



YOUR WATER DONE WELL

DELIBERATION BOOKLET

Submissions # 1 – 424



Submitters full submissions can be viewed on the Selwyn District Council's website at selwyn.govt.nz/yourwater - Submission and Hearing Booklets.

Submitter Number	Submitter Name	Organisation
1	Simone Bayer	
2	Gary Watson	
3	Janine Smith	
4	Mel Evans	
5	Gary Doyle	
6	Colin Eady	
7	Vicky Frost	
8	Darren Graham	
9	Gary Martini	
10	Rebecca Lindsay	
11	Christine Lyne	
12	Annatasha David	
13	Jane Mulholland	
14	Graeme Tucker	
15	Andrew Loader	
16	Nick Konijn	
17	Neville Farquhar	
18	Nick Hallett	
19	Iain Collingwood	
20	Cleve Prescott	
21	Libby Allison	
22	Neisha Livermore	
23	Hamish Crombie	
24	Daniel Schmidt	
25	Richard McCulloch	
26	Nicole Holloway	

Submitter Number	Submitter Name	Organisation
27	Andrew Werrett	
28	Roxanne Fennell	
29	Sara Shea	
30	Mark Paterson	
31	Lisa Gabel	
32	Scott Payne	
33	Grace Calder	
34	Denise/Rick Piper	
35	Darren Wilson	
36	Ian Lawrence	
37	Colin Richards	
38	Lyn Watson	
39	Erica Inglis	
40	Nick Hanrahan	
41	Tim Hodge	
42	Sue Paul	
43	Amy Tennant	
44	Sandra Arnott	
45	Cheryl Ridgen	
46	Duncan Wood	
47	Brent Margetts	
48	Megan Stanbury	
49	Kylee Jones	
50	Jessica Jones	
51	Mark McCallion	
52	Dave Bowler	

Submitter Number	Submitter Name	Organisation
53	Karl Straver	
54	Alex Breig	
55	Belinda Margetts	
56	Michael Van Haastrecht	
57	Alina Gheonea	
58	Wayne Skelton	
59	Loki Stanley	
60	Chloe S	
61	Kristina Seregina	
62	Andrew Harper	
63	C M	
64	Alan Coulton	
65	Margaret McIntosh	
66	Barry Mackenzie	
67	Facundo Carril	
68	Jonathan Scott	
69	Richard Wright	
70	Jeremy Bateup	
71	Craig Lambie	
72	Belinda Hegan	
73	John Roper	
74	Brent Gillespie	
75	Katie Tilson	
76	Paul Rosanowski	
77	Kaylene Wilson	
78	Judy Chapman	

Submitter Number	Submitter Name	Organisation
79	Nathan Burrows	
80	ALan McKinnon	
81	Kate Boys	
82	Dianne Marshall	
83	Kristina Koole	
84	Janita Dubery	
85	Natarsha Smith	
86	Anita Wise	
87	Pullan Claudette	
88	Simon Boys	
89	Fredrik Rohs	
90	Mark Mulholland	
91	Geraldine Leech	
92	Scott McLaren	
93	Jane West	
94	Robert Perry	
95	Hannah Eddy	
96	Michelle Rhodes	
97	Kate Worner	
98	Rob Straver	
99	Paul Hamilton	
100	Reuben Campbell	
101	Jonny Bogue	
102	Ken Wong	
103	Tracey MacLeod	
104	Erin McDonald	

Submitter Number	Submitter Name	Organisation
105	David Parkinson	
106	Kieran Barron	
107	Raewyn Anderton	
108	Thomas Dowie	
109	Ben Thompson	
110	Andrew Day	
111	Andy Carter	
112	Alastair Taylor	
113	Renato Carenza	
114	Katrina Young	
115	Richard Young	
116	Andy Williams	
117	Tim Rowlands	
118	Kate Patterson	
119	Susan Carline-Wright	
120	Paul Spence	
121	Stefan Clerens	
122	Glenn Clark	
123	Michelle Cutler	
124	Sarah Booth	
125	Deborah Gillon	
126	Stewart David	
127	Nigel Humphries	
128	David Whale	
129	Pauline Doody	
130	Robert Koller	

Submitter Number	Submitter Name	Organisation
131	Wayne Smith	
132	Julie Bowler	
133	Ciara Halkett	
134	Tracy Bourke	
135	Grahame Richards	
136	James Graham	
137	Mitchell Rogers	
138	Heather Davies	
139	Matt Smith	
140	Willisnz Tolhoek	
141	Debbie Tubb	
142	Nadene Butcher	
143	Nick Haugh	
144	Andrea Byrom	
145	Ron Clark	
146	Robert Lawrence	
147	Hayley Lilley	
148	Alastair Joyce	
149	Cathy Kewish	
150	Michelle Flay	
151	Margaret Morrison	
152	Conan Griffin	
153	Angela Jones	
154	Joanne Frazer	
155	Claire Thomason	
156	Diane White	

Submitter Number	Submitter Name	Organisation
157	Jo White	
158	Ashleigh Taylor	
159	Sarah D	
160	Paul Biddick	
161	Christine renwick	
162	Antoni Sansom	
163	Emma Jenkins	
164	Matthew Brovelli	
165	Karl van Slooten	
166	Kevin Burney	
167	Kelly McEvedy	
168	Rodney Inch	
169	Helen Meikle	
170	Josh Ewing	
171	Anita Wright	
172	Brett Jones	
173	Asti Boal	
174	Steve Garbett	
175	Tracey Baughan	
176	Leanne Farrar	
177	Lisa Jones	
178	Kirsty Wilde	
179	Tom Moorby	
180	Kerry McFetridge	
181	Martin Russell	
182	John Bradley	

Submitter Number	Submitter Name	Organisation
183	Charlotte Rietveld	
184	Ian Burney	
185	Trish Standfield	
186	Rachel Smith	
187	Glenn Frauenstein	
188	Richard Williams	
189	Rachel Barker	
190	Tim Ure	
191	Jesse Le Lievre	
192	Neil Mugford	
193	James Proudlove	
194	Sue Jarvis	
195	June McLachlan	
196	J Herd	
197	Chris Roberts	
198	Mario Franzoni	
199	Alison Outram	
200	Tracey Wyllie	
201	Lan-Kuang Chuang	
202	Cherry Li	
203	Wayne Sargerson	
204	Kevin Mallon	
205	Robyn Murphy	
206	Jason Cadogan	
207	Mark Palmer	
208	Joe Glamuzina	

Submitter Number	Submitter Name	Organisation
209	Stephen Harrington	
210	Candice Harrington	
211	Ian McIntosh	
212	Judith Sachdeva	
213	Susan Mayo	
214	Bryan Tubb	
215	Sally Lrmon	
216	Bevan Sutherland	
217	David Henshall	
218	Marcus Waters	
219	David Butcher	
220	Yvonne Stiles	
221	Mark Stanley	
222	Kevin Stanley	
223	Joanne Morris	
224	Richard Haffner	
225	David McKenzie	
226	Basil and Trudi Meyer	
227	Heiko Mueller-Cajar	
228	Edward Parker	
229	Ellen Cavanagh	
230	Rose Harrison	
231	Yvonne Reid	
232	Cristene Trenuela-Chan	
233	Mike Beynon	
234	Ann-Maree Ozanne	

Submitter Number	Submitter Name	Organisation
235	Geraldine Scott	
236	Rita Garland	
237	Keith Wills	
238	Justine Dodds	
240	Linus Meyer	
241	Sam Carrick	
242	Alan Maccalman	
243	Brian Deans	
244	Terry Anderson	
245	John McNamara	
246	Sharlene Sallabanks	
247	Angela Berry	
248	Fiona Newcombe	
249	Ryan Shepherd	
250	Hilary Michie	
251	Veera Pathuri	
252	Sue Stokes	
253	Elizabeth Deans	
254	Susan Farmer	
255	Richard Daglish	
256	Murphy Jill	
257	Hilary Barrer	
258	Mark U	
259	Gail Harkerss	
260	Lindsay Robertson	
261	Maree Chalmers	

Submitter Number	Submitter Name	Organisation
262	Sandra Robertson	
263	Betty Walls	
264	Gaylene Weir	
265	Sally Dunbar	
266	Vanessa Robinson	
267	Harvey Polglase	Darfield Residents Association
268	Andrea Clemens	
269	Angela Hart	
270	Graeme Gemmill	
271	Christine Parker	
272	Mary Quayle	
273	Mark Alexander	Rolleston Residents Association
274	Rafael Vial	
275	L Gourlie	
276	John Benefield	
277	Stephen Matthews	
278	Peter Baylis	
279	Joe Morris	
280	Sean Rooney	
281	Tonya Frew	
282	Vitor Centeno	
283	Samuel Wilshire	
284	Anna-Lisa van Tuinen	
285	Anita Vulling	
286	Kathreen Joy Haylock	
287	Karren Madden	

Submitter Number	Submitter Name	Organisation
288	Helena Immers	
289	Brendon Wilshire	
290	Steven Bruce-Jones	
291	Max User	
292	Andrew Jorgensen	
293	Marie Stafford	
294	Murray Winsloe	
295	Helen Stevenson	
296	Allison Rosanowski	
297	Denise Carrick	Lincoln Voice
298	Kenneth May	
299	Joann van der Salm	
300	Jack van der Salm	
301	Carey Barnett	Ellesmere Sustainable Agriculture Incorporated
302	Geoffrey Griffiths	
303	Heidi Jensen-Warren	
304	Elaine Smart	
305	Haydn Porritt	
306	Dave Page	
307	Ian Denholm	
308	Ralph Brown	
309	Leonardo Ferreira	
310	Mikayla Bovey	
311	Carolyn Skinner	
312	Peter Ising	
313	Ronwyn Coulson	

Submitter Number	Submitter Name	Organisation
314	Katherine Molloy	
315	Pete Forbes	
316	Christopher Ward	
317	Manjusha Ganta	
318	Craig Reynolds	
319	Andrew Livermore	
320	Jude Will	
321	Laurence Harkerss	
322	Tanya Douglas	
323	Tanya Douglas	Lincoln Residents and Community Association
324	Christine Ferguson	
325	Peter Hartshorne	
326	Mervyn Johns	
327	Aaron Horan	
328	Delwyn McKenzie	
329	Jill O'Connor	
330	Michael Lloyd	
331	Eric Askin	
332	Nikki Chippendale	
333	Donald Reid	
334	Nicola McDowell	
335	Brian Lester	
336	Lieuwe Doubleday	
337	Catherine Payne	
338	Aaron McGlinchy	
339	Robin McKenzie	

Submitter Number	Submitter Name	Organisation
340	Viv Titmus	
341	Barry Neil Manson	
342	Maureen Flattery	
343	Richard Frost	
344	Calvin Payne	
345	David Farmer	
346	Douglas Marshall	
347	Chris Reddell	
348	Grace Taylor	
349	Jane Elms	Prebbleton Community Association
350	Darryl Griffin	
351	Jane Elms	
352	Gareth Payne	
353	Margaret Mary Nimmo	
354	Lean Seng (Tony) Gan	
355	Malcolm Gourlie	
356	James Gourlie	
357	Yvonne Evans	
358	Jacinda Anderson	
359	Mark Hunter	
360	Talbot Janet	
361	Carolyn Jones	
362	Andrew Fischer	
363	Sarah Manifold	
364	Graeme Young	
365	Clavin Clare	

Submitter Number	Submitter Name	Organisation
366	Susan Hunter	
367	Samuel Wilshire	West Melton District Residents Association
368	Neville Strong	
369	David Armstrong	
370	Fred Bull	
371	Graeme Dawson	
372	John Verry	Malvern Community Board
373	Janet Mathewson	
374	Patricia Clare	
375	Alice Thorne	
376	Margaret Lang-dale Hunt	
377	Walker Brian	
378	Patrick Van dePol	
379	Stephen Ray	
380	Steve Pudney	
381	Andrew Howard	
382	Lesley Palmer	
383	Sonya Strahan	
384	Eric Freeman	
385	John Verry	
386	Christopher Norton	
387	William Gye	
388	Sharon Howard	
389	Ian Tennant	
390	Sharon Ray	
391	Connor van dePol	

Submitter Number	Submitter Name	Organisation
392	Bronwyn van dePol	
393	Keith Taege	
394	Helen Taege	
395	Alan Hogg	
396	Bruce Russell	
397	Vanessa Murray	
398	Philip Anderson	
399	M Smithies	
400	J Gourlie	Parkdale Farm
401	Shanelle Carroll Pudney	
402	Graham Gough	
403	Gary Brown	
404	Scott Halkett	
405	Pietro Scalia	
406	Alan Mathewson	
407	Christine Montrose Hogg	
408	Pauline Scalia	
409	Tara Norton	
410	George Thorne	
411	Owen Murray	
412	Carly Norton	
413	Stuart Murray	
414	Francine Murray	
415	Pauline Sewell	
416	Kelvin Sewell	
417	Heather Stanley	

Submitter Number	Submitter Name	Organisation
418	Rachel Inch	
419	Charlotte Barraclough	
420	Clint Madden	
421	Bronwen Quigley	
422	Jeff Quigley	
423	Helen Madden	
424	Vince Barry	National Public Health Service, Te Waipounamu Region, Health New Zealand – Te Whatu Ora

Report: Summary of Submissions by Submitter Number/Name

Submitter Number:	1	Submitter:	Simone Bayer
Documents:	Your Water Done Well		
Point Number	1.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: While it sounds good, all future possibilities of selling the entity to a private company must be prevented. We saw it happen to the trains and to other assets before.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		
Point Number	1.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: If it stays with the council, the costs may be higher, but the assets are safer.		
Staff Recommendation	A WSCCO is a council-controlled organisation, meaning the council maintains control with accountability back to the community. The key difference is that an independent board would oversee day-to-day operations, ensuring that long-term investment decisions are made based on expertise rather than short-term political pressures. This structure helps safeguard water services while ensuring they remain affordable, reliable, and in public hands.		
Point Number	1.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Again, the security of water is important, and I do not want a loophole for the government to sell the WSCCO to a private company to make money and gain savings.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		

Submitter Number:	2	Submitter:	Gary Watson
Documents:	Your Water Done Well		
Point Number	2.1	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Any solution that prevents the ripping off of the Upper Selwyn Huts residents is fine by me.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	3	Submitter:	Janine Smith
Documents:	Your Water Done Well		
Point Number	3.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I have lived in Australia and the UK where they did this very same thing and the cost to the people ended up much more. I would like to see water & waste stay with council.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	3.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	3.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Check other countries and see how this has not worked and the cost involved to revoke the changes when you realise it hasn't worked. It will cost us more!		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		

Submitter Number:	4	Submitter:	Mel Evans
Documents:	Your Water Done Well		
Point Number	4.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	4.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	4.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Vital that mana whenua are included on the board. Please remove the chlorine from out drinking water.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	5	Submitter:	GARY DOYLE
Documents:	Your Water Done Well		
Point Number	5.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We have our own well for drinking water and our own waste water disposal system.		
Staff Recommendation	Any change would not impact properties that are not connected to the Council supplies.		
Point Number	5.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: We have our own system, and have nothing to do with a council supplied system.		
Staff Recommendation	Any change would not impact properties that are not connected to the Council Supplies.		

Point Number	5.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	6	Submitter:	Colin eady
Documents:	Your Water Done Well		
Point Number	6.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Setting up a third party just lets council off the hook if anything goes wrong, plus requires a whole new management structure so costs will be greater. Doesn't make sense to add complexity. If it did you would outsource everything, why not the stormwater. We pay rates to the council for these things so that you are responsible. Should I pay a private contractor to collect my bins?		
Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while		

maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number 6.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** What is wrong with this model. Everything you need to do can be done within this model. It should not stop you working with others and sharing costs for big infrastructure etc

Staff Recommendation Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Point Number 6.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff Recommendation Council acknowledges there are no further comments.

Submitter Number: 7 **Submitter:** Vicky Frost

Documents: [Your Water Done Well](#)

Point Number 7.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water

Staff Recommendation	Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Do not support a separate entity with a whole new set of paid consultants, directors, etc when the council already pay people in these roles. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
Point Number Comments: Staff Recommendation	7.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: In house will save money. The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
Point Number Comments: Staff Recommendation	7.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? Yes Comment: Another top heavy administration to pay for out of rates. Not needed. Our rate increases are already unaffordable for many. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	8	Submitter:	Darren Graham
Documents:	Your Water Done Well		
Point Number	8.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	8.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	8.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	9	Submitter:	Gary Martini
Documents:	Your Water Done Well		

Point Number	9.1	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: No need to increase an already bloated council head count as you are currently coping with the workload within the current structure... Additionally, water is not a person therefore does not require mumbo jumbo protection which will no doubt require \$ to cross palms of the special people.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	9.2	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	10	Submitter:	Rebecca Lindsay
Documents:	Your Water Done Well		
Point Number	10.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Short term pain for long term gain. Long term savings are preferable.		
Staff Recommendation	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.		

