk, projected changes in rainfall patterns and extreme rainfall, land-use pressures, freshwater health, pressures on indigenous biodiversity, and the resilience of rural and urban infrastructure.

MDC relies on its own operational information, scientific and hazard information held by Horizons Regional Council, and national environmental datasets and assessments. National reporting does not replace regional monitoring or location-specific evidence, but it provides a consistent national benchmark, offers context and data for trends and issues which are pan-regional in scale (e.g. climate change and external threats to indigenous biodiversity and agriculture), supports comparison of long-term trends across environmental domains, and strengthens public accountability for environmental change.

National environmental reporting is therefore an important supporting and accountability layer for MDC's Long-term Plans, infrastructure strategies, growth and land-use decisions, emergency preparedness and future climate adaptation planning.

## **Reporting Cycle and Transition**

Although ***Our Environment 2025*** provides a recent national whole-of-environment baseline, the Bill is proposed to commence on 1 May 2027 and the first state-of-the-environment report under the amended system would not be required until before 1 April 2031. This would create an interval of up to six years between integrated national assessments. During that period, significant planning, adaptation and institutional

reforms are being proposed and others are already being implemented. These include (but are not limited to) new legislation to replace the Resource Management Act 1991 (RMA), new national direction under the RMA, projects under the Fast-track Approvals Act 2024, changes to climate change legislation, changes to Emergency Management legislation, and the reform of local government itself (which could result in changes to the form and functions of regional councils).

Council's concern is not the absence of environmental evidence, but the risk that emerging and cumulative changes across environmental domains, including any effects arising during implementation of significant planning, development and institutional reforms, may not be brought together in a new, authoritative national synthesis at a sufficiently useful point in the reform cycle.

MDC recognises the case for a six-yearly full synthesis: a longer cycle may allow deeper cross-domain analysis, reduce repetitive reporting and lessen demands on central government agencies and data providers. It also acknowledges that the Parliamentary Commissioner for the Environment supported a six-yearly cycle in his 2022 submission because it largely reflected his 2019 recommendations. It is worth noting that those recommendations pre-dated the scale and pace of the current environmental, water services and local government reform programme.

The Commissioner's support however noted recommendations for a mandatory government response and action plan, core indicators prescribed in regulations and reviewed after three years, commentaries focused on materially changed information and emerging issues, and powers to actively collect data. Council therefore considers that the six-year cycle should be assessed as part of a complete package of safeguards, rather than in isolation.

On that basis, MDC does not oppose a six-yearly full state-of-the-environment report in principle. It considers the interval acceptable only if the Act also requires a comprehensive mid-cycle stocktake no later than three years after each full report, updating the core indicators and identifying material changes across all prescribed topics. This would retain the benefits of a deeper six-year synthesis while providing councils and the public with a regular integrated check on whether environmental conditions are materially changing.

### **Commentary reports and integrated reporting**

Council considers that annual commentary reports are a useful addition, but they are not a complete substitute for a current whole-of-environment synthesis. Commentary reports may be topic-specific, may span one or more domains, and need only ensure that each prescribed topic is covered once within each six-year period between state-of-the-environment reports. That approach may improve flexibility, but it does not guarantee the regular availability of a nationally integrated stocktake suitable for councils, communities, and infrastructure providers making strategic decisions across multiple environmental domains. Because the natural environment is interconnected, a commentary focused on one domain may miss changes in pressures or environmental states occurring elsewhere that are contributing to, or affected by, the issue being examined.

Council is also concerned that the proposed commentary framework may not provide sufficient assurance that rapidly changing environmental issues will be assessed and reported when conditions materially change. This is particularly relevant for environmental matters where significant changes may occur over relatively short periods, such as freshwater quality or air pollution events. While the underlying monitoring of these matters may continue more frequently, timely statutory reporting remains important because it brings that information together, interprets its significance and makes emerging trends visible to decision-makers and the public. Council therefore considers that the commentary programme should be sufficiently responsive to revisit prescribed topics where monitoring or other evidence indicates material change, rather than relying solely on the requirement that each topic be covered once during the six-year cycle.

Council also notes the Regulatory Impact Statement's own implementation risk that some environmental areas may be repeatedly overlooked because another issue is seen as more urgent. A requirement to cover each prescribed topic once within six years does not fully address that risk. It ensures eventual coverage, but not that information will be current when councils must make decisions or that changes across climate, freshwater, land, biodiversity and natural hazards will be assessed together.

### **Strategic Evidence Panel**

MDC requires more clarity about the governance design of the proposed Strategic Evidence Panel. The Bill describes the Panel as providing independent advice, but the Secretary sets the terms of reference, appoints members in consultation with the Minister, and may remove members for just cause. The Ministry also provides secretariat support. Council accepts that this model may be administratively workable but considers that the Bill should contain stronger safeguards if the Panel is to carry public confidence as an independent source of strategic advice. At present the Bill contains no express requirement to publish the Panel's advice, no requirement to publish the Secretary's response to that advice, and no explicit requirement for membership to include expertise from local government, climate adaptation, mātauranga Māori, or environmental statistics beyond the broad requirement that members collectively hold relevant expertise.

MDC notes that the Regulatory Impact Statement itself places considerable weight on the value of independent expert advice and on the need for a range and diversity of expertise. It also records that earlier respondents raised cost, resourcing and capacity concerns, particularly for local government and other environmental data holders. Those matters reinforce the importance of a transparent, balanced and trusted panel architecture.

Council considers that the Panel's independence should be demonstrated through its statutory design, not only through its description. The Act should require transparent appointment criteria, publication of the Panel's terms of reference and substantive advice, disclosure and management of conflicts, and a published response where the Secretary does not adopt a material recommendation. The Panel should collectively include expertise in environmental science, official statistics, climate adaptation, mātauranga

Māori, public health, environmental economics, infrastructure and the practical use of environmental evidence by local government. This need not make the Panel representative of sector interests; it would ensure its advice is informed by the systems that collect and use the data.

### **Data Collection, Standards and Indicator Continuity**

MDC also notes that the Bill strengthens the Secretary's role in setting indicators and standards but does not impose direct express duties on local authorities to provide data. While that limits the Bill's direct compliance burden on councils, it is likely to create practical expectations around data interoperability and timing. Council therefore considers that any national indicator-setting or standards-setting process that materially affects local-government-held data should involve meaningful consultation with local government and should be supported by realistic implementation pathways and funding arrangements where change is required.

New section 14B is especially relevant. It requires the Secretary to specify scientific environmental monitoring standards and methods, but unlike new section 14A, which expressly requires consultation with the Government Statistician before indicators are set, it does not expressly require consultation with councils, iwi, monitoring agencies or other affected data providers before standards and methods are introduced or materially changed. Council considers that this is a significant omission.

Council's concern is not that the proposed reporting cycle itself will increase costs for councils. The risk arises at implementation: new standards, methods or data specifications may require changes to monitoring programmes, systems, metadata, quality assurance or reporting timetables. Council acknowledges that the Planning Bill and Natural Environment Bill also contain monitoring and reporting requirements that may generate some of the information required under this Bill. However, those requirements are primarily directed at assessing the implementation and effectiveness of national direction, plans and environmental limits, and may not capture wider environmental trends, cumulative pressures or emerging issues.

