

Date: Tuesday 27 May 2025
Time: 9.30am - Fees & Charges and Development
Meeting Room: Contributions Policy
Venue: Tasman Council Chamber
189 Queen Street, Richmond

Tasman District Council

Kaunihera Katoa

MINUTES ATTACHMENTS

ITEM	PAGE
RCN25-05-21 Draft Development and Financial Contributions Policy Deliberations	
Attachment 1 Alternative stormwater detention discount option - tabled document.....	2
Attachment 2 Attachment to S17A report - tabled document	8

PUBLIC FORUM: Council provides the opportunity for public forum input at its ordinary meetings. The views and opinions expressed in public forum do not necessarily reflect the position of the Tasman District Council, Council officers or elected members

MEMORANDUM

TO: Mayor and Councillors

FROM: Dwayne Fletcher (Strategic Policy Manager), Brylee Wayman (Senior Community Policy Advisor), Ian McComb (Senior Infrastructure Planning Advisor Stormwater, Rivers & Coasts)

DATE: 26 May 2025

RE: **Alternative option for stormwater detention discount in Development and Financial Contributions Policy (2025 Review)**

Background

Council has consulted on changes to the Development and Financial Contributions Policy 2024-2034. One of these changes related to the current Policy's discount for some developments with on-site stormwater detention. This discount currently applies to the Stormwater Development Contributions which are charged in the Waimea and Motueka catchments.

The proposed change was to remove the discount for most developments, except for part of Richmond where the discount would still apply.

We proposed to limit the provision of this discount to 25% to apply only if:

- the development is in the Richmond Intensive Development Area and the development detains primary stormwater to the maximum allowed under Nelson Tasman Land Development Manual (NTLDM) standards.

The reason for this proposed removal of the discount was to recognise the need to fund significant investment for stormwater management that provides benefit to developments, including the management of downstream and upstream flows. This infrastructure is required to manage the effects of growth, including overland flows, even with the provision of some on-site stormwater detention.

During consultation on the Policy changes, several submitters gave feedback that the stormwater detention discount criteria should not change. They noted that not all developments benefit equally from Council stormwater networks and a blanket full charge is inappropriate.

Alternative option

The current staff Deliberations report proposes no change to this. As part of the Deliberations, the Council has the option of making amendments to the Policy in response to submissions. Following a subsequent staff discussion – we think there is another option you may wish to consider – outlined below.

The alternative option is to keep a 25% discount for most developments but to exclude parts of Richmond, Motueka, and Māpua where no discounts would apply. This is to recognise the significant investment in stormwater management in the Borck Creek, Seaton Valley, and Motueka West catchments. To some extent, this will create a two-tier stormwater development contributions price structure within the Waimea and Motueka catchments.

The advantages of this option are:

- Addresses submitter concerns by having an approach to stormwater development contributions that may better address and balance fairness and equity across different developments.
- Recognises that some developments have a reduced impact on the Council's stormwater network and that some developments have a stronger alignment between the development contributions charge and the benefits from Council's stormwater infrastructure in their catchment.
- Reduces the funding shortfall for stormwater Development Contributions. This is estimated to be an increase of \$280,000 a year in additional revenue over 2025/2026 and 2026/2027, assuming 50 HUDs a year in the Waimea catchment would have been eligible for a 25% discount, and 30 HUDs a year in Motueka West.
- Helps incentivise infill development in Richmond.

The disadvantages of this option are:

- There may be some developments that could have previously had a discount that will no longer be eligible, increasing the costs for some developments.

Staff note that the next triennial review of the Policy in 2025/2026 will include a review of the development contributions catchment maps to better reflect the location of developments which benefit from stormwater management infrastructure.

Alternative Policy Wording

59. The Council recognises that most developments manage the peak flows of stormwater they produce.
60. Where this management is permanent and will not become redundant as a result of the Council works in the future, the Council will reduce development contributions by 25% for stormwater. This is dependent on primary stormwater flows from the development site being managed in accordance with the maximum requirements in the Nelson Tasman Land Development Manual.
61. However, the 25% reduction in stormwater development contributions will not apply to properties in Maps 1, 2, and 3:
 - parts of Richmond which benefit from significant investment in stormwater management in the Borck Creek catchment.
 - parts of Māpua which benefit from significant investment in stormwater management in the Seaton Valley catchment.
 - parts of Motueka which benefit from significant investment in stormwater management in Motueka West catchment.
62. The Council also recognises there is a lag in providing a complete stormwater network for new brownfield intensification development, and there are some benefits from on-site stormwater detention. The Council has a strategic goal of intensification in Tasman's existing main centres (Future Development Strategy 2022-2052). For these reasons, the discount will continue to apply to development in the Richmond Intensive Development Area (RIDA).

