

Concessions Policy review - Summary of submissions					
Submission No.	Name	Submission	GWRC comments	To be heard?	Councillors Notes
01	David Driscole	<ol style="list-style-type: none"> 1. Agrees with the proposal to remove fees for the not for profit groups using the regional parks. 2. Suggests that the cap of 150 participants be reconsidered, with more emphasis placed on "environmental impacts", i.e., running a mountain bike race or quad bike race would create more impacts. 3. When differentiating between non-commercial and commercial organisers, then consideration needs to be extended to the organisers of commercial events. For well established large events then a fee for the event is appropriate. However, for event organisers that are starting out in the first year or trying to establish their business, then fees should be reduced or waived as additional fees will further strain their financial burden. 	<p>Point 2 – In respect to the cap of 150 participants, the assessment is not limited to participant numbers but is also based on actual effects of either a low or high impact i.e. traffic counts, ranger time, trail bikes causing track marks. Refer to pages 5 and 6 of the draft Concessions Policy document for further details.</p> <p>Point 3 – Currently the fee waiver would strictly be for events/activities associated with school or college aged children <19.</p>	No	
02	Warren Mueller	<ol style="list-style-type: none"> 1. Supports that commercial activities should be charged. 2. Opposes the increase in charges for commercial and non-commercial activities on the basis that there is a growing absence of young people using these facilities. The increases may add to this problem. 3. Supports the trading of mobile traders. 4. Notes that an increase in younger people participating in outdoor pursuits is a good thing. Seeks that all clubs that wish to take any <19 year old for excursions should not be charged. 5. Opposes the non-refundable application fee as events can be cancelled because of weather conditions and thereby the fee would be forfeited. 6. Suggests a business plan or supporting evidence that demonstrates the cost to administrate the implementation, collection and collation of the fees is less than the revenue recouped from the fees. 	<p>Points 2 and 4 – There is a proposed fee waiver (nil charge) for events/activities associated with school or college aged children <19. This would encourage young people to use the GWRC parks and forests.</p> <p>Point 5 – This is an accepted risk when planning for events/activities within the event management industry.</p> <p>Point 6 – Not relevant to the draft Concessions Policy.</p>	No	
03	Steve Dunphy	<ol style="list-style-type: none"> 1. Supports that commercial activities should be charged. 2. Opposes the increase in charges on the basis that as a hunter there are plenty of other hunters who are not a hunting permit holder. The changes will prevent good honest people from obtaining permits to match others that do not have permits. The cost of policing the charges is not known. 3. Supports the trading of mobile traders. 4. Supports the fee waiver for those <19 years old. 	<p>Point 2 – Hunter permits are currently free and no change is proposed to that policy.</p>	No	
04	Marco Renall	<ol style="list-style-type: none"> 1. Supports that commercial activities should be charged. 2. Opposes the increases in charges on the basis that the PNP Cycling Club would find the \$5 per rider and ranger fee at \$80 per hour too expensive. 3. Would like GWRC to take into account of allowing for the building and maintenance of MTB trails in the Stratton Street woolshed area. 4. Supports the trading of mobile traders. 5. Supports the fee waiver for those <19 years old. 6. Seeks that the concession administration fee be waived for non-profit groups such as the PNP Cycling Club and Hutt Valley Orienteering Club for reasons that it would be able to assist our members more and reduce our costs. 	<p>Point 2 - The proposed Concessions Policy will not be charging for non-commercial events/activities with less than 150 participants.</p> <p>Point 3 – This is considered a separate operational matter to that of the Concessions Policy. This is dealt with under the Belmont Park Management Plan process.</p> <p>Point 6 – The proposed Concessions Policy will not be charging for non-commercial events/activities with less than 150 participants.</p>	No	
05	Linda Mead	<ol style="list-style-type: none"> 1. Supports that commercial activities should be charged. 2. Supports the increase in charges for commercial and non commercial activities. 3. Supports the trading of mobile traders but only in some locations with a permit. 4. Supports the fee waiver for those <19 years old. 5. Seeks that non-profit clubs such as tramping, orienteering and harrier clubs should not be charged. 	<p>Point 5 – The proposed Concessions Policy will not be charging for non-commercial events with less than 150 participants and will also have a nil administration fee.</p>	No	