Point Number	10.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	10.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	11	Submitter:	Christine Lyne
Documents:	Your Water Done Well		
Point Number	11.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Sets up a whole new bureaucracy with governance and members appointed by council. This cost will be passed on to ratepayers. No detail of makeup of board and representation. CCC has just opted for in house. Wellington has a independent water service board and that is such a mess. Just creates more delays and consultation in the system which adds another layer and more inefficiencies and costs.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board		

helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	11.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Holds council directly accountable to ratepayers. Does not add another layer of bureaucracy and a new division and all those costs at management level eg HR, finance, boards etc

Staff

Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	11.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** As previous comments. Unnecessary additional layers of management and no direct accountability to ratepayers. How much will this setup costs. Will elected officials be appointed. Will iwi be appointed. Not enough transparency or detail of costs of this operating model. Given CCC have opted in house suggests it's a better model

Staff

Recommendation

A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Additionally, a skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via

an appointments panel with representation from Council, WSCCO and an independent.

Submitter Number:	12	Submitter:	Annatasha David
Documents:	Your Water Done Well		
Point Number	12.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The last thing we need is more bureaucrats and more debt! We are struggling as it us with rising rates and now you want to increase our water rates? The council in house system is working just fine, we do not need another organisation to oversee our water, it is just wasteful!		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. Borrowing enables Council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built, and spreads cost across current and future users. A separate entity does provide the benefit of having specialised governance with expertise in the sector.		
Point Number	12.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: See previous comments		
Staff Recommendation	Comment acknowledged.		

Point Number	12.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	13	Submitter:	Jane Mulholland
Documents:	Your Water Done Well		
Point Number	13.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	13.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	13.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges that there are no further comments.		

Submitter Number:	14	Submitter:	Graeme Tucker
Documents:	Your Water Done Well		
Point Number	14.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	14.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Looking at the Council staffing and the recent comments of no extra work required for staff at a parking ticket court case m guess is there is enough staff to carry on in house. No need for another seperate board, CEO etc as a further expense to the ratepayer.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. Both options will require ongoing review of capacity and delivery reviews to ensure they are appropriately resourced. Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an		

opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.			
Point Number	14.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Not required.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	15	Submitter:	Andrew Loader
Documents:	Your Water Done Well		
Point Number	15.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I prefer that SDC maintain full control of water services delivery. While a WSCCO may increase borrowing capacity there is risk that capital works water delivery being separate from other delivery programmes such as transport, results in inefficiency and extra cost to the ratepayer.		
Staff Recommendation	A WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.		
Point Number	15.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	15.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: That it should not proceed. I don't believe that SDC would be considering this as an option if it weren't part of a government mandate therefore it is not in the districts best interest.		
Staff Recommendation	The Local Water Done Well process is a legislative requirement and all councils across New Zealand are required to consult their community on models for future of water delivery services.		

Submitter Number:	16	Submitter:	Nick Konijn
Documents:	Your Water Done Well		
Point Number	16.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Not another bureaucratic entity on top of our council one!		
Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.		
Point Number	16.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: That is what the council is supposed to do! Not creating another entity!		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet		

new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 16.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** an entity on top an entity ad infinitum

Staff Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number: 17 **Submitter:** Neville Farquhar

Documents: [Your Water Done Well](#)

Point Number 17.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** No comment necessary.

Staff Recommendation

It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number 17.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** No comment necessary.

Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	17.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: No		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	18	Submitter:	Nick Hallett
Documents:	Your Water Done Well		
Point Number	18.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The short term increased costs of setting up a cco during this cost of living crisis is unpalatable and i also question the cost of set up. Its under estimated and rushed. The reality will be higher costs to rate payers ongoing on top of 10 year rate rises for council rates..The offset of each option is best guess at best and i know to well cost of building this infrastructure, the additional overheads to run a cco and servicing that higher dept will be an additional burdon on the community of selwyn for a generation. This is rushed consultation without due dilligence of the true cost to the community being articulated. -6% over the 10 years is a soft and impossible pipe!dream.		
Staff Recommendation	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	18.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Live within the means of what we have today, prioritise spend and ensure value for money and public value is realised.		
Staff Recommendation	As mentioned in the risks of the Council delivered model, with the limited funding capacity there is the possibility that funding priorities change and the funding may be allocated to other activities across the Council.		
Point Number	18.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	19	Submitter:	Iain Collingwood
Documents:	Your Water Done Well		
Point Number	19.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	19.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	19.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no further comments.		

Submitter Number:	20	Submitter:	Cleve Prescott
Documents:	Your Water Done Well ; Your Water Done Well		
Point Number	20.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I fail to see the benefit of a new organisation, with its added costs, when a perfectly good in house team can be created with out the over heads		
Staff Recommendation	Comment acknowledged.		
Point Number	20.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: I fail to see the benefit of a new organisation, with its added costs, when a perfectly good in house team can be created with out the over heads, the only benefit i see is the water management business can be sold off in the mad scramble to privatise.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		

Point Number	20.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: I fail to see the benefit of a new organisation, with its added costs, when a perfectly good in house team can be created with out the over heads. its setting us up for added costs we can not afford or need.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	20.4	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I fail to see the benefit of what's proposed to we the rate payers, why should you need this structure? its added costs are not a benefit to the rate payer's, except rate rises which many are smuggling with currently. there is a perfectly good in house team at council now why change what is working? look at both Auckland and wellington where they have a separate water entity, they are both a fail. Nelson is a well run council who went to consultation in December and have voted for in House. Why do Selwyn need to try and be first for this rediculas move out side council. if Christchurch and Dunedin go in house as is reported there is a message there. So no stay in house.		
Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.		

Point Number	20.5	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: stay in house, we don't need the added rating costs or the inefficacy this will bring like Auckland and Wellington have been able to achieve when no one was watching. Stay in House, we don't need to add to the empire, that could be sold off with changes to government and council management. stay in house. large dept costs, and must be repaid		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	20.6	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: its to costly, giving the extra 200Mil to play with will still ned repaid, Auckland and wellington didnt work because nobody was watching. stay in house.		
Staff Recommendation	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.		

Submitter Number:	21	Submitter:	Libby Allison
Documents:	Your Water Done Well		
Point Number	21.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	21.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	21.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	22	Submitter:	Neisha Livermore
Documents:	Your Water Done Well		
Point Number	22.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: This is the best long term solution for our water services.		
Staff Recommendation	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.		

Point Number	22.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	22.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Having a specialised water management team and board would be the best outcome.		
Staff Recommendation	Establishment of a CCO will benefit from specific water expertise both at a governance and management level.		

Submitter Number:	23	Submitter:	Hamish Crombie
Documents:	Your Water Done Well		

Point Number	23.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: There is no way that establishing a new entity can be cost effective. The costs of initiating the entity will be high, and the duplication of back office systems and costs cannot be lower than continuing in house. Council needs to ensure developments contribute better toward future service needs instead of allowing every subdivision ti go ahead without providing for an upgrade of all infrastructure, not just 3 waters.		
Staff Recommendation	Comment acknowledged.		

Point Number	23.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: See previous comment		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	23.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Please see previous comments		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	24	Submitter:	Daniel Schmidt
Documents:	Your Water Done Well		
Point Number	24.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: I think it makes sense to ensure water gets appropriate priority through funding.		
Staff Recommendation	Comment acknowledged.		
Point Number	24.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: I think water will get politicised at times and struggle to get funded appropriately.		
Staff Recommendation	Comment acknowledged. The WSCCO would have ability to borrow up to 500% of revenue vs Council 280%.		

Point Number	24.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	25	Submitter:	Richard McCulloch
Documents:	Your Water Done Well		
Point Number	25.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I cannot see that the inclusion of another organisation in the management of our water will add any efficiencies.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	25.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Local people know and understand the local issues. Bulk purchasing options could however help.		
Staff Recommendation	Comment acknowledged.		

Point Number	25.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Not sure how this could add efficiencies.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	26	Submitter:	Nicole Holloway
Documents:	Your Water Done Well		
Point Number	26.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	26.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	26.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	27	Submitter:	Andrew Werrett
Documents:	Your Water Done Well		
Point Number	27.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is adding yet another layer of unnecessary bureaucracy		
Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.		
Point Number	27.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The current delivery model appears to work reasonably well, and should require only a few minor tweaks to adapt		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	27.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff**Recommendation**

Council acknowledges there are no more comments.

**Submitter
Number:**

28

Submitter:

Roxanne Fennell

Documents:

[Your Water Done Well](#)

Point Number

28.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number

28.2

Category

1-Questionnaire > 1.2-Future In-
house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number

28.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff**Recommendation**

Council acknowledges there are no more comments.

Submitter Number:	29	Submitter:	Sara Shea
Documents:	Your Water Done Well		
Point Number	29.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The consultation document was well presented but it lacked sufficient information to be able to make an informed view as a resident. I have outstanding questions on: - Why Selwyn couldn't for a joint CCO with other councils to reduce costs - Apart from the rate payer subsidising, will developers in Selwyn also be contributing to paying for future options? - What are other similar councils proposing? For example options into joining forces with Christchurch? Or other fast growing districts like Waimakiriri? - If a chair person has already been appointed to a Selwyn CCO, does that mean that a decision has already been reached? I look forward to hearing information on the above. Many thanks		
Staff Recommendation	Comment acknowledged. Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through. Council has appointed an establishment chair on a short-term contract and there is a fixed term contract Programme Director. Due to the timeframes for developing Water Services Delivery Plans (WSDP) some activity is occurring simultaneously to ensure we can meet regulatory deadlines regardless of whether a WSCCO or enhanced in-house delivery option is chosen.		
Point Number	29.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: As per my previous comments, I would need more intonation before I could form a view		

Staff Recommendation	Comment acknowledged.		
Point Number	29.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	30	Submitter:	Mark Paterson
Documents:	Your Water Done Well		
Point Number	30.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Dear Selwyn District Council, I am writing to formally submit my feedback on the proposed establishment of a Water Services Council Controlled Organisation (WSCCO) for drinking water and wastewater services. While I acknowledge the importance of maintaining safe and sustainable water infrastructure, I have significant concerns about the financial, operational, and transparency aspects of this proposal. 1. Transparency & Public Consultation Process • The consultation period is only three weeks, which is insufficient for residents to fully understand the long-term financial and service delivery implications. A decision of this magnitude should involve a more extensive public engagement process. • The Council has already appointed a chairperson to set up the WSCCO, which raises concerns that this consultation is a formality rather than a genuine effort to seek community input. • The consultation document is only 20 pages long, with limited financial details, particularly regarding debt repayment strategies. 2. Financial Concerns & Ratepayer Impact • The consultation document indicates that this proposal would increase council debt from 280% of rates revenue to 500% within five years. This is a significant burden on ratepayers, and it is unclear how the council plans to manage this debt long-term. • Ratepayers are already facing 14% annual rate increases under the Long-Term Plan. The proposed WSCCO model suggests that an average household could see an additional \$600+ in rates within three years. • There is no clear debt repayment strategy outlined. If debt reaches 500% of rates revenue, what measures will be taken to avoid further rate hikes? 3. Alternative Approaches & Comparisons		

with Other Councils • The council states that maintaining in-house water services is not viable due to legislation, funding constraints, and compliance costs. However, Christchurch and Dunedin have opted to keep their water services in-house. Why is Selwyn taking a different approach, and why hasn't this been clearly explained? • Splitting water services between the WSCCO (drinking water & sewage) and the council (stormwater, land drainage, and water races) seems inefficient. This creates duplication in staffing, equipment, and operations, which could increase costs rather than reduce them. • Many councils require developers to contribute to infrastructure costs through development contributions. Has the council considered increasing developer contributions instead of placing more financial pressure on existing ratepayers?

4. Request for Further Information & Extended Consultation To ensure that residents can make an informed decision, I request the following: 1. A detailed breakdown of the financial impact of this proposal, including long-term debt repayment strategies and the overall impact on rates beyond the water component. 2. An explanation of why Selwyn is not following Christchurch and Dunedin in keeping water services in-house. 3. A comparative cost-benefit analysis of separating water services (WSCCO for drinking water/sewage vs. in-house stormwater and drainage). 4. An extension of the public consultation period to allow more residents to engage with this important decision.

Conclusion Given the significant financial implications and lack of clarity around debt management, I urge the council to reconsider this rushed process and provide the community with more detailed financial analysis. Transparency, fiscal responsibility, and a long-term sustainable funding plan must be the priority. I appreciate the opportunity to provide feedback and look forward to your response.

**Staff
Recommendation**

Comment acknowledged.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).

Council has appointed an establishment chair on a short-term contract and there is a fixed term contract Programme Director. Due to the timeframes for developing Water Services Delivery Plans (WSDP) some activity is occurring simultaneously to ensure we can meet regulatory deadlines regardless of whether a WSCCO or enhanced in-house delivery option is chosen.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

The Preliminary Arrangements Act requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new

conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	30.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	30.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	31	Submitter:	Lisa Gabel

Documents:	Your Water Done Well

Point Number	31.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** From my perspective, the risks clearly outweigh the benefits and the impact on rate payers is significant. As we are currently in a cost of living crisis so this is not a suitable time to increase expenditure and debt- I am concerned residents may not be able to cover this and we also need to think about the long term implications of reduced control over our water supply. There is limited transparency in the consultation documents about what this looks like.

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	31.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This is consistent with other regional councils in this area (Christchurch and a Dunedin).		
Staff Recommendation	Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through. Consultation is currently underway for neighbouring Councils with decisions yet to be made.		
Point Number	31.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Moving to a WSCCO is fraught with risks, and have significant debt implications and sovereignty for the future. The consultation documents are not sufficiently detailed and the consultation period is very short for the nature of this proposal.		
Staff Recommendation	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10		

years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	32	Submitter:	Scott Payne
Documents:	Your Water Done Well		
Point Number	32.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: How much is the new water company paying for existing infrastructure /assets that ratepayers paid for? do ratepayers get a refund for the money we have invested in the region.		
Staff Recommendation	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income.		
Point Number	32.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: increase development contributions on any land sales or new houses. Make rainwater tanks mandatory for lawn/garden irrigation, this will reduce demand to make drinking water.		
Staff Recommendation	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only		

recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Point Number	32.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:**
- costs more to locals til 2034, -no control, just expectations of service, - subcontracting out to another company means headaches. eg the govt establishing companies to deliver major projects in CHCH have all failed, hospital, sports centre, convention centre, stadium costs.

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	33	Submitter:	Grace Calder

Documents:	Your Water Done Well

Point Number	33.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District

Staff Recommendation		Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Do not need another company running what we already have set up in council	
Staff Recommendation		Comment acknowledged.	
Point Number	33.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Seems sensible to keep control of our very valuable resource	
Staff Recommendation		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.	
Point Number	33.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? Yes Comment: Will you just sell it off? I'd say that's what will happen then we will be further removed from controlling what we need the most	
Staff Recommendation		Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.	

Submitter Number:	34	Submitter:	Denise/Rick Piper
Documents:	Your Water Done Well		
Point Number	34.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District	

Staff Recommendation	Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I do not see the need for change, the system at present is working well. Its not necessary to privatize as this will certainly impact our allready expensive rates The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
Point Number	34.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: If its not broke why fix it Staff Recommendation Comment acknowledged.
Point Number	34.3 Category 1-Questionnaire > 1.3-Comments Comments: Question: Do you have any comments on the WSCCO model? Yes Comment: To me its just starting another business that has not been proven Staff Recommendation Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submitter Number:	35 Submitter: Darren Wilson Documents: Your Water Done Well
Point Number	35.1 Category 1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	35.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	35.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? No Comment: Staff Recommendation Council acknowledges there are no more comments.			

Submitter Number:	36	Submitter:	Ian Lawrence
Documents:	Your Water Done Well		
Point Number	36.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: All water management to remain as a council deliverable			

Staff Recommendation	Comment acknowledged.		
Point Number	36.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: That's the expectation my rates should be prioritised against		
Staff Recommendation	As mentioned in the risks of the Council delivered model, with the limited funding capacity there is the possibility that funding priorities change and the funding may be allocated to other activities across the Council.		
Point Number	36.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	37	Submitter:	Colin Richards
Documents:	Your Water Done Well		
Point Number	37.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Look, you do what you like, as you have already made up your minds. You had already signed the waste pipe contract off, before the end of that consultation period, so why waste our money with this consultation. The rate payer detests the Selwyn District Council, but you know that already.		
Staff Recommendation	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025. Any budget allocated to the programme team is there to support water services delivery regardless of the delivery model chosen.		

Point Number	37.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	37.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	38	Submitter:	Lyn Watson
Documents:	Your Water Done Well		
Point Number	38.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: The safety of our water is very important to our household but I don't agree with fluoride being added at any stage and the cost of water being used to be kept as low as possible for everyone.		
Staff Recommendation	The submission opposing fluoridation is acknowledged. The Health Act 1956 was amended in 2021 to enable the Director-General of Health to direct local authorities to fluoridate drinking water supplies, to provide nationally consistent decision-making on this health-centred matter. Selwyn District Council has not received such a directive and therefore has not budgeted for the implementation of fluoridation. Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The		

current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.