Maps

Map 1 (Richmond stormwater detention discount exclusion area) will be the areas outside of the Richmond Intensive Development Area (Figure 1) and left of the green line in Figure 2. (i.e. The areas inside the shaded areas or to right of the green line will still be eligible for the discount.)

Map 2 (Māpua stormwater detention discount exclusion area) will be the area inside of the green line in Figure 3. (i.e. The areas outside of the green line will still be eligible for the discount.)

Map 3 (Motueka stormwater detention discount exclusion area) will be the area of Motueka West outlined in Figure 4. (i.e. The areas outside of the green line will still be eligible for the discount.)

Note: All of Wakefield and Brightwater will still be eligible for the discount. Stormwater development contributions do not apply to the rest of the District, nor to other settlements in the Motueka or Golden Bay catchments, and therefore no discounts are needed.

Summary of options for stormwater DC discount when permanent detention is required

	OPTIONS		
	Current Policy	Draft Policy 2025 Review – proposed for consultation	Alternative option for discussion at Deliberations
Areas eligible for a discount	Richmond, Māpua, Motueka, Brightwater, Wakefield (25% if detain primary flows, 50% if also detain secondary flows)	Richmond Intensive Development Area (25%)	Richmond Intensive Development Area Eastern area of Richmond Rest of Māpua (outside of Seaton Valley catchment) Rest of Motueka (outside of defined Motueka West area) Brightwater and Wakefield
Areas excluded from the discount (not eligible)	None	Rest of Richmond Māpua, Motueka, Brightwater, Wakefield	Rest of Richmond Māpua (area inside of Seaton Valley catchment) Motueka West area