The legislation should therefore require early consultation, transparent assessment of implementation implications, reasonable transition periods and appropriate funding where national requirements create material new costs.

Indicator continuity is equally important. The Bill does not expressly require a stable core set of indicators, reasons to be published when indicators change, parallel reporting when methods change, or preservation of comparability across reporting cycles. Without those safeguards, apparent changes in environmental condition may reflect a change in indicator or methodology rather than a real environmental trend.

This continuity will be particularly important if local government reform results in changes to regional council functions or structures. Regional councils hold long-running environmental datasets, monitoring programmes and specialist expertise, and any

transfer of responsibilities will need to preserve data stewardship, monitoring continuity and institutional knowledge.

### **Data and Evidence Priorities and Government Accountability**

Council supports the proposed Data and Evidence Priorities Report, but its value will depend on what follows. Under the Bill it must be produced within six months of each state-of-the-environment report, meaning it may operate on the same six-year cycle. The Bill does not require a government response, an implementation plan, named delivery agencies, funding decisions or public progress reporting.

The need to address these gaps is not new. The Parliamentary Commissioner for the Environment has previously identified significant gaps and inconsistencies in New Zealand's environmental information and the difficulties these create for understanding environmental change. The Data and Evidence Priorities Report provides an opportunity to systematically identify and prioritise those deficiencies.

The Regulatory Impact Statement and Cabinet material also acknowledge that the amendments will not fill all environmental data gaps, and that sustained investment will be required. Council is concerned that gaps could be repeatedly identified without a clear mechanism for addressing them. A formal government response should set out which priorities are accepted, how they will be progressed, who is responsible and how progress will be reported. This would preserve the independence of the evidence while ensuring accountability for the response.

### **Reporting Against Statutory Outcomes and Limits**

New sections 8(3) and 11(3) provide that reports may compare environmental findings with relevant policy outcomes, targets, limits or goals set in legislation. Council considers that reporting against applicable statutory limits and outcomes should be mandatory. A national reporting system intended to support environmental stewardship should not leave it entirely discretionary whether the public is told if legislated environmental requirements are being achieved.

Reports should distinguish binding statutory limits and outcomes from non-statutory government priorities. Where evidence permits, they should also describe the significant statutory, policy, investment or management responses already in place and the available evidence about whether those responses are influencing outcomes. This would complete the feedback loop without turning independent reporting into policy advocacy.

### **Independence of Environmental Reporting**

The Bill transfers sole responsibility for producing and publishing environmental reports to the Secretary, while the Government Statistician's role is narrowed to producing statistics and participating in specified consultations. It also removes the joint ministerial recommendation currently required for topic regulations. Council understands the

objective of clearer accountability but considers that the changes concentrate significant influence over reports, indicators, standards and topics in a single office.

Formal statistical assurance is important to maintain consistency, comparability, transparent methodology and public confidence, particularly where findings may be politically or economically contentious. Council therefore supports either retaining joint production or requiring the Government Statistician to publish an independent statistical assurance statement covering the statistics, methodologies, consistency and comparability used in each report.

### **Topic Regulations and Local Usefulness**

The scope of reporting will also depend heavily on the Environmental Reporting (Topics for Environmental Reports) Regulations. The Bill leaves those topics to regulations recommended by the Minister for the Environment, rather than jointly by the Environment and Statistics Ministers. Council considers that the regulations should be developed and amended through a transparent process involving the Government Statistician, the Strategic Evidence Panel, local government, iwi and relevant science and monitoring bodies. The evidence supporting topic selection should be published.

National-level reporting should also be capable of informing decisions below the national scale. National averages can obscure significant variation between regions and catchments. Indicators and underlying data should therefore be spatially disaggregated to regional, catchment or local scales where data quality and methodology permit, with clear explanations where this is not possible. Data should be provided in accessible, machine-readable and geospatially usable formats, with metadata, uncertainty statements and documentation of methodological changes.

### **Te Tiriti, Mātauranga Māori and Environmental Information**

The earlier consultation recorded support for stronger Māori participation, core Māori indicators, appropriate incorporation of mātauranga Māori and resourcing for participation. Council considers that the Strategic Evidence Panel should expressly include mātauranga Māori expertise and that iwi and hapū should be appropriately involved in developing relevant indicators, standards and methods. This involvement must protect culturally sensitive knowledge and respect appropriate Māori data sovereignty and governance.

### **Review of the Amended Framework**

Council considers that the amended reporting framework should be reviewed within three years of commencement. This would allow Parliament to assess whether the commentary reports are providing sufficiently current and integrated information, whether the indicator and monitoring-standard processes are working effectively, whether data-sharing

arrangements are adequate, and whether the Strategic Evidence Panel is operating independently and transparently.

An early review would be preferable to waiting until the first full six-year reporting cycle has been completed. It would not affect the Parliamentary Commissioner for the Environment's ability to examine the environmental reporting system independently under the Commissioner's existing functions.

## **Recommendation**

MDC recommends that the Committee amend the Bill to:

1. Retain the proposed six-year cycle for full state-of-the-environment reports only if the Bill also requires a comprehensive mid-cycle stocktake no later than three years after each full report, identifying material changes across all prescribed topics and updating the core environmental indicators. If that safeguard is not adopted, retain a three-yearly integrated reporting requirement. Council considers this mid-cycle stocktake a fundamental safeguard within the proposed six-year reporting model.
2. Strengthen the commentary reporting provisions by requiring a publicly available forward work programme, regular updating of material indicators and appropriate consideration of cumulative and cross-domain environmental effects. The framework should also provide for prescribed topics to be revisited where monitoring or other evidence indicates material or rapidly emerging environmental change. It should also preserve a stable core set of indicators and require transparent documentation of changes to indicators or methods so that environmental trends remain comparable over time.
3. Require environmental reports, where applicable, to assess progress against statutory environmental outcomes, targets and limits rather than leaving that assessment entirely discretionary. Reports should also, where evidence permits, describe significant existing responses and the available evidence of their effectiveness.
4. Require the Government to publish a formal response to each state-of-environment report and Data and Evidence Priorities Report, including the action proposed in response to significant findings and evidence gaps. The response should identify responsible agencies, implementation steps, funding implications and arrangements for public progress reporting.
5. Require meaningful consultation with local government, iwi and other affected data providers before environmental indicators, monitoring standards or methods are set, together with transparent assessment and appropriate funding of any significant implementation costs. This should include a statutory consultation requirement before monitoring standards, methods or topic regulations are made or materially amended, reasonable transition periods and protection of long-term data series.

