

Lower Clutha/Mata-Au and Lower Taieri Flood Protection and Drainage Scheme Rating Model Review - Hearings Report

October 2026

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1 Introduction

Otago Regional Council (ORC) issued a Statement of Proposal (the Proposal) for the Lower Clutha/Mata-Au and Lower Taieri Flood Protection and Drainage Scheme Rating Model Review (the Model Review) for public consultation on 29 July 2026. The consultation sought feedback on proposed changes to the rating models for the Lower Clutha/Mata-Au and Lower Taieri Flood Protection and Drainage Schemes.

For clarity, the Lower Taieri schemes comprise the Lower Taieri Flood Protection Scheme, the West Taieri Drainage Scheme and the East Taieri Drainage Scheme. The Lower Clutha/Mata-Au Scheme combines flood protection and drainage. In this report, "Lower Taieri schemes" refers collectively to the three Lower Taieri schemes, the "Lower Clutha/Mata-Au scheme" refers to that combined flood protection and drainage scheme, while "both scheme areas" refers collectively to the Lower Taieri schemes and Lower Clutha/Mata-Au scheme areas.

The Proposal seeks to provide a clearer, more transparent and more defensible approach to allocating targeted scheme costs. It proposes a differential targeted rating model that allocates flood protection costs according to the level of benefit received and drainage costs according to land area and land-use/exacerbator factors.

It also proposes changes to the rating boundaries for both scheme areas. The detailed proposal, including the methodology, proposed boundary changes and indicative rates impacts, is set out in the Proposal¹.

Consultation is being undertaken using the Special Consultative Procedure under the Local Government Act 2002. Consultation opened on 10 August 2026 and closed at 11.59pm on 25 September 2026.

This report has been prepared following consultation on the Proposal to assist the Hearings Panel by providing:

- an outline of the purpose and scope of the Model Review
- a summary of the consultation and engagement undertaken
- an overview of submissions received
- a summary and analysis of responses to the consultation questions
- officer responses to the matters raised in submissions
- officer recommendations on any proposed changes or further work arising from submissions.

The report is intended to be read alongside the Proposal, the full submissions and other consultation material. It is intended to assist the Hearings Panel in considering the submissions and making recommendations to Council on the proposed rating model.

2 Background

2.1 Purpose of the review

The purpose of the review is to develop a clearer, more transparent and more defensible approach to allocating the targeted rates used to fund the Lower Clutha/Mata-Au scheme and the Lower Taieri schemes.

¹

<https://www.orc.govt.nz/media/xqcfx1f2/flood-and-drainage-rating-model-review-statement-of-proposal-updated-sep-9-2026.pdf>

The current rating models have evolved over many years and include historical arrangements and cost allocations that can be difficult to explain and do not always clearly reflect the level of benefit received by properties or the demand different land uses place on drainage infrastructure.

The Model Review is intended to:

- develop rating model options that are transparent and easy to understand
- balance technical fairness with simplicity and administrative efficiency
- provide robust documentation to support Council decision-making and future implementation
- provide a clear basis for inclusion of the preferred rating model in the Long Term Plan.

The review is focused on how targeted scheme costs are allocated among ratepayers. It does not propose changes to the current proportion of scheme costs funded through general and targeted rates.

2.2 Proposal consulted on

Council consulted on replacing the current targeted rating allocation models for the Lower Clutha/Mata-Au scheme and the Lower Taieri schemes with preferred **Option 4**, being a differential targeted rating model based on the benefits properties receive from flood protection and the demand properties place on drainage infrastructure and being the preferred model (Preferred Model).

Under the Preferred Model:

- flood protection costs would be allocated using benefit zones identified through flood modelling, with targeted rates based on capital value and adjusted according to the level of protection received;
- drainage costs would be allocated based on land area, adjusted using land-use/exacerbator factors to reflect relative runoff and demand on the drainage network;
- rating boundaries would be amended to better reflect properties that receive benefit from, or place demand on, the schemes.

The Preferred Model approach was selected following consideration of a range of rating options and engagement with the Lower Clutha and Lower Taieri Flood Protection and Drainage Scheme Liaison Groups. The Proposal provides the detailed methodology, proposed boundaries and indicative property-level rates impacts.

2.3 Scope of consultation

The consultation focused on how the targeted costs of both scheme areas should be allocated among ratepayers.

The review did not propose changes to the current proportion of scheme costs funded through general and targeted rates. It was also not a detailed review of scheme levels of service, engineering design standards or floodbank alignments, and was not a rates-setting exercise. Final rates will be determined through the Long Term Plan, Funding Impact Statement and annual rates resolution processes.

The consultation sought feedback on three questions:

1. To what extent do you support ORC's Preferred Model?
2. To what extent do you support the proposed boundary changes?
3. Is there anything else Council should consider before making a decision on the Preferred Model?

2.4 Corrections to the Statement of Proposal

On 9 September 2026, ORC identified and corrected several minor errors in the Proposal. The other consultation information, including the online rates estimator, interactive maps and information on the consultation webpage, was correct and did not require amendment.

The corrections to the Proposal were:

- Lower Taieri drainage scheme boundaries and benefit zones: maps on pages 16 and 25 incorrectly showed some land north and north-east of Outram as proposed for inclusion in the scheme. The maps were corrected.
- Properties partly within a scheme: information explaining how properties crossing a scheme boundary or flood protection benefit zone would be treated had been omitted. A new section was added to explain the proposed apportionment approach.
- Lower Taieri drainage rates: the indicative rates shown in Figure 14 were slightly higher than the correct amounts and the graph was replaced.
- Stirling indicative rate: the estimated rate for the example rural property in Stirling was corrected from \$5,730 to \$6,880.

To provide an opportunity and sufficient time for submitters to (re)consider the Proposal in light of the corrected information, ORC extended the consultation period to 11.59pm on 25 September 2026, from the previous closing date of 11 September 2026. Submitters who had already provided feedback were not required to resubmit but were able to do so if the corrected information affected their submission.

3 Consultation and engagement

3.1 Consultation process

ORC consulted on the Preferred Model using the Special Consultative Procedure under the Local Government Act 2002.

Consultation opened on 10 August 2026 via public notice and flyers distributed in the affected areas. Following corrections to the Proposal identified during the consultation period, the closing date was extended to 11.59pm on 25 September 2026. The updated Proposal sets out the revised consultation period.

To encourage and support submissions on the Proposal information was available on the ORC website² submitters could provide feedback through ORC's online consultation form, with submitters invited to respond to the three consultation questions and provide any additional comments relevant to the Preferred Model. Those wishing to submit using a hard copy submission form were also able to do so. The consultation webpage informed submitters that their feedback would help Council decide how costs for both scheme areas should be shared in future.

3 Engagement undertaken

In addition to the formal submission process, ORC provided opportunities for affected communities and individuals to discuss the Proposal directly with staff.

Staff took a multifaceted approach to engagement to reach as many individuals as possible across both scheme areas using different mediums and styles of engagement approaches, materials and locations.

Six community drop-in sessions were held across both scheme areas:

Date	Location	Sessions
20 August 2026	Te Pou Ō Mata-Au / Clutha District War Memorial & Community Centre, Balclutha	12pm–3pm and 4pm–7pm
24 August 2026	Taieri Bowling Club, Mosgiel	11am–2pm and 4pm–6.30pm
25 August 2026	West Taieri Rugby Club, Outram	11am–2pm and 4pm–6.30pm

ORC staff and consultants were available at these sessions to explain the Proposal and answer questions from property owners and other interested parties.

To promote the rating review, ORC ran a promotional campaign which encouraged people to take part in the consultation and attend the drop-in sessions.

Methods of consultation	Description	General feedback from staff
Contacting key stakeholders	ORC staff contacted and encouraged key stakeholders to make submissions.	ORC received submissions from key stakeholders.
Public drop-in sessions	As noted above, six community drop-in sessions were held across both scheme areas in August.	290 people attended the drop-in sessions. The feedback from attendees indicated that 90% found the session useful and the format of combining in-person drop-ins, with information

² <https://www.orc.govt.nz/get-involved/open-for-feedback/flood-protection-and-drainage-how-rates-are-shared#statement-of-proposal>

		available online and the flyer worked well for them. All participant feedback regarding engagement methodology used at the sessions will be considered for future engagements.
Promotional campaign	The ORC communications team undertook a comprehensive advertising campaign to encourage submissions on social media, ORC's website and OnStream, radio, direct email to subscribers, and flyers delivered to all properties within the schemes. A public notice was published in the Otago Daily Times and in the Clutha Leader.	
Website engagement	ORC used its website to explain the Model Review, the Proposal and Preferred Model to demonstrate the proposed changes to how flood protection and drainage scheme costs are shared in both scheme areas. The website provided access to information about the Preferred Model, an online rates estimator and interactive maps to help property owners understand how the changes could affect them. It also provided information on how to make a submission and have a say in the review.	Webpage stats (10 August to 25 September): • 7,270 page views • 3,940 active users
Social media engagement	ORC used social media to raise awareness of the Model Review and encourage people in both scheme areas to have their say. Posts on social media directed people to the consultation information on ORC's website, where they could explore the proposed changes, Preferred Model, use the rates estimator and interactive maps, and make a submission.	Organic social posts • 38,407 views (i.e. number of times the post was seen) • 24,079 viewers (i.e. number of people who saw it)

The Model Review was also informed by earlier engagement with the Lower Clutha and Lower Taieri Flood Protection and Drainage Scheme Liaison Groups, including consideration of the Preferred Model before consultation.