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06	Film Wellington (Deanna Borren and Stacey Ferdinands)	<ol style="list-style-type: none"> 1. Opposes commercial activities being charged on the basis that within filming there are situations where a project should not be charged. There needs to be flexibility to deal with charities or small companies with no budget to have their fees waived. News/current affairs are given a nil charge yet a local Wellington production company with little or no budget can still be charged as much as \$750 a day. Fees should be negotiable. 2. Opposes the increase in charges for some activities (commercial versus non-commercial activities) for reasons that the film and television companies in Wellington contribute millions of dollars to the Wellington economy and provide hundreds of jobs to residents. They also encourage tourism and promote the natural beauty of our parks and forests. 3. Opposes the trading of mobile traders for reasons that parks and forests do not need to be serviced by mobile traders. However, film and television crews with catering facilities (temporary) should be an exception. 4. Supports in part for the fee waiver of those <19 years old. Suggests that film and TV companies should be assessed on a case by case basis and fees should be negotiable. Organisations with extremely low budgets or non-profit organisations should also be eligible for waived or reduced fees. 5. Opposes the fee increase for filming for reasons that the increase in feature film and TV filming fees to \$500 a day is not consistent with the film friendly protocol agreed to by the Councils within the Greater Wellington region. Local/New Zealand production companies should not be charged at the same commercial rate as big budget internationals. The local film and TV production industry should be supported by the GWRC and the charges need to be consistent across the Wellington region. The standard fee of \$250/half day and \$400/full day for filming in the region should remain consistent as per the Wellington City Council fees. The Council should also reduce or waive fees for low budget productions (as Wellington City Council does). 	<p>Point 1 – Noted. Point 2 – Noted. Point 3 – Noted. Point 4 – There is a fee waiver for student film activities undertaken for educational purposes. Point 5 - Noted. Notes that GWRC has not signed up with the film friendly protocol.</p>	No	
07	Pat Van Berkel	<ol style="list-style-type: none"> 1. Notes that there is an error with the Draft Concessions policy stating that orienteering is listed as an example of a commercial activity as set out in appendix 1 of the draft Concessions Policy. It is incorrect that orienteering is commercial as it is an activity that is non-commercial in nature. 	<p>Point 1 – This is a misinterpretation as orienteering would be deemed a non-commercial activity as set under “definitions” in appendix 2. However, recommendation is to omit reference to ‘orienteering’ as a commercial activity as stated within the fee structure (appendix 1).</p>	No	
08	Gavin Scott (member of Orienteering Hutt Valley Club)	<ol style="list-style-type: none"> 1. Notes that there is an error with the draft Concessions Policy stating that orienteering is listed as an example of a commercial activity as set out in the draft Concessions Policy. It also appears that the policy requires a fee for orienteering activities, as being “commercial”. Recommends that orienteering be included as a non-commercial activity. Recommends that there are no fees for orienteering events. 	<p>Point 1 - This is a misinterpretation as orienteering would be deemed a non-commercial activity as set under “definitions” in appendix 2. However, recommendation is to omit reference to “orienteering” as a commercial activity as stated within the fee structure (appendix 1). The Concessions Policy sets out that if an activity is managed on a non-commercial basis and that there are less than 150 people then there are no fees charged.</p>	No	
09	Heather McMillan	<ol style="list-style-type: none"> 1. Opposes commercial activities being charged on the basis that it is an error that orienteering and running are stated as commercial events. Most of the orienteering events are club run with a family focus. Any profit made is then reinvested in equipment for the club. The proposed \$5 charge will discourage families from getting out, exercising and enjoying our parks. 2. Opposes the increased charges for some activities (commercial and non-commercial activities) on the basis that orienteering has very little impact on the environment and has minimal (if any) Council input. How is the cost justified? Participants are already being hurt by the increase in petrol costs to get to venues. 	<p>Point 1 - This is a misinterpretation as “orienteering” or “running” would be deemed a non-commercial activity as set under “definitions” in appendix 2. However, recommendation is to omit reference to ‘orienteering’ or “running” as a commercial activity as stated within the fee structure (appendix 1). The Concessions Policy sets out that if an activity is managed on a non-commercial basis and that there are less than 150 people then there are no fees charged. Point 2 - As for point 1. Commercial events should be charged to avoid or minimise any ratepayer subsidy of private gain. Point 5 - As for point 1.</p>	No	

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		<ol style="list-style-type: none"> 3. Supports the trading of mobile traders. 4. Supports the fee waiver for those <19 years old. 5. Seeks that orienteering should not be charged as it is family focused with toddlers to pensioners joining in. These people already pay rates, have minimal impact on the park and promote the parks at no cost to the Council. 6. Opposes to that of orienteering being classed as commercial. Many clubs depend upon the success of public events to raise funds for the club. Participation in these events is vital for public health. Agrees to charge the commercial operators as they have prizes and incentives that encourage participants. 	Point 6 - As for point 1.		