6. Provide the Secretary with clear and proportionate powers and responsibilities to secure the data necessary to populate core environmental indicators, subject to statutory protections, consultation with affected data providers, transparent cost assessment and appropriate funding where new obligations arise.
7. Strengthen the role of the Government Statistician by retaining joint production of environmental reports or requiring the Government Statistician to publish an independent statistical assurance statement on the quality, methodology, consistency and comparability of each report.
8. Strengthen the independence and transparency of the Strategic Evidence Panel through clear appointment criteria, an appropriate range of expertise, publication of substantive advice and publication of the Secretary's response to that advice.
9. Ensure that environmental data and indicators are published, where practicable, at useful national, regional and catchment scales and in accessible formats that can be incorporated into local government planning, infrastructure and adaptation processes. Publication should include underlying data, metadata, uncertainty information and machine-readable and geospatial formats where practicable.
10. Provide appropriate mechanisms for iwi and hapū participation, mātauranga Māori expertise and Māori data governance within the environmental reporting system.
11. Request an independent statutory review of the amended reporting framework within three years of commencement, before the first complete six-year cycle has elapsed, while preserving the Parliamentary Commissioner for the Environment's existing independent oversight role.

## **Conclusion**

MDC supports the objective of improving the quality and usefulness of environmental reporting. Council does not oppose a six-yearly full synthesis in principle but considers that the framework must also provide a mandatory mid-cycle integrated stocktake and regularly updated core indicators. Greater flexibility, better indicators, stronger standards and more forward-looking analysis are worthwhile reforms. However, those improvements should not come at the expense of the currency, independence, comprehensiveness or practical usefulness of New Zealand's environmental evidence base.

The decisions facing councils are increasingly long-term and consequential. MDC must plan for infrastructure, growth, natural hazards, environmental management and climate adaptation while managing affordability pressures for a provincial and substantially rural community.

The national environmental reporting system must provide a sufficiently regular and authoritative foundation for those decisions. It should also ensure that significant environmental findings and evidence gaps lead to transparent consideration and accountability, rather than publication alone.

MDC asks the Committee to amend the Bill accordingly.

MDC does not wish to speak to this submission.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Ford', with a long, sweeping horizontal stroke extending to the right.

Michael Ford

**Mayor**

1 September 2026

Ministry of Business, Innovation and Employment  
Tourism and Hospitality  
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Tēnā koutou

**Feedback from the Manawatū District Council on the Investment Framework for Tourism**

The Manawatū District Council (MDC) thanks the Ministry of Business, Innovation and Employment (MBIE) for the opportunity to provide feedback on the proposed IVL Investment Framework for Tourism.

Manawatū District is not traditionally considered a high-tourism area; however, visitor activity has grown in recent years. The District's visitor offering includes rural touring experiences such as The Country Road, alongside walking and cycling experiences, including Te Araroa, Tour Aotearoa, mountain biking and other outdoor and nature-based activities associated with places such as Tōtara Reserve Regional Park and Ruahine Forest Park. The District's visitor economy is predominantly domestic, with domestic visitors accounting for approximately 87% of tourism expenditure (Infometrics, March 2026).

Feilding provides a focal point for visitors, while events and attractions across the wider rural District draw visitors into smaller communities and rural areas. These include agricultural events such as Central District Field Days, the Cross Hills Gardens Country Fair and Kimbolton Sculpture Festival.

While tourism is not on the scale experienced in some parts of New Zealand, growing and dispersed visitor activity creates demand for appropriate infrastructure and amenities. This includes roads and pathways that provide access to visitor destinations and experiences, as well as signage and wayfinding infrastructure that enables visitors to safely navigate the District. MDC therefore has an interest in ensuring the IVL investment framework recognises the infrastructure needs of emerging and developing visitor destinations, as well as areas already experiencing high levels of international tourism.

The following responses focus on those matters within the consultation document that are most relevant to MDC, particularly in its role as a provider of infrastructure and services that support visitor activity.

***Question 1: Are these objectives clear enough for discretionary tourism-related investment?***

MDC generally supports the proposed investment objectives. However, MDC requests clarification as to what is meant by “retain and enhance the social contract” under Objective 2, as it is not clear what outcome this is intended to achieve or how it would guide investment decisions.

The reference to “increased infrastructure capacity to attract and support visitors” under Objective 1 is of particular relevance to local authorities, given their role in providing much of the public infrastructure and amenities that support visitor activity. MDC therefore supports the recognition of infrastructure capacity within the investment objectives.

***Question 2: Do the proposed investment categories and sub-categories sufficiently support the stated framework objectives and assessment criteria?***

MDC broadly supports the proposed investment categories and sub-categories. In particular, MDC supports visitor-related infrastructure being identified as a distinct investment category.

MDC considers the proposed sub-categories appropriately recognise the range of infrastructure that supports visitor activity, including visitor facilities and amenities, transport and access infrastructure, and visitor and destination management infrastructure. For MDC, this includes roads and pathways that provide access to and support outdoor and nature-based visitor experiences, as well as signage and wayfinding infrastructure that enables visitors to safely navigate between destinations.

***Question 3: Is there enough information to understand what types of investments are likely to be supported? What additional information or guidance would you want to see?***

MDC considers that further guidance would be beneficial to help potential applicants understand the types of investments that are likely to be supported.

In particular, greater clarity is sought on how visitor-related infrastructure that provides benefits to both visitors and local communities would be considered. Many of the examples identified in the framework, such as public toilets and amenities, carparks, rest stops and trail networks, are mixed-use assets that support both residents and visitors. Similar questions may arise in relation to infrastructure supporting freedom camping, where facilities may serve visitors while also providing broader community benefits. The framework should make clear how the tourism-related benefits of these investments would be assessed and whether mixed-use infrastructure would be eligible for IVL funding.

MDC also considers that the framework should provide clarity on whether there are any expectations regarding user charges for IVL-funded infrastructure, particularly where infrastructure is also used by local communities. Care would be needed to ensure that

any such expectations do not result in local residents bearing additional costs for infrastructure investment driven primarily by visitor demand.

MDC also seeks clarification on what is meant by investment categories being areas where discretionary tourism-related funding could support a “strategic system shift”. It is not clear what this means for individual investment proposals, including whether local or regional infrastructure projects would need to demonstrate wider tourism system benefits to be eligible for funding. For example, MDC is considering the development of an adaptive mountain biking trail at Mt Lees Reserve. Projects of this nature illustrate the need for clear guidance on the eligibility of locally significant visitor infrastructure, particularly where infrastructure supports both tourism outcomes and recreational opportunities for the local community.

***Question 4: Which investment categories and specific types of investments do you think are most important for IVL investments to address immediate tourism needs?***

MDC considers visitor-related infrastructure to be an important priority for IVL investment in addressing immediate tourism system needs.

Local authorities provide and maintain much of the public infrastructure and amenities that support visitor activity, including public toilets, carparks, roads and pathways, signage and wayfinding, and recreational facilities. While this infrastructure also provides benefits to local communities, visitor activity can increase demand on these assets and create additional costs for councils.

For MDC, pathways are a significant visitor-related infrastructure cost, particularly given the District's outdoor and nature-based visitor offering. Signage and wayfinding can also involve significant establishment and ongoing maintenance costs, particularly where signage is required on or adjacent to the state highway network.