3.2 Information made available during consultation

A range of educational information was made available to help submitters understand the Proposal and how it could affect individual properties.

This included:

- the Proposal
- the ORC consultation webpage, which provided a summary of information including the Proposal
- the consultation document
- an online rates estimator showing indicative property-level impacts
- an interactive map showing current and the Preferred Model boundaries and flood protection benefit zones

- information explaining flood protection benefit zones and drainage demand factors
- scheme-specific information for both scheme areas
- frequently asked questions
- contact details for property-specific queries
- the online and hardcopy submission form.

The rates estimator allowed property owners to compare their 2025–26 targeted rates with indicative rates under the proposed model. ORC made it clear that the estimates were indicative only and that any new rates would be set through the Long Term Plan process.

The interactive map enabled individuals to compare the current and Preferred Model scheme boundaries and see the Preferred Model flood protection benefit zones applying to their property.

4 Overview of submissions

This section provides an overview of the submissions received; including response coverage, scheme and geographic distribution, and the principal areas of feedback. Detailed analysis against each consultation question is provided in Section 5.

4.1 Submissions received

A total of 178 submissions were included in the analysis. One further submission was received after the submission period had closed and has therefore not been included in the analysis. Of submissions analysed, 177 responded directly to the rating model question and 175 responded directly to the boundary changes question. Two submitters answered the rating model question without selecting a response to the boundary changes question, and one submitter provided relevant written feedback without selecting a response to either question. All submissions have been retained in the analysis. Percentages showing levels of support are calculated using only submissions that directly answered the relevant question. All 178 submissions provided written feedback for consideration when identifying the key matters raised.

Response Coverage	Submissions
Answered both the rating model and boundary changes questions	175
Answered the rating model question only	2
Did not directly answer either question but provided relevant written feedback	1
Total valid submissions	178

Submissions were also analysed according to whether they related to the Lower Clutha/Mata-Au scheme area, the Lower Taieri schemes area or both scheme areas. Submissions made on behalf of organisations or other entities were identified separately where relevant.

A submission could raise more than one matter in response to a question. Each substantive matter was included in the analysis. Consequently, the number of comments or matters identified may exceed the number of actual submissions.

Of the 178 submissions received, 155 were submitted online and 23 were received through non-online channels. Seventeen submitters requested to speak at the hearing. Of all submissions, 176 were made by individuals and two were made on behalf of an organisation or another entity.

4.2 Geographic or scheme distribution

Most submissions related to the Lower Taieri schemes. Of the 178 submissions, 162 concerned the Lower Taieri schemes, eight concerned the Lower Clutha/Mata-Au scheme and eight concerned both scheme areas.

Because the Lower Clutha/Mata-Au scheme and 'both scheme areas' submission categories contain only eight submissions each, results for these categories are presented using counts as well as percentages. The small number of submissions in these categories means that percentage results should be interpreted with more care.

Scheme/City	Lower Taieri	Lower Clutha/Mata-Au	Both schemes	Total
Mosgiel	98 (60%)	0 (0%)	3 (38%)	101
Outram	52 (32%)	0 (0%)	3 (38%)	55
Dunedin	10 (6%)	0 (0%)	1 (13%)	11

Balclutha	0 (0%)	5 (63%)	1 (13%)	6
Kaitangata	0 (0%)	3 (38%)	0 (0%)	3
Allanton	1 (1%)	0 (0%)	0 (0%)	1
Riverside	1 (1%)	0 (0%)	0 (0%)	1
Total	162 (100%)	8 (100%)	8 (100%)	178

*Percentages may not sum to 100% due to rounding.

Submitter location did not always correspond to a single scheme. Of the 101 Mosgiel submissions, 98 related to the Lower Taieri schemes and three related to both scheme areas. Of the 55 Outram submissions, 52 related to the Lower Taieri schemes and three related to both scheme areas. Ten of the 11 Dunedin submissions related to the Lower Taieri schemes and one related to both scheme areas.

Five of the six Balclutha submissions related to the Lower Clutha/Mata-Au scheme, while one concerned both scheme areas. All three Kaitangata submissions related to the Lower Clutha/Mata-Au scheme. The submissions from Allanton and Riverside related to the Lower Taieri schemes.

City or town should therefore be treated as the submitter's location rather than as a direct indicator of the scheme addressed. No city contained submissions relating separately to both scheme areas; the cross-scheme differences arose from submissions selecting 'Both schemes.'

4.3 Summary of feedback received

Feedback addressed the Preferred Model, the proposed boundary changes and additional matters Council was asked to consider. The principal themes included affordability and the scale of rate changes, fairness of the rating distribution, alignment between charges and benefit or flood risk, drainage and flood-protection performance, development and runoff, boundary and property inclusion, wider infrastructure benefits and requests for clearer information.

Views differed between and within the submission categories. Lower Taieri schemes submissions included both support for a wider distribution of costs and concern about increases affecting Mosgiel properties, capital-value calculations, benefit classifications and the contribution from Dunedin Airport. Lower Clutha/Mata-Au scheme submissions raised matters including affordability, the concentration of scheme costs, wider regional benefits and river or scheme maintenance. Submissions concerning both scheme areas raised consistency, regional funding, transition and implementation matters.

Detailed results and the matters raised under each consultation question are presented in Section 5.

Consultation question	Direct responses
Proposed rating model	177
Proposed boundary changes	175
Additional matters raised	112 submissions

*Additional matters raised includes submissions containing at least one substantive additional matter, rather than responses to a set question.

Overall responses to the Preferred Model were relatively evenly divided, with 46% expressing support or strong support, 49% expressing opposition or strong opposition, and 5% which were neutral. Responses to the proposed boundary changes were: 42% expressed support or strong support, 35% expressed opposition or strong opposition and 22% were neutral.

Responses	Preferred Model	Proposed Boundary Changes
Support	46%	42%
Neutral	5%	22%
Oppose	49%	35%

Results varied between submission categories. The Lower Clutha/Mata-Au scheme and 'Both schemes' contained only eight submissions each. The small number of submissions in these categories means that percentage results should be interpreted with more care.

5 Analysis of submissions

This section provides detailed analysis of responses to each of the three consultation questions:

- Question 1: To what extent do you support the ORC's proposed rating model?
- Question 2: To what extent do you support the proposed boundary change?
- Question 3: Is there anything else Council should consider before making a decision on the proposed rating model?

Submission coverage and geographic distribution are described above in Section 4. Results are presented for the Lower Clutha/Mata-Au scheme, the Lower Taieri schemes and both scheme areas.

Individual submissions could raise several matters. Themes reported across more than one question may derive from a single submission.

5.1 Question 1: To what extent do you support ORC's proposed rating model?

Submitters were asked to indicate their level of support for the proposed rating model; Option 4, the Preferred Model and explain their response. Percentages are based on the 177 submissions that directly answered this question. Written feedback from all relevant submissions was considered when identifying the key matters raised. One submission did not directly answer the question and is therefore excluded in this section.

5.1.1 THE PROPOSAL

ORC proposes to replace the existing targeted rating allocation models for the Lower Clutha/Mata-Au scheme and Lower Taieri schemes with a differential targeted rating model. The preferred approach is Option 4, under which properties that benefit from flood protection and properties contributing to drainage demand pay according to the characteristics of each scheme and the application of the Model to their individual properties as outlined below.

The Preferred Model separates flood-protection and drainage costs:

- Flood-protection costs would be allocated using benefit zones derived from flood modelling. Rates would be based on capital value and adjusted according to the level of protection attributed to each property.
- Drainage costs would be allocated according to the land area within the drainage scheme and adjusted using land-use or exacerbator factors representing relative runoff and drainage demand.

The proposed drainage exacerbator factors are 217% for business land, 183% for residential land, 150% for lifestyle land and 100% for rural land.

Where a property falls partly within a scheme or more than one flood-protection benefit zone, its capital value or land area would be apportioned between the relevant areas.