Point Number	38.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As long as the cost is at an amount that is affordable for each rate payer /household but at the same time keeping the water at an acceptable cost to maintain its high standard.		
Staff Recommendation	Comment acknowledged.		

Point Number	38.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	39	Submitter:	Erica Inglis
Documents:	Your Water Done Well		

Point Number	39.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	39.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	39.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	40	Submitter:	Nick Hanrahan
Documents:	Your Water Done Well		

Point Number	40.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Keep it as it is now you are already financially crippling your rate payers we cannot afford this option		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		

Point Number	40.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	40.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: As stated ear we as rate payers cannot afford this. Stop spending rate money like its a bottomless pit!		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	41	Submitter:	Tim Hodge
Documents:	Your Water Done Well		
Point Number	41.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Please don't create a WSCCO I understand you're reacting to central government legislation. Future governments may enact new legislation too and it's far, far, far easier to respond as one Council rather than then several different CCOs. I also understand your desire to access more debt via a WSCCO. Please don't do this. Loading debt onto future generations is unwise. Having several CCO with several Boards and potential for different future owners is duplication and inefficient. I am concerned about this proposal and am strongly opposed to it.		
Staff Recommendation	Comment acknowledged. After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.		

Point Number	41.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As per previous comments. Far, far, far prefer this option for transparency and efficiency.		
Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	41.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Please don't do it.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	42	Submitter:	Sue Paul
Documents:	Your Water Done Well		
Point Number	42.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	42.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	42.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This seems to be the first step in privatisation of our water supply.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		

Submitter Number:	43	Submitter:	Amy Tennant
Documents:	Your Water Done Well		
Point Number	43.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I want the council to maintain control so rate payers can still have a say. A new organization will mean it is separate and might prioritize themselves over what is best for rate payers		
Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.		

Point Number	43.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Yes, then rate payers can have a say and if we aren't happy with how it is handled we can use our votes to express that and change leadership		
Staff Recommendation	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		

Point Number	43.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: If rate payers are going to pay for this then it shouldn't be separate from the council		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	44	Submitter:	Sandra Arnott
Documents:	Your Water Done Well		

Point Number	44.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Has the council looked at the option of installing smaller wastewater systems throughout the region using the HTC system, whereby waste is converted into renewable resources, provide its own energy, plus energy into the grid, create activated carbon, and clean water. The quality and volume of water is clearly declining. We need to think smarter if we want to continue to grow our primary resources, whilst still have sources of		

		potable water. There are some really innovative solutions out there, we just need to pick wisely, do it once and do it right. I ask that you all take the time to go to a company called Somax, and investigate their method of handling wastewater using a system created in Germany in the 1920s. The pros for using this system speak for themselves.	
Staff Recommendation		Comment acknowledged. Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.	
Point Number	44.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	44.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	45	Submitter:	Cheryl Ridgen
Documents:	Your Water Done Well		
Point Number	45.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We pay enough people in council now, why pay more to do the sam job	

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	45.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	45.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Don't change the system we have to try and make another system means there will be more things to go wrong		
Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.		

Submitter Number:	46	Submitter:	Duncan Wood
Documents:	Your Water Done Well		
Point Number	46.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Subsidiaries and SOE's within local		

Staff Recommendation		and central govt have not delivered the results we hoped in NZ. Learn from this and keen it internal where the council has better oversight and control. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.	
Point Number	46.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The council need to own the water supply and services as one of their core services.	
Staff Recommendation		Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.	
Point Number	46.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? Yes Comment: Seperation of governance and operations for local and central govt services only brings communication gaps and lack of visability from those who are utimaltely reponsible. We also do NOT want any further rate increases or council debt from developing new organiations. Remove the council fat, cancel projects we can't afford and be fiscally responsible please. This is another example of appalling fiscal responsibility by this mayor and his council.	
Staff Recommendation		We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.	

Submitter Number:	47	Submitter:	Brent Margetts
Documents:	Your Water Done Well		

Point Number	47.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	47.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	47.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	48	Submitter:	Megan Stanbury
Documents:	Your Water Done Well		
Point Number	48.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	48.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	48.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	49	Submitter:	Kylee Jones
Documents:	Your Water Done Well		
Point Number	49.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I believe we already pay more than enough for this to be managed within the current council, not paying more to set up a seperate entity and paying even more, the water was fine prior to all the chlorine etc was added now it is undrinkable and causes skin irritability		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government		

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Point Number	49.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** I am not comfortable paying or contributing to these proposed changes

Staff Recommendation	Comment acknowledged.

Point Number	49.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** It is a waste of time and money

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	50	Submitter:	Jessica Jones

Documents:	Your Water Done Well

Point Number	50.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** if it means we might actually be able

		to drink water from the tap without tasting like i've drank the town pool water, I agree 100%	
Staff Recommendation		It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	50.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:	
Staff Recommendation		It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	50.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	51	Submitter:	Mark McCallion
Documents:	Your Water Done Well ; SDC Water Chlorination - WSA 2		
Point Number	51.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: In my lived experience I'm yet to see a privately delivered service that was once a council/government entity cheaper than what that public entity delivered it. If I don't like what a public entity is doing with the water delivery quality/price I can vote for change at the ballot. There's not a lot I can do to influence what a CCO is doing. The example property model costs in the discussion don't appear to show any economic	

	benefit, the first 3x years of increased costs of a CCO equates to 18 years worth of the rate "benefit" projected in 9 years time.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC. It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	51.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: SDC and it's current arrangements already delivers a quality & value 3 waters system. At council presentations regarding the chlorination of water in Selwyn it was estimated to have a \$83million cost in compliance costs to prove our water was safe enough to not have chlorination. For Selwyn's ratepayers that was \$231 each. Can 't imagine the testing and reporting requirements (plus a little inflation) for WDW would be much higher. The proposed CCO is \$1000's more in costs.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs. It is unlikely that further chlorine exemptions will be applied for due to cost and risk. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	51.3	Category	1-Questionnaire > 1.3-Comments

Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Don't do it.
Staff Recommendation	Comment acknowledged.

Submitter Number:	52	Submitter:	Dave Bowler
Documents:	Your Water Done Well		
Point Number	52.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The council's history of over costing by setting up a new entity is not needed		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	52.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Don't dump the basics take responsibility and make it work within a budget		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council. Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.		
Point Number	52.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation

**Submitter
Number:**

53

Submitter:

Karl Straver

Documents:

[Your Water Done Well](#)

Point Number

53.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** It should stay in house to prevent any future privatisation.

Staff**Recommendation**

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Point Number

53.2

Category

1-Questionnaire > 1.2-Future In-
house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Keep it in house to capitalize on synergies already in place between council departments.

Staff**Recommendation**

Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).

Point Number

53.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Don't do it.

Staff**Recommendation**

Comment acknowledged.

Submitter Number:	54	Submitter:	Alex Breig
Documents:	Your Water Done Well		
Point Number	54.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	54.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	54.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	55	Submitter:	Belinda Margetts

Documents: Your Water Done Well			
Point Number	55.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	55.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	55.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	56	Submitter:	Michael Van Haastrecht
Documents:	Your Water Done Well ; Your Water Done Well		
Point Number	56.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: These services should already be supplied by the council within existing rates. It is not beneficial for the ratepayers to have these separate entities setup. The rates burden on residents is already unsustainable for many people and should not be added to any further. Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.			
Point Number	56.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Use the energy put in this to deliver these services at a lower cost in-house Staff Recommendation Keeping water services in-house does not mean things will stay the same - significant investment will still be required to meet new government legislation and compliance requirements.			
Point Number	56.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? Yes Comment: It is not clear how this model provides any benefits over the current model. Nor what the risks or negative impacts are of the new model Staff Recommendation The benefits and risks for the proposed WSCCO are set out on page 12 and 13 of the 'Your Water Done Well' consultation document.			
Point Number	56.4	Category	1-Questionnaire > 1.1-Council Proposal
Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The proposal doesn't provide any details on how this benefits the ratepayers the current Wellington water scandal is a showcase why this approach doesn't work.			

Staff Recommendation	Wellington Water was a management company delivery services but not responsible for the maintenance of the assets, this is different to the model applied here. There will be external central government oversight (which did not exist in the Wellington Water example) and a Statement of Expectations and Charter will be established between Council and any CCO. The external scrutiny would also apply to an in-house delivery model, but the governance structure would be unchanged.		
Point Number	56.5	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This is the most effective and efficient way of managing this.		
Staff Recommendation	Comment acknowledged.		
Point Number	56.6	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Look at the wSCCO model failure in Wellington. There is no evidence or realistic expectation that SDC can do this better.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	57	Submitter:	Alina Gheonea
Documents:	Your Water Done Well		
Point Number	57.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We don't need another organization to keep the services under the Council. Don't increase our rates even more. Charge the developers for new infrastructure if they want to continue developing new subdivisions.		

Staff Recommendation	Comment acknowledged. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.		
Point Number	57.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This way you don't need to borrow more money for establishing a new company. And our rates will not increase to the point of people not being able to pay them. Stop spending money that you don't have at this moment when everyone struggles.		
Staff Recommendation	Debt will not be used to fund the operating costs. Debt will fund Capital projects that don't have Development contributions attached to them. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	57.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Yes a waste of money from the rates payers pockets.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	58	Submitter:	Wayne Skelton
Documents:	Your Water Done Well		
Point Number	58.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: These are services that are supposed to be supplied under the current infrastructure. This will add cost which will duly be passed onto ratepayers, more cost to us for the same product no thanks		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	58.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	58.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	59	Submitter:	Loki Stanley
Documents:	Your Water Done Well		
Point Number	59.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It's the path to Privatisation. We need to maintain our necessary services in-house.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		
Point Number	59.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Setting up a separate company will increase cost and will be sold off in future making our water services privatised.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	59.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: It's a really bad idea.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	60	Submitter:	Chloe S
Documents:	Your Water Done Well		
Point Number	60.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Making rate payers lives easier! All for it		
Staff Recommendation	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.		
Point Number	60.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: If the plans you have for water go ahead, then it's looking really good for selwyn.		
Staff Recommendation	Comment acknowledged.		
Point Number	60.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: There is a huge desire to have chlorine removed. There's comments in the community on how bad our skin and hair has been since living here... it just dries you out and feels like you're in the swimming pool. Any changes here would be incredible		
Staff Recommendation	Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.		

Submitter Number:	61	Submitter:	Kristina Seregina

Documents: [Your Water Done Well](#)

Point Number	61.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** We need less bureaucracy & fewer rate-funded organisations. The initial setup of WSCCO will be enormous spending with little to no results to show. No clear benefits in the future. Bureaucracy for bureaucracy's sake + cushy management positions for some people. Some other big councils such as Christchurch & Auckland are not going this route - and we didn't get any clear cost-benefit analysis on why we should do this.

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number	61.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** All water should stay in-house & to manage this better, we need fewer useless departments, not more. More practical approach without ridiculous wellbeing and cultural considerations.

Staff

Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	61.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:**

	We don't need any extra organisations that will just be bleeding money on our rates & creating debt.
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	62	Submitter:	Andrew Harper
Documents:	Your Water Done Well		
Point Number	62.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The council should be able to manage drinking and wastewater in house as it does already.		
Staff Recommendation	Comment acknowledged.		
Point Number	62.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Ensure everyone in the community has an equal say in water and wastewater infrastructure, not have Iwi over ruling local ratepayers		
Staff Recommendation	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).		

Point Number	62.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Remove any mention of the Mana or Mauri of water unless these terms can be defined permanently in English. Remove any Iwi or Mana Whenua partnerships in association with ratepayer funded services.		
Staff Recommendation	Council recognises the explanation of mana and mauri would have provided context. The goal is to ensure that all parties involved in managing water resources work towards protecting and enhancing the mana (spiritual authority) and mauri (lifeorce) of all water bodies, regardless of any future changes in how water is managed or governed.		

Submitter Number:	63	Submitter:	C M
Documents:	Your Water Done Well		
Point Number	63.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Too expensive - MUST focus on heeling rates down not going up		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	63.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Keep costs down !! Please this is out of control		
Staff Recommendation	Through the Act there will increased costs and compliance required, this means there will be added costs for either option taken.		

Point Number	63.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	64	Submitter:	Alan Coulton
Documents:	Submission #64 - Alan Coulton		
Point Number	64.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	64.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	64.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** One water strategy whilst I support Ngai Tahu & Mana Whenua support on strategy, I do not support any dollar value paid to Ngai Tahu, Mana Whenua. **No one owns the water**

Staff**Recommendation**

Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).

Submitter Number:	65	Submitter:	Margaret McIntosh
Documents:	Your Water Done Well		
Point Number	65.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Don't see the reason for the extra expense when we are already paying for the water resources		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	65.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	65.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter Number:**

66

Submitter:

Barry Mackenzie

Documents:

[Your Water Done Well](#)

Point Number

66.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** This is the only avenue to be able to obtain the funding necessary to update the water system assets

Staff**Recommendation**

Comment acknowledged. Establishment of a CCO would give access to funding that could be used to invest in water infrastructure, also enabling management of debt over a longer period of time.

Point Number

66.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** This option limits the funding available

Staff**Recommendation**

The WSCCO would have ability to borrow up to 500% of revenue vs Council 280%.

Point Number

66.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** There is no political accountability in this model.

Staff**Recommendation**

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework

will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	67	Submitter:	Facundo Carril
Documents:	Your Water Done Well		
Point Number	67.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	67.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	67.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	68	Submitter:	Jonathan Scott
Documents:	Your Water Done Well		
Point Number	68.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We don't need any more rates rises - stick to a budget and deliver with the in-house team you have. Our incomes cannot cope with the constant additions.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	68.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Make it happen, without consultants, without more managerial levels that just suck up the rates when we cannot afford any more increases		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		

Point Number	68.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	69	Submitter:	Richard Wright
Documents:	Your Water Done Well		
Point Number	69.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: More rate payers money going into another deep hole.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	69.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	69.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	70	Submitter:	Jeremy Bateup
Documents:	Your Water Done Well		
Point Number	70.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We already have massive rates increases people cannot afford anymore increases		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	70.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	70.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	71	Submitter:	Craig Lambie
Documents:	Your Water Done Well		
Point Number	71.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Why do you need to set up another corporation, Selwyn District Council already is one.		
Staff Recommendation	Comment acknowledged.		
Point Number	71.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: without adding fertilizer by product and chlorine		
Staff Recommendation	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.		
Point Number	71.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: History will say it never reduces the cost to rate payers .		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	72	Submitter:	Belinda Hegan
Documents:	Your Water Done Well		
Point Number	72.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: New council to control water will bring in more debt to the people. Our rates are to high now.		
Staff Recommendation	Comment acknowledged. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	72.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	72.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: We cant afford to pay another body to take control of our water.		

Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	73	Submitter:	John Roper
Documents:	Your Water Done Well		
Point Number	73.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: There is no need to set up a separate entity to manage water services for the following reasons: A separate entity will require administrative functions. This is already in place within SDC. Going down this path will likely end up a bureaucratic top heavy organisation with no practical hands on experience. Already SDC is forecasting significant borrowing and cost increase projections without any tangible projects or outcomes which clearly shows any cost benefits analysis. Any future expansion to water services cost should be met by any developers. Water services should not exclude stormwater as SDC has identified several flood prone areas which by default reduces the properties values however this is not reflected in any rates reduction or remedial mitigation. In summary keep the status quo in house and in changes need to be made do so within your allocated funding.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		

Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Splitting out stormwater from the other surface waters (water races, and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains in Council. Stormwater also integrates with Transport and Open Space assets. This does not relate to part of the consultation.

Comment is acknowledged.

Point Number	73.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As per previous submission.		
Staff Recommendation	Comment acknowledged.		

Point Number	73.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	74	Submitter:	Brent Gillespie
Documents:	Your Water Done Well		
Point Number	74.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Water and sewerage fees already make up far too much of our rates, setting up a new organization will surely only cost more		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	74.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Its not broken leave it be		
Staff Recommendation	Comment acknowledged.		
Point Number	74.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This will only lead to more cost, manager at WECCO reporting to a manager at council rate increases are high enough		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the		

customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	75	Submitter:	Katie Tilson
Documents:	Your Water Done Well		
Point Number	75.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The council should have enough staff and expertise to manage this themselves. This will just cost rate payers more. I am also concerned that as a separate entity it will not be headed by elected officials and therefore will be out of ratepayer control. I don't support it a new water organisation.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	75.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: We should already have the people and expertise to cover this within council and also ensure our democratic voting rights on our water are protected. I do not agree with paying the additional overheads and costs to set up a new organisation.		
Staff Recommendation	Although Water Services are currently managed by in-house by Council staff the WSCCO would have the additional benefit of a professional board.		