MDC considers that the costs associated with providing infrastructure to support tourism should not fall disproportionately on local authorities and their ratepayers. IVL investment provides an appropriate mechanism for international visitors to contribute towards the infrastructure that supports their experience and helps communities accommodate visitor activity.

***Question 5: Which investment categories and specific types of investments do you think are most important for IVL investments to prioritise on over the next five years, and why?***

MDC considers that visitor-related infrastructure should remain a priority for IVL investment over the next five years. As visitor numbers increase, investment will be required to ensure that infrastructure and amenities can continue to accommodate visitor demand and maintain a high-quality visitor experience.

Priority should be given to infrastructure where there is evidence of existing or reasonably foreseeable visitor demand and where visitor activity is placing, or is expected to place, additional pressure on local infrastructure and amenities. This should include consideration of emerging and regional destinations where patterns of visitor activity are changing.

Given the constrained fiscal environment facing both central government and local authorities, IVL investment should be targeted to areas of demonstrated need and where it can provide clear and enduring benefits.

***Question 6: Are these the right overall set of principles to guide tourism-related IVL investment decisions?***

MDC generally supports the proposed investment principles of strategic alignment, value for money, strategic impact, and partnership and deliverability.

MDC considers these principles provide an appropriate basis for assessing and prioritising IVL investments. However, further clarity is required regarding the practical application of the partnership and deliverability principle, particularly in relation to expectations for co-investment. This is addressed further in our response to Question 7.

***Question 7: Are any principles missing, duplicative or difficult to apply in practice? Where do we need to be clearer?***

MDC considers that further clarity is required regarding the application of the partnership and deliverability principle, particularly what constitutes “appropriate co-investment arrangements”.

The proposed framework should recognise the changing local government funding environment when considering co-investment. Councils are likely to face increasing constraints on their ability to co-invest in tourism-related initiatives as greater emphasis is placed on the delivery and funding of core services.

In its draft guidance on the proposed regulations for groups of activities, MCERT identifies tourism within the proposed “Other activities” group and states that this group is intended for activities that are not considered core services. This is significant in the context of the Local Government (System Improvements) Amendment Bill, which proposes a greater emphasis on core services in local authority decision-making and financial management. While this would not prevent councils from investing in tourism-related activities, it is likely to make securing local authority co-investment more difficult where tourism initiatives are competing for limited funding against core infrastructure and services.

The IVL Investment Framework should therefore avoid an assumption that local authority co-investment will necessarily be available for otherwise suitable visitor infrastructure projects. The assessment of what constitutes appropriate co-investment should recognise councils' financial circumstances, competing statutory obligations and infrastructure priorities, and the extent to which infrastructure demand is attributable to visitors.

MDC also seeks clarification regarding the “strategic impact” principle, which states that investments should generate significant and enduring system-wide benefits. It is unclear how this principle would be applied to visitor infrastructure projects that may provide significant benefits at a local or regional level but may not, individually, demonstrate system-wide benefits. MDC considers that otherwise suitable local or regional infrastructure projects should not be disadvantaged solely because their benefits are geographically concentrated.

**Question 8: What information would applicants need to support a transparent and clear submission process?**

MDC supports a transparent and clearly communicated submission process. Applicants should have access to clear information on investment priorities, eligibility requirements, assessment criteria, co-investment expectations, information requirements and key dates before committing resources to developing a proposal.

MDC also considers that further information is required on how the alternative investment pathways would operate, particularly the targeted invitation pathway. The framework indicates that targeted invitations may be used where a defined capability, location, mandate or partnership is required, but it is not clear how organisations would be identified or selected to submit proposals.

To support transparency and fairness, the framework should clearly set out the circumstances in which targeted invitations may be used, how potential applicants will be identified, and how proposals progressed through this pathway will be assessed relative to proposals received through the regular investment process.

MDC also considers there would be merit in exploring whether the IVL investment model should include a two-tier approach to funding for territorial authorities. This would consist of an annual allocation of funding to territorial authorities for smaller-scale visitor infrastructure and amenity needs, and a contestable fund for larger or more strategically significant investments. This could help ensure that IVL investment is distributed across a broader range of communities and visitor destinations, including emerging destinations that may be less likely to secure funding through a nationally contestable process.

**Question 9: Would an expression of interest process help applicants submit early-stage ideas?**

MDC supports the introduction of an expression of interest (EOI) stage as part of the annual IVL investment process.

An EOI process would provide applicants with an opportunity to test early-stage ideas against the Government's investment priorities before committing significant time and resources to developing a full proposal. This would be particularly beneficial for infrastructure proposals, which can require considerable work and investment to develop to a stage suitable for a full funding application.

To maximise the benefit of the EOI process, applicants would need sufficient information about the Government's investment priorities and assessment criteria, as outlined in our response to Question 8. The timeframe provided for preparing an EOI will also be important and is addressed in our response to Question 10.

**Question 10: What would be a reasonable timeframe for preparing an expression of interest or full proposal? Does this depend on the type of proposal (eg infrastructure vs workforce development)?**

MDC considers that the proposed timeframe for preparing an expression of interest (EOI) is too short, particularly for local authorities. The proposed process provides for investment priorities to be published in early July, with EOIs closing in late July. This

provides limited time for councils to identify suitable projects, coordinate across relevant teams and prepare an EOI.

A longer EOI period would be preferable. Alternatively, providing early indications of likely investment priorities, together with EOI templates and guidance ahead of the formal opening of the process, would enable potential applicants to undertake some preparatory work.

The timing of final funding decisions also creates practical difficulties where an IVL proposal requires local authority co-investment. The proposed process provides for funding outcomes to be announced post-Budget and before 1 July. This coincides with the period in which councils are finalising and adopting their Long-term Plans or Annual Plans, which must be adopted by 30 June.

Where Council co-investment is required, councils need sufficient certainty about the availability and level of IVL funding for any Council contribution to be considered through their statutory planning and budgeting processes. MDC recommends that the investment process recognise local government planning cycles and, where local authority co-investment is required, provide funding decisions or sufficient funding certainty early enough to inform those processes.

## **Recommendations**

Manawatū District Council recommends that MBIE:

1. Clarifies what is meant by “retain and enhance the social contract” within Objective 2.
2. Provides further guidance on the eligibility and assessment of mixed-use visitor infrastructure that benefits both visitors and local communities.
3. Clarifies what is meant by a “strategic system shift”, including how local and regional infrastructure proposals will be considered.
4. Prioritises visitor-related infrastructure, including pathways, signage and wayfinding infrastructure, where visitor activity is creating, or is reasonably expected to create, additional demand on local infrastructure and amenities.
5. Ensures the assessment of “appropriate co-investment arrangements” recognises the financial constraints facing local authorities and does not assume that local authority co-investment will necessarily be available.
6. Clarifies how the “system-wide benefits” requirement will apply to otherwise suitable local or regional infrastructure projects whose benefits may be geographically concentrated.
7. Provides greater transparency around alternative investment pathways, particularly the circumstances and criteria for targeted invitations.
8. Explores a two-tier IVL funding model that provides territorial authorities with access to an annual funding allocation for smaller-scale visitor infrastructure needs, alongside a contestable fund for larger or strategically significant investments.