Richmond stormwater detention discount exclusion area

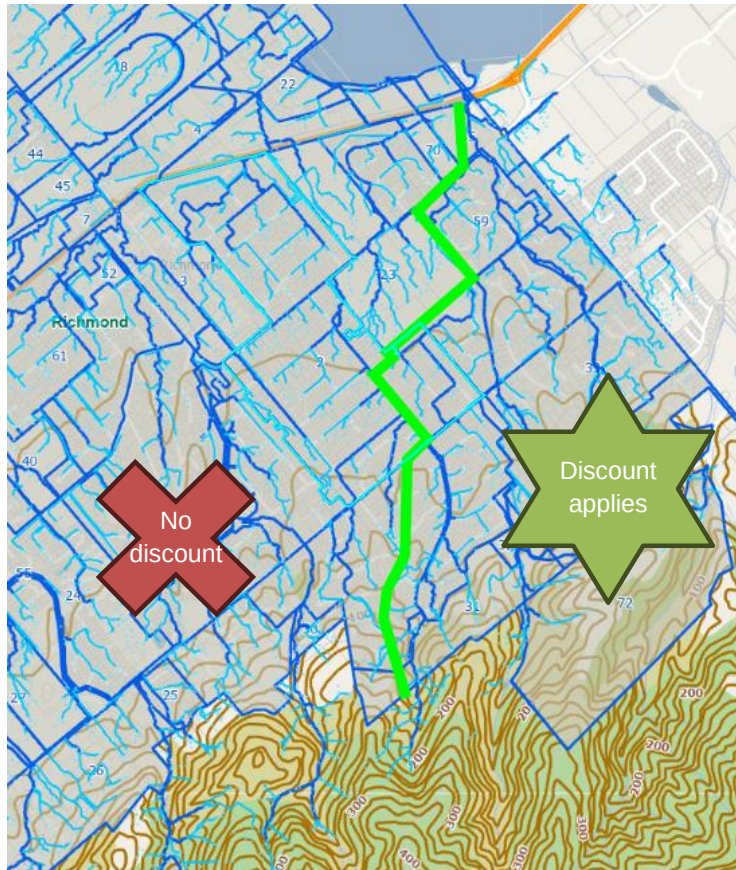


Figure 1

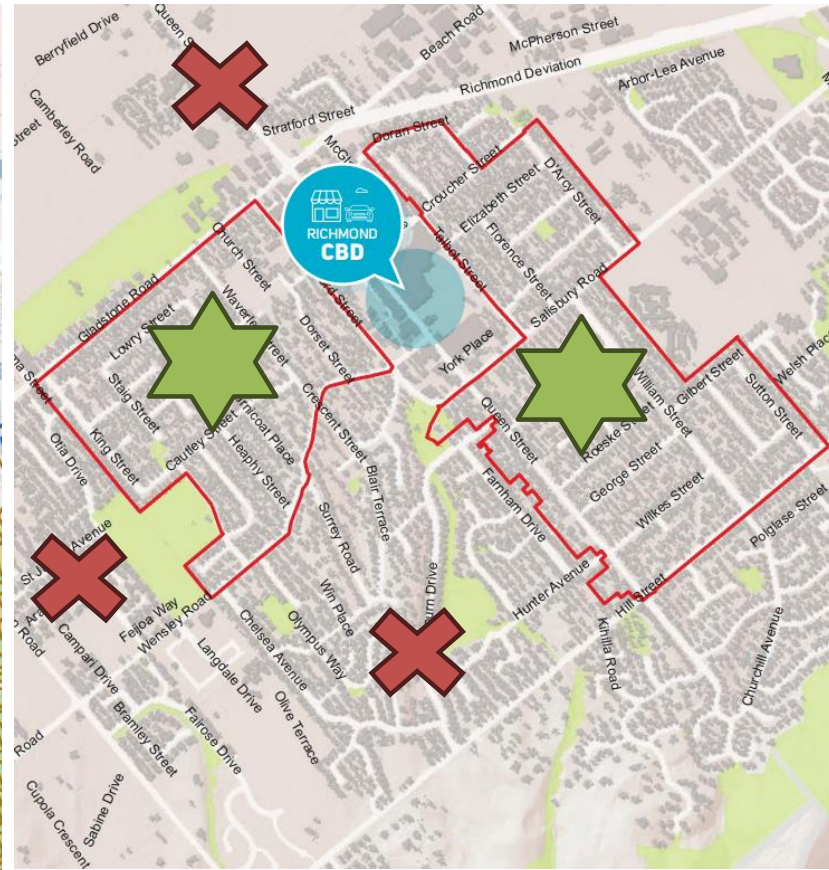


Figure 2

Map 1 (Richmond stormwater detention discount exclusion area) will be the area left of the green line in Figure 1 and outside of the Richmond Intensive Development Area (RIDA) (Figure 2). (The area right of the green line and inside the RIDA will still be eligible for the discount.)