The Proposal concerns how targeted scheme costs are distributed between properties. It does not propose to change scheme levels of service, increase total scheme funding or alter the existing proportions funded through general and targeted rates. Indicative effects were calculated using the 2025/26 rates requirements. Final rates will be determined through the Long Term Plan, Funding Impact Statement and annual rates resolutions.

5.1.2 SUBMISSION RESPONSE

Of the 177 submissions that answered the question, 82, or 46%, supported or strongly supported the proposed rating model. A total of 86, or 49%, opposed or strongly opposed it, while nine, or 5%,

selected neutral. One submission did not directly answer this question and is therefore excluded in this section.

Scheme	Strongly Support	Support	Neutral	Oppose	Strongly Oppose	Unclear	Total
Lower Clutha	3 (38%)	3 (38%)	1 (13%)	0	1 (13%)		8
Lower Taieri	61 (38%)	12 (7%)	7 (4%)	19 (12%)	62 (38%)	1 (1%)	162
Both schemes	3 (38%)	0	1 (13%)	0	4 (50%)		8
Total	67 (38%)	15 (8%)	9 (5%)	19 (11%)	67 (38%)	1 (1%)	177

*Percentages may not sum to 100% due to rounding.

Six of the eight Lower Clutha/Mata-Au scheme submissions supported or strongly supported the Preferred Model. Among Lower Taieri schemes submissions, 73 of 161 supported or strongly supported it, while 81 opposed or strongly opposed it. Of the eight submissions concerning both scheme areas, three strongly supported the Proposal, four strongly opposed it and one was neutral.

5.1.3 KEY MATTERS, OFFICER ANALYSIS AND RECOMMENDATIONS

Submitters raised several matters when explaining their level of support or opposition. A single submission could raise more than one matter, so the themes below are not mutually exclusive.

Key matter	Summary of submissions	Officer analysis	Officer recommendation
Affordability and the scale of rate changes	48 submitters considered the proposed increases too large or unaffordable, particularly for households on fixed incomes, pensioners and properties facing substantial percentage increases. Requests included consideration of phasing the changes, capping annual increases or introducing a longer transition period.	Options to phase increases throughout the Preferred Model will impact a wider ratepayer cohort than those making the request. Phasing will cause concentration of revenue collection in later years. Practical options to mitigate this impact are primarily individual rates deferral or an alternative General/Targeted Rate split.	No change to Preferred Model recommended. Communicate rates deferral options. Consider recommending a change to the targeted/general rate funding split to Council for consideration through the Long Term Plan.
Fairness of allocation	66 submitters expressed differing views about whether the Proposal would distribute costs more fairly. Supporting submissions considered that the Proposal would spread costs across a broader group of beneficiaries. Other submissions considered that it would transfer an unreasonable share of the	Generally, the Preferred Model distributes costs across a wider area in the Lower Taieri schemes, while also collecting costs more evenly. While generally, the Lower Clutha/Mata-Au scheme proposal reduces the area for targeted rate collection and concentrates costs on fewer landowners than the previous model.	No change to Preferred Model recommended.

Key matter	Summary of submissions	Officer analysis	Officer recommendation
	cost to properties receiving limited direct benefit.		
Relationship between charges, benefit and flood risk	58 submitters requested a clearer relationship between the amount charged and the flood protection or drainage benefit received. Matters raised included actual flood exposure, land use, runoff contribution, drainage demand, existing mitigation and the level of service provided to individual properties.	Generally, two options exist to address this feedback. The first is to consider another option, likely more complex. An alternative is to put greater effort into explaining the cost to benefit relationship.	No change to Preferred Model recommended. Development of clearer communication material recommended.
Use of capital value and broad classification	12 submitters questioned whether capital value and broad benefit classifications accurately represent flood risk, runoff contribution or the benefit received from the schemes. Property-level assessment or more detailed classifications were requested.	Capital Value is proposed as a simple proxy for relative flood risk. Any property level assessment of flood risk factors is likely to have significant overhead cost implications and would require an alternative rating model proposal.	No change to Preferred Model recommended.
Wider and general-rate contributions	12 submitters considered that a greater proportion of the schemes' costs should be met through the general rate or by wider regional beneficiaries. They referred to benefits provided to communities, transport links, utilities, the airport, industry and the wider regional economy.	The targeted rating model/the Preferred Model is designed to collect the targeted rate portion of scheme income. The general rate portion of scheme income is intended to account for the costs associated with wider regional benefits including infrastructure. Altering the Targeted to General Rate split could be considered through Long Term Plan.	No change to Preferred Model recommended. Consider recommending a change to the targeted/general rate funding split to Council for consideration through the Long Term Plan.
Dunedin Airport and major infrastructure	5 submitters raised the proposed contribution from Dunedin Airport and other major infrastructure. Comments included retaining or increasing the Airport's contribution, establishing a separate classification or recognising the wider regional benefit of protecting strategic infrastructure.	This feedback primarily responds to the significant reduction in rates contribution for Dunedin Airport under the Preferred Model, and a perceived higher ability to pay. A separate zone for Dunedin Airport could be considered. Further consultation with Dunedin Airport should be	Consider adding a special Airport Zone to the targeted rate model through further consultation with Dunedin Airport.

Key matter	Summary of submissions	Officer analysis	Officer recommendation
		undertaken if this option is to be considered further.	
Development and runoff	26 submitters requested that new subdivisions, urban development, sealed surfaces and upstream runoff contributors be recognised in the rating allocation. Some suggested that developers should fund additional stormwater mitigation, pumping or storage capacity.	The Preferred Model improves cost attribution for these factors within the targeted rate boundary. It does not include upstream run-off contributors, accounted for through general rate revenue. Developer contributions to the Schemes cannot be incorporated into the rate model effectively.	No change to Preferred Model recommended. Consider recommending a change to the targeted/general rate funding split to Council for consideration through the Long Term Plan.
Scheme service and maintenance	11 submitters connected their view of the Preferred Model with the condition or performance of flood-protection and drainage services. Matters included drain and waterway maintenance, pumping capacity, flood bank performance and whether increased charges would result in improved services.	These matters are service performance focused. They do not relate directly to the rate collection model.	No change to Preferred Model recommended. These submissions will be passed to asset management staff for consideration in future infrastructure planning.
Information and transparency	12 submitters requested clearer explanations of the calculations, classifications, property-level effects, scheme expenditure and the evidence supporting the Preferred Model.	A small number of submitters have requested further detailed information. Efforts have been made to share all available information. Further work on methods and calculations will be produced and made available if the Preferred Model is implemented.	No change to Preferred Model recommended.
Retaining, delaying or reconsidering the proposal	21 submitters requested that the current approach be retained, that implementation be delayed, or that the rating methodology be reconsidered before changes are introduced.	Delaying implementation or retaining the current rating models are both options that could be considered. Options for partial delay are not considered practical.	No change to Preferred Model recommended.

5.2 Question 2: To what extent do you support the proposed boundary changes?

Submitters were asked to indicate their level of support for the proposed boundary changes and explain their response. Percentages are based on the 175 submissions that directly answered this question. Relevant written comments were considered even where the submitter did not select a response. Three submissions did not directly answer this question and are therefore excluded from this section.

5.2.1 THE PROPOSAL

Council proposes to revise the rating boundaries to reflect current flood-hazard information, the areas receiving flood-protection benefit and the properties contributing to drainage demand.

For the Lower Clutha/Mata-Au scheme, the proposed flood-protection boundaries are based on Council's flood-hazard layers. The changes would reduce the overall scheme area, principally by removing the former Zone F, which captured indirect effects at a low differential. Proposed additions include a small number of parcels west of Kaitangata. The proposed drainage boundary would also include a gully west of Finegand that is considered to drain into a Council drainage asset. Balclutha and Finegand would not be included in the drainage scheme because they are not serviced by Council drainage infrastructure.

The proposed additions to the drainage schemes in the Lower Taieri schemes include:

- part of the North Taieri alluvial fans;
- urban areas in Mosgiel and immediately south of Mosgiel;
- properties south of Owhiro Stream; and
- other areas considered to drain into or increase demand on the drainage network.

For the Lower Taieri schemes, proposed additions include land northwest of Outram, land near the intersection of Outram-Mosgiel Road and Riccarton Road West, and areas around Waipori and Waiholā that are protected by floodbanks but were previously not rated.

Proposed exclusions from the Lower Taieri schemes include the North Taieri alluvial fans, the area south of Owhiro Stream, and alluvial-fan and flood-transition areas near the coastal hills south of Mosgiel.

Where a property falls partly within a proposed scheme boundary, only the relevant portion of its capital value or land area would be included in the rates calculation.

5.2.2 SUBMISSION RESPONSE

Of the 175 submissions that answered question 2, 74, or 42%, supported or strongly supported the proposed boundary changes. A total of 62, or 35%, opposed or strongly opposed them, while 39, or 22%, were neutral.