It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	75.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Do not go ahead with this proposal. It will cost ratepayers too much.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	76	Submitter:	Paul Rosanowski
Documents:	Your Water Done Well		
Point Number	76.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I do not support a new Water Services Council Controlled Organisation (WSCCO) as I do not wish to see another cog added to the cost of the local government machine. I do not support the establishment of a WSCCO because I believe lines of accountability should be kept short, unprejudiced and transparent. Governments, national and local, are littered with failed instances of creeping, and overt, privatisation of public welfare and assets. While I understand what you mean by "Council controlled" I submit that control is more effectively exercised from inside the SDC tent. Further, I do not accept the validity of the cost predictions offered in the supporting documents here. Thank you, however, for trying.

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Point Number

76.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** See previous panel here for an obverse perspective.

Staff Recommendation

Comment acknowledged.

Point Number

76.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

**Staff
Recommendation**

Submitter Number:	77	Submitter:	Kaylene Wilson
Documents:	Your Water Done Well		
Point Number	77.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It makes our rates unaffordable		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	77.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: No need for duplication with our water supplies		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	77.3	Category	1-Questionnaire > 1.3-Comments

Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Its to expensive to push onto the already over stretched rate payers
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	78	Submitter:	Judy Chapman
Documents:	Your Water Done Well		
Point Number	78.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	78.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	78.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	79	Submitter:	Nathan Burrows
Documents:	Your Water Done Well		
Point Number	79.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Stop wasting money we can not afford any further increases between council waste and a 100% increase in water cost over a few years. Not to mention the fixed charge which has also increased. Purely wasteful.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	79.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	79.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Waste of money		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-		

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	80	Submitter:	ALan McKinnon
Documents:	Your Water Done Well		
Point Number	80.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I am opposed to the setting up of a separate entity with its own board and ceo etc because I do not believe that overall the efficiencies claimed will be achieved. The major benefit in having a separate entity seems to be an increased ability to borrow. If that is the case, surely a simpler approach would be to get the borrowing restrictions changed.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The debt limits of 280% for Council and 500% for the proposed CCO are not set by Council but set by LGFA (Local Government Funding Agency).		
Point Number	80.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The ratepayers have ore control and the operation is more efficient.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will		

also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	80.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	81	Submitter:	Kate Boys
Documents:	Your Water Done Well		

Point Number	81.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Drinking and waste water services are a core part of the council's duties, and should be kept within the council. The information provided in the summary presented to the community do not clearly explain what the required changes from new legislation would be, should these services remain within the council. I do not agree with the council setting up a new company to acquire more debt, as this seems rather short-sighted. I feel very strongly that the council should be looking at other ways to reduce spending so that services that we are already paying for can continue to be managed, owned, and operated by the council. This will ensure the council retain control of these services, which in turn keeps it within the rate-payers' control as well, as the elected council serve their community.		
Staff Recommendation	Comment acknowledged. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for		

economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number 81.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number 81.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff Recommendation Council acknowledges there are no more comments.

Submitter Number: 82 **Submitter:** Dianne Marshall

Documents: [Your Water Done Well](#)

Point Number 82.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	82.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	82.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	83	Submitter:	Kristina Koole
Documents:	Your Water Done Well		

Point Number	83.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: More money, water was fantastic here 12 years ago. Don't go private. Highly against this.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		

Point Number	83.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: All houses should be supplied with whole house filters for chlorine and other bugs. Not acceptable adding chlorine		
Staff Recommendation	Centralised treatment, with economy of scale, provides the most cost-effective solution.		

Point Number	83.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Stay away from Selwyn		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	84	Submitter:	Janita Dubery
Documents:	Your Water Done Well		

Point Number	84.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	84.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	84.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	85	Submitter:	Natarsha Smith
Documents:	Your Water Done Well		
Point Number	85.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	85.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	85.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter Number:**

86

Submitter:

Anita Wise

Documents:

[Your Water Done Well](#)

Point Number

86.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Stop trying to change the system!

Staff

Comment acknowledged.

Recommendation**Point Number**

86.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Selling off our water service to outsiders so the SDC has more money to waste on frivolous "woke" nonsense is NOT your mandate.

Staff

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Recommendation**Point Number**

86.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** A further waste of SDC ratepayers money

Staff

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government

Recommendation

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	87	Submitter:	Pullan Claudette
Documents:	Your Water Done Well		
Point Number	87.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Atop wasting ratepayers money, you are literally bankrupting already struggling people		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	87.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	87.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter
Number:

88

Submitter: Simon Boys

Documents:

[Your Water Done Well](#); [2025 02 26 Selwyn Water](#)

88

Scenario 1: \$1,000 invested and repaid evenly over 50 years, interest at 5%

Total: \$1,000 invested, repaid evenly over 50 years, interest at 5%														v Hidden columns	
Interest	5%	50 yrs													
	\$1,000	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 50	Total over term		
Capital	\$20	\$20	\$20	\$20	\$20	\$20	\$20	\$20	\$20	\$20	\$20	\$20	\$1,000		
Debt remaining		\$980	\$960	\$940	\$920	\$900	\$880	\$860	\$840	\$820	\$800	\$20			
Interest	\$50	\$49	\$48	\$47	\$46	\$45	\$44	\$43	\$42	\$41	\$40	\$1	\$1,275		
Annual payment	\$70	\$69	\$68	\$67	\$66	\$65	\$64	\$63	\$62	\$61	\$60	\$21	\$2,275		

Scenario 2: \$1,000 invested and repaid evenly over 20 years, interest at 5%

Interest														5%	20 yrs															
	\$1,000	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10	Yr 50	Total over term																	
Capital	\$50	\$50	\$50	\$50	\$50	\$50	\$50	\$50	\$50	\$50	\$50	\$50	\$1,000																	
Debt remaining		\$950	\$900	\$850	\$800	\$750	\$700	\$650	\$600	\$550	\$500	\$0																		
Interest		\$50	\$48	\$45	\$43	\$40	\$38	\$35	\$33	\$30	\$28	\$0	\$525																	
		\$100	\$98	\$95	\$93	\$90	\$88	\$85	\$83	\$80	\$78	\$0	\$1,525																	

Scenario 3: Table mortgage \$1,000 invested, term 50 years, interest 5%

Invested	Term	Interest	Annual repayment	Total repaid over term
\$1,000	50	5%	\$ 4.54	\$ 227.07

Scenario 3: Table mortgage \$1,000 invested, term 20 years, interest 5%

Invested	Term	Interest	Annual repayment	Total repaid over term
\$1,000	20	5%	\$ 6.60	\$ 131.99

Point Number

88.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** CONTROL, INFLUENCE OVER CORE BUSINESS Water and wastewater are core Council services. These should be central to Council's business, your their thinking and being. Once the entity is formed as recommended, the assets and local service would easily be removed from Council focus and leadership through amalgamation with other authorities and the potentially asset sales. ALTERNATIVE TO FUND GROWTH Funding new infrastructure ahead of growth (new housing etc) may be funded by SPVs (special purpose vehicles) at development-by-development level rather than by carving off the entire Selwyn water/wastewater service. Infrastructure built under SPVs may be transferred to Council ownership once capacity is substantially taken up, rates income being received for that capacity. GEOGRAPHICAL CHALLENGES There will be increasing challenges that are unique to specific towns across Selwyn. Nitrates, water sources, treatment solutions will differ with different feed waters. Some of these are (need to be) engaging politically, as our community weighs whether to improve the incoming water source (contamination) or invest more in treating the downstream. This is why we elect representatives TENSION TO REDUCE/MANAGE DEBT I like that the Council feels tension to prioritise how it spends capital. Relieving this tension seems counter to good choices between water, libraries, stormwater, transport etc. I recognise the issue of long term planning and good infrastructure decisions being disrupted by political interference, however

separating water services will not resolve this. Either model must respond to the pressures from the Council. GOVERNANCE Good governance is essential, as proposed. This applies equally across both options. Not a point of difference. DEBT STRATEGY It is flawed logic to use debt to assign infrastructure costs to users over the assets life. Over 50 years at 5% interest the cost of finance is 130% of that for the infrastructure itself.... \$2.30 paid for every \$1 invested. Selwyn must join other Councils in adopting a "best total cost of ownership" approach ... restricting capital spend to pay down some debt to create heads pace for future investments as they arise. Paying infrastructure off over 20 years instead of 50 would mean the cost of finance is only 30% of the infrastructure cost. That is \$1.30 paid for every \$1 invested. (5% cost of capital). Yes, future generations will enjoy infrastructure we paid for, but we also enjoy infrastructure paid for by those who came before. IN HOUSE We are lucky to have the Selwyn Council. I recommend restructuring the existing water/wastewater teams to accommodate the growth, continue to share expertise through consultancy and aligned services contracts, but retain ownership and hands on leadership (and accountability) within the Selwyn Council.

**Staff
Recommendation**

Comment acknowledged.

Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

Asset sales will still have to be considered in the context of the Water CCO's requirement to provide resilient water infrastructure and comply with water delivery standards. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

The WSCCO would remain accountable to Council. A statement of expectation would be put in place between the Council and the CCO including the ability to align strategic work programmes. Although Water Services are currently managed professionally by in-house staff with support from consultancy and service contracts the WSCCO would have the additional benefit of a professional board.

An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections,

this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number	88.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** CONTROL, INFLUENCE OVER CORE BUSINESS Water and wastewater are core Council services. These should be central to Council's business, your their thinking and being. Once the entity is formed as recommended, the assets and local service would easily be removed from Council focus and leadership through amalgamation with other authorities and the potentially asset sales. ALTERNATIVE TO FUND GROWTH Funding new infrastructure ahead of growth (new housing etc) may be funded by SPVs (special purpose vehicles) at development-by-development level rather than by carving off the entire Selwyn water/wastewater service. Infrastructure built under SPVs may be transferred to Council ownership once capacity is substantially taken up, rates income being received for that capacity. GEOGRAPHICAL CHALLENGES There will be increasing challenges that are unique to specific towns across Selwyn. Nitrates, water sources, treatment solutions will differ with different feed waters. Some of these are (need to be) engaging politically, as our community weighs whether to improve the incoming water source (contamination) or invest more in treating the downstream. This is why we elect representatives TENSION TO REDUCE/MANAGE DEBT I like that the Council feels tension to prioritise how it spends capital. Relieving this tension seems counter to good choices between water, libraries, stormwater, transport etc. I recognise the issue of long term planning and good infrastructure decisions being disrupted by political interference, however separating water services will not resolve this. Either model must respond to the pressures from the Council. GOVERNANCE Good governance is essential, as proposed. This applies equally across both options. Not a point of difference. DEBT STRATEGY It is flawed logic to use debt to assign infrastructure costs to users over the assets life. Over 50 years at 5% interest the cost of finance is 130% of that for the infrastructure itself.... \$2.30 paid for every \$1 invested. Selwyn must join other Councils in adopting a "best total cost of ownership" approach ... restricting capital spend to pay down some debt to create heads pace for future investmemts as they arise. Paying infrastructure off over 20 years instead of 50 would mean the cost of finance is only 30% of the infrastructure cost. That is \$1.30 paid for every \$1 invested. (5% cost of capital). Yes, future generations will enjoy infrastructure we paid for, but we also enjoy infrastructure paid for by those who came before. IN HOUSE We are lucky to have the Selwyn Council. I recommend restructuring the existing water/wastewater teams to accommodate the growth, continue to share expertise through consultancy and aligned services contracts, but retain

	ownership and hands on leadership (and accountability) within the Selwyn Council.
Staff Recommendation	Comment acknowledged in Q1.1

Point Number	88.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Instead of applying this to the water/wastewater service as a whole, apply a SPV to individual developments.		
Staff Recommendation	The previous government introduced new regulations, created Taumata Arowai (a new water regulator), and planned to shift water services from councils to larger entities. However, after the 2023 election, the new government repealed these changes and replaced them with the Local Water Done Well (LWDW) policy, returning control to councils with specific options to establish new delivery models and to consult with our community, these options are: - In-house business unit for water delivery (our current model) - A Water Services Council Controlled Organisation (WSCCO) - Joint Local Government arrangements - Consumer Trust – where council assets would transfer to a consumer-trust owned organisation After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn’s water infrastructure. As New Zealand’s fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.		

Submitter Number:	89	Submitter:	Fredrik Rohs
Documents:	Your Water Done Well		
Point Number	89.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: A new organisation dedicated to supplying fresh household use water sounds great but the cost of establishing this will inevitably be added onto rates. The present rates, plus already		

		announced increases, are making the cost of living for retired people almost unsustainable. Kiwi saver should be going towards to added costs of healthcare in retirement years, not into rates and insurance.
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.	
Point Number	89.2	Category 1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	89.3	Category 1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation	Council acknowledges there are no more comments.	

Submitter Number:	90	Submitter:	Mark Mulholland
Documents:	Your Water Done Well		
Point Number	90.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water		

	Services Council Controlled Organisation (WSSCO) with stormwater services to remain within Council? No Comment: It's just another level of unnecessary costs and structure.Create a new entity and your costs will escalate. Employ the right sort of planners and engineers as consultants who have a responsibility to get it right. The fiasco of the sewerage system for Darfield is an obvious example of incompetence. Two years down the track and still carting by road as the system not ready.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSSCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	90.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Keep control of the costs. We already have a disgraceful blow out in rates what do you think would happen when you have yet another entity charging rate payers?		
Staff Recommendation	While the modelling of the proposed WSSCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSSCO will bring in income to cover its own costs. Through the Act there will be increased costs and compliance required, this means there will be added costs for either option taken.		
Point Number	90.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSSCO model? Yes Comment: Its floored before it starts as Council will loose control of costs and running costs will ballon out.		
Staff Recommendation	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	91	Submitter:	Geraldine Leech
Documents:	Your Water Done Well		
Point Number	91.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This is just the first step to privatisation and higher cost to the rate payers. I do not trust this council and their motives for this move.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		
Point Number	91.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: We already have people that are paid to look after our water in council. Why would we want to set up another entity to look after this and spend a lot of money setting this up.		
Staff Recommendation	Although Water Services are currently managed by in-house by Council staff the WSCCO would have the additional benefit of a professional board. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Point Number	91.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: waste of tax payer money. We need to stop spending money of things we don't need. Make what we have work.		
Staff Recommendation	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing.		

Submitter Number:	92	Submitter:	Scott McLaren
Documents:	Your Water Done Well		
Point Number	92.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: It is the only way to get good funding to fund the new projects		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations. Establishment of a CCO would give access to funding that could be used to invest in water infrastructure, also enabling management of debt over a longer period of time.		
Point Number	92.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	92.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	93	Submitter:	Jane West
Documents:	Your Water Done Well		
Point Number	93.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: ... and yes. Is it really just the ability to debt load that makes savings over time for ratepayers? Debt still has to be paid off, so eventually it is simply a larger debt (albeit focused on water services) that ratepayers need to pay.		
Staff Recommendation	Comment acknowledged. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users		
Point Number	93.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: ... and yes. See previous answer. There is not enough information to properly understand how the debt loading will work under the WSCCO, how much will need to be borrowed, and where this will be spent. It appears the only true advantage is the potential removal of some of the arguments over where Council spends ratepayers money.		
Staff Recommendation	Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity.		

Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

Point Number 93.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** See previous comments. Two advantages: you can borrow more, but not enough info as to how much and what it would be used for, or the process for paying back debt; you will potentially reduce in-house argument over competing use of ratepayer money.

Staff Recommendation Comment acknowledged. A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Submitter Number: 94 **Submitter:** Robert Perry

Documents: [Your Water Done Well](#)

Point Number 94.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** The competent management of fresh water/waste water is a core and direct responsibility of any Council, and not something to be passed on to an "arms length" organisation with its own bureaucratic infrastructure and associated overheads which would inevitably and once again be funded by ratepayers. Escalation in rates is an ongoing concern by existing ratepayers in Selwyn and it is long overdue for Selwyn DC to better manage ratepayers money through less expenditure on "Vanity" projects such as barely used cycle lanes, and concentrated more on improving its in-house efficiencies to manage ratepayer owned assets more effectively. The proposed creation of this water services entity cannot also help but be seen by many ratepayers as "streamlining" the process by which a future racially biased anti-democratic He PuaPua / 3 waters agenda might be facilitated and this concerningly also adds a "political" motivation behind this proposal by SDC. Most of the town's infrastructure is relatively new, so levies on developers should be increased to accommodate any associated infrastructure growth requirements.. Existing ratepayers should not be paying for this! It has also been suggested by some correspondents on this matter that

Staff Recommendation	this proposal is being promoted by SDC as a vehicle to increase its debt ceiling. I am unsure of the veracity of this statement, but if true it represents a further justification for retention of the status quo (with improved SDC efficiencies to better manage assigned budgets in the same way that ratepayers and residents have to) In conclusion, I strongly object to the establishment of this Council Controlled Organisation and have no doubts that many Selwyn Ratepayer share the views outline above. Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term, reducing overheads. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.		
Point Number Comments: Staff Recommendation	94.2 Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The management of these services is a direct accountability of SDC to its ratepayers. The SDC needs to review and improve its in-house efficiencies and better manage the funding provided by ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Point Number Comments:	94.3 Question: Do you have any comments on the WSCCO model? Yes Comment: As outlined above, there appears to be a potential political motivation behind this proposal. Councils have no place in this area. They are there to represent the best interest of ratepayers. If the SDC feels that it is unable to internally manage the ratepayer owned infrastructure and assets with which it is charged	Category	1-Questionnaire > 1.3-Comments

then perhaps an appeal to the Minister of Local Government to address this issue is the next step for ratepayers. While Corde as a CCO already does the majority of maintenance work on SDC Water/Waste Water assets, and this seems to work OK, to divest any further responsibilities such as determining where expenditure is required on new assets or asset improvement is a step too far for a non democratically elected CCO.