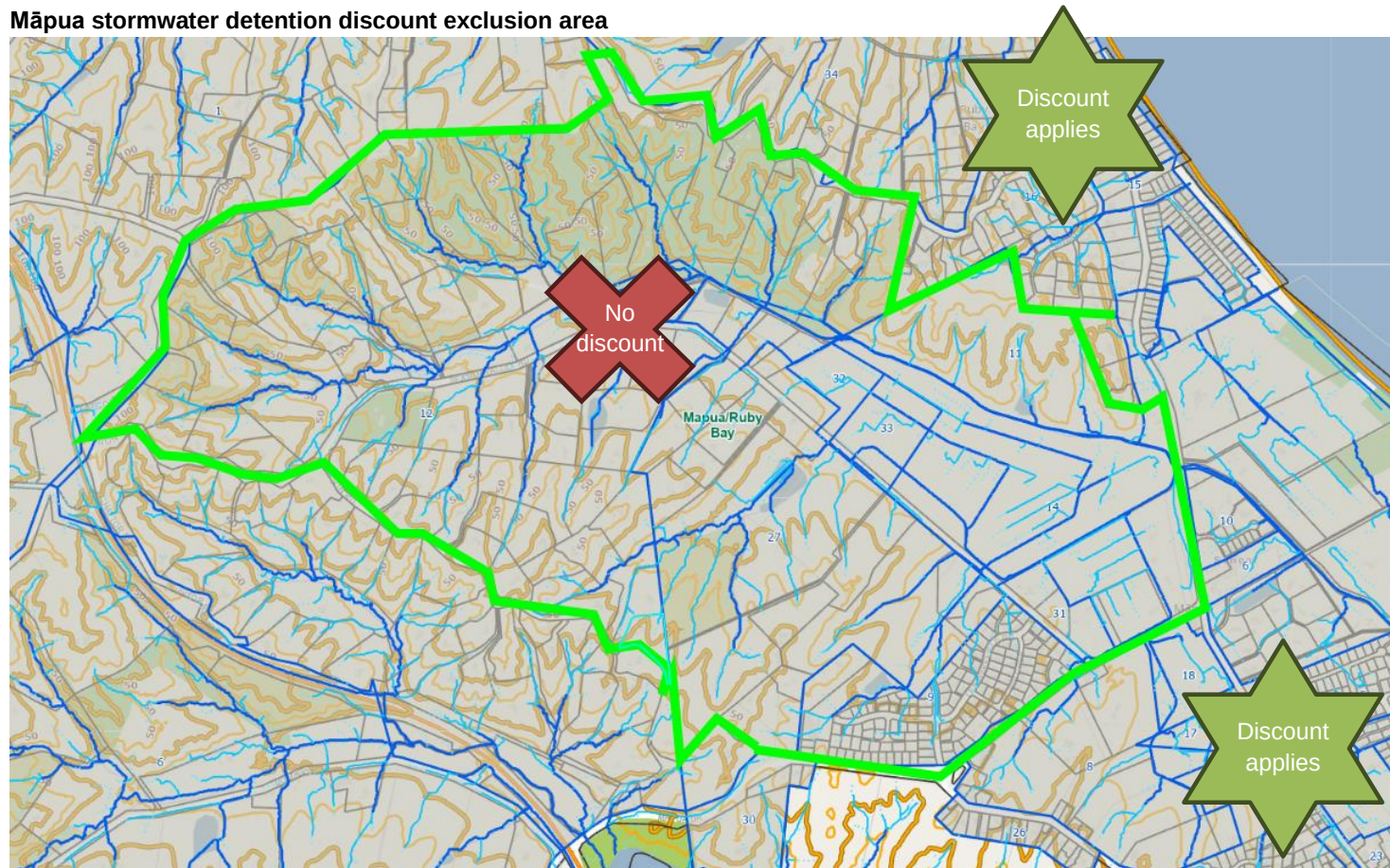
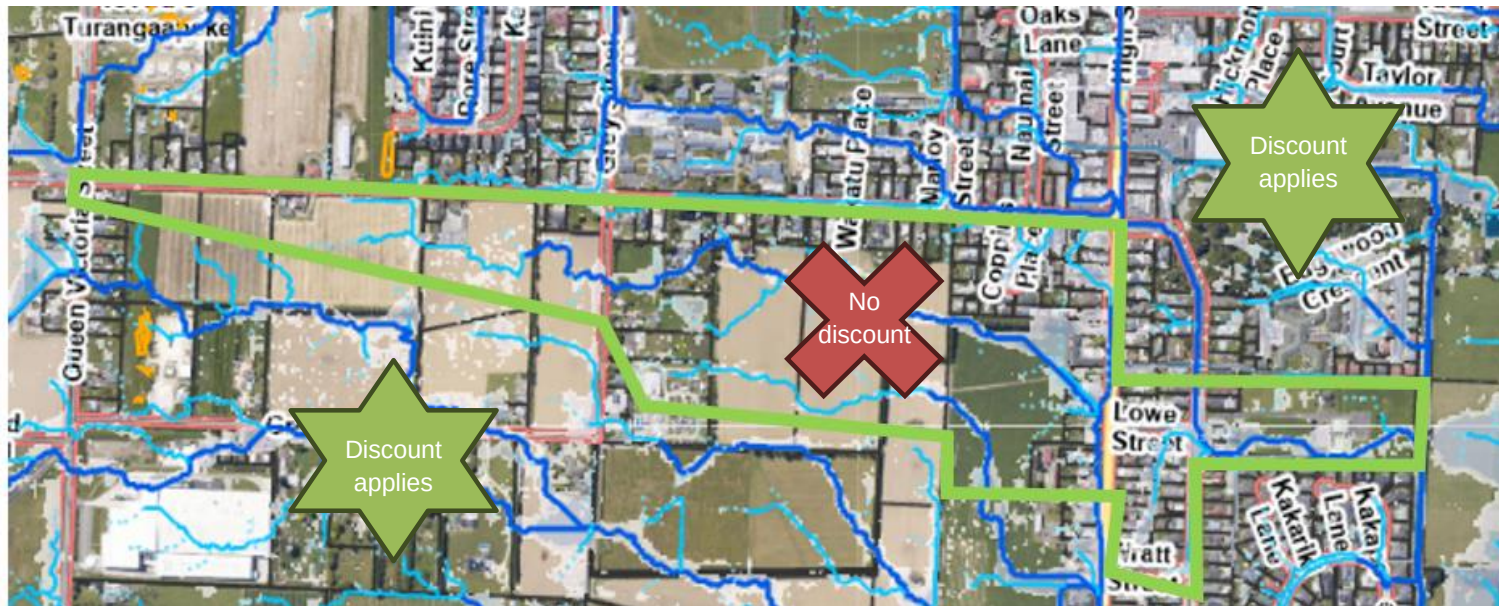
Māpua stormwater detention discount exclusion area

Figure 3

Map 2 (Māpua stormwater detention discount exclusion area) will be the area inside of the green line in Figure 3. (The areas outside of the green line will still be eligible for the discount.)

Motueka stormwater detention discount exclusion area*Figure 4*

Map 3 (Motueka stormwater detention discount exclusion area) will be the area outlined in green in Figure 4. (The areas outside of the green line will still be eligible for the discount.)

Regulatory Services – S17A Review

Section 17A of the Local Government Act 2002 requires Council to review of the cost effectiveness of current arrangements for meeting the needs of our communities for good-quality local infrastructure, local public services and the performance of regulatory functions.