9. Introduces an EOI process that enables applicants to test early-stage proposals before committing significant resources to a full proposal.
10. Provides applicants with sufficient advance information, guidance and time to prepare EOIs, including early indications of likely investment priorities where possible.
11. Aligns the IVL investment process with local government planning and budgeting cycles, including providing sufficient funding certainty to inform those processes where local authority co-investment is required.

MDC again thanks MBIE for the opportunity to provide feedback on the IVL Investment Framework for Tourism.

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

**Mayor**

11/09/2026

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Tēnā koutou,

**Feedback from the Manawatū District Council on the National Engineering Design Standards Proposal Document**

The Manawatū District Council (MDC) thanks the Water Services Authority Taumata Arowai for the opportunity to provide feedback on the proposed National Engineering Design Standards Framework (NEDS).

The case for change presented in the proposal document is that the current use of different engineering standards by councils has resulted in a fragmented system, with inconsistent requirements across the country. The proposed NEDS seek to address this through a nationally consistent framework intended to make the planning, design, approval and construction of water infrastructure more efficient and cost-effective.

MDC supports the objective of improving consistency where this can reduce unnecessary duplication, cost and uncertainty. However, MDC does not consider that the existence of local variation in engineering standards is, in itself, evidence of a problem that requires those standards to be replaced by a new national code-based framework. Local requirements can be appropriate and necessary to reflect the capacity, operation, maintenance and resilience needs of the receiving network.

MDC's Engineering Standards for Land Development, like those of many councils, are based on the existing national standard NZS4404:2010. MDC considers that, before establishing a new national code-based framework, the Authority should consider whether the simpler and more cost-effective approach would be to review and update NZS4404:2010 and use this as the national baseline for water infrastructure design. This would provide a common national foundation while continuing to allow provider-specific requirements where these are necessary to respond to network or local conditions.

MDC has also considered the submission prepared by Water New Zealand and supports a number of the principles and recommendations it contains. In particular, MDC agrees

that the NEDS framework needs to retain sufficient flexibility to accommodate legitimate local conditions, affordability, innovation and resilience, and that Codes of Practice need to be practical and workable across the range of provider and network contexts. MDC also supports Water New Zealand's emphasis on proportionality, affordability and whole-of-life value, and the need for representative sector involvement as the detailed requirements and Codes of Practice are developed and tested.

MDC's position differs from Water New Zealand in the level of support for the proposed NEDS framework. Water New Zealand supports the proposed framework as a sound foundation for achieving greater national consistency. MDC is more cautious and considers that the case for replacing established local engineering standards with an extensive new national code-based system has not yet been demonstrated. MDC also takes a different view on the role of national Codes of Practice and the assessment of alternative solutions. These differences are explained further in this submission.

MDC is concerned that an outcomes-based framework supported by national deemed-to-comply codes could create unintended complexity. While the proposed performance standards are intended to allow flexibility and innovation, experience with other outcomes-based regulatory frameworks demonstrates the potential for different interpretations and for deemed-to-comply pathways to become the default in practice. The NEDS framework therefore needs to ensure that appropriate local standards and alternative solutions remain genuinely viable and are not subject to disproportionate evidential, approval or liability requirements.

A further concern is that, although the proposed national codes of practice would be optional, a nationally published deemed-to-comply pathway could become the default benchmark used by designers, reviewers, insurers and auditors. Alternative solutions may then carry additional design, evidence, approval and liability costs. This could make an optional code effectively mandatory in practice and discourage proportionate, innovative or locally appropriate solutions.

If the Authority proceeds with national codes of practice, MDC considers that they should be limited, modular and clearly subordinate to the mandatory performance requirements. They should operate as non-exclusive means of demonstrating compliance. Water service providers should retain the ability to specify additional or alternative requirements where these are reasonably necessary to respond to receiving network or local conditions, provided these are consistent with the mandatory NEDS requirements.

## **Responses to individual questions**

- 1. The overall NEDS framework.** *Is the proposed NEDS framework clear, practical and useable for the sector? What would make it more practical?*

The three-layer concept is understandable, but MDC considers that further work is required to ensure the framework is practical and workable for water service providers. The relationship between mandatory performance standards, national codes of practice, local engineering standards and other provider-specific requirements, and alternative solutions needs to be much clearer.

The framework should explicitly recognise the ability of water service providers to respond to legitimate network and local conditions within the national compliance system. Local requirements remain necessary because connection and vesting decisions directly affect the capacity, operation, maintenance, resilience and future cost of the receiving network.

MDC also supports Water New Zealand's recommendation to establish a mechanism for sharing approved alternative solutions and supporting evidence where these have wider applicability, including to inform future updates to the national Codes. This could reduce duplication and assessment costs while supporting innovation across the sector. MDC considers that shared solutions should remain guidance rather than becoming prescribed standards, with providers retaining the ability to determine their suitability for local circumstances.

To make the framework practical, MDC recommends that the Authority do the following:

- a) express the mandatory layer as a limited set of measurable performance requirements and test methods, rather than detailed design rules;
- b) recognise the ability of water service providers to specify additional or alternative requirements where these are reasonably necessary to address receiving network capacity, configuration, operational requirements, local hazards or other relevant local conditions, provided these are consistent with the mandatory NEDS requirements;
- c) ensure a national code pathway has no legal or administrative preference over an approved local or project-specific solution;
- d) publish a simple and nationally consistent process for assessing alternatives, including decision timeframes and proportionate evidence requirements;
- e) distinguish clearly between requirements for new assets and triggers applying to repairs, maintenance, renewals and upgrades of existing assets;
- f) establish a mechanism for sharing approved alternative solutions and supporting evidence where these have wider applicability;

- g) coordinate requirements with water services bylaws, Water Services Strategies, drinking water rules, environmental performance standards, resource consent conditions, planning requirements and FENZ responsibilities; and
- h) provide implementation funding, training, digital tools and an adequate transition period, particularly for smaller providers.

*Do you think this framework will be enduring as the Authority regularly reviews, updates and adds to the standards and codes of practice over time?*

MDC considers that the framework could be enduring if it remains genuinely outcomes-based and is founded on stable principles. However, a growing library of detailed codes risks becoming increasingly complex to navigate, maintain and keep internally consistent. Frequent changes to national requirements could also impose repeated costs on council bylaws, specifications, procurement documents, digital systems, staff training, consultants and development agreements.

An enduring framework therefore needs formal change control and versioning, regulatory impact and whole-of-life cost assessment, sector consultation, and appropriate minimum transition periods. Requirements should not change simply because preferred technical practice changes. Changes to the mandatory layer should be evidence-based and respond to an identified material risk or demonstrable system-wide benefit.

**2. Common Objectives.** *Do you think the proposed common objectives capture the most important outcomes that water infrastructure must support?*

The seven objectives broadly capture the core technical outcomes. MDC supports them as a starting point, provided they remain high-level and are applied in a risk-based way. 'Context suitability and network integration' should explicitly recognise the receiving network's capacity, existing configuration, operational practices, maintainability, local hazards and planned level of service.