10	Lynette Porter	<ol style="list-style-type: none"> 1. Opposes commercial activities being charged on the basis that the charges would in turn be charged to the participants. A majority of them already pay a portion of their rates to the Regional Council to have the use of these parks. 2. Opposes the increased charges for some activities (commercial and non-commercial activities) on the basis the charges do not encourage any active groups to use the GW parks, whether they are under or over 150. The users would be forced to look at other alternatives if the cost of paperwork became too onerous. 3. Supports the trading of mobile traders. 4. Opposes the fee waiver for those <19 years old on the basis that a large number of all participants are children and families which should be encouraged. If there must be a charge, the <19 concession policy should be available to all participants using the park. 5. Notes that if they do not come under the eligibility status for the streamlined concession, they would be forced to look at alternative areas for future mapping, with a result of less use of the GWRC parks. 6. Recommends whether orienteering qualifies for a streamlined concession or whether a permit for each activity is required; it appears we do come under your non-commercial activity with less than 150 participants is thereby eligible for a streamlined concession. However, under the permit fee structure orienteering is included as a commercial activity. We are a voluntary non-profit organisation who would expect all levels of government to support voluntary sports clubs like orienteering. 7. Recommends that orienteering can have a long-term streamlined concession for possibly once a year. This would help to alleviate the workload of GWRC staff/orienteering volunteers and to enable consistent interpretation of the guidelines. 	<p>Point 1 –The rationale for the draft Concessions Policy is that commercial concessionaires should pay fees for the privilege of obtaining monetary profit/gain or gain or any other benefits from the use of public land.</p> <p>Point 2 – The proposed charges are actually a reduction of the current Concessions Policy fees. The proposed Concessions Policy sets out that if an activity is managed on a non-commercial basis and that there are less than 150 people then there are no fees charged. In the case of commercial events, they should be charged to avoid or minimise any ratepayer subsidy of private gain.</p> <p>Point 4 – Noted.</p> <p>Points 5 and 6 – With regard to the criteria, as demonstrated on the flow chart on page 5 of the Concessions Guidelines, if the activity is managed on a non-commercial basis and has less than 150 participants, these activities would be eligible for a streamlined concession. However, recommendation is to omit reference to "orienteering" as a commercial activity within appendix 1 (fee structure).</p> <p>Point 7 – A year long concession process would be hard to administer because of events potentially clashing with each other in the case of booking events last minute and is also dependent on location/space and ranger availability. The proposed streamlined concession process will simplify and significant reduce the timeframe and paperwork required for processing concessions.</p>	No	
11	The Printing Museum (Incorporated)	<ol style="list-style-type: none"> 1. Supports the proposed "Concessions Guidelines" in principle with its intent. It is a necessary part of the "users pays" economy. 2. Notes that the printing museum will be in the category of "non-commercial". 3. Our submission is that GWRC should give serious consideration to classifying the land immediately adjacent to the MacKay's crossing entry to the Park as a development area as a "Heritage Precinct". 	<p>Point 2 – Noted.</p> <p>Point 3 – This issue is not relevant to the proposed Concessions Policy.</p>	No	
12	Robert George Bell	<ol style="list-style-type: none"> 1. Opposes that of commercial activities being charged on the basis that fundraising events for approved charities should be exempt from being charged fees. 2. Opposes the increase in charges for commercial and non commercial activities on the basis that all users should pay regardless of what they are undertaking within the area. User Pays! 3. Supports the trading of mobile traders. 4. Opposes the fee waiver for those <19 years old on the basis that it should be for school/college students but NOT for anyone under the age 	<p>Point 1 – There are no exemptions for operators who are running events for the purposes of fundraising for approved charities in the proposed policy.</p> <p>Point 2 – The rationale behind the proposed Concessions Policy sets out that if an activity is managed on a non-commercial basis with less than 150 people then no fees will be charged. In the case of commercial events, they should be charged to avoid or minimise any ratepayer subsidy of private gain.</p> <p>Point 4 – The criteria as set out is clear with a fee waiver for those <19</p>	No	

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		of 19. Under 19 undertaking motorised recreation should still pay otherwise it will be too hard to police.	years old on the basis that it is strictly for school/college students only for school/educational related events. Therefore, any under 19 undertaking motorised recreation would be charged as under "motor and trail bike" fees of the fee schedule (appendix 1) of Concessions Policy.		