This is a review of services under s17A of the Local Government Act. It includes:

Contents

Review Details	1
Part 1: Present Arrangements.....	2
Part 2: Decision to Review	9
Part 3: Review – Analysis of Options s17A(4).....	9
Part 4 - Recommended Governance, Funding and Delivery Option.....	11

Review Details

Service description and scope	To provide competent and timely enforcement services relating to key regulatory work programmes including Dog Control, Animal Control (other than dogs), Freedom Camping, Removal of Abandoned Vehicles, Parking Control, Dog Registrations, and other statutory functions pursuant to legislation and Council bylaws within the boundaries of Tasman District.
Reason for review	A review must be considered because: • No service delivery review under s17A has been undertaken within 6 years, and • There has been a significant change in the performance of those services (being the ending of the Control Services contract).
Review method	The review was conducted internally in consultation with Council's regulatory, legal and finance teams.
Review carried out by	Shane Bruyns, Regulatory Manager
Review date	13/03/2025
Group Manager	Kim Drummond, Group Manager – Environmental Assurance
Approval Body	Council
Date approved	DD/MM/YYYY

Resolution if applicable	XXX
---------------------------------	-----

Part 1: Present Arrangements

Rationale for service provision	Territorial Authorities are required to administer and enforce a myriad of Legislation, regulation and bylaws. This includes (but is not limited to): - The Dog Control Act 1996, - Tasman District Council Dog Control Bylaw, - Impounding Act 1955. - Freedom Camping Act 2011 - Freedom Camping Bylaw 2017 - Litter Act 1979 - Local Government Act 1974 - Local Government Act 2002 - Land Transport Act 1998 The administration and enforcement of the above is guided by and compliant with relevant legislation, regulations and guidelines. The provision of these services is critical to protect the community, stock and wildlife and contributes to the following outcomes: - Our unique natural environment is healthy and protected. - Our communities are healthy, safe, inclusive and resilient. - Accountability and transparency.
Previous arrangements	Control Services Contract 2015-2024 • The contract to manage Regulatory Services on behalf of Council was tendered in 2015. • Control Services Ltd were the only tender and secured the contract for three years until 1 July 2018. • An 17A assessment of the service was carried out in 2017. • The assessment determined that the arrangements were appropriate at the time and recommended that the Animal Control contract for dogs and stock not be reviewed. • The contract was extended for a further three years until 1 July 2021. • Prior to the contract ending 1 July 2021, it was extended to 1 July 2024. • Control Services Ltd were responsible for delivering the regulatory service function on behalf of Council. However, this contractual arrangement ended on 30 September 2024.
Present arrangements	• As a temporary measure this regulatory function was brought in-house on 1 October 2024 and is currently being managed by seven fixed term staff until 30 June 2025.

	- The Team Leader position is excluded from the seven fixed term staff number and is currently vacant. - Council owns the dog pound and ensure that the daily welfare of the dogs in our care are met. - Council provides a 24/7 service to high priority complaints relating to dog attacks and stock. - To support the decision to continue provision of the in-house service or seek an external provider, this document provides an assessment of these options, as well as providing a request for an exemption from a full s17A review which would require the consideration of service provision by Council Controlled Organisation or another local authority.
Levels of service and measures	LTP Measure: - We will provide animal control services to minimise the danger, distress, and nuisance caused by dogs and wandering stock and to ensure all known dogs are recorded and registered. <i>Measure:</i> - All known dogs are registered or otherwise accounted for annually by 30 June. - We respond to high priority dog complaints within 60 minutes, 24 hours a day, seven days a week. <u>Summary of other Regulatory services provided:</u> Dog registration, Complaints and Patrols: - Inspections and household visits, advice and raising awareness for dog owners regarding non-registration. - Respond to high priority complaints within 60 minutes, 24 hours a day, seven days per week. <i>(High priority complaints include dogs attacking, biting, or showing aggressive behaviour to people, barking complaints where notices have been served, and gross cruelty to dogs).</i> - Respond to medium priority complaints within four hours, 24 hours a day, seven days per week. <i>(Medium priority complaints include dogs chasing, worrying or attacking animals, dogs in dog prohibited areas, uplifting wandering/stray dogs caught by other persons).</i> - Respond to non-urgent complaints by end of the next working day. - Carrying out of routine patrols of public areas including prohibited and restricted areas to enforce Bylaw and Policy. Dog Pound: - Daily caring and welfare for dogs in the pound. - Microchip dogs as required. - Disposing of unclaimed dogs (rehoming or euthanasia)