Staff Recommendation The Local Water Done Well process is a legislative requirement and all councils across New Zealand are required to consult their community on models for future of water delivery services.

Submitter Number: 95 **Submitter:** Hannah Eddy
Documents: [Your Water Done Well](#)

Point Number 95.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I am concerned that the risks associated with transitioning the control of water to a CCO have not properly been identified and thought about in this consultation. In principle, I think that transitioning to a CCO (with the higher borrowing limits) would be a good thing for the people of Selwyn and ratepayers, however I think that the consultation document, and this consultation does not accurately reflect the risks by having a separate commercial entity controlling out water supply. I want more information about how this will work, and how Council will maintain control of our water supply (how will Council make sure that the CCO ensures everyone has access to clean drinking water and waste water systems, and how will the CCO ensure that access to water is affordable for everyone). Also in addition, how will the CCO respond to advocacy from community, for example, Selwyn's nitrate levels are very high compared to other places in New Zealand, and well above international safety standards (I note that they are within New Zealand's standards). How will the CCO respond to this, and if it becomes more of an issue, how will the public get a say on their water? Like I said, in principle I think it is a good idea, but I and I think a lot of Selwyn need more information.

Staff Recommendation Comment acknowledged. If a decision is made to establish a CCO, transition will occur over a period of time with a shared service model initially to ensure no drop in level of service.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or

CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

If established, the WSCCO will have its own constitution and will be directed by a binding Statement of Expectation from Council provided each year to the WSCCO. A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Point Number	95.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** see previous comment

Staff Recommendation

Comment acknowledged.

It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	95.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** see previous comment

Staff Recommendation

Council acknowledges there are no more comments.

Submitter Number:	96	Submitter:	Michelle Rhodes

Documents:	Your Water Done Well

Point Number	96.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I do not support the establishment of CCO for water services for the following reasons... 1. It removes the control of water further from the owners (ratepayers) and from the control of our elected representatives. 2. As with CORDE, there is a high chance that run as a sperate company (organisation), the goal of the CCO will become profit and not the best interests of the owners. 3. There seems to be no necessity to spend rate payer money on another board, management, premises, vehicles, branding, advertsing and all the other costs that go with a new entity. other cost of seetc when this work is currently being		
Staff Recommendation	It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	96.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Water is a core council service. The cost and staff should remain part of the council and be directly answerable to our elected councilors.		

Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Point Number	96.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	97	Submitter:	Kate Worner
Documents:	Your Water Done Well		
Point Number	97.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I don't believe that this is the fiscally responsible option. Yes - The WSCCO has merits, however we do NOT have the population to support this financially. Possibly in 20 years, but as of right now you are expecting a district to front up with significant money, already increasing our rates. The amount of funds you charge developers and businesses for the 'infrastructure' of new developments, would mean that any and all new infrastructure should be constructed for future growth. However, your proposal is also unbalanced and biased. It shows the council has already decided on the path forward as the pros and cons are not well prepared. I really hope the council takes on board all feedback and acts in good faith and with		

		transparency when communicating back to the community on the feedback received
Staff Recommendation	The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.	
Point Number	97.2	Category 1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As previous comments	
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	97.3	Category 1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: You are putting a large financial burden on the residents of Selwyn community. Whilst I can see the benefits, its clear that the costs are far too high and puts SDC in a position of large debt which will take a long time to recover from	
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.	
Submitter Number:	98	Submitter: Rob Straver

Documents: Your Water Done Well			
Point Number	98.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	98.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	98.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	99	Submitter:	Paul Hamilton
Documents: Your Water Done Well			
Point Number	99.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	99.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: Staff Recommendation It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	99.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? No Comment: Staff Recommendation Council acknowledges there are no more comments.			

Submitter Number:	100	Submitter:	Reuben Campbell
Documents:	Your Water Done Well		
Point Number	100.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater.			

Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	100.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	100.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	101	Submitter:	Jonny Bogue
Documents:	Your Water Done Well		
Point Number	101.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The council are looking to monopolize the construction market of these services by creating a buisness they will opperate. How is this legal? I think if you plan on going forward with this seperate entity then it should be unable to carry out physical construction and upgrades of existing services.		
Staff Recommendation	Comment acknowledged. There is no monopoly or any other legal issue from a competition perspective created by either a WSCCO or in-house. The WSCCO would undertake projects on assets it owns to establish new assets, refresh, maintenance or		

repair assets as it does now. The operating model for how this is delivered would be set by the WSCCO under the guidance of Council Statement of Expectations and a need to deliver the most cost-effective outcome while balancing quality. WSCCO would undertake competitive procurement processes for any services or projects it does not deliver in house in the same manner Council does now (and would continue to do under an in-house model).

Point Number	101.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** You need to manage the services by making decisions that are appropriate to our district. Not just dumping chlorine into drinking water without showing result's of testing and independent advice. Following the same solutions as councils in other districts makes zero sense

Staff Recommendation	Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Point Number	101.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Produce to the public the cost breakdowns of your expenditures over the last 5 years things like your construction spending and how much of that is given to CORDE on a platter rather than offered up to other local contractor's. Also id like to see how much has been spent on working groups looking into these services

Staff Recommendation	Comment acknowledged. A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it.

Submitter Number:	102	Submitter:	Ken Wong
Documents:	Your Water Done Well		
Point Number	102.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: While supportive of the formation of this new water body, there doesn't seem to be a distinct advantage delivered to consumers in cost. Perhaps the funding methods, and the deliverables need to be reviewed.		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations. Modelling shows an increase in costs over the first 9 years with costs reducing from 10 years.		
Point Number	102.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	102.3	Category	1-Questionnaire > 1.3-Comments

Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Besides having the advantage of a higher loan ceiling to debt, the main consideration should be what is the advantage it can deliver to residents, a core consideration being cost. Reducing rates from Council but increasing it from this front makes 0 difference.
Staff Recommendation	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Submitter Number:	103	Submitter:	Tracey MacLeod
Documents:	Your Water Done Well		
Point Number	103.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: SDC CEO has indicated Corde cannot provide these services as it has a conflict of interest as a water maintenance provider. This Govt is running a platform on efficiencies, reduced bureaucracy and demanding Council's focus on must haves. Requiring us to spend an additional \$750k pa on a CEO and Board when we have both in Corde, including the former CEO of Watercare and who is also on Infrastructure NZ Commission is bewildering. Setting up a new entity, branding, hiring, lawyers, consultants accountants will bleed money and create the gravy train we are trying to avoid. Council need to lobby Govt to expose their own contradictions and allow us to utilise Corde for the provision of these services. I have not read any costing for this new entity and that is a huge concern. It ought to have been a large part of the consultation documentation Infrastructure and Service Delivery: In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model may struggle to scale effectively to meet the ever-increasing demand on our district's assets, impacting service reliability and quality. And Unexpected repairs or emergencies can strain the Council's financial resources, leading to budget reallocations or increased rates. When beginning the reationale for choosing the WSCCO option, your document states The WSCCO would be responsible for planning, funding, building and maintaining drinking and wastewater infrastructure, as well as		

running the day-to-day customer-facing services for those water services. Based on the CEO's comment that Corde is providing the maintenance and therefore cannot be the WCCO it is odd to mention maintenance issues in the context of a new entity that will not be providing maintenance. In your document you clearly state the new entity will provide maintenance. This is confusing and impacts our ability to genuinely feedback a view. The release of an auditor report last year was an eye-opening insight into incompetencies or negligence in running the financial aspects of SDC and meeting regulatory (H & S) requirements. To this end I have no faith that the costings or projections provided by SDC in relation to this project can be relied upon. It goes without saying that having these entities foisted on us with the dangling of a 500% loan carrot rather makes a nonsense of this being genuinely about Local decision-making. While Democracy can be a hindrance to some to others it is important. This process reeks of by-passing Democracy, forcing our hands with Loan offers and duplicating costs unnecessarily. I am aware the Govt has threatened Councils that if they don't comply they will appoint a Statutory Manager. Another sledgehammer approach.

**Staff
Recommendation**

Comment acknowledged.

Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

The benefit of the additional administrative costs will be a governance structure that includes Water expertise that can provide greater management and strategy on the projects performed by the WSCCO.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

Establishment of a CCO will benefit from specific water expertise both at a governance and management level, improved scalability and enhanced access to higher debt limits.

Point Number

103.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** Lobby the govt to let us use Corde so we dont waste money on 2 boards, 2 ceos and enormous duplication of cost

**Staff
Recommendation**

Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the

council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

Point Number 103.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** SDC CEO has indicated Corde cannot provide these services as it has a conflict of interest as a water maintenance provider. This Govt is running a platform on efficiencies, reduced bureaucracy and demanding Council's focus on must haves. Requiring us to spend an additional \$750k pa on a CEO and Board when we have both in Corde, including the former CEO of Watercare and who is also on Infrastructure NZ Commission is bewildering. Setting up a new entity, branding, hiring, lawyers, consultants accountants will bleed money and create the gravy train we are trying to avoid. Council need to lobby Govt to expose their own contradictions and allow us to utilise Corde for the provision of these services. I have not read any costing for this new entity and that is a huge concern. It ought to have been a large part of the consultation documentation Infrastructure and Service Delivery: In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model may struggle to scale effectively to meet the ever-increasing demand on our district's assets, impacting service reliability and quality. And Unexpected repairs or emergencies can strain the Council's financial resources, leading to budget reallocations or increased rates. When beginning the rationale for choosing the WSCCO option, your document states The WSCCO would be responsible for planning, funding, building and maintaining drinking and wastewater infrastructure, as well as running the day-to-day customer-facing services for those water services. Based on the CEO's comment that Corde is providing the maintenance and therefore cannot be the WCCO it is odd to mention maintenance issues in the context of a new entity that will not be providing maintenance. In your document you clearly state the new entity will provide maintenance. This is confusing and impacts our ability to genuinely feedback a view. The release of an auditor report last year was an eye-opening insight into incompetencies or negligence in running the financial aspects of SDC and meeting regulatory (H & S) requirements. To this end I have no faith that the costings or projections provided by SDC in relation to this project can be relied upon. It goes without saying that having these entities foistered on us with the dangling of a 500% loan carrot rather makes a nonsense of this being genuinely about Local decision-making. While Democracy can be a hindrance to some to others it is important. This process reeks of by-passing Democracy, forcing our hands with Loan offers and duplicating costs unnecessarily. I am aware the Govt has threatened Councils that if they don't comply they will appoint a Statutory Manager. Another sledgehammer approach.

Staff Recommendation Comment acknowledged in Q1.1.

Submitter Number:	104	Submitter:	Erin McDonald
Documents:	Your Water Done Well		
Point Number	104.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	104.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	104.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	105	Submitter:	David Parkinson

Documents: [Your Water Done Well](#)

Point Number	105.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** A separate entity will require additional layers of administration and overheads to run.

Staff Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	105.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This will require greater control of spending and require more focus on core council service and delivery costs.

Staff Recommendation

Comment acknowledged.

Point Number	105.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** A separate entity will require another highly paid CEO and management structure. This will also require buildings/fittings, vehicles, self-promoting advertising.

Staff Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused

entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	106	Submitter:	Kieran Barron
Documents:	Your Water Done Well		
Point Number	106.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Another entity means more money wasted on management and administration.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	106.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Already have a structure to manage this.		
Staff Recommendation	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	106.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter Number:**

107

Submitter:

Raewyn Anderton

Documents:

[Your Water Done Well](#)

Point Number

107.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I believe when the areas are joined as one this makes it easier for bigger decisions to be made without public having a say about our services. It also affects the amount the rates will rise to service the other areas as a group.

Staff**Recommendation**

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number

107.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Take care of our own area.

Staff**Recommendation**

Comment acknowledged.

Point Number

107.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** To bigger entity with big fish being over paid

Staff**Recommendation**

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial

modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	108	Submitter:	Thomas Dowie
Documents:	Your Water Done Well		
Point Number	108.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The board of the WSCCO will be too far removed from us ratepayers who supply the funds to implement any of their decisions.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	108.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: In house model is more responsive to ratepayers(who fund the council).		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Point Number	108.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Way too much power, and will not feel the financial impact their decisions have on us ratepayers.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	109	Submitter:	Ben Thompson
Documents:	Your Water Done Well		
Point Number	109.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Council is out of control with its spending. Rate increases are unaffordable and this new water entity has been touted as increasing our water costs in the first year by 10%, 15% in second year and 35% in the third year before coming down. The costs are far too high.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	109.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Based on costs of a CCO it has to. Having lived in Auckland, CCOs have got out of control there and I see it being no different in Selwyn. Plus, the costs for the new infrastructure for subdivisions etc should be paid for by the developers and costs passed on to those buying the land - not existing rate payers. This would		

Staff Recommendation	most likely happen in some, shape or form judging by current Selwyn District Council standards Comment acknowledged. Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
Point Number Comments: Staff Recommendation	109.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? Yes Comment: Yes, as per my previous comments, CCOs in Auckland haven't worked particularly well (like AT and Watercare), what makes a CCO (or as termed here - WSCCO), function any better? Comment acknowledged.

Submitter Number: Documents:	110 Your Water Done Well	Submitter: Andrew Day
Point Number Comments: Staff Recommendation	110.1 Category 1-Questionnaire > 1.1-Council Proposal Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: In short to medium term the in house version works out cheaper. I don't trust long term predictor of cost as government organisations continually make massive errors around cost modelling to such an extent it is the norm rather than the exception. Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.	

Point Number	110.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: With an in house model we at least have the ability to vote the people responsible for it out if it's not performing well.		
Staff Recommendation	It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Point Number	110.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Though it sounds positive in some respects government organisations are notoriously inefficient and costs will increase above those forecast. Without competition it will become inefficient. It will also be used to give board positions and incomes to political favourites and through creative accounting will be used to take on more council debt, like CCC has done with Orion over the years. If it does operate more efficiently it will simply mean council will pile more debt onto it to make council books look better.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	111	Submitter:	Andy Carter
Documents:	Your Water Done Well		
Point Number	111.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water		

Staff Recommendation		Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	111.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	111.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	112	Submitter:	Alastair Taylor
Documents:	Your Water Done Well		
Point Number	112.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Selwyn council already provides 3 waters services. There is no need for more bureaucracy and cost to already stretched ratepayers	
Staff Recommendation		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-	

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	112.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Water is done well now - keep doing it as is - not adding more bureaucracy and unnecessary costs

Staff Recommendation

Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

A separate entity does provide the benefit of having specialised governance with expertise in the sector.

Point Number	112.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** The costings are unrealistic. It will patently cost more in the long and short term to operate a separate entity

Staff Recommendation

Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing.

Submitter Number:	113	Submitter:	Renato Carenza
Documents:	Your Water Done Well		
Point Number	113.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	113.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	113.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	114	Submitter:	Katrina Young
Documents:	Your Water Done Well		

Point Number	114.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	114.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	114.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	115	Submitter:	Richard Young
Documents:	Your Water Done Well		
Point Number	115.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	115.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	115.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	116	Submitter:	Andy Williams
Documents:	Your Water Done Well		
Point Number	116.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Do the job that my rates pay for, stop wasting money and stop polluting the water we drink.		
Staff Recommendation	Comment acknowledged. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government		

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 116.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** That is what the rates are paid for. You are increasing the rates so do the job that you are paid to do. This council is a joke at times and are so wasteful with money.

Staff Recommendation As mentioned in the risks of the Council delivered model, with the limited funding capacity, there is the possibility that funding priorities change and the funding may be allocated to other activities across the Council.

Point Number 116.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Stop increases rates to fund private companies/ separate organisations to take over. Do the job you're paid for.

Staff Recommendation Comment acknowledged. The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document.

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Submitter Number: 117 **Submitter:** Tim Rowlands

Documents: [Your Water Done Well](#)

Point Number 117.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** Support conditional on allowing the WSCCO full autonomy in making decisions and pushing improvements through without undue interference from the sitting council.