Scheme	Strongly Support	Support	Neutral	Oppose	Strongly Oppose	Unclear	Total
Lower Clutha	2 (25%)	3 (38%)	1 (13%)	1 (13%)	1 (13%)		8
Lower Taieri	33 (20%)	34 (21%)	34 (21%)	20 (12%)	38 (23%)	3 (2%)	162
Both schemes	2 (25%)	0	4 (50%)	0	2 (25%)		8
Total	37 (21%)	37 (21%)	39 (20%)	21 (12%)	41 (23%)	3 (2%)	178

*Percentages may not sum to 100% due to rounding.

Five of the eight Lower Clutha /Mata-Au scheme submissions supported or strongly supported the boundary changes. Among the Lower Taieri schemes submissions, 67 of 159 supported or strongly supported the changes, while 58 opposed or strongly opposed them. Of the eight submissions concerning both schemes, two strongly supported the changes, two strongly opposed them and four were neutral.

5.2.3 KEY MATTERS RAISED

Submitters raised several key matters in relation to the proposed boundary changes. Note that as a single submission could raise more than one matter the themes below are not mutually exclusive.

Key matter	Summary of submissions	Officer analysis	Officer recommendation
Inclusion and exclusion	39 submitters requested that the inclusion or exclusion of particular properties and areas be reviewed. Some considered that their property received little or no benefit from the scheme, while others identified properties or areas they believed should be included because they benefit from, or contribute runoff to each scheme.	Submissions on this topic covered a wide range of properties and rationale for a change to boundaries. Some simple boundary adjustments could be considered.	Detailed options to be presented for minor boundary changes for consideration by the Hearings Panel.
Relationship between boundaries, benefit and flood risk	31 submitters requested that boundaries more closely reflect actual flood exposure, scheme benefit, runoff contribution and the drainage services received by individual properties.	Broad scale flood maps in the proposed rating model reflect the option selected for its balanced approach to the trade-off between fairness and transparency. This feedback effectively seeks a more complex flood analysis which would form a part of a more complex rating model.	No change to Preferred Model recommended.
Recognition of wider catchments and runoff contributors	22 submitters supported broader boundaries in both the Taieri and Clutha/Mata-Au areas or funding arrangements that recognise upstream properties, new development, sealed areas and other locations contributing runoff to protected or drained areas. Concerns included increased runoff associated with commercial development, retirement villages, development around Wingatui and residential intensification. Some considered that developments contributing to additional runoff should contribute financially to the required drainage and flood-management infrastructure.	Adding zones or broadly extending the boundaries to capture the wider catchment area is a significant change to the proposed rating model and would require further consultation.	No change to Preferred Model recommended.

Key matter	Summary of submissions	Officer analysis	Officer recommendation
Property-level evidence and ground truthing	25 submitters questioned whether mapped boundaries and classifications accurately reflect local ground levels, flood history, private drainage infrastructure and property-specific conditions. Queries included site verification, clearer supporting evidence and an accessible review and/or appeal process.	Flood and drainage modelling tools used to specify zones are generally a good reflection of sites. The details submitters sought are property specific in nature and would introduce general overhead costs into the rating system. While a property specific review process is possible, staff consider that scope should be discrete to align with the Preferred Model put forward.	No change to Preferred Model recommended. Introduction of a property specific review process is possible, if pursued the scope of this process should properly be restricted to considering matters that are relevant to the Preferred Model.
Fairness of the resulting cost allocation	Submissions made on this varied. 22 submitters supported the boundary changes because they considered that a wider range of benefiting or contributing properties would pay. While four submitters considered that the proposed boundaries would place costs on properties receiving insufficient benefit.	Submitters presented a wide range of rationale for boundary changes based on fairness with divergent outcomes sought.	No change to Preferred Model recommended.
Limited explanation	68 submitters selected a boundary response without providing a detailed explanation.	This selected response should remain included in the quantitative results, but no additional rationale should be attributed to these submissions.	No change to Preferred Model recommended.

5.3 Question 3: Is there anything else Council should consider before making a decision on the proposed rating model?

Submitters were invited to identify any additional matters Council should consider. Unlike sections 5.1 and 5.2, this was an open-text question rather than a support scale. The analysis therefore reports the number of substantive comments and the matters contained in those comments.

5.3.1 SUBMISSION RESPONSE

Of the 178 submissions, 112 contained at least one substantive additional message. This comprised 103 submissions concerning the Lower Taieri scheme, five concerning the Lower Clutha/Mata-Au scheme and four concerning both scheme areas.

Scheme	Total submissions	Submissions with additional matters	Individual matters identified
Lower Clutha/Mata-Au scheme	8	5	12
Lower Taieri schemes	162	103	186
Both schemes	8	4	16
Total	178	112	214

Several submitters raised more than one matter. A total of 214 matters were identified across the 112 submissions. The number of matters therefore exceeds the number of submissions providing additional feedback.

Primary matter	Submissions
Rates affordability or scale of change	29
Fairness of rating distribution	23
Drainage or flood-protection service	17
Other matters	16
Information or consultation process	6
Wider infrastructure benefits	6
Benefit and flood-risk alignment	6
Boundary inclusion or exclusion	6
Urban and rural allocation	3
Total substantive responses	112

The table assigns each submission to a single matter. Some submissions raised additional matters, which are included in the wider analysis in section 5.3.2.

'Other matters' comprised 16 submissions that did not fit neatly within the eight primary matters categories. Fifteen related to the Lower Taieri schemes and one related to the Lower Clutha/Mata-Au scheme. Other matters included:

- Council expenditure and budget management;
- maintaining financial reserves for future flood events;
- the allocation of costs between affected and unaffected properties;
- affordability;
- consideration of actual flood history and surface-flooding locations;
- retaining, reconsidering or proceeding with the Proposal;
- general expressions of concern or support.

5.3.2 KEY MATTERS RAISED

Key matters raised included:

Key matter	Summary of submissions	Officer analysis	Officer recommendation
Drainage and flood-protection performance	25 submitters raised the maintenance and capacity of drains, waterways, pumps, flood banks and related infrastructure. Location-specific matters included Silverstream, Outram, the Lower West Taieri and gravel accumulation in the Clutha River near the Balclutha road and rail bridges.	These matters are service performance focused. They do not relate specifically to the rate collection model.	These submissions will be passed to asset management staff for consideration in future infrastructure planning.
Development, subdivisions and stormwater runoff	13 submitters raised the effect of new subdivisions, buildings and impermeable surfaces on runoff and drainage capacity. Some requested developer contributions or one-off charges to fund additional pump, storage or stormwater mitigation requirements.	The Proposed Model is more effective than both status quo models at dealing with land use change by using capital value as a factor for flood protection, or cost bandings based on rating classification. Other models generally require a model zone change to effectively incorporate land use change with land use change.	No change to Preferred Model recommended.
Affordability and transition	31 submitters raised further concerns about substantial rate increases, particularly for fixed-income households and properties considered to receive limited benefit. Suggestions included caps, phasing and longer transition periods.	Most feedback on this topic focused on managing the impact on individual landowner cost increases. Options to defer costs through rates deferral schemes could be considered.	No changes to Preferred Model recommended.
Wider beneficiaries and infrastructure	20 submitters referred to benefits provided to the airport, roads, rail, utilities, industrial areas and the wider regional economy. Some considered these benefits should be recognised through a wider funding contribution.	The rating model is designed to collect the targeted rate portion of scheme income. The general rate portion of scheme income is intended to account for the costs associated with wider regional benefits including infrastructure. The Targeted to General Rate split could be considered through the Long Term Plan.	No changes to the Preferred Model recommended.

Key matter	Summary of submissions	Officer analysis	Officer recommendation
Information and supporting evidence	16 submitters requested clearer maps, property-level calculations, examples, technical evidence, underlying reports, options considered and explanations of the rating and boundary methodology.	A small number of submitters have requested further detailed information. Efforts have been made to share all available information. Further work on methods and calculations will be produced and made available if the proposed model is implemented.	No change to Preferred Model recommended.
Council expenditure and transparency	11 submitters requested information about total scheme revenue and expenditure, administration costs, the cost of preparing the review and how additional rating revenue would be used.	The majority of the information requested is publicly available. The exception is the request for the total cost of the review, which will be compiled and shared when the review is complete. Information that is currently available has been provided where requested.	No change to Preferred Model recommended.
Private infrastructure and limited service	6 submitters requested recognition of private drainage works, existing property-level mitigation and circumstances where a property was considered to receive limited protection or drainage service.	Infrastructure that makes up flood and drainage schemes is typically arterial, while private infrastructure connects to the scheme, it rarely services more than a handful of properties. If a case for wider public good from private assets exists, Scheme funding through rates rebates is not the most appropriate way to manage private asset subsidies, transfer of assets to public ownership is likely less complicated and more transparent.	No change to Preferred Model recommended.
Implementation and oversight	7 submitters suggested aligning implementation with the Long Term Plan, providing stronger ratepayer oversight, retaining scheme liaison-group involvement and resolving boundary, funding and transition matters before implementation.	Implementation through Long Term Plan is required. Further engagement with liaison groups can be facilitated.	No change to Preferred Model recommended.
Matters outside, or wider than, the rating review	36 submitters raised broader matters relating to land use, development, stormwater, maintenance	These matters are service performance focused. They do not relate to the rate collection model.	These submissions will be passed to asset management staff for consideration in

Key matter	Summary of submissions	Officer analysis	Officer recommendation
	or infrastructure. These matters have been recorded in the submission analysis, although some may extend beyond the immediate scope of the rating model review.		future infrastructure planning.