*Are there other objectives you think should be included in the NEDS?*

Yes. MDC recommends that a specific objective be added for proportionality, affordability and whole-of-life value. Suggested wording is:

**Proportionality, affordability and whole-of-life value** - Requirements and compliance evidence are proportionate to the scale, risk, function, service level and local context of the infrastructure, and support the most efficient whole-of-life outcome for customers and communities.

This should be a substantive decision criterion, not only explanatory guidance. It is particularly important for smaller and constrained schemes. For example, a national requirement relating to firefighting flow and pressure could require substantial upgrades in a network such as Sanson. The relationship between firefighting service expectations, water service provider responsibilities and funding responsibilities needs to be clearly resolved and should not be transferred into drinking water standards without explicit policy, affordability and proportionality analysis.

MDC made a submission on Standards New Zealand's consultation on DZ PAS 4509:202X – Firefighting Water Supplies – Code of Practice. A copy of this submission is attached for your information. This submission raises proportionality concerns and seeks the inclusion of flexible, site-specific solutions for achieving firefighting water supply outcomes, particularly in rural and non-reticulated areas. It is not clear from the proposal document how the NEDS fits with this proposed Code of Practice.

MDC also supports Water New Zealand's recommendation that asset criticality and the risk being managed should inform the development of mandatory performance requirements. The level of performance required should be proportionate to the risk and consequences of asset failure, including consideration of whether different minimum requirements are appropriate for different risk or criticality profiles.

MDC supports Objective 4 (Lifecycle performance and asset integrity), including its explicit recognition of maintainability and operability. MDC considers that, when this objective is translated into performance requirements, it should ensure that whole-of-life operational and maintenance needs are considered at the design and acceptance stages. This should include matters such as safe access, compatibility with the provider's operating model, the ability to isolate and maintain assets, and appropriate supporting asset information, manuals, telemetry and availability of spares.

**3. Codes of Practice.** *Should codes of practice be structured by component, lifecycle activity, or both?*

MDC considers that, before determining how individual codes of practice should be structured, the Authority should first determine which matters genuinely benefit from national standardisation and which are better addressed through local engineering standards and professional judgement.

For those matters where a national code of practice is appropriate, MDC considers that a modular, component-led structure is likely to be easier for day-to-day design and review, supported by a small number of cross-cutting lifecycle modules for matters such as commissioning, handover, asset data, operation, maintenance and decommissioning. This would avoid unnecessary duplication across separate lifecycle chapters while recognising that some requirements apply across multiple infrastructure components.

MDC also supports Water New Zealand's recommendation that proportionality, affordability and whole-of-life value be considered when determining the technical requirements contained in the codes of practice. The level of specification should be proportionate to the performance outcome being sought, particularly where different design approaches can achieve the required outcome at materially different cost.

Codes of practice should remain focused on providing practical pathways for demonstrating compliance with the mandatory performance requirements and should not develop into exhaustive national design manuals.

*Does the proposed structure reflect how sector users apply compliance pathways?*

Only partly. Designers and reviewers commonly work by asset or component, while operators and asset managers work across lifecycle activities. The more important practical issue is that providers approve connections and accept vested assets into existing networks. They need to assess network effects, operational compatibility, access, future renewal and local service constraints, not merely whether a component matches a national detail.

MDC considers that national standardisation is likely to provide the greatest value in areas such as common definitions, asset data fields, as-built information, commissioning evidence, handover requirements, performance test methods and standard drawing conventions. Detailed sizing, configuration, material selection and local hydraulic or stormwater design may require greater flexibility to reflect receiving network conditions and should remain subject to provider-specific requirements where these are necessary to achieve the mandatory performance requirements.

Any code should state clearly that:

- a) it is one non-exclusive means of demonstrating compliance;
- b) water service providers retain the ability to specify additional or alternative requirements where these are reasonably necessary to address receiving network capacity, configuration, operational requirements, local hazards or other relevant local conditions, provided these are consistent with the mandatory NEDS requirements;

- c) no adverse inference arises merely because a national code is not used;
- d) alternative solutions are assessed against the mandatory performance requirements, rather than against the detailed solution contained in the code; and
- e) evidence requirements are risk-based, proportionate and comparable across compliance pathways.

**4. The Prioritisation Approach.** *Do you think the two prioritisation questions capture the most important things we should consider when prioritising the first set of NEDS? Is there anything else we should consider?*

They are relevant but incomplete. “Would national direction make a material difference?” should require evidence that local variation is causing a material problem, rather than treating variation itself as a problem. “How quickly can the area be standardised and codified?” risks favouring topics that are easy to codify rather than those where national standardisation would deliver the greatest benefit.

MDC’s position is consistent with Water New Zealand’s view that the expected material benefit of national standardisation should be given greater weight than how readily an area can be codified. MDC also supports Water New Zealand’s recommendation that the scale and frequency with which requirements are applied should inform the assessment of material benefit, and that dependencies between different areas of NEDS should inform the sequencing of development.

The prioritisation assessment should also consider:

- a) the net whole-of-life benefit after implementation, transition, assurance and alternative-solution costs;
- b) whether national intervention is the least-cost and least-restrictive response to the identified problem;
- c) the need for local variation due to geography, climate, hazards, network configuration, receiving environments and service levels;
- d) the effect on affordability for small communities and constrained schemes;
- e) interaction with existing regulation, consent conditions, standards and provider accountabilities;
- f) technical maturity, evidence quality and the risk of locking in a preferred solution or inhibiting innovation;
- g) provider capability, workforce and digital-system impacts;
- h) whether the proposed requirement can be objectively tested and audited;

- i) the scale and frequency with which the requirement is applied; and
- j) dependencies between different areas of NEDS that may affect the appropriate sequencing of development.

*Looking at the full lifecycle of water supply, wastewater and stormwater infrastructure (from design and construction through to operation, maintenance and decommissioning), what are the areas where you currently see the most challenges and inefficiencies?*

MDC considers that the most significant lifecycle challenges and inefficiencies are:

- a) incomplete or inconsistent as-built records, asset attributes and geospatial data;
- b) variable commissioning, testing, defect close-out and handover information;
- c) assets designed without sufficient consideration of whole-of-life operational and maintenance requirements, including safe access, isolation and future renewal;
- d) unclear and inconsistent evidence requirements for alternative solutions;
- e) poor integration between new development infrastructure and the capacity or operating constraints of existing networks;
- f) uncertainty about how new requirements apply to existing assets, including at the point of maintenance, renewal or upgrade; and
- g) duplication or conflict between regulatory instruments, consent requirements and provider standards.