	Property Inspections (Dog Control) - Inspect properties in accordance with the Dog Control Policy. - Resource Consent & Kennel licences - conduct visits of permit holders. Public Education, Advice and Liaison (Dog Control). - Carry out dog safety education at schools, business organisations as requested. Stock Control - Respond to high priority complaints within 60 minutes, 24 hours a day, seven days per week. <i>(High priority complaints include stock at large in urban public places and roads, or urban residential properties.)</i> - Respond to medium priority complaints within four hours, 24 hours a day, seven days per week. <i>(Medium priority complaints include uplift of wandering stock caught or secured by other persons and stock at large in rural public places and rural roads.)</i> - Respond to non-urgent complaints by the end of the next working day. Removal of Abandoned Vehicles - Arrange for removal and disposal of abandoned vehicles at least cost to Council. - Investigate all complaints and concerns regarding abandoned vehicles. Parking Control - Education, encouragement and enforcement of Council's Traffic Control Bylaw - Investigate and report on all complaints and concerns about parking behaviour. - Write and serve all required infringement notices. Monitoring and Enforcement of Freedom Camping Bylaw - Education, encouragement and enforcement of the Act and Council's Bylaws on Freedom Camping
Last review	None. Exemption from s17A review was granted in 2017.
Performance	Previous Model: - Under the terms and conditions of the contract, the service delivery was not sufficient to provide an efficient service which was a result of a fixed cost being agreed to deliver the service. - Staff working under contract were employed on a part time basis to cover the contractual hours as shown in table 1 and table 2 below. - To ensure that the contract was financially viable, the contractor strictly adhered to the terms and conditions of the contract. - Any additional work carried out above and beyond the contract agreement was invoiced at \$65 per hour.

- The additional work related to extra hours that was required to monitor and perform freedom camping enforcement, parking enforcement, dog control and replacing damaged signage across the district.
- Total cost to Council was in the 2023/2024 financial year was \$567,302.12

Service delivery carried out via contract was not sufficient to meet the community expectations or to provide an efficient service, for example:

- **Parking** – Only 70 hours per week were allowed for in the contract to perform parking enforcement duties across the district. This was scheduled as follows:
 - at least all five weekdays in Richmond,
 - two days a month in Takaka,
 - three days a week in Motueka/Mapua and
 - at least 3 days per week in Kaiteriteri during summer from 1 November to 31 March or as otherwise agreed with Council.

Table 1 & 2 below set out the average weekly hours across the district via the contract agreement:

Table 1.

Summer Hours (1 Nov - 31 Mar)

Area		Average Weekly Hours
Richmond	9am-3pm, 5 days/wk	30
Motueka/Mapua	9am-3pm, 3 days/wk including Saturday	18
Kaiteriteri & Marahau	10am-4pm, 3 days/wk including Saturday	18
Takaka	9am-3pm, 2 days/mth	4
	Total Weekly Hours	70

Table 2

Winter (1 Apr – 31 Oct)

Area		Average Weekly Hours
Richmond	9am-3pm, 5 days/wk	30
Motueka/Mapua	9am-3pm, 3 days/wk	18

Takaka	9am-3pm, 2 days/mth	3
	Total Weekly Hours	51

Freedom Camping

The crucial time to enforce the freedom camping rules is during the summer period i.e. from 1 December to 31 March.

The contract provided for an average of **40 hours** per week to do freedom camping enforcement across the district during the summer period. No more than **120 hours per annum** was allocated to this role outside the summer period.

Council would pay \$65+GST per hour for any additional hours required to do enforcement or monitoring.

In 2024 during negotiations with the contractor, it was agreed that the hourly fee to do additional hours would increase to \$85 + GST per hour.

Learnings from temporary in-house approach:

- Bringing the regulatory function in-house allowed Council to improve the service delivery to the community.
- Since bringing the service in house there have been concerns raised about the professionalism and processes of the service being undertaken on Council's behalf.
- Customer feedback regarding service delivery remained positive since bringing the regulatory function in-house.
- Parking officers are rostered to patrol the Richmond, Mapua, Motueka and Golden Bay areas five days a week.
- In-house staff are employed to work a 40-hour week.
- Staff working a 40-hour week allows Council to be flexible enough to respond to changes and demands in circumstances to ensure a better service to our customers.
- The contractor was unable to resolve complaints about the lack of coverage at crucial times in certain areas e.g. Golden Bay for example, ongoing non-compliance with the Dog Control Bylaw over weekends.
- The lack of coverage was a result of the contractor delivering their responsibilities strictly within the agreed terms and conditions of the contract.
- Bringing the service in-house increased our coverage and service delivery within the district.