6 Submissions from key organisations or groups

Two submissions were disclosed as being made on behalf of a stakeholder organisation or entity. Their responses are included in the overall results in Sections 4 and 5. This section provides a consolidated summary of the principal matters these submitters raised.

A more detailed summary of each organisation's position, the matters raised and the outcomes sought is provided below. These summaries should be read alongside the full submissions and the analysis in Section 5.

Submission	Organisation or entity	Scheme	Principal matters raised
76	Mosgiel Taieri Community Board	Lower Taieri schemes	Capital value, benefit classifications, Airport and strategic infrastructure, runoff and evidence-based decisions
146	Otago Federated Farmers	Both the Lower Taieri schemes and Lower Clutha/Mata-Au scheme	Lower Taieri schemes rating approach, Lower Clutha/Mata-Au affordability and concentration of costs, wider regional and general-rate funding, recognition of runoff contributors, transition arrangements, ratepayer oversight, ground-truthing and appeals, private infrastructure and implementation safeguards.

6.1 Mosgiel-Taieri Community Board – submission 76

6.1.1 SUBMISSION POSITION

The Mosgiel-Taieri Community Board (the Board) selected neutral for both consultation questions because it had not undertaken its own community-wide consultation. It nevertheless supported changes that would make the system fairer, simpler and more transparent.

6.1.2 MATTERS RAISED

The Board considered that the Lower Taieri schemes provide wider benefits to communities, transport connections, public facilities and economic activity across the Taieri. It questioned whether capital value alone provides an appropriate basis for allocating flood-protection costs and raised concern about the scale of proposed rural rate reductions and the proposed reduction in Dunedin Airport's rates.

The Board supported boundaries based on current flood modelling, drainage catchments and hydraulic connections. It considered that properties benefiting through connected drainage systems and hillside developments contributing runoff should be included consistently.

6.1.3 OUTCOME SOUGHT

The Board requested that Council:

- assess alternatives to relying solely on capital value, including a differential based on relative flood risk;
- review the proposed rates for Dunedin Airport and rural properties against the benefit received;
- spread the cost of protecting Dunedin Airport and State Highway 1 more widely;
- consistently include hillside developments contributing runoff;
- address boundary anomalies and unintended consequences;
- use updated modelling, engineering information and other robust evidence; and
- review the model within two years of implementation.

Related analysis is provided in Section 5. Officer responses and recommendations on these matters are set out in Section 7.1, and alternative options considered in response to submissions are set out in Section 7.2.

6.2 Otago Federated Farmers – submission 146

6.2.1 SUBMISSION POSITION

Otago Federated Farmers feedback position was neutral overall as its members experience different effects across the two schemes (the Lower Taieri schemes and the Lower Clutha/Mata-Au scheme). It supported the proposed Lower Taieri schemes approach but raised significant concerns about the application of the model to the Lower Clutha/Mata-Au scheme.

6.2.2 MATTERS RAISED

For the Lower Taieri schemes, Otago Federated Farmers supported recognising urban runoff, expanding the rating base and including previously unrated benefiting areas. It considered that properties and developments generating additional runoff should contribute to downstream drainage costs.

For the Lower Clutha/Mata-Au scheme, Otago Federated Farmers considered that contracting the rating boundary would concentrate fixed costs across a smaller group of productive properties. It also argued that the wider regional benefits of the two schemes and the effects of upstream contributors should be reflected in the funding arrangements.

Otago Federated Farmers raised concerns about affordability, sudden rate increases, property and boundary classifications, private drainage infrastructure, practical levels of service, scheme expenditure and ratepayer involvement in scheme governance.

6.2.3 OUTCOME SOUGHT

Otago Federated Farmers requested:

- greater regional and general-rate contributions;
- recognition of upstream and wider regional beneficiaries;
- phasing or capping of substantial rate increases;
- a simple, cost-free process for reviewing or appealing boundary and benefit classifications;
- the use of property-specific evidence to ground-truth classifications;
- recognition or credit for private drainage infrastructure;
- reclassification where properties receive a lower practical level of service;
- stronger ratepayer and liaison-group involvement in maintenance, operational and capital-planning decisions;

- greater transparency about scheme expenditure; and
- resolution of the identified funding, boundary and implementation issues through the Long Term Plan process before implementation.

Related analysis is provided in Section 5. Officer responses and recommendations on these matters are set out in Section 7.1 and alternative options considered in response to submissions are set out in Section 7.2.

7 Officer conclusions and recommendations

7.1 Recommended changes in response to submissions

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
01	2, 8, 10, 11, 12, 14, 15, 16, 17, 20, 24, 25, 30, 31, 32, 36, 38, 44, 45, 48, 52, 56, 58, 59, 61, 62, 70, 71, 80, 81, 87, 88, 92, 93, 97, 98, 105, 107, 108, 115, 117, 119, 121, 123, 142, 145, 146, 151, 152, 177, 158, 168, 171	Preferred Model – affordability and scale of increase.	Substantial increases were considered unaffordable, particularly for fixed-income households, pensioners and properties facing large percentage increases.	The proposed changes would result in substantial increases for some properties and reductions for others.	No recommendation for change.	Rates deferral or Target Rate/General Rate Split options exist to ease the highlighted burden.
02	11, 12, 14, 15, 16, 20, 24, 25, 30, 31, 36, 38, 44, 48, 52, 56, 58, 59, 61, 62, 70, 80, 87, 92, 93, 98, 105, 107, 108, 119, 121, 123, 146, 151, 152, 158, 168	Rating model – limited benefit or flood exposure.	Properties described as having limited flood exposure or receiving little scheme benefit should not face substantial increases.	The proposed classifications allocate charges according to the benefit and protection assigned to each property.	No recommendation for change.	The Preferred Model is a simplified model compared to previous models. The simplified nature of the model doesn't allow for a high level of technical complexity. The model apportions benefit at an area wide level rather than at a property level. Many of the arguments for this change incorrectly assume because an example property hasn't

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
						flooded that the property is not protected.
03	10, 32, 37, 41, 73, 81, 88, 108, 117, 123, 142, 146, 171	Rating model – transition arrangements.	Phase substantial increases, apply annual caps and provide transitional assistance. Submission 148 proposed a 10%–15% annual cap over three to five years.	Submissions describe the proposed increases as taking effect without sufficient phasing, caps or transitional assistance.	No recommendation for change.	Rates deferral or Target Rate/General Rate Split options exist to ease the highlighted burden.
04	3, 33, 40, 61, 89, 92, 96, 106, 113, 118, 123, 128, 129, 136, 143, 149, 150, 153, 159, 158, 172, 178	Rating model – urban and rural cost allocation.	Rebalance contributions between urban and rural properties and recognise the effect of urban development and runoff.	The proposed model reallocates costs between urban and rural properties using benefit and drainage classifications.	No recommendation for change.	The Preferred Model seeks to charge on the basis of benefit received. The rural/urban change is an outcome of the change in model.
05	101, 110, 114, 120, 132, 138, 147, 149, 150	Rating model – fair allocation among benefiting properties.	Allocate costs more fairly among properties benefiting from or contributing to the schemes.	The proposed model allocates costs using benefit zones, property classifications and drainage factors.	No recommendation for change.	The Preferred Model is a simplified model compared to previous models. The simplified nature of the model doesn't allow for a high level of technical complexity. The model apportions benefit at an area wide level rather than at a property level. Many of the arguments for this change incorrectly