*Which areas do you think would benefit most from having a consistent national standard and code of practice?*

MDC considers that the first tranche should focus on nationally useful interfaces, information and evidence requirements where consistency can deliver clear benefits, before moving into more detailed areas of engineering design where local context may be more significant.

| Priority      | MDC view                                                                                                                                                                                              |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High priority | Common asset data definitions and minimum attributes; as-built and geospatial formats; commissioning and acceptance evidence; handover information; common terminology; and performance test methods. |

| Priority                                        | MDC view                                                                                                                                                                                                                                                      |
|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Selective priority</b>                       | Outcome-based requirements for resilience, failure containment, safe access, isolation, whole-of-life operability and maintainability, network integration and monitoring, where national benchmarks can accommodate local risk, network and service context. |
| <b>Lower priority for national codification</b> | Detailed network sizing, local firefighting capacity, prescriptive materials or products, standard physical configurations, and detailed stormwater or hydraulic design where local context and receiving-network conditions are decisive.                    |

## **Additional matters**

### **Existing infrastructure and compliance triggers**

MDC requests that the Authority clearly define how NEDS will apply to the maintenance, repair, renewal, upgrade and replacement of existing water services infrastructure. In particular, the framework should specify when work on an existing asset triggers a requirement to meet current NEDS requirements, and the extent to which any resulting obligation applies beyond the asset or component being worked on.

MDC would strongly oppose routine maintenance or minor works triggering disproportionate upgrades to existing infrastructure or connected networks. Compliance triggers should be risk-based and proportionate, take account of affordability and the remaining life and condition of existing assets, and provide for staged implementation where appropriate. These triggers should be subject to specific consultation before being finalised.

### **Water services bylaws**

The proposal states that councils must implement water services bylaws setting out the process for inspection and approval. MDC is already reviewing its water services bylaws in response to the new requirements of the Local Government (Water Services) Act 2025 (“the Act”). Territorial authorities must complete their initial review of water services bylaws for consistency with the requirements of the Act no later than 27 August 2027 (s263 of the Act), with any amended or replacement bylaw made no later than 27 August 2030. MDC has already drafted amendments to its Trade Waste Bylaw and will be consulting on these amendments, along with its draft Trade Waste Discharge Plan, in March 2027.

MDC understands that statutory consultation on NEDS is scheduled for mid-2027, with a transition period during 2028/29. This creates a sequencing issue given the statutory timeframe for councils to undertake their initial review of existing water services bylaws.

MDC requests that the Authority provide clear guidance on how councils should take the developing NEDS into account when undertaking their initial bylaw reviews, and clarify the relationship between NEDS and the inspection, connection and approval provisions that will need to be included in water services bylaws. Model provisions and appropriate sequencing and transition arrangements should be provided sufficiently early to inform councils' bylaw work. Requirements confirmed too late could result in councils and water organisations having to revisit and amend bylaws shortly after completing statutory reviews or adopting replacement bylaws.

### **Administration and assurance**

The proposal states that water service providers will administer the new arrangements. For councils such as MDC that continue to deliver water services through an in-house business unit, the practical implications of this role need to be clarified.

MDC requests that the Authority clarify how in-house water service providers will be expected to demonstrate compliance for their own infrastructure works, including what verification or independent assurance will be required, how any potential conflicts between compliance and infrastructure owner/operator functions should be managed, and what compliance information must be provided to the Authority.

Any assurance requirements should be proportionate to the nature and risk of the work and should avoid imposing unnecessary additional processes or costs on in-house providers.

### **Technical representation**

The proposal notes that a technical reference group will provide specialist advice as the NEDS are developed. MDC considers that the technical reference group should include representation from small and medium-sized councils, rural and mixed networks, operators and asset managers with appropriate expertise covering drinking water, wastewater and stormwater, alongside other sector expertise. This will help ensure that the NEDS are practical and proportionate across different provider scales, network types and operating environments. This is consistent with Water New Zealand's recommendation that the Codes be developed and tested with a representative cross-section of the sector to ensure they are workable across different provider and network contexts.

MDC wishes to register its interest in participating in relevant technical workstreams as the NEDS are developed.

## **Water Services Strategies and investment planning**

MDC understands that the NEDS are expected to have a transition period during 2028/29, before moving into a steady-state system from 2030/31. This creates a significant sequencing issue for water service providers that must adopt their first Water Services Strategies by 30 June 2027, before the detailed NEDS requirements and their potential cost implications are known.

MDC requests that the Authority provide guidance on the assumptions providers should make about NEDS when preparing Water Services Strategies and associated investment programmes before the detailed requirements are finalised. The Authority should also clarify how subsequent NEDS requirements are expected to be incorporated into adopted investment programmes, particularly where compliance would require additional or accelerated capital expenditure.

Implementation arrangements should recognise existing investment commitments and provide sufficient flexibility and transition time to avoid undermining affordability or requiring significant reprioritisation of adopted programmes.

### **Cost-savings claims**

The proposal document includes estimates of potential OPEX and CAPEX savings over the lifecycle of water services infrastructure. MDC requests independent validation of these forecast savings and disclosure of the assumptions and evidence underlying the estimates. As noted in Water New Zealand's submission, the technical requirements ultimately adopted through NEDS will themselves have direct implications for infrastructure costs.

Any assessment of the net benefits of NEDS should account for the full costs of implementation, including bylaw and specification changes, training, systems, assurance and verification requirements, assessment of alternative solutions, transition costs, and any additional investment in existing infrastructure that may be triggered through renewal, upgrade or other compliance requirements.

The assessment should also consider how costs and benefits are distributed across different provider types and network sizes, including small and medium-sized providers and constrained schemes.

## **Liability and decision rights**

MDC requests that the Authority clarify how liability will be allocated under the proposed NEDS framework, particularly where a water service provider approves or accepts an asset that has been designed and constructed in accordance with a national codes of practice but subsequently proves to be defective or fails to perform as expected. The liability implications of approving alternative solutions should also be made clear, so that providers are not inadvertently incentivised to favour the national code pathway because it is perceived to carry less risk.

The NEDS framework should also preserve the ability of water service providers to decline or condition connection or vesting where there are legitimate concerns about receiving network capacity, operational compatibility, maintainability or whole-of-life risk, even where an individual asset otherwise complies with the national performance requirements or a code of practice.

More generally, liability settings should appropriately reflect the respective responsibilities of designers, constructors, developers, water service providers and other relevant parties under the NEDS framework.

## **Recommendations**

Manawatū District Council recommends:

1. That the Authority consider whether reviewing and updating NZS4404:2010 could provide a simpler and more cost-effective national baseline for relevant aspects of water infrastructure design before developing an extensive new suite of national codes of practice.
2. That the NEDS framework allow water service providers to specify additional or alternative requirements where reasonably necessary to address receiving network capacity, configuration, operational requirements, local hazards or other relevant local conditions, provided these are consistent with the mandatory NEDS requirements.
3. That national codes of practice operate as non-exclusive means of demonstrating compliance, with alternative solutions assessed against the mandatory performance requirements rather than against the detailed solutions contained in national codes, and without disproportionate evidence, administrative or liability requirements.
4. That the Authority establish a mechanism for sharing approved alternative solutions and supporting evidence where these have wider applicability, including to inform future updates to the national codes, while ensuring that shared solutions remain guidance rather than prescribed standards.
5. That proportionality, affordability and whole-of-life value be included as a common NEDS objective, so that requirements and compliance evidence are proportionate to scale, risk, function, service level and local context. These considerations should inform the technical requirements contained in the codes

of practice, with mandatory performance requirements also taking account of the risk being managed and asset criticality, including whether different minimum requirements are appropriate for different risk or criticality profiles.