Staff Recommendation	Establishment of a CCO would put the decision on investment in water infrastructure with the CCO rather than Council.		
Point Number	117.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: The council spends too much time deliberating and meeting rather than organizing and doing. Water must not be politicized as it's done now and fresh, clean water must be made available for everyone - even it this comes at a cost.		
Staff Recommendation	Comment acknowledged. A WSCCO is a council-controlled organisation, meaning the council maintains control with accountability back to the community. The key difference is that an independent board would oversee day-to-day operations, ensuring that long-term investment decisions are made based on expertise rather than short-term political pressures. This structure helps safeguard water services while ensuring they remain affordable, reliable, and in public hands.		
Point Number	117.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: None other than mentioned previously.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	118	Submitter:	Kate Patterson
Documents:	Your Water Done Well		
Point Number	118.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	118.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	118.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	119	Submitter:	Susan Carline-Wright
Documents:	Your Water Done Well		
Point Number	119.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The separate costs to set up a new organisation including premises, logo design etc etc will still outweigh any benefits.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government		

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 119.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Even though Council say it will restrict borrowing that can only be a good thing, as 500% sounds like a huge level of debt.

Staff

Recommendation

Comment acknowledged.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

Point Number 119.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Recommendation

Council acknowledges there are no more comments.

Submitter Number: 120 **Submitter:** Paul Spence

Documents: [Your Water Done Well](#)

Point Number 120.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** WSCCO represents a duplication of existing services, administration and expertise, already found within CCO Corde. This will inevitably feed through into additional costs to ratepayers. There is also the very real risk that water services entities will be set up to fail and hence become privatisation targets. This is consistent with current ideology

		within central government, so we should be suspicious of the motivations behind the pending legislation.	
Staff Recommendation		CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.	
Point Number	120.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: It does make sense to provide the services through a CCO. But we already have a CCO that is very well equipped to deliver. The Council needs to lobby central government to allow for existing organisations to fulfill the role.	
Staff Recommendation		CORDE cannot be used under the Preliminary Arrangements Act.	
Point Number	120.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? Yes Comment: Two comments. If the WSCCO proceeds, there must be an equitable framework for charging water related rates or fees. The current fees are too low. Users should be charged by volume, irrespective of whether they are town or rural users. Heavy users get off far too lightly under the current system and have no incentive to minimise consumption. Secondly, the WSCCO constitution must have sound protections protecting against acquisition or privatisation.	
Staff Recommendation		Comment acknowledged. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.	

Submitter Number:	121	Submitter:	Stefan Clerens
Documents:	Your Water Done Well		

Point Number	121.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I have no option but to choose yes or no. My submission is about not enough alternative options being explored and presented, so in fact there is not enough information to choose yes or no. Please see my further comments.		
Staff Recommendation	Comment acknowledged.		

Point Number	121.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: There is not enough information to choose yes or no.		
Staff Recommendation	Comment acknowledged.		

Point Number	121.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: It is difficult to understand why the Council hasn't explored the option of using an existing Council Owned Company (Corde) to take on the tasks described. Unexplainably the consultation document appears to be completely silent on this option. There may well be good reasons for dismissing this as an option, but they need to be presented. If there are no good reasons for dismissing this as an option, then it needs to be included as a genuine option with an analysis of advantages and disadvantages.		
Staff Recommendation	CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.		

Submitter Number:	122	Submitter:	Glenn Clark

Documents: [Your Water Done Well](#)

Point Number	122.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I want status quo, you can learn to manage assets as it's one of your basic jobs, not to create another bureaucratic nightmare. I don't even understand "Waikirikiri Ki Tua Future Selwyn" I cannot even find our Library. This is not democracy. I don't trust the council, some time ago properties were rezoned to stop the breaking up of land. All I see is West Melton growing and creating congestion. Poor roading layouts. I don't agree to what's happening in our area including slowing traffic down on a main highway with traffic lights and now more intersections from a growing village. Use your intelligence and not agenda against the public will. For your interest there are technologies out there that toilets incinerate waste without septic tanks etc, you also create waster from the atmosphere. How about that. More innovation is required by you not the same old.

Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.

Point Number	122.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** please see previous comments.

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	122.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Don't want it.

Staff Recommendation	Comment acknowledged.

Submitter Number:	123	Submitter:	Michelle Cutler
Documents:	Your Water Done Well		
Point Number	123.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It doesn't make sense to split water services with some in house and some out, means more people needed to communicate from one workplace to another, which means more time and money.		
Staff Recommendation	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).		
Point Number	123.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	123.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	124	Submitter:	Sarah Booth
Documents:	Your Water Done Well		

Point Number	124.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	124.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	124.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Don't do it!! Waste of money		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	125	Submitter:	Deborah Gillon
Documents:	Your Water Done Well		
Point Number	125.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The increased costs to rate payers and potentially borrowing up to 500% to establish and manage the new entity are not justified			
Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.			
Point Number	125.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:			
Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	125.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? Yes Comment: There is insufficient information about potential costs and risks assoc with borrowing up to 500% of revenue. This is excessive borrowing and risky for rate payers. No other council is doing this locally.			
Staff Recommendation A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.			

Submitter Number:	126	Submitter:	Stewart David
Documents:	Your Water Done Well		

Point Number	126.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	126.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	126.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	127	Submitter:	NIGEL HUMPHRIES
Documents:	Your Water Done Well		
Point Number	127.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We do not need a completely new		

Staff Recommendation	Company with all its attendant costs. Council staff already do the required work and all that would happen would be an unnecessary increase in staff numbers and overheads We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
Point Number Comments: Staff Recommendation	127.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff have done this for a long time and should know it all The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
Point Number Comments: Staff Recommendation	127.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? Yes Comment: An absolute waste of funds, a \$2m set up cost, a whole new organisation to basically do what Council is already doing. In spite of Council contending that in 10 years time the WSCCO model would be cheaper than on house I do not believe that. How can Council truthfully contend that an additional business being established would be more economic? Such a contention defies all reasonable logic and economics. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	128	Submitter:	David Whale
Documents:	Your Water Done Well		
Point Number	128.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Corde is becoming too large and there exists limited opportunity to effectively complain about services they provide or elicit change.		
Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.		
Point Number	128.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: More accountable.		
Staff Recommendation	Comment acknowledged.		
Point Number	128.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	129	Submitter:	Pauline Doody
Documents:	Your Water Done Well		
Point Number	129.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: I feel the Selwyn Council can manage this better.		
Staff Recommendation	Current water management by Council is provided to a high standard, a WSCCO option would provide a more focused Governance model.		
Point Number	129.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It would be hopefully better for rate payers		
Staff Recommendation	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.		
Point Number	129.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	130	Submitter:	Robert Koller

Documents: [Your Water Done Well](#)

Point Number 130.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:**

Staff Recommendation It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number 130.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:**

Staff Recommendation It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number 130.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:
Question: Do you have any comments on the WSCCO model? Yes **Comment:** Dear Council It seems a sensible solution. However in the document you use terms such as 'mana' and 'mauri'. You should really explain what you mean by these words. It might sound nice but what impact do they have and who decides in what way these concepts are applicable to the water strategy. Mana and Mauri are lovely kind of spiritual almost religious terms and might not be appropriate in this context. Kind regards Robert

Staff Recommendation Council recognises the explanation of mana and mauri would have provided context. The goal is to ensure that all parties involved in managing water resources work towards protecting and enhancing the mana (spiritual authority) and mauri (lifeforce) of all water bodies, regardless of any future changes in how water is managed or governed.

Submitter Number:	131	Submitter:	Wayne Smith
Documents:	Your Water Done Well		
Point Number	131.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This hasn't worked in other countries around the world. It is the people's water and should be managed by the people's elected council. It is not a commodity to be separated away to an organisation that needs to make money and can cut corners to do so. It would be a big mistake to make this transition! I am strongly against you doing it.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income.		
Point Number	131.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	131.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	132	Submitter:	Julie Bowler
Documents:	Your Water Done Well		

Point Number	132.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** This is not a consultation you are telling us what you plan to do and what do we think - we are not talking about the options

Staff Recommendation A proposal has been submitted for community feedback, and no decision will be made until 2 April 2025.

Point Number	132.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Not perfect but fixable with the mom eoy you would spend setting us a new entity

Staff Recommendation The WSCCO would have the additional benefit of a professional board.

Point Number	132.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Expensive- work with what is set up and save ratepayers money

Staff Recommendation

Submitter Number:	133	Submitter:	Ciara Halkett
Documents:	Your Water Done Well		
Point Number	133.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Stop trying to close or sell all of our assests that the rate payer has already and still is paying for just to be charged more for something we already own.....		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		
Point Number	133.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Yes keep our assets in house and stop selling them off only for the rate payer to be charged more for something we used to already own.....		
Staff Recommendation	If a WSCCO was established the assets would be transferred but overall ownership would still sit with Selwyn District Council.		
Point Number	133.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: It's another cop out for the council. Pull up your big girl pants and work for this community like your supposed to and not treat it all like a bloody business and money making scheme or fucking the rate payers and upping rates to cover your fuck ups		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	134	Submitter:	Tracy Bourke
Documents:	Your Water Done Well		
Point Number	134.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	134.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	134.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: I just DO NOT want to be paying for any more shit in my rates		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	135	Submitter:	Grahame Richards
Documents:	Your Water Done Well		
Point Number	135.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I believe it will bring more cost to Rate Payers that are already financially stretched by the horrific rate rises we have had in the past 3 years.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	135.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	135.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	136	Submitter:	James Graham
Documents:	Your Water Done Well		

Point Number	136.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Selwyn District Council lacks the required ability to manage this prudently, as shown by numerous failings in the past.		
Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.		
Point Number	136.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Selwyn District council lacks the expertise to manage a WSCCO. The leadership has a penchant for borrowing that is fiscally irresponsible.		
Staff Recommendation	Comment acknowledged.		
Point Number	136.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: No comments.		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	137	Submitter:	Mitchell Rogers
Documents:	Your Water Done Well		

Point Number	137.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	137.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	137.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	138	Submitter:	Heather Davies
Documents:	Your Water Done Well		
Point Number	138.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Personally think a referendum be		

		held till after the election. We want people to actually do what is best for the area not just the first to implement it as this is huge. The information regarding this is not informative enough	
Staff Recommendation		Comment acknowledged.	
Point Number	138.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Have a referendum until the council elections then hopefully much more information regarding this. As a retired person one pension and a mortgage I would have to sell	
Staff Recommendation		SDC have followed the consultation approach as set out under the Water Services Preliminary Arrangements Act and have used a consultation approach that also recognises our current Significance and Engagement Policy. We recognise the challenge of speed but the decision is needed to enable council to meet its legislative deadline of 3 September to deliver a WSDP. We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.	
Point Number	138.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? Yes Comment: Prefer to utilize what we already have meaning CORDE	
Staff Recommendation		CORDE is not eligible to be a water services CCO. Under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, a WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.	

Submitter Number:	139	Submitter:	Matt Smith
Documents:	Your Water Done Well		

Point Number	139.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	139.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	139.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	140	Submitter:	Willisnz Tolhoek
Documents:	Your Water Done Well		
Point Number	140.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The cost of water supply should fit		

Staff Recommendation	within the current council long term plan and should not have any additional cost. Moving to a separate entity allowing debt to be taken on shows little understanding about the who bares the final cost (rate payers). We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
Point Number Comments: Staff Recommendation	140.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It will be more efficient to keep in house to stay within the long term plan and the cost associated. As mentioned in the consultation document on page 5, maintaining the current model under the new legislation is not possible and a future in-house model would still require increased investment.
Point Number Comments: Staff Recommendation	140.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? No Comment: Funding needs to fit into existing long term plan. I am disappointed to see other councils make adjustments to their ongoing building, infrastructure and other related costs to reduce the high rate rises. This needs to be addressed urgently. An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations. The Council consistently seeks opportunities to enhance cost efficiency and ensure the prudent use of resources, prioritising value for the ratepayer.

Submitter Number:	141	Submitter: Debbie Tubb
Documents:	Your Water Done Well	

Point Number	141.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This approach has the potential to increase the debt burden of the rate payers now and in the future. Setting up a new entity seems like a risky investment, when the government legislation is not finalised. The councillors are also up for reelection this year and I would think that it would be better to wait until both Legislation and new councillors are in. I've been in a business where the government has forced separation and the only people who profit are big businesses, not the people who are the customers. It's also not a good idea to start a business that has the ability to add debt in such a high amount to the ratepayers when the country is struggling to get out of the recession.		
Staff Recommendation	Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users. The Preliminary Arrangements Act, passed in September 2024 provides the framework for water services delivery and requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. Council must present a WSDP by the 3 September 2025 and we are working to confirm the position in advance of our new financial year on 1 July 2025.		
Point Number	141.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a		

future in-house water delivery model? Yes **Comment:** This uses the existing infrastructure to provide the best possible service to our community. I understand that this will also require some additional resources and potential debt. Again I don't think we should rush into anything until the legislation has been passed and the new council is sworn in. Sometimes it is better to be the tortoise and make the changes once all of the factors can be determined. I see too much money spent on consultants and nothing to show for it and I can see that being a possibility under the other model.

**Staff
Recommendation**

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Point Number

141.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** In my opinion this solution is being rushed into being. It has the potential to line the pockets of a few people at its inception but not provide value to the ratepayers and our community.

**Staff
Recommendation**

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

**Submitter
Number:**

142

Submitter:

Nadene Butcher

Documents:

[Your Water Done Well](#)

Point Number	142.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** 1 - Lack of Information in Consultation Document *The Your Water Done Well Consultation Document lacks sufficient detail. *It presents a generalized intent rather than a clear, comprehensive plan. *The document appears biased in favor of WSCCO while portraying Selwyn District Council (SDC) as incapable. 2 - Uncertainty in Legislation *The government's legislation on this matter has not been finalized. *Without a legal framework in place, WSCCO cannot accurately outline its intentions or predict outcomes for ratepayers. 3 - Lack of Public Consultation and Referendum *A decision of this scale should be made with full public input. *A local referendum is necessary to ensure residents can make an informed choice. *The current two-week consultation period is inadequate, especially given the low public awareness of this proposal. 4 - Selwyn's Existing Water Infrastructure Selwyn District is expanding and has newer infrastructure compared to many other regions. *Areas like Lincoln, Rolleston, Leeston, Darfield, Kirwee, and West Melton have benefited from recent investments. *There was nothing wrong with SD water in the first place, until they put Chlorine in it.

Staff Recommendation

Comment acknowledged.

We are bound to follow the legal guidelines provided under the Local Government Act, and the Water Services Preliminary Act regarding connection with the community and they have provided the parameters for us to work within for decision making.

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Point Number	142.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** *The consultation period should be extended to allow proper community engagement. *A local referendum should be held to ensure residents are informed of the legislation and cost, so they can have a direct say in this decision. *This whole agenda needs to be re looked at due to lack of transparency and detailed information. You can always go forward but you can never go back - 2 weeks consult with the public is appalling!

Staff

Recommendation

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	142.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** - **Lack of Information and Clarity** - The model presented in the document lacks sufficient detail and transparency. - How can WSCCO create an accurate model without having access to the finalized legislation? - **Financial Concerns** - Where does WSCCO derive the claim of 500% leverage from with the LGFA? - What are WSCCO's actual equity and collateral? - **Affordability for Ratepayers** - How do local and central governments expect ratepayers to afford the costs of setting up a new entity? - This transition could place a significant financial burden on the community. - **Risk and Accountability** - If this new entity fails, who will be responsible for the financial consequences? - Will ratepayers be left to cover the costs? - This is inter-generational debt once again! Plus you didn't give the SDC time to even give the rate payers enough

time for consultation - this is being pushed through and looks like a re branding of 3 WATERS!

Staff

Recommendation

Under the new legislation, councils must fund water infrastructure upgrades without additional government funding. One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house. If the decision is made that a WSCCO is created, as stated on page 11 of the consultation document, 'Ownership of drinking water and wastewater assets (and all associated debt and liabilities) would transfer to the WSCCO. The equity in a WSCCO would represent the residual interests in assets (including those transferred) after deducting all liabilities (overheads and other direct costs).

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	143	Submitter:	Nick Haugh
Documents:	Your Water Done Well		
Point Number	143.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I believe that the creation of another entity will cost the rate payer dearly. The proposed borrowing would be ludicrous. Slow down further development by ensuring developers pay for entire sewer and water reticulation as well as a development fee that covers a % of any further waste water treatment system required to cope with the number of dwellings/sections that are developed. On vital matters like this that entail possible massive expenditure a referendum should be required. Definitely No to this proposal by council.

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number

143.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Selwyn's water system is actually pretty good! A few of the outlying rural villages require work and this can be done in house in a systematic manner. You have a terrific team of people on the ground so continue to use them. All the major growth that has occurred re new developments have water and sewer reticulation that's awesome. Simply put if you can't afford it without borrowing then you can't afford it at all.