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
						assume because an example property hasn't flooded that the property is not protected.
06	11, 14, 15, 16, 18, 22, 33, 48, 51, 52, 60, 68, 75, 77, 87, 89, 104, 105, 109, 111, 119, 122, 133, 134, 151, 152, 154	Rating model – flood-protection risk and benefit.	Base flood-protection charges on actual flood risk, protection and benefit, including the change in risk with and without the scheme.	The proposed flood-protection charges use benefit zones and targeted differentials.	No recommendation for change.	The Preferred Model is a simplified model compared to previous models. The simplified nature of the model doesn't allow for a high level of technical complexity. The model apportions benefit at an area wide level rather than at a property level. Many of the arguments for this change incorrectly assume because an example property hasn't flooded that the property is not protected.
07	53, 73, 86, 99, 111, 114, 122, 131, 137, 151, 155, 159, 160, 169	Rating model – drainage service and demand.	Base drainage charges on service received, land use, runoff, property size and demand placed on the drainage network.	The proposed drainage calculation considers land area, land use and drainage demand.	No recommendation for change.	The Preferred Model seeks to incorporate many of the factors highlighted by the comments, making advances on the existing model.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
08	107, 112, 144, 146, 152	Rating model – use of capital value.	Reconsider capital value where it does not reflect risk or benefit. Consider land area, land use, runoff and drainage demand instead.	Capital value forms part of the proposed calculation for flood protection only. Drainage uses land area alongside benefit and drainage factors.	No recommendation for change.	The Preferred Model uses capital value to determine flood rates. Land area and land use has been used to calculate charges for drainage rates.
09	44, 52, 55, 58, 83, 107, 143, 146, 150, 153, 154	Rating model – general-rate contribution.	Increase the general-rate contribution to recognise the wider public benefit provided by the schemes.	The Preferred Model retains a general-rate contribution alongside targeted scheme charges.	No recommendation for change.	Target Rate/General Rate Split options exist and could be considered through the Long Term Plan process.
10	5, 58, 76, 109, 132, 140, 144, 145, 146, 150, 153, 172, 174, 177	Rating model – wider regional beneficiaries.	Increase contributions from communities, infrastructure and economic activities receiving wider regional benefits.	Targeted charges remain focused on properties classified as benefiting from or contributing to the schemes.	No recommendation for change.	Target Rate/General Rate Split options exist and could be considered through the Long Term Plan process.
11	103, 109, 110, 147	Rating model – retain or increase the Airport contribution.	Retain or increase the Airport's contribution because the Airport benefits the wider region.	Submissions report that the proposed model would substantially reduce the Airport's rates.	No recommendation for change.	Acknowledge the airport rate decreases under the Preferred Model. A special zone for the airport could be considered.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
12	55, 78, 88, 107, 110, 147	Rating model – separate Airport classification.	Create a separate Airport classification that reflects its commercial and regional significance.	The Airport is assessed within the proposed benefit and land use classifications.	No recommendation for change.	Acknowledge the airport rate decreases under the Preferred Model. A special zone for the airport could be considered.
13	7, 32, 36, 54, 55, 66, 76, 77, 78, 79, 83, 88, 91, 107, 146, 150	Rating model – wider funding of Airport protection.	Spread the cost of protecting the Airport and related strategic infrastructure across wider Dunedin or Otago.	The proposed Airport contribution is calculated through the Preferred Model rather than a separate wider infrastructure charge.	No recommendation for change.	Acknowledge the airport rate decreases under the Preferred Model. A special zone for the airport could be considered.
14	19, 22, 23, 27, 31, 43, 44, 47, 53, 56, 68, 73, 76, 83, 86, 95, 102, 108, 110, 124, 131, 140, 146, 147, 153, 158, 159, 160, 163, 173, 172	Rating model – reflect development and runoff in charges.	Recognise additional runoff from subdivisions, buildings, roofs and sealed areas when calculating charges.	The proposed model includes drainage and exacerbator factors but submissions state that development impacts are not fully reflected.	No recommendation for change.	The Preferred Model seeks to incorporate many of the factors highlighted by the comments, making advances on the existing model.
15	1, 32, 35, 55, 67, 75, 76, 83, 88, 131, 146, 147, 153, 155, 166, 166, 173, 172, 178	Boundary changes – include runoff contributors.	Consistently include properties and areas contributing runoff to the Lower Taieri schemes and Lower Clutha/Mata-Au scheme within the rating boundaries.	Submissions state that some runoff contributors remain outside the proposed boundaries.	No recommendation for change.	Specific detail would be required for a property by property analysis. ORC staff to develop a recommended change

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
						for each submission in this group.
16	159, 161, 166, 173	Rating model – development contributions.	Require new subdivisions to fund pumps, storage and other stormwater mitigation associated with increased runoff as well as a developer levy.	Developer-funded mitigation was proposed in submissions as an addition to the property-rating approach.	No recommendation for change.	A rates review is not the appropriate mechanism for dealing with development contributions, ORC staff will investigate opportunities to address this outside of this process.
17	5, 7, 14, 18, 21, 27, 28, 32, 37, 46, 50, 62, 69, 75, 79, 91, 95, 110, 116, 118, 121, 124, 126, 150, 159, 165, 166, 174	Drainage and flood-protection services – routine maintenance.	Improve routine maintenance of flood banks, drains, streams, rivers, pumps and other scheme assets.	The Proposal changes the allocation of scheme costs. Submissions also raised concerns about existing maintenance.	No recommendation for change.	Noted – outside scope of rates review. These submissions will be passed to asset management staff for consideration in future infrastructure planning.
18	16, 23, 37, 46, 50, 55, 62, 69, 73, 75, 79, 91, 95, 97, 110, 116, 118, 121, 124, 150, 159	Drainage and flood-protection services – performance.	Improve scheme performance and the level of drainage and flood-protection service received by ratepayers.	Submissions questioned higher charges where the service or protection received was considered inadequate.	No recommendation for change.	Noted – outside scope of rates review. These submissions will be passed to asset management staff for consideration in future infrastructure planning.
19	7, 110, 118, 124, 165, 166	Drainage services – Silverstream.	Improve Silverstream maintenance, flood bank	Submissions identify existing Silverstream	No recommendation for change.	Noted – outside scope of rates review. These submissions will be passed

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
			performance and stormwater discharge capacity.	maintenance and capacity concerns.		to asset management staff for consideration in future infrastructure planning.
20	7, 121, 159	Drainage services – Outram.	Address recurring flooding and drainage problems in Outram and the Outram Stream catchment.	Submissions describe recurring flooding and ineffective drainage within the Outram area.	No recommendation for change.	Noted – outside scope of rates review. These submissions will be passed to asset management staff for consideration in future infrastructure planning.
21	147, 150, 159	Drainage services – Lower West Taieri.	Address Lower West Taieri ponding, pumping capacity and frequent flooding from the Owhiro Stream.	Submissions describe recurring ponding and insufficient pumping or outlet capacity.	No recommendation for change.	Noted – outside scope of rates review. These submissions will be passed to asset management staff for consideration in future infrastructure planning.
22	5, 28	Flood-protection services – Clutha River gravel.	Remove gravel and address river restrictions near the Balclutha road and rail bridges.	Submissions identify gravel accumulation and restricted river width as flood risks.	No recommendation for change.	Noted – outside scope of rates review. These submissions will be passed to asset management staff for consideration in future infrastructure planning.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
23	13, 14, 15, 24, 25, 29, 30, 33, 44, 46, 49, 50, 51, 56, 58, 75, 87, 94, 98, 108, 112, 113, 123, 125, 133, 144, 146, 152, 165, 166, 170	Boundary changes – exclude properties receiving limited benefit.	Review or exclude properties considered outside flood-risk areas or receiving limited scheme benefit.	The proposed boundaries include properties according to their assigned benefit, risk or drainage classification.	Some recommendations for change.	Each individual request for a boundary or zone change has been considered. Recommendations are included in the Appendix.
24	14, 15, 24, 25, 27, 29, 34, 35, 44, 50, 51, 56, 58, 75, 76, 87, 88, 108, 112, 113, 123, 125, 133, 140, 144, 146, 147, 152, 153, 154, 155, 170, 174, 178	Boundary changes – review property classifications.	Review the classification of properties within the proposed boundary where local conditions are considered inconsistent with the assigned category.	The proposal applies mapped benefit and drainage classifications to properties within the boundaries.	Some recommendations for change.	Submitters raised a wide range of issues, many of which would result in changes that are not consistent with the Preferred Model. The Lower Pond is an area where changes may be appropriate. Details are in the Appendix.
25	125, 133, 146, 152, 154	Boundary changes – ground-truth classifications.	Ground-truth mapped classifications and demonstrate property-specific flood risk and scheme benefit.	The proposed boundaries and classifications rely on flood modelling, mapping and drainage information.	No recommendation for change.	Modelling tools used to specify zones are generally a good reflection of sites. The details submitters sought to be considered are property specific in nature and generally would introduce overhead costs into the rating system. While a review process is possible, ORC staff

