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From: Phil Lang <phil@plang.co.nz>
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I have attached a submission for Universal Beef Packers Limited and PEL Holdings Ltd on relation to the proposed changes to the Te Kuiti urban rating area. The submission was lodged online but it was unclear whether it had been accepted into the council's website.

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Thank you.

WAITOMO DISTRICT COUNCIL PROPOSAL FOR EXPANSION OF URBAN RATING AREA

SUBMISSIONS BY UNIVERSAL BEEF PACKERS LIMITED AND PEL HOLDINGS LIMITED

Introduction

1. The District Council has proposed to extend the urban rating area at Te Kuiti to include one rural farming property owned by PEL Holdings Limited and one industrial property owned by Universal Beef Packers Limited. Both properties are outside and remote from the main Te Kuiti urban area. The PEL property is a fully rural farming property that is not serviced by any of the Te Kuiti urban services. The UBP property is the southern-most industrial activity, almost one kilometre south on SH 30 from the main urbanised area of Te Kuiti.
2. The essence of the Council's proposal is to enable levying of rates for stormwater services against the UBP and PEL properties. UBP and PEL are opposed to the proposed expansion of the urban rating area to include their properties, for the reasons set out below.

Reasons for opposition to the proposed urban rating area extensions

PEL Holdings Limited

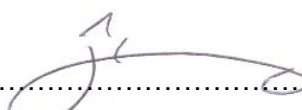
3. The PEL property is a fully rural farming property. It has a rural zoning and is operated as a working farm with no urban component to that activity. Stormwater drainage from the property is entirely through surface water courses that have existed indefinitely as part of the natural drainage of the property.
4. Although the PEL property is at least partly within the catchment that feeds stormwater into the Te Kuiti stormwater drainage system, the farm does not require any reticulated drainage system and does not contribute any contaminants that would require any stormwater treatment before eventual discharge to surface water.
5. The stormwater from the property appears to be piped for only a short distance beneath SH 30 and the NIMTR before discharging to the Mangaokewa Stream without

any treatment. It appears that the only reason why there is any piped section needed for the natural stormwater flow from the property is the intervention of the road and the railway, crossing the natural flow path of the main drainage watercourse.

6. The method of calculating stormwater rates from owners of properties within the urban rating area has not been formulated to produce fairness for properties such as the PEL property, where the property value is relatively high but the relationship with the urban stormwater network is very low. Inclusion of the PEL property in the urban rating area would produce a disproportionate contribution by the owner of the property.

UBP Limited property

7. This is the southern-most property used for industrial purposes at Te Kuiti.
8. The stormwater from the property is directed to a single watercourse that has its origins as a natural watercourse, but which has been modified to include two ponds for water detention and settlement purposes. The stormwater then progresses as surface water to enter the short piped section that crosses under the railway and SH 30 to discharge to the Mangaokewa Stream, without Council treatment.
9. It is not likely that the stormwater from the UBP site will have a need to be managed or treated in any other way within the Te Kuiti urban stormwater network.
10. The interaction between the stormwater from the UBP property and the urban stormwater network is inconsequential and is required only because of the passage of the state highway and the railway across the natural route of the watercourse.
11. The method of calculating stormwater rates from owners of property within the urban rating area has not been formulated to produce fairness for properties such as the UBP property, where the property value is relatively high but the relationship with the urban stormwater network is very low. Inclusion of the UBP property in the urban rating area would produce a disproportionate contribution by the owner of the property.


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P. Lang, legal counsel for the submitters