Staff Recommendation

Positive endorsement of current SDC management is acknowledged. A WSCCO would have the additional benefit of a professional board and would remain accountable to Council who in turn have accountability to ratepayers.

Debt will not be used to fund the operating costs. Debt will fund capital projects that don't have Development Contributions attached to them.

Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number 143.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** It would be a bit like setting up another entity of any type within the same business that doesn't make money. It just cost more money. This is not a good idea. Manage it in-house.

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number: 144 **Submitter:** Andrea Byrom

Documents: [Your Water Done Well](#)

Point Number 144.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** First of all I just want to mention that I recently completed the 'Making Good Decisions' course so am trained as a RM commissioner. I don't know if that qualifies as a conflict of interest exactly, but I thought I would mention it. With the above declaration, I offer a few comments. 1. This is cautious support for the new entity i.e. a CCO to run the delivery of drinking and waste water services. I think it has the potential to be a more efficient organisation. 2. Having said that, I would have liked to see a more fulsome discussion about the benefits and costs of creating a stand-alone entity. There are some in the community who will effectively see this as distancing of a vital community asset from day-do-day Council business. You have put forward some good arguments as to why this could be a more efficient model, but it could come with risks if Council does not have full control of the asset(s) into the future. 3. The current Ngai Tahu claim going through the courts

is most interesting in terms of Tino Rangatiratanga. Even if their claim fails, I think there will be some legal precedents set, and it would be good to see Council being more clear about what you will do to respond. I say this because at the moment there is quite coded language about 'partnership' in the document - presumably because you didn't want to rile up the haters - but in my view the way of the future is going to be to have greater input from tangata whenua and mana whenua. I would like to see Council being very clear (proudly and with respect) about what this means for our communities - and that it could be very good for everyone. Perhaps painting some positive benefits about co-management and co-governance. 4. My final point is a top priority for me. The governance of these entities is going to be critical. You allude to 'experts' in water infrastructure funding, long-term debt management, and water delivery. These are laudable but I suggest that both management and governance of these entities should also include environmental experts e.g. people who understand the setting of environmental limits and targets, impacts of over-allocation of the ecology of streams, lakes and rivers, etc. This is not mentioned in the documents. Further, in terms of governance it would be good to be clear about the role of mana whenua (i.e. that they will have seats at the table as is their right under Te Tiriti). Finally, it would be good to see a good and robust appointment process for all governors to ensure that the entity is governed by a wide diversity of community voices - not the same old perspectives. Some active recruitment to ensure that a diversity of skills apply for, and are appointed to, these boards will be critical for the long term success of the entity if it goes ahead.

**Staff
Recommendation**

Comment acknowledged.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Additionally, a skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua

(Bicultural Strategy). Council's One Water Strategy | Wai-Ora, sets out our mana whenua partnership to sustainably manage water now and into the future.

Point Number 144.2

Category 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** See previous comments - while I cautiously support the idea of a stand-alone CCO, it would be good to see Council running a robust, open and transparent process to appoint the governance board of the entity, to ensure that a diversity of community perspectives and expertise are sitting around the table and not the 'same old same old'. Also, please set up a process to ensure that mana whenua / tangata whenua have seats at the (governance) table in the new entity.

Staff Recommendation

Comment acknowledged.

A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Point Number 144.3

Category 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** See previous comments.

Staff Recommendation

Council acknowledges there are no more comments.

Submitter Number: 145

Submitter: Ron Clark

Documents: [Your Water Done Well](#)

Point Number 145.1

Category 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District

Staff Recommendation	Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Setting up a new organisation is costly and will end up with additional salaries etc that will need to be paid by rate payers. There is no guarantee that a new government wouldn't change the water set up requirements and make a new organisation irrelevant. Forecasting the future is never accurate as in 2008, Rolleston's population was expected to reach 16,000 in 2041! Only advantage with a new organisation is the ability to borrow more money which should not be necessary as most of our infrastructure should be new. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
Point Number Comments: Staff Recommendation	145.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This will save rate payers money over time. Projected savings from the alternative aren't predicted for a long time and there is no guarantee that they will actually eventuate. The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
Point Number Comments: Staff Recommendation	145.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? No Comment: Council acknowledges there are no more comments.

Submitter Number:	146	Submitter:	Robert Lawrence
Documents:	Your Water Done Well		
Point Number	146.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I would like to raise some points regarding the submission format and the consultation process, as well as several important questions that need to be addressed before I can confidently indicate a preference on the options presented. 1. Submission Form Format • On the first page of the submission form, the tick box indicating "Do you wish to make a submission before council?" is pre-marked as No. I strongly feel this box should be left blank, allowing submitters to actively make their own choice rather than being led by a pre-selection. • The Yes/No options appear before there is space to provide any reasoning or comments. This gives the impression that the act of ticking Yes or No is the most important part, rather than the ability to engage with the issues fully. I believe this ordering undermines the consultative process and discourages detailed public input. • One has to tick a box before the submission can be accepted, there fore I ticked NO to each option. 2. Need for Further Information Before Indicating Preference I feel there are several key concerns raised by Lincoln Voice and others in the community that need to be fully addressed before I can make an informed selection on a preferred option. These questions are critical to understanding the real costs, risks, and impacts of the WSCCO model versus the in-house model. The tight timeframe and the rushed nature of this consultation process increase the risk of poor decision-making that could have serious long-term impacts on ratepayers. 3. Importance of Cross-Ward Communication The input from Lincoln Voice demonstrates the value of cross-ward communication in ensuring the entire district is represented. I would be more comfortable supporting the council's preferred WSCCO option if the following critical points could be clearly answered: Questions Requiring Council Response 1. What is the total amount the council plans to borrow through the new WSCCO? The consultation document refers to \$450 million—please confirm if this is correct. 2. If the WSCCO model proceeds, will this reduce the debt that council plans to take on through the Long Term Plan (LTP)? If so, by how much? 3. For each of the next 10 years, what will the combined debt be across the WSCCO and the council's LTP? 4. What will the WSCCO borrowings be spent on specifically (broken down year by year) over the next 10 years? 5. For the average urban household, what will be the effect on rates for each of the next 10 years under the WSCCO model? 6. For the average urban household, what will be the combined rates increases for each of the		

next 10 years when WSCCO charges and LTP rates are added together? 7. Will the implementation of the WSCCO alter any of the projects planned through the LTP? If so, which projects? 8. Why has the council not sought a time extension for this consultation, given the complexity, the potential significant cost to ratepayers, and the need to fully evaluate these costs and communicate them transparently? 9. Why has the council not requested a time extension if full legislative requirements and implications from central government have not yet been released? 10. Why did council not initially schedule any public information sessions, drop-ins, or meetings to allow the community to ask questions and understand the issues before completing their submissions? (I understand some are now being arranged, but a full week of the consultation period has already passed.) 11. If full information on costs, debt, and rates impacts cannot be made available immediately, will council either pause the consultation or extend the consultation period until this information is clearly provided to ratepayers in an accessible and transparent way? If not, why not? 12. If the full debt and rates implications cannot be provided now, will council confirm that no binding decisions on debt and rates will be made as part of this consultation or the associated council decision? In such a case, these financial decisions must be subject to a further future consultation with the public. Final Comment Without clear answers to these questions, it is very difficult to offer meaningful support for either option. Decisions made under pressure, with incomplete information, are likely to lead to poor outcomes for the district and for future generations of ratepayers. I urge council to take these concerns seriously and to prioritise transparency, proper public engagement, and thorough analysis over adherence to arbitrary timeframes. Thank you for the opportunity to provide this feedback, and I look forward to your comprehensive response. Yours sincerely, Rob Lawrence

**Staff
Recommendation**

Comment acknowledged.

The proposed WSCCO net debt (including existing borrowings taken over from Council) are modelled to reach a maximum of \$328M over the next 10 years, as illustrated on page 16 of the consultation document. As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA).

The debt based on the LTP that the Council will not need to take on over the remaining periods is \$170M if the proposed WSCCO goes ahead.

The total Council and proposed WSCCO debt would be approximately \$600M at the end of 2033/34. This includes any debt repayments over the respective years.

As stated on page 16 of the Consultation Document, 'Modelling is based on assumptions drawn from the Council's Long-Term plan, accounting for additional regulatory and operating costs of a new entity'. The benefit of the WSCCO model means there would be dedicated water-focused operational and governance experts in water delivery, infrastructure funding, and long-term debt management, ensuring compliance with new regulations and improving service delivery for growing communities. The WSCCO does provide flexibility to look

at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility).

Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Please refer to the FAQs for a breakdown of these costs.

The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO. There are no extra projects planned under the WSCCO.

The benefit of the WSCCO model means there would be dedicated water-focused operational and governance experts in water delivery, infrastructure funding, and long-term debt management, ensuring compliance with new regulations and improving service delivery for growing communities.

The Preliminary Arrangements Act requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The Preliminary Arrangements Act, passed in September 2024 provides the framework for water services delivery and requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Drop ins were held in all four wards, and some Councillors chose to also hold their own meetings, or speak at residents' association meetings. There was an

online session for those able to access the internet and this was recorded and made available after the fact.

Comment acknowledged - noting the consultation does include the financial scenarios on costs, rates and debt for both options.

Point Number	146.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** I would like to raise some points regarding the submission format and the consultation process, as well as several important questions that need to be addressed before I can confidently indicate a preference on the options presented.

1. Submission Form Format • On the first page of the submission form, the tick box indicating "Do you wish to make a submission before council?" is pre-marked as No. I strongly feel this box should be left blank, allowing submitters to actively make their own choice rather than being led by a pre-selection. • The Yes/No options appear before there is space to provide any reasoning or comments. This gives the impression that the act of ticking Yes or No is the most important part, rather than the ability to engage with the issues fully. I believe this ordering undermines the consultative process and discourages detailed public input. • One has to tick a box before the submission can be accepted, therefore I ticked NO to each option.
2. Need for Further Information Before Indicating Preference I feel there are several key concerns raised by Lincoln Voice and others in the community that need to be fully addressed before I can make an informed selection on a preferred option. These questions are critical to understanding the real costs, risks, and impacts of the WSCCO model versus the in-house model. The tight timeframe and the rushed nature of this consultation process increase the risk of poor decision-making that could have serious long-term impacts on ratepayers.
3. Importance of Cross-Ward Communication The input from Lincoln Voice demonstrates the value of cross-ward communication in ensuring the entire district is represented. I would be more comfortable supporting the council's preferred WSCCO option if the following critical points could be clearly answered: Questions Requiring Council Response

1. What is the total amount the council plans to borrow through the new WSCCO? The consultation document refers to \$450 million—please confirm if this is correct.
2. If the WSCCO model proceeds, will this reduce the debt that council plans to take on through the Long Term Plan (LTP)? If so, by how much?
3. For each of the next 10 years, what will the combined debt be across the WSCCO and the council's LTP?
4. What will the WSCCO borrowings be spent on specifically (broken down year by year) over the next 10 years?
5. For the average urban household, what will be the effect on rates for each of the next 10 years under the WSCCO model?
6. For the average urban household, what will be the combined rates increases for each of the next 10 years when WSCCO charges and LTP rates are added together?
7. Will the implementation of the WSCCO alter any of the projects planned through the LTP? If so, which projects?
8. Why has the council not sought a

time extension for this consultation, given the complexity, the potential significant cost to ratepayers, and the need to fully evaluate these costs and communicate them transparently? 9. Why has the council not requested a time extension if full legislative requirements and implications from central government have not yet been released? 10. Why did council not initially schedule any public information sessions, drop-ins, or meetings to allow the community to ask questions and understand the issues before completing their submissions? (I understand some are now being arranged, but a full week of the consultation period has already passed.) 11. If full information on costs, debt, and rates impacts cannot be made available immediately, will council either pause the consultation or extend the consultation period until this information is clearly provided to ratepayers in an accessible and transparent way? If not, why not? 12. If the full debt and rates implications cannot be provided now, will council confirm that no binding decisions on debt and rates will be made as part of this consultation or the associated council decision? In such a case, these financial decisions must be subject to a further future consultation with the public. Final Comment Without clear answers to these questions, it is very difficult to offer meaningful support for either option. Decisions made under pressure, with incomplete information, are likely to lead to poor outcomes for the district and for future generations of ratepayers. I urge council to take these concerns seriously and to prioritise transparency, proper public engagement, and thorough analysis over adherence to arbitrary timeframes. Thank you for the opportunity to provide this feedback, and I look forward to your comprehensive response. Yours sincerely, Rob Lawrence

**Staff
Recommendation**

Comment acknowledged in Q1.1.

Point Number	146.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** I would like to raise some points regarding the submission format and the consultation process, as well as several important questions that need to be addressed before I can confidently indicate a preference on the options presented. 1. Submission Form Format • On the first page of the submission form, the tick box indicating "Do you wish to make a submission before council?" is pre-marked as No. I strongly feel this box should be left blank, allowing submitters to actively make their own choice rather than being led by a pre-selection. • The Yes/No options appear before there is space to provide any reasoning or comments. This gives the impression that the act of ticking Yes or No is the most important part, rather than the ability to engage with the issues fully. I believe this ordering undermines the consultative process and discourages detailed public input. • One has to tick a box before the submission can be accepted, there fore I ticked NO to each option. 2. Need for Further Information Before Indicating Preference I feel there are several key concerns raised by Lincoln Voice and others in the community that need to be fully addressed before I can make an informed selection on a preferred option. These questions are critical to understanding the real costs, risks, and impacts of the WSCCO model versus the in-house model. The tight timeframe and the rushed nature of this consultation process increase the risk of poor decision-

making that could have serious long-term impacts on ratepayers. 3. Importance of Cross-Ward Communication The input from Lincoln Voice demonstrates the value of cross-ward communication in ensuring the entire district is represented. I would be more comfortable supporting the council's preferred WSCCO option if the following critical points could be clearly answered: Questions Requiring Council Response 1. What is the total amount the council plans to borrow through the new WSCCO? The consultation document refers to \$450 million—please confirm if this is correct. 2. If the WSCCO model proceeds, will this reduce the debt that council plans to take on through the Long Term Plan (LTP)? If so, by how much? 3. For each of the next 10 years, what will the combined debt be across the WSCCO and the council's LTP? 4. What will the WSCCO borrowings be spent on specifically (broken down year by year) over the next 10 years? 5. For the average urban household, what will be the effect on rates for each of the next 10 years under the WSCCO model? 6. For the average urban household, what will be the combined rates increases for each of the next 10 years when WSCCO charges and LTP rates are added together? 7. Will the implementation of the WSCCO alter any of the projects planned through the LTP? If so, which projects? 8. Why has the council not sought a time extension for this consultation, given the complexity, the potential significant cost to ratepayers, and the need to fully evaluate these costs and communicate them transparently? 9. Why has the council not requested a time extension if full legislative requirements and implications from central government have not yet been released? 10. Why did council not initially schedule any public information sessions, drop-ins, or meetings to allow the community to ask questions and understand the issues before completing their submissions? (I understand some are now being arranged, but a full week of the consultation period has already passed.) 11. If full information on costs, debt, and rates impacts cannot be made available immediately, will council either pause the consultation or extend the consultation period until this information is clearly provided to ratepayers in an accessible and transparent way? If not, why not? 12. If the full debt and rates implications cannot be provided now, will council confirm that no binding decisions on debt and rates will be made as part of this consultation or the associated council decision? In such a case, these financial decisions must be subject to a further future consultation with the public. Final Comment Without clear answers to these questions, it is very difficult to offer meaningful support for either option. Decisions made under pressure, with incomplete information, are likely to lead to poor outcomes for the district and for future generations of ratepayers. I urge council to take these concerns seriously and to prioritise transparency, proper public engagement, and thorough analysis over adherence to arbitrary timeframes. Thank you for the opportunity to provide this feedback, and I look forward to your comprehensive response. Yours sincerely, Rob Lawrence

**Staff
Recommendation**

Comment acknowledged in Q1.1.

**Submitter
Number:**

147

Submitter: Hayley Lilley

Documents: Your Water Done Well			
Point Number	147.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	147.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	147.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	148	Submitter:	alastair joyce
Documents: Your Water Done Well			
Point Number	148.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** The administration costs will be too much for ratepayers to have to be burdened with. I am fortunate to be rural where we will not be burdened with direct rate increases with this option as confirmed by Councillor Debra Hasson at the Prebbleton Community Ass meeting on 3/3/25 (we have our own well & septic system) However we do have a concern regarding security for borrowings which has been highlighted by Lincoln Voice. The guarantees council will make are against all ratepaying properties, not just those serviced with reticulated water. This issue is being rushed and it is becoming more and more evident as each day passes as we near the end of the very short consultation timeframe. The only decision to make at this point is to leave things in house until there is more discussion on the wider subject of local government. There is a ground swell of the need for change of direction in many areas of local governments roles. To relinquish a core service such as water while retaining the "nice to haves" while ratepayers are struggling financially just doesn't make any sense.