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
						consider that scope should be discrete to align with the Preferred Model.
26	146	Boundary changes – review or appeal process.	Provide a cost-free process for property owners to challenge boundary and benefit classifications.	Submission states that a specific review or appeal mechanism is required.	No recommendation for change.	Modelling tools used to specify zones are generally a good reflection of sites. The details submitters sought to be considered are property specific in nature and generally would introduce overhead costs into the rating system. While a review process is possible, ORC staff consider that scope should be discrete to align with the Preferred Model put forward.
27	5, 27, 91, 107, 111, 122, 140, 144, 146, 153, 154, 172, 174, 178	Boundary changes – wider catchment contributors.	Include relevant upstream catchments, foothills, exacerbator areas and properties draining into the schemes.	Submissions state that some upstream and runoff-contributing properties remain outside the proposed boundaries.	No recommendation for change.	Adding zones or broadly extending the boundaries to capture the wider catchment area is a significant change to the Preferred Model and would require further consultation.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
28	153	Boundary changes – Allanton, Gladfield Road and Owhiro.	Include Allanton to Gladfield Road and other land draining into the Owhiro.	The proposed rural boundary does not include all land identified as draining into the Owhiro.	No recommendation for change.	Adding zones or broadly extending the boundaries to capture the wider catchment area is a significant change to the Preferred Model and would require further consultation. Furthermore, Allanton generally drains to the Taieri River.
29	152	Boundary changes – Solway Place and Centre Road.	Review properties east of Solway Place and Centre Street and recognise private drainage, DCC charges and the reported scheme boundary. This submission suggests there is no flood protection benefit to properties in Solway Place, Mosgiel.	The submission states that the proposed classification includes properties east of the boundary identified in referenced maps and reports.	No recommendation for change.	Private assets typically only protect one or two properties, and do not allow for broader flood protection. The area has been assessed to be protected from flooding from the Silverstream.
30	147	Boundary changes – Lower Pond.	Recognise recurring Lower Pond flooding, review its classification and include all relevant exacerbator areas.	The Lower Pond was described as receiving a 10–40-year protection classification despite more frequent flooding from the Owhiro Stream.	Some change could be considered.	The Lower Pond is one area that boundary changes may be appropriate. Details are in the Appendix.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
31	111	Boundary changes – Dukes Road North.	Review the rate and classification of the property and include surrounding runoff contributors and relevant foothill areas.	The submission states that the current and proposed rate and zoning are disproportionate to the property's risk and runoff contribution.	No recommendation for change.	The property sits within an existing flood scheme boundary. No change is proposed at this location. The property is serviced by close proximity drains (S1 and M9).
32	125	Boundary changes – East Taieri.	Review the property's urban classification and inclusion because it was described as above the floodplain and adjoining rural land.	The property is included within the proposed urban classification.	No recommendation for change.	The submission references a property that is included as a drainage scheme exacerbator; it is residentially zoned with land that drains to the Owhiro Stream.
33	165, 166, 173	Development and infrastructure – Universal Developments (Wal's) subdivision.	Address drainage capacity associated with the Universal Developments (Wal's) subdivision and require adequate developer-funded mitigation.	Submissions state that existing infrastructure may not have sufficient capacity for the additional development and runoff.	No recommendation for change.	Noted – outside scope of rates review in the Proposal. Staff continue to work with developers within the scheme on infrastructural solutions relating to specific developments.
34	178	Boundary changes – adjoining	Include properties draining into flood-prone areas while retaining a greater	The submission states that not all adjoining properties	No recommendation for change.	Adding zones or broadly extending the boundaries to capture the wider catchment area is a significant change to the

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
		development and drainage.	contribution from properties within flood zones.	contributing drainage are included.		Preferred Model and would require further consultation.
35	146	Lower Clutha/Mata-Au scheme - boundary contraction and cost concentration.	Review boundary contraction where it concentrates costs on fewer properties and include appropriate wider-catchment contributors.	The submission states that the proposed boundary contraction concentrates fixed costs on fewer Lower Clutha properties.	No recommendation for change.	Adding zones or broadly extending the boundaries to capture the wider catchment area is a significant change to the Preferred Model and would require further consultation.
36	146, 152	Rating model – private drainage infrastructure.	Recognise private drainage assets through credits or adjusted property classifications.	Submissions state that private infrastructure is not fully reflected in the proposed classifications.	No recommendation for change.	ORC's drainage network receives water from a range of private assets and territorial authority infrastructure. Private assets primarily provide benefit to the property they service.
37	155	Rating model – existing on-site mitigation.	Recognise existing stormwater mitigation already provided on individual properties.	The Preferred Model applies standard classifications that may not reflect existing property-level mitigation.	No recommendation for change.	ORC's drainage network receives water from a range of private assets. Retention assets have been installed to mitigate effects on the network in lieu of development contributions or other upgrade projects.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
						Records of these assets and their effects are not held by the ORC.
38	146, 152, 155	Rating model – limited scheme service.	Adjust charges where properties receive limited drainage or flood-protection service.	The proposed model allocates charges according to assigned benefit and service classifications.	No recommendation for change to this model. Any future rates review should consider reduced levels of service within the scheme related to pluvial flooding.	The proposed model seeks to charge for flood protection on the basis of benefit received.
39	7, 9, 15, 16, 32, 34, 41, 45, 71, 80, 81, 108, 116, 120, 125, 146	Information – rating model explanation.	Provide clearer information about how rates, costs and expenditure were calculated, including the reasons for the proposed changes.	Information on the Preferred Model and rates estimator was provided but was considered difficult to understand or insufficiently explained.	No recommendation for change.	A report outlining the detailed methodology for the preferred rating model will be produced to support implementation.
40	15, 16, 26, 41, 71, 81, 85, 116, 125, 133, 152, 154	Information – maps and boundaries.	Provide clearer maps and explain how boundaries, benefit zones and property classifications were determined.	Proposed maps and classifications were provided, but submitters requested clearer explanations of their basis and further detail	Work underway to document and clarify boundary development process.	Documentation is planned to cover this detail post consultation.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
				regarding rating zone development.		
41	7, 15, 16, 32, 45, 71, 80, 81, 108, 120, 125, 133, 146, 152	Information – property examples.	Submitters sought further detail regarding rating zone development and requested that ORC provide property-specific examples or evidence showing how rating and boundary classifications have been applied.	General examples and indicative rates were provided, but submitters requested information specific to affected properties.	Work underway to document and clarify boundary development process.	Documentation is planned to cover this detail post consultation.
42	133, 146, 152, 154	Information – technical evidence.	Submitters sought further detail regarding rating zone development and requested that ORC provide the evidence and technical basis used to determine rating, benefit and boundary classifications.	The Proposal refers to modelling and technical information, but submitters requested access to the underlying evidence.	Work underway to document and clarify boundary development process.	Documentation is planned to cover this detail post consultation.
43	154	Information – underlying reports and options.	This submitter sought further detail regarding rating zone development and requested that ORC provide the reports, option analysis and information used to develop and narrow the proposed approach.	The submitter states that this underlying material had been requested but not received.	Work underway to document and clarify boundary development process.	Documentation is planned to cover this detail post consultation.

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
44	146, 152	Information – scheme revenue, expenditure and administration.	Provide clearer information about revenue from these schemes, expenditure, operational budgets, capital planning and administration costs.	The submitters state that this financial information was not sufficiently available.	No recommendation for change.	This will form part of the current and future Long Term Plan, and the details requested here will be included there.
45	152, 154	Information – review and report-preparation costs.	Explain the cost of preparing the rating review, engineering reports and supporting analysis.	These submitters requested further information about the cost and development of the review.	No recommendation for change.	Not relevant to Hearing Panel deliberations. Details of the full cost of the review will be made available when the rating review process is complete and that information is known.
46	146	Implementation – Long Term Plan alignment.	Align implementation with the Long Term Plan.	Submitter requests that implementation be coordinated with the next Long Term Plan.	No recommendation for change.	Noted.
47	146	Governance – liaison-group and ratepayer oversight.	Strengthen scheme liaison-group involvement and direct ratepayer oversight.	Submitter requests stronger oversight of scheme expenditure and implementation.	No recommendation for change.	Liaison groups were consulted during the development of rating options.
48	146	Implementation – safeguards.	Introduce transition, classification, funding and expenditure safeguards before implementation.	Submitter states that boundary, funding and transition matters should be resolved	No recommendation for change.	Rates deferral or Target Rate/General Rate Split options exist to deal with transition. The

ID	Submission reference(s)	Question / topic	Summary of feedback/request	Current proposal / position	Recommended change or response	Feedback
				before implementation.		Infrastructure Strategy forms part of the current and future Long Term Plan and will contain the detail required.
49	12, 31, 40, 116, 121, 139, 157, 173	Rating model – retain the current approach or do not proceed.	Retain the current approach or do not proceed because of affordability and allocation concerns.	The Proposal would replace the existing allocation approach with the Preferred Model.	No recommendation for change.	Noted.
50	80, 174	Rating model – delay implementation.	Delay the changes because of other anticipated local-government and government changes.	The proposal was expected to proceed within the consultation and implementation timetable.	No recommendation for change.	Noted
51	159	Drainage infrastructure – Owhiro Stream flood pump.	Reconsider a flood pump at the confluence of the Owhiro Stream and Taieri River to address restricted flows, road overtopping and recurring farm flooding. Consider funding it through contributions from developments generating additional runoff.	The Proposal addresses cost allocation. It does not include specific infrastructure works or developer contributions.	No recommendation for change	This will be passed to ORC asset management staff for consideration in future infrastructure planning.