13	Ann-Louise Webster	<ol style="list-style-type: none"> 1. Opposes that of commercial activities being charged on the basis that if a group are fundraising for a charity then they should not be charged. This would be on the basis that the event is advertised as a fundraising event. 2. Opposes the increase in charges for commercial and non commercial activities on the basis that I don't see why some recreational users have to pay and others do not. I think some groups are being discriminated against. Why should non-motorised users not be charged? Walkers, trampers should also be paying to be there if other people who choose to use a motorised form of transport have to pay. User pays! 3. Supports the trading of mobile traders especially for having food and drink stalls at the start or finish of an event. 4. Opposes the fee waiver for those <19 years old. 5. Recommends that if there is going to be charges then everyone who goes into the parks and forests should pay. Reduce the charges, but charge everyone. That is fair. 	<p>Point 1 – Noted. There are no exemptions for operators who are running events for the purposes of fundraising for approved charities.</p> <p>Point 2 – Noted. The rationale behind the proposed Concessions Policy sets out that if an activity is managed on a non-commercial basis with less than 150 people then no fees will be charged. In the case of commercial events, they should be charged to avoid or minimise any ratepayer subsidy of private gain.</p> <p>Point 5 – The philosophy of the Concessions Policy is to not to charge for non-commercial use but to charge for commercial use to avoid or minimise any ratepayer subsidy of private gain. However, should an event be of high impact, such activities would be charged on this basis.</p>	No	
14	Alan Horn (Wellington Orienteering Club)	<ol style="list-style-type: none"> 1. Supports that of commercial activities being charged on the basis that non-profit volunteer club organisations (i.e. orienteering clubs) are recognised as a non-commercial activity of low impact AND that such clubs do not need to engage in lengthy applications for each use. 2. Opposes the increase in charges for commercial and non commercial activities on the basis that an increase in fees would stop the club using Regional Council parks because event fees (which cover cost only) would become prohibitive to those participating. 3. Supports the trading of mobile traders. 4. Supports the fee waiver for those <19 years old on the basis that events such as orienteering would typically have about 50% of competitors under the age of 19. The Wellington Orienteering club runs events for College Sport Wellington where the competitors are from a variety of schools in the Wellington region. 5. Opposes to orienteering being listed as a commercial activity. Orienteering clubs are run by volunteers as a non-profit activity which has little impact on other park users. 6. Seeks that clarification be sought for the assessment as to what is "non-commercial" and "low impact". 7. GWRC is the only Council whose land the club uses which; 1) charges us to apply for use, 2) requires a bond, and 3) puts a participation rate on this activity. There needs to be an easier way to identify our club's potential use of Queen Elizabeth Park and get permission to use without having to apply for each and every event from scratch. 8. Notes that the current application processes are unreasonable and bureaucratic and contrary to SPARC and government policy. Seeks to ratify that we can register once as a regular user, and then only notify the Council when events are being held. 	<p>Point 1 – The rationale behind the proposed Concessions Policy sets out that if an activity is managed on a non-commercial basis and that there are less than 150 people then no fees will be charged. The process for such non-commercial events with low impact is proposed to be "streamlined" so that the application timeframe and process is reduced.</p> <p>Point 2 - The philosophy of the proposed Concessions Policy is not to charge for non-commercial use but to charge for commercial use to avoid or minimise any ratepayer subsidy of private gain.</p> <p>Point 5 - This is a misinterpretation as orienteering would be deemed a non-commercial activity as set under "definitions" in appendix 2. However, recommendation is to omit reference to 'orienteering' as a commercial activity as stated within the fee structure (appendix 1).</p> <p>Point 6 – Refer to the flow chart and assessment chart on pages 5 and 6 of the draft Concessions Policy. This sets out criteria for events or activities to be deemed "non-commercial" and/or "low impact".</p> <p>Points 7 and 8 – The event process is being proposed to be a lot more simplified with the "streamlined" concession process. This will enable activities/events that fulfil the criteria on page 5 to fill out a one page form to be processed at head office or by a park ranger. This form will also have the contract attached to it.</p>	Yes	