6. That the performance requirements developed under Objective 4 ensure that whole-of-life operational and maintenance needs are considered at the design and acceptance stages, including safe access, isolation, compatibility with provider operating practices and appropriate supporting asset information.
7. That the Authority expand its proposed prioritisation assessment to consider evidence of material problems arising from current variation, net whole-of-life benefit, proportionality and affordability, the need for local variation, interaction with existing requirements, technical maturity and implementation impacts, rather than prioritising areas primarily because they can readily be standardised.
8. That the first tranche of NEDS prioritise areas where national consistency can provide clear value, including common asset data and as-built information, commissioning and acceptance evidence, handover requirements, terminology and performance test methods, before detailed design matters where local network and site context may require greater flexibility.
9. That the Authority clearly define when maintenance, repair, renewal, upgrade or replacement of existing infrastructure triggers compliance with current NEDS requirements, with triggers that are risk-based, proportionate and affordable and do not result in routine maintenance or minor works requiring disproportionate upgrades to existing assets or networks.
10. That the Authority provide early guidance, model provisions and appropriate transition arrangements explaining how NEDS should be reflected in water services bylaws, enabling councils to meet their statutory bylaw review obligations without unnecessary duplication or subsequent rework.
11. That the Authority clarify how in-house water service providers will demonstrate compliance, including verification or independent assurance requirements, management of potential conflicts and information requirements, with assurance requirements proportionate to the nature and risk of the work.
12. That the Authority provide early guidance on the assumptions water service providers should make about NEDS in Water Services Strategies adopted before the standards are finalised, and provide transition arrangements that allow subsequent NEDS requirements and costs to be incorporated into adopted investment programmes in an affordable and orderly manner.
13. That the Authority independently validate the forecast OPEX and CAPEX savings from NEDS and publish the underlying assumptions and evidence, taking account of the full implementation and transition costs and the distribution of costs and benefits across different provider and network types.
14. That the Authority clarify liability allocation under NEDS, ensure that alternative compliance pathways do not create disproportionate liability for water service providers, and preserve providers' ability to decline or condition connection or vesting where receiving-network, operational or whole-of-life risks are unacceptable.

15. That the Authority clarify how NEDS will interact with PAS 4509 and other firefighting water supply requirements, including the respective responsibilities of water service providers and other parties, and ensure that any firefighting requirements applied through NEDS are subject to explicit affordability and proportionality assessment and allow appropriate site-specific solutions.
16. That the Authority ensure the NEDS and codes of practice are developed and tested with a representative cross-section of the sector, including small and medium-sized councils, rural and mixed networks, and operators and asset managers with appropriate expertise covering drinking water, wastewater and stormwater.

### **Closing Matters**

Manawatū District Council supports greater national consistency where it can demonstrably reduce unnecessary duplication, cost and uncertainty. MDC considers that the NEDS framework should focus national standardisation where it will deliver clear benefits, while retaining sufficient flexibility for water service providers to respond to receiving network conditions, local risks and operational requirements. The framework should be proportionate, affordable and focused on achieving efficient whole-of-life outcomes.

MDC thanks the Authority for the opportunity to provide feedback and welcomes the opportunity to participate in further consultation and relevant technical work as the NEDS are developed.

MDC agrees to this submission being made publicly available.

Yours sincerely,



Lyn Daly

**Acting Chief Executive**

### **Attachments:**

- Submission from the Manawatū District Council on DZ PAS 4509:202X Firefighting Water Supplies – Code of Practice

18 September 2026

Committee Secretariat  
Governance and Administration Committee  
Parliament Buildings  
WELLINGTON 6143

Dear Sir/Madam

**Submission from the Manawātū District Council on the Local Government (Management of Local Authorities) Amendment Bill**

Thank you for the opportunity to make a submission on the Local Government (Management of Local Authorities) Amendment Bill.

**Introduction**

The Manawātū District Council (Council) supports the draft submission from Taituarā below, and its recommendation that the Bill **does not** proceed:

- Submission of Taituarā – Local Government Professionals Aotearoa regarding the Local Government (Management of Local Authorities) Amendment Bill

Council recognises the importance of elected members having appropriate access to information and advice and of chief executives and council staff being accountable for implementing the decisions and direction of the governing body. However, Council considers that the Bill creates unnecessary uncertainty around the established distinction between governance and management.

**Governance and Management**

Effective local government depends on a clear and constructive relationship between elected members, who are responsible and democratically accountable for governance and decision-making, and the chief executive, who is responsible for managing the organisation and implementation of Council decisions.

Council is concerned that the proposed powers for a governing body to direct and supervise the chief executive's management of the local authority could blur this distinction and encourage governing bodies to become involved in operational matters.

This is particularly concerning where chief executives or other officers exercise statutory or regulatory functions that are intended to be performed independently and impartially. The legal advice obtained by LGNZ and Taituarā identifies uncertainty about how the proposed direction and supervision powers would interact with these functions and with powers already delegated to the chief executive.

## Independent Advice

Council also shares Taituarā's concerns regarding proposed section 42(3B), which provides for individual elected members to obtain advice from persons other than the chief executive.

Council supports elected members having access to appropriate information and independent advice where required. However, the Bill does not adequately address how independently commissioned advice would be authorised, funded, shared with other elected members, or managed where multiple members seek separate advice on the same matter. These uncertainties could create significant governance, financial and legal risks for councils.

Council therefore supports Taituarā's recommendation that proposed section 42(3B) be deleted. If it is retained, Council supports appropriate safeguards requiring independent advice to be commissioned by the governing body as a whole (in place of individual elected members) and managed within an approved and transparent budget.

## Conclusion

Manawatū District Council recommends that the Bill **does not** proceed.

If the Committee nevertheless recommends that the Bill proceed, Council supports the amendments and safeguards proposed in the Taituarā submission, including:

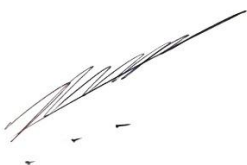
- Clarifying that the governing body's direction and supervision powers are subject to the Local Government Act 2002, other enactments and the general law.
- Maintaining and clarifying the chief executive's independence in relation to the employment of staff and organisational structure.
- Appropriately addressing the health and safety responsibilities and liabilities associated with increased governing body direction of management.
- Deleting proposed section 42(3B) or alternatively restricting the commissioning of independent advice to the governing body and requiring appropriate budgetary controls.

Council considers that these amendments would reduce, although not eliminate, the governance, legal and financial risks created by the Bill.

The Manawatū District Council does not wish to be heard in support of this submission.

Please feel free to contact our Governance and Assurance Manager ([Ash.Garstang@mdc.govt.nz](mailto:Ash.Garstang@mdc.govt.nz)) if you have any questions or concerns about this submission.

Yours sincerely



Michael Ford

**Mayor**