7.2 Other options considered in response to submissions

ID	Submission reference(s)	Question / topic	Option considered	Potential advantages	Potential disadvantages or risks	Officer assessment and recommendation
01	4, 12, 31, 40, 116, 121, 139, 157, 173	Rating model – retain the current approach.	Retain the existing rating approach or do not proceed with the proposed model.	Avoids the proposed increases and retains established arrangements.	Other submitters described the existing allocation as inequitable and placing disproportionate costs on some rural and Outram properties.	Option is open to the Hearings Panel for their consideration.
02	10, 30, 32, 37, 41, 73, 81, 88, 108, 117, 123, 142, 146, 171	Rating model – transition arrangements.	Phase substantial increases, cap annual changes or provide transitional assistance.	Reduces immediate affordability impacts, particularly for fixed-income households and properties facing large percentage increases.	Delays the full redistribution of costs sought by submitters who consider the current allocation unfair.	Rates deferral or Target Rate/General Rate Split options exist to ease the highlighted burden.
03	107, 112, 144, 146, 152	Rating model – alternative allocation methodology.	Reduce or remove reliance on capital value and place greater weight on flood risk, benefit, land area, land use, runoff or drainage demand.	Better aligns charges with the risk, benefit and demand attributed to each property.	Submitters identified the need for more detailed property-level evidence, modelling and ground-truthing before classifications are applied.	This option is essentially one of the more complex options initially considered. If the Hearings Panel choose to proceed with this, ORC staff would need to develop a separate rates model for consultation. Any changed model would likely result in similar submissions raising fairness and inequity issues in the resulting feedback, as here.

ID	Submission reference(s)	Question / topic	Option considered	Potential advantages	Potential disadvantages or risks	Officer assessment and recommendation
04	5, 17, 44, 52, 55, 57, 76, 83, 99, 107, 109, 111, 113, 120, 132, 140, 143, 144, 145, 146, 150, 154, 172, 174	Rating model – wider funding contribution.	Increase the general-rate contribution or collect contributions from wider communities and regional beneficiaries.	Recognises benefits to transport links, the Airport, utilities, productive land, businesses and wider economic activity.	Other submissions opposed paying scheme costs where properties receive little direct benefit or protection.	Rates deferral or Target Rate/General Rate Split options exist to ease the highlighted burden.
05	7, 32, 36, 54, 55, 66, 76–79, 83, 88, 91, 103, 107, 109, 110, 146, 147, 150	Rating model – Dunedin Airport.	Retain or increase the Airport's existing contribution, establish a separate Airport classification, or fund its protection more widely.	Recognises the Airport's reliance on flood protection and its importance to Dunedin and the wider region.	Wider funding could transfer costs to ratepayers who consider that they receive little direct scheme benefit.	Acknowledge the airport rate decreases under the proposed model. A special zone for the airport could be considered.
06	161, 166, 173	Rating model – developer contributions.	Require new subdivisions to fund pumps, storage and other stormwater mitigation associated with additional runoff.	Links the cost of additional drainage demand to the development generating it.	Submitters also stated that existing infrastructure may already lack sufficient capacity, meaning developer contributions alone may not resolve current problems.	A rates review is not an appropriate mechanism for dealing with development contributions, ORC staff will investigate opportunities to address this outside of this process.
07	32, 35, 67, 76, 83, 107, 111, 140, 146, 147, 153, 165, 166, 173, 172, 174, 178	Boundary changes – wider inclusion.	Extend boundaries to include upstream catchments, foothills, subdivisions and other runoff-	Broadens the contribution base and includes properties identified as contributing	Risks including properties that consider themselves outside flood-risk areas or	If the Hearings Panel choose to proceed with extending the boundaries to capture surrounding hill properties in the targeted rate, ORC staff would need to develop a separate

ID	Submission reference(s)	Question / topic	Option considered	Potential advantages	Potential disadvantages or risks	Officer assessment and recommendation
			contributing or exacerbator areas.	water to the schemes.	receiving limited direct benefit.	rates model for consultation. Any changed model would likely result in similar submissions raising fairness and inequity issues in the resulting feedback, as here.
08	125, 133, 146, 152, 154	Boundary changes – review and appeal.	Introduce property-level ground-truthing and a formal review or appeal process for boundary and benefit classifications.	Allows local evidence, private infrastructure and actual flood exposure to be considered and anomalies corrected.	Requires additional property-level evidence, assessment and administration. The submissions did not quantify these requirements.	Modelling tools used to specify zones are generally a good reflection of sites. The details submitters sought to be considered are specific in nature and generally would introduce overhead costs into the rating system. While a review process is possible, ORC staff consider that scope should be discrete to align with the Preferred Model which is simpler.
09	146, 152, 155	Rating model – private infrastructure and mitigation.	Provide credits or adjusted classifications for private drainage, existing mitigation or properties that receive limited benefit from the scheme.	Recognises costs already carried by property owners and differences in the service or benefit received.	Requires property-level verification of infrastructure, mitigation and service received.	ORC's drainage network receives water from a range of private assets and territorial authority infrastructure. Private assets primarily provide benefit to the property they service.

ID	Submission reference(s)	Question / topic	Option considered	Potential advantages	Potential disadvantages or risks	Officer assessment and recommendation
10	5, 7, 16, 18, 19, 21, 23, 25, 27, 28, 32, 37, 42, 46, 49, 50, 55, 62, 69, 70, 73, 75, 79, 91, 95, 96, 97, 110, 112, 116, 118, 121, 124, 126, 147, 150, 159, 158, 165, 166	Drainage and flood-protection services.	Prioritise maintenance, pumping, drainage capacity, stormwater management and river or stream works before or alongside changes to the rating model.	Addresses the service and infrastructure concerns raised by affected properties.	The submissions do not establish how the works would be funded or how service improvements would resolve the disputed allocation of existing scheme costs.	Noted. The Infrastructure Strategy and the Long Term Plan are the appropriate processes to deal with this topic.

8 Appendices

8.1 Recommendations for boundary changes Taieri Drainage Scheme

Submission ID	Detail raised	Notes and ORC Recommendations
50	Requests a site visit before confirming inclusion or classification. Says the property is outside the existing scheme and has privately established wetlands and planting that slow drainage.	ORC agrees that the property neither benefits from nor places demand on the drainage scheme. The recommended approach is to amend the proposed boundary to exclude the property. A revised map should be prepared, and the implications for the property and any other affected properties should be confirmed.

8.2 Recommendations for change regards Lower Pond benefit zone Taieri Flood Protection

Submission ID	Detail raised	Notes and ORC Recommendations
35	Establish boundaries according to protection needed and received, with higher-risk properties contributing more than one-in-100-year properties.	No boundary change is currently recommended. ORC acknowledges the concerns about the Lower Pond protection level and pluvial flooding of the property. Further technical analysis should be undertaken where possible, with supporting maps and identified risks presented to the Hearing Panel for consideration.
75	Extend the boundary to all properties contributing floodwater to the Taieri. Review the farm's 40–100-year zone because of regular significant Ōwhiro Stream flooding.	Consider this submission together with submission 35. ORC should present the available technical analysis and maps relating to the Lower Pond protection level and pluvial flooding of the property to the Hearing Panel for consideration.
147	Reclassify the Lower Pond to the Upper Pond ponding-area classification because Ōwhiro Stream flooding occurs every one to two years. Include all exacerbator areas now and establish a separate Airport classification.	Consider the Lower Pond and runoff-contributor matters for the property together with submissions 35 and 75. ORC should present the available technical analysis and maps to the Hearing Panel. The matters relating to the Airport zone should be assessed separately.
153	Extend the rural boundary into the lower hills and include Allanton to Gladfield Road because it drains to the Ōwhiro. Review land beside the stream classified as one-in-100-year despite frequent flooding, and different treatment of comparable hill land.	Consider the Lower Pond protection-level and runoff-contributor matters for the property together with submissions 35, 75 and 147. ORC should provide the Hearing Panel with the available technical analysis and maps to inform its decision.