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15	Ian Priest	<ol style="list-style-type: none"> 1. Opposes commercial activities being charged on the basis that the proposed charges do not distinguish between events conducted by individuals or businesses conducted for personal or commercial gain, and events conducted by volunteers on behalf of a club or organisation for advancing the objectives of the club or organisation. 2. Supports the trading of mobile traders. 3. Supports the fee waiver for those <19 years old. 4. Seeks that other organisations such as organisations of volunteers or in support of charities not be charged. 5. Seeks clarification for when an activity is undertaken in more than one park, then is there a separate application and fee payable for each. 6. Seeks clarification that for an activity for a short time (>3 hours) and for other events slightly longer (>5 hours) then will they be at different rates or will the full day levy be required in respect of all? 	<p>Point 1 – Refer to fee schedule (appendix 1) under non-commercial activities. To ensure that non-commercial activities remain non-commercial GWRC will require them to demonstrate evidence of this and to sign a disclaimer as well.</p> <p>Point 4 - There are no exemptions for operators who are running events for the purposes of fundraising for approved charities in the proposed policy.</p> <p>Point 5 – There are no additional fees activities for more one park for the same event. However, there is scope to investigate reducing fees should events be combined with GWRC parks and forests with other public lands (i.e., DoC land).</p> <p>Point 6 – A half day and a full day are yet to be determined. However, suggest that for any event/activity of <4 hours is deemed a half day and that for >4 hours is deemed to be a full day.</p>	Yes	
16	Jennifer Hardie	<ol style="list-style-type: none"> 1. Opposes that of commercial activities being charged on the basis that most running events are organised by harrier clubs and are not commercial events but inter-club events. Organising clubs need to get participants and these clubs rely on this money to help keep them afloat. 2. Opposes the increase in charges for commercial and non commercial activities on the basis that events that were not charged for previously are now going to be charged. 3. Opposes the trading of mobile traders on the basis that they should only be allowed to trade if invited to assist at an event. 4. Supports the fee waiver for those <19 years old on the basis that any sporting club affiliated to a national body (e.g. Athletics NZ) should be treated the same as many of their participants are under 19. 5. Notes that health and safety guidelines request clubs such as harrier clubs to use venues that do not allow vehicular access, wherever possible. Notes that this proposed charge goes against health and safety guidelines. 6. Notes that affiliated sporting clubs such as harriers are being lumped into the same group as those that organise large public running/walking events that charge large amounts of money. 7. Notes that athletic and harrier clubs run many events over the year which caters for ages 5-75. Clubs charge athletes. These fees go toward administration of the sport, the rest to the organising club. If clubs are forced to pay a GWRC per capita fee then many of the existing events would cease to exist as the cost of entry is too high. Notes that GWRC should be encouraging participation in sport, not discouraging it. Most of our members have already paid for parks/reserves in their rates and so are paying for it twice. 	<p>Points 1 and 2 - This is a misinterpretation as "running" would be deemed a non-commercial activity as set under 'definitions' in appendix 2. The Concessions Policy sets out that, if an activity is managed on a non-commercial basis with less than 150 people, then there are no fees charged. Therefore, running events that are held by harrier clubs for non-commercial purposes and have <150 participants would have no fees charged to them.</p> <p>The intent of the Concessions Policy is not to charge for non-commercial use but to charge for commercial use to avoid or minimise any ratepayer subsidy of private gain. The proposed fee change is an actual reduction in fees from operational Concessions Policy.</p> <p>Point 3 - Noted.</p> <p>Point 5 – It is noted that the health and safety guidelines with regard to vehicles and events/activities to require the following:</p> <ul style="list-style-type: none"> ▪ Event vehicles to be road legal ▪ Speed within legal speed restrictions or appropriate to planned event ▪ Access to site for emergency vehicles and; <p>Therefore, there is no reference for venues not allowing vehicular access. As noted in points 1 and 2, there under certain criteria there are no charges proposed.</p> <p>Points 6 and 7 – The Concessions Policy sets out that if an activity is managed on a non-commercial basis and that there are less than 150 people then no fees are charged. Therefore, the running and athletic events that are held by harrier/athletic clubs for non-commercial purposes and <150 participants will not be charged.</p>	Yes	