Benefits of the in-house approach

Bringing the regulatory service in-house, allowed Council to improve service delivery to the community, these include:

- **Parking Enforcement**
Parking enforcement is now carried out by parking officers across the Richmond, Mapua, Motueka and Golden Bay areas five days a week.
- **Resources**
A dedicated Enforcement Officer who is based in Golden Bay.

	• Freedom Camping Four staff are available to attend to freedom camping complaints during the week and three on call over weekends. Summary, • Bringing the regulatory service in-house allows Council to deliver a more efficient, effective and professional service to the community. • The in-house model allows Council to be flexible enough to respond to any changes in demand or circumstances that could have an impact on service delivery.																																																										
Cost	A. The total operating and capital cost budgeted to deliver the service under contract was: <table><tr><th>Year</th><th>Budget</th><th>Actual</th><th>Difference</th></tr><tr><td>2016/17</td><td>\$ 416,354.00</td><td>\$ 329,211.25</td><td>\$ 87,142.75</td></tr><tr><td>2017/18</td><td>\$ 401,450.00</td><td>\$ 314,057.63</td><td>\$ 87,392.37</td></tr><tr><td>2018/19</td><td>\$ 437,014.00</td><td>\$ 408,408.99</td><td>\$ 28,605.01</td></tr><tr><td>2019/20</td><td>\$ 448,133.00</td><td>\$ 442,407.57</td><td>\$ 5,725.43</td></tr><tr><td>2020/21</td><td>\$ 461,088.00</td><td>\$ 487,648.45</td><td>-\$ 26,560.45</td></tr><tr><td>2021/22</td><td>\$ 472,750.00</td><td>\$ 501,853.49</td><td>-\$ 29,103.49</td></tr><tr><td>2022/23</td><td>\$ 486,049.00</td><td>\$ 529,308.36</td><td>-\$ 43,259.36</td></tr><tr><td>2023/24</td><td>\$ 501,968.00</td><td>\$ 567,302.12</td><td>-\$ 65,334.12</td></tr></table> • As noted above, since 2020/21 the budget was not sufficient to cover the actual cost to deliver the service. • During negotiations with the contractor in 2024, it was agreed to increase the contract fixed fee to \$572,818.68 p.a • This excluded additional fees which were expected to be approximately \$80,000.00 p.a. above the new fixed contract price. • The additional fees would cover the extra hours required to perform extra parking enforcement, freedom camping enforcement, dog control and damage sign replacements. B. The forecasted cost to continue the service in-house: <table><tr><th>Year</th><th>TDC</th></tr><tr><td>2024/25</td><td>\$ 914,329.47</td></tr><tr><td>2025/26</td><td>\$ 795,168.43</td></tr><tr><td>2026/27</td><td>\$ 796,912.25</td></tr><tr><td>2027/28</td><td>\$ 747,199.67</td></tr><tr><td>2028/29</td><td>\$ 756,974.50</td></tr><tr><td>2029/30</td><td>\$ 710,918.25</td></tr><tr><td>2030/31</td><td>\$ 717,792.36</td></tr><tr><td>2031/32</td><td>\$ 716,243.31</td></tr><tr><td>2032/33</td><td>\$ 720,066.10</td></tr><tr><td>2033/34</td><td>\$ 715,003.16</td></tr></table> • On 1 October 2024, the regulatory function was brought in-house and the cost to deliver this service is forecasted to be \$914,329.47 for the 2024/25 financial year, which includes CAPEX expenses of \$202,741.72	Year	Budget	Actual	Difference	2016/17	\$ 416,354.00	\$ 329,211.25	\$ 87,142.75	2017/18	\$ 401,450.00	\$ 314,057.63	\$ 87,392.37	2018/19	\$ 437,014.00	\$ 408,408.99	\$ 28,605.01	2019/20	\$ 448,133.00	\$ 442,407.57	\$ 5,725.43	2020/21	\$ 461,088.00	\$ 487,648.45	-\$ 26,560.45	2021/22	\$ 472,750.00	\$ 501,853.49	-\$ 29,103.49	2022/23	\$ 486,049.00	\$ 529,308.36	-\$ 43,259.36	2023/24	\$ 501,968.00	\$ 567,302.12	-\$ 65,334.12	Year	TDC	2024/25	\$ 914,329.47	2025/26	\$ 795,168.43	2026/27	\$ 796,912.25	2027/28	\$ 747,199.67	2028/29	\$ 756,974.50	2029/30	\$ 710,918.25	2030/31	\$ 717,792.36	2031/32	\$ 716,243.31	2032/33	\$ 720,066.10	2033/34	\$ 715,003.16
Year	Budget	Actual	Difference																																																								
2016/17	\$ 416,354.00	\$ 329,211.25	\$ 87,142.75																																																								
2017/18	\$ 401,450.00	\$ 314,057.63	\$ 87,392.37																																																								
2018/19	\$ 437,014.00	\$ 408,408.99	\$ 28,605.01																																																								
2019/20	\$ 448,133.00	\$ 442,407.57	\$ 5,725.43																																																								
2020/21	\$ 461,088.00	\$ 487,648.45	-\$ 26,560.45																																																								
2021/22	\$ 472,750.00	\$ 501,853.49	-\$ 29,103.49																																																								
2022/23	\$ 486,049.00	\$ 529,308.36	-\$ 43,259.36																																																								
2023/24	\$ 501,968.00	\$ 567,302.12	-\$ 65,334.12																																																								
Year	TDC																																																										
2024/25	\$ 914,329.47																																																										
2025/26	\$ 795,168.43																																																										
2026/27	\$ 796,912.25																																																										
2027/28	\$ 747,199.67																																																										
2028/29	\$ 756,974.50																																																										
2029/30	\$ 710,918.25																																																										
2030/31	\$ 717,792.36																																																										
2031/32	\$ 716,243.31																																																										
2032/33	\$ 720,066.10																																																										
2033/34	\$ 715,003.16																																																										

Revenue streams:	
1. Dogs	
2. Parking	
3. Freedom Camping	
4. Parking - Sundry	
5. Animal Control – Sundry	
Year	Expected revenue
2024/25	\$ 956,153.88
2025/26	\$ 1,205,577.86
2026/27	\$ 1,205,598.74
2027/28	\$ 1,206,424.09
2028/29	\$ 1,206,466.19
2029/30	\$ 1,206,507.74
2030/31	\$ 1,206,550.32
2031/32	\$1,206,592.22
2032/33	\$1,206,635.12
2033/34	\$1,206,635.12

Part 2: Decision to Review

Council can make a decision not to conduct a review, however this decision must comply with S17A(3).

Exemption criteria

Does the cost of undertaking the review outweigh the benefits?	No – a truncated s17A review has been completed.
Is delivery of the service, regulatory function or infrastructure governed by legislation, contract or other binding agreement that cannot be reasonably altered within the following two years?	No.

Recommendation to review

Recommendation to review	Given the importance of this function a truncated s17A review has been completed.
---------------------------------	---

Part 3: Review – Analysis of Options s17A(4)

The Act requires that Council considers and record answers to all these options

Governance and Funding Options

Tasman District Council	Currently the provision of regulatory services has been brought in house with the function reporting to the Environment and Regulatory Committee. This is the recommended option.
Joint committee or other shared governance	While the provision of a shared service with Nelson City Council could be considered in future the transition would be a long term project and not something that could be achieve in the timeframe available to Council. This option is not recommended at this stage.
Other reasonably practicable option	NA

Delivery Options

Tasman District Council	Currently the provision of regulatory services has been brought in house with the function reporting to the Environment and Regulatory Committee. The temporary arrangement has proven that the function can be delivered effectively in house and in a manner which creates a better level of service for the Community. Community views have not been sought on this approach. The cost of this option is higher than the previous contractual arrangements, however as noted above the Council is providing a higher quality service. The Environmental Assurance team intend to review the running of this function within two years to ensure that it is operating as efficiently and effectively as possible. This is the recommended option.
CCO wholly owned or partly owned by Tasman District Council	The cost of running this service is estimated to be approximately \$800,000 per annum. At this stage it is considered that the cost of forming a CCO either alone or with Nelson City would outweigh any benefit. However, this will be considered further when the effectiveness of the service is considered in two years' time. This option is not recommended.
Contract the service to a provider	This was the previous arrangement which provided a less-than-optimal level and standard of service. Last time the contract was put out for tender in 2015 the Council received one response. That company has now ceased to exist. It is not known whether there are other established contractors which Council could engage with. It is also noted that the ending of this contract created immediate administrative and performance problems for Council. This risk remains for any contracted provider. This option is not recommended.

Part 4 - Recommended Governance, Funding and Delivery Option

Recommendations from the service delivery reviews	The recommendation is that the performance of this function remains in-house. The function would form part of the Environmental Assurance Group and report to the Environment and Regulatory Committee. The performance of the function in-house is considered by staff to be the best way to deliver this service. The rationale for this recommendation is: • The current temporary arrangements are working well, • While there is an increased cost this has been reflected in an increased level of service seen by the Community. This can be reflected in the levels of service in the next LTP. • The cost of delivering the function is offset by the revenue generated. • Having staff as opposed to contractors perform the function means a greater level of professionalism and quality can be delivered to the community. • The other options, such as tendering the contract or setting up a CCO or shared service are not practicable or cost effective at this time. This recommendation will be sent to the Council's Executive Leadership Team for endorsement before approval is sought from Council.
--	---