Staff Recommendation

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

The debt under the proposed WSCCO will be secured by the uncalled capital from SDC. SDC does not have right to claim individual houses unless in extreme circumstances on unpaid rates. The proposed WSCCO would have no direct claim on houses.

The Preliminary Arrangements Act requires us to make a decision on a model by 3 September 2025. This piece of legislation is in force now.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	148.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Water is a core requirement along with roading, rubbish, etc. Council should be mindful that we as ratepayers ALL need these utilities as the core reason for the need to have a council at all.		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.		

Point Number	148.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Not a viable option at this time, this model sitting outside of council should only be considered on a much wider regional basis.		
Staff Recommendation	As part of the Delivery Model Options there was an option for Territorial Authorities to explore new delivery models including joint local Government arrangements. SDC consulted with other Councils, however this was currently not a viable option, although this could be considered in the future.		

Submitter Number:	149	Submitter:	Cathy Kewish
Documents:	Submission #149 - Cathy Kewish		

Point Number	149.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Water needs to be protected and the current pipework etc needs to be upgraded due to lack of modernisation. Long term this will benefit everyone.		
Staff Recommendation	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.		

Point Number	149.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: A seperate Organisation with specialist staff & management would be preferred.		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	149.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	150	Submitter:	Michelle Flay
Documents:	Your Water Done Well		
Point Number	150.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	150.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** The first few years of the new model are extremely expensive (even though long-term it is the better option). Selwyn has been relatively proactive with infrastructure investment in comparison to other TA's. If the CCO model is adopted, then it is likely that upgrades and maintenance expenditure would be prioritised for degraded assets outside of Selwyn. Therefore, as a Selwyn rate payer, I would be paying more in the short term, for potentially no benefit in infrastructure improvement. It would be better for SDC to continue to operate an in-house model and leverage future central government opportunities to make 'growth pay for growth' (e.g. infrastructure), as part of the Phase 3 of the RMA Reform. Also, the additional ability to take on further debt is not necessarily something that should be accepted.

**Staff
Recommendation**

Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.

Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.

Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number

150.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

**Staff
Recommendation**

Council acknowledges there are no more comments.

Submitter Number:	151	Submitter:	Margaret Morrison
Documents:	Your Water Done Well		
Point Number	151.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: No I dont. As a rate payer all I can see is vastly more expense and more rates. I use Corde as an example. I am a regular at Selwyn Sports center and /he total inefficiency long drawn out mess and lack of progress at the Youth playground is appalling.. Looks like an abandoned wasteland.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	151.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As per reasons above using Corde as an example I see many staff driving around in shiney new vehicles and very little in the way of work progress happening.		
Staff Recommendation	A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.		
Point Number	151.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Seeing massive expenses and inefficiencies.		
Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will		

also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	152	Submitter:	Conan Griffin
Documents:	Your Water Done Well		
Point Number	152.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The Selwyn district rate payers can not afford it.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	152.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	152.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Too expensive. Council needs to operate within it's budget and control it's spending like all other businesses have to and stop borrowing money to pay for nice to have projects then increasing rates to try and cover poor council budgeting skills.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	153	Submitter:	Angela Jones
Documents:	Your Water Done Well		
Point Number	153.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: waste of money - the infrastructure is new and we dont need the debt - i dont want to hear about failures due to out sourcing		
Staff Recommendation	The WSCCO provides flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and our current borrowing cap of 280% to fund all of Council's projects. Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the region's growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.		
Point Number	153.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: yes yes yes		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	153.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	154	Submitter:	Joanne Frazer
Documents:	Your Water Done Well		
Point Number	154.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Using this way of providing services will place rate payers out in the cold - we will have NO way to have our say in what this company does or how much debt they will rack up for us & future generations to have to service!		
Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act. A "Charter" would also allow for management of the relationship including transparency expectations. Funds are required under legislation to be ringfenced for the spending on water. Please note the CCO will continue a volume-based charging model of water charges, there will be no rates charged for water.		
Point Number	154.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This option gives me a slight hope (albeit very faint) that we, as tax payers will have some say in how things are Donetsk & will reduce the racking up of huge debt		
Staff Recommendation	Comment acknowledged. After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.		
Point Number	154.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: I feel this whole consultation has been far too rushed & am disappointed that we were not informed until the last day about the central government's		

	consultation regarding the legislation that is imposing all these changes. The whole exercise is just money grabbing.??
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	155	Submitter:	Claire Thomason
Documents:	Your Water Done Well		
Point Number	155.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This decision is rushed without awaiting full details from the legislation. Premature to make changes before knowing exactly what changes need to be made.		
Staff Recommendation	The Preliminary Arrangements Act, passed in September 2024 provides the framework for water services delivery and requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is		

aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number 155.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This could change once legislation outcomes what is required. Why not leave status quo til then.

Staff Recommendation The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Point Number 155.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Rushed, poorly consulted, not enough info given, contradicts professional advice.

Staff Recommendation The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number: 156 **Submitter:** Diane White

Documents: [Your Water Done Well](#)

Point Number	156.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Keep it simple . Do not need another layer of management etc . Waste of money .		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	156.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Less management , do the core job well with less people , more system . Simple effective management .		
Staff Recommendation	The current 'in-house' management structure is responsible for the delivery of all council delivered services. One of the benefits of the WSCCO is management and governance are focused solely on the delivery of water services and are considered specialists in water service delivery.		
Point Number	156.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Too much structure, too many layers of management . Making work for the sake of it .		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure		

investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	157	Submitter:	Jo White
Documents:	Your Water Done Well		
Point Number	157.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: No definitely do not support that huge cost to our council which in turn lands on even more rate increases. We are being burdened with 14% rises for the next 3 years. We are not able to earn that extra amount of money. Stop landing us with huge rates rises. Get back to basics. Thanks Jo		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	157.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As I previously mentioned I don't want a separate business for water. If u did why not use Corde?		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District		

Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.			
Point Number	157.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Far too expensive. We don't want to have a huge capacity to borrow even more money to put us into bigger debt.		
Staff Recommendation	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.		

Submitter Number:	158	Submitter:	Ashleigh Taylor
Documents:	Your Water Done Well		
Point Number	158.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	158.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	158.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	159	Submitter:	Sarah D
Documents:	Your Water Done Well		
Point Number	159.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The rates increase with the LTP is high enough over the next 10 years to also add additional for a new water services operation when there is already infrastructure & staff employed to these services already within the Council		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	159.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Keeping the existing services means it can be improved upon if required. 3 of the 5 services will stay		

		with the Council with the proposed new water services which seems a waste of rate payer money.
Staff Recommendation		The WSCCO would have the additional benefit of a professional board. Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
Point Number	159.3	Category 1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:
Staff Recommendation		Council acknowledges there are no more comments.

Submitter Number:	160	Submitter:	Paul Biddick
Documents:	Your Water Done Well		
Point Number	160.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:	
Staff Recommendation		It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	160.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	

Point Number	160.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	161	Submitter:	Christine renwick
Documents:	Your Water Done Well		
Point Number	161.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Expensive setting up a new controlled organisation. A huge expense . There will be double ups of resources and staff. Keep it simple		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	161.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Far better financially and structurally. No logic having a separate organisation.		

Staff Recommendation	As mentioned in the consultation paper on page 5 maintaining the current model under the new legislation is not possible and a future in-house model would still require increased investment.		
Point Number	161.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Why don't you allow us to vote on this at the next election.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	162	Submitter:	Antoni Sansom
Documents:	Your Water Done Well		
Point Number	162.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The current model works for us controlled by the SDC. We dont need another organization to pay for.		
Staff Recommendation	Comment acknowledged.		
Point Number	162.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Keep it in house with more control and accountability		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will		

also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	162.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	163	Submitter:	Emma Jenkins
Documents:	Your Water Done Well		

Point Number	163.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	163.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	163.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter
Number:**

164

Submitter:

Matthew Brovelli

Documents:

[Your Water Done Well](#)

Point Number

164.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number

164.2

Category

1-Questionnaire > 1.2-Future In-
house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number

164.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Current quality is known. Moving this to a new model has risk in terms of quality and service delivery. I am hesitant to choose another council owned entity given inefficiency of beurocracy.

Staff**Recommendation**

Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there

will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submitter Number:	165	Submitter:	Karl van Slooten
Documents:	Your Water Done Well		
Point Number	165.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Council should keep drinking water and wastewater assets as they are to reduce rates		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	165.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: Prefer to keep rates lower with the old system		
Staff Recommendation	The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.		
Point Number	165.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Why change something that will increase rates substantially.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-		

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	166	Submitter:	Kevin Burney
Documents:	Your Water Done Well		
Point Number	166.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Given the concerns about corruption in other areas of the country,i feel this is a most likely outcome from a private organisation(greed being a basic human default) and if some form of accountability can be maintained through a council controlled agency,and the cost you have provided us are to be believed this is therefore the best option for us		
Staff Recommendation	Comment acknowledged.		
Point Number	166.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	166.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	167	Submitter:	Kelly McEvedy
Documents:	Your Water Done Well		
Point Number	167.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We have some of the best three waters infrastructure in the country. Currently well managed by an organization that is answerable to the rate payer.		
Staff Recommendation	Positive endorsement of current SDC management is acknowledged. A WSCCO would remain accountable to Council who in turn have accountability to ratepayers.		
Point Number	167.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It is unreasonable to spend huge amounts of money on setting up a new CCO when we what we have works.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	167.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This organisation is removed from the rate payer, there are unnecessary set up costs, we already have a council that operates with a board, and local representation. The staff working at Council and you CCO, Corde, have already been through the uncertainty of the Three Waters Reform, enough is enough. Corde have heavily invested in their staff and training to ensure they can meet the needs of the maintenance contracts they hold with council, employing many locals. They have worked hard on having good systems and a good		

reputation. Why 'fix' something that is not broken, it is a ridiculous proposal. At least wait until all of the legislation is out, and give the community a decent amount of time to look at this, three weeks is an insult to the rate payer paying your wages.

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

**Submitter
Number:**

168

Submitter: Rodney Inch

Documents:

[Your Water Done Well](#)

Point Number	168.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I do not believe that the district council has been good with money. Making a new council will just cause more costs and there is no control over it.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	168.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: Neither options are good and the community has not had enough time to understand the pros and cons of this suggestion. I am sick of the council not talking to its community enough considering we are the ones who pay you.		
Staff Recommendation	Comment acknowledged. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model		

or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	168.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** There is not enough understanding about this because the council has not explained it properly. Instead it has been rushed through. To make a decision on any contract i need to understand what i am signing. Therefore it is a no until the council consults the community properly and focusses on reducing wasteful spending and other things like annual pay increases to staff . When we have lots of tough economic years we dont go creating more debt. Start communicating properly with reasonable times for people to decide

Staff Recommendation

SDC have followed the consultation approach as set out under the Water Services Preliminary Arrangements Act and have used a consultation approach that also recognises our current Significance and Engagement Policy. We recognise the challenge of speed but the decision is needed to enable council to meets its legislative deadline of 3rd September to deliver a WSDP.

Submitter Number:	169	Submitter:	Helen Meikle

Documents: [Your Water Done Well](#)

Point Number	169.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** This is a total waste of resources.

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number	169.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:			
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Improve on what u already. Remember that a lot of ratepayers are not able to continue to pay the huge rising cost of living easily.			
Staff Recommendation			
The WSCCO would have the additional benefit of a professional board.			
While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.			
Point Number	169.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Question: Do you have any comments on the WSCCO model? Yes Comment: Unnecessary expense and obviously getting ready to sell off asset and mortgaging the properties that are privately owned			
Staff Recommendation			
Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.			

Submitter Number:	170	Submitter:	Josh Ewing
Documents:	Your Water Done Well		
Point Number	170.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:			
Staff Recommendation			
It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	170.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	170.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	171	Submitter:	Anita Wright
Documents:	Your Water Done Well		
Point Number	171.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We need to keep decisions within Council (and therefore with ratepayers) as much as we can. A new entity is going to have it's own Board which we, as ratepayers, cannot elect. We have no idea if they will do their best to keep the cost of water on our rates down or if they will get driven by profit and dividend payout requirements.		
Staff Recommendation	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income. It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Point Number	171.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This is the best option of what's been presented in the submission. I would rather everything just stays as it is without all these increases to our rates. An Urban Residential Property with Sewerage is suggested to be \$1,552 (in house model) for 2025/2026. My current rates bill for Urban Water Supply is \$370 + Sewerage \$702 + Stormwater \$152 (if my assumption on the "3" waters this will cover is correct) = \$1,224. What you are proposing is a 26% increase. That's on top of the double digits rate rise we have already been warned about for the next couple of years. How are households expected to handle this? Wages and salaries are not going up and cost of living is increasing. You are going to be driving people out of Selwyn (there's a lot being driven out of NZ to Australia).

Staff Recommendation

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

The example stated on page 18 of the consultation document is reflective of an average urban residential property. Please refer to the FAQs on our consultation page where there is additional information and further breakdown.

Point Number

171.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** As mentioned, it removes the say on water further away from ratepayers with a Board in place that we cannot elect. They will be driven by profit and dividend payouts. Keeping it in house in Council means ratepayers are at least closer to being able to make decisions on our water.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:

172

Submitter:

Brett Jones

Documents:[Your Water Done Well](#)

Point Number	172.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	172.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	172.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	173	Submitter:	Asti Boal
Documents:	Your Water Done Well		
Point Number	173.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This is being rushed without proper		

consultation. What is the actual benefit to rate payers for being the first local authority in NZ to set this up? It feels like the decision has been made with ratepayers an afterthought. This will have a huge impact on future generations and affordability for owning property. This is only one portion of driving the rates up. It seems crazy to do this so you can borrow more and put the debt as leverage over ratepayers properties. Three Waters was opposed. Wait for legislation to be written to understand the full implications and effects. Water should stay in house to manage! Assets aren't being properly maintained now. How about fixing the current issues instead of creating more.

Staff Recommendation

A proposal has been submitted for community feedback, and no decision will be made until 2 April 2025.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Point Number

173.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Better transparency and collaboration between departments who do the work behind the scenes. Gives ratepayers more say for something we pay for. Come up with more efficient in-house solutions to manage water assets.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections,

this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Point Number	173.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: How can this go ahead when legislation is still being developed? The model moves staff and you end up losing connections and collaboration between council and CCO. There's a lot of risk for ratepayers and it should not proceed.		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	174	Submitter:	Steve Garbett
Documents:	Your Water Done Well		

Point Number	174.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The benefits of this change to a WSCCO as a single authority do not seem clear. A WSCCO requires additional set up costs, additional overheads to run with the investment levels essentially being the same in terms of asset renewal over the next 10 years. My view is that the ONLY benefit is to borrow more (i.e. additional cost of debt) to do the work faster rather than prioritise the asset renewal programmes over time. This		

requires an additional cost ratepayers and seems counter-intuitive as the savings are projected to be 10 years away, and may not be realised due to the huge number of changing variables that may come into play in the intervening period. I also cannot support a WSCCO proposal which is then not accountable to the local democratic process.

Staff

Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The work programme is currently based on the LTP. If the proposed WSCCO goes ahead a policy on the use of debt will be put in place, likely to be aligned to the current SDC policy.

Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number

174.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** The council is currently a single entity with a democratically led approach to delivering what are essentially the same challenges for the future of water services in our district either way. The in-house council team need to improve their efficiency in the way they manage and renew their assets, and they also need to optimise the way they manage externally-driven development that adds pressure to the existing assets through a proper framework that charges developers for their

expanded growth and additional demands for service. Rather creating an additional WSCCO overhead, the existing SDC in-house water delivery team need to maximise their management capability to justify appropriate government funding and make strong data-driven renewal and investment programmes to achieve efficient and prioritised delivery programmes to meet increased legislative requirements and ratepayer's level of service needs. I do not accept the need for ratepayers to pay \$3,000+ of additional charges over 10 years to accommodate WSCCO overheads and the cost of additional debt with no guarantee of a reduction from 2034 onwards.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Council runs an advanced IDS renewal model.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number	174.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** The case for a single authority CCO is not strong. Council already has the responsibility and accountability to ratepayers to deliver water services and meet the government's requirements so setting up a CCO seems an unnecessary step. The case would be different if this was a multi-authority CCO where there would be economies of scale and the need to manage cross-boundary politics - if this situation were to eventuate then the council could re-visit the CCO option in the future.

Staff Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submitter Number:	175	Submitter:	Tracey Baughan
Documents:	Your Water Done Well		
Point Number	175.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	175.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	175.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	176	Submitter:	Leanne Farrar
Documents:	Your Water Done Well		

Point Number	176.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I strongly disagree with moving the drinking water and waste water being moved into a different company that is appointed and not elected. They will not be accountable and the ratepayers will have no say in how they want their water managed		
Staff Recommendation	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Point Number	176.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Looking after the water is part of their job, no need to pay extra people to do this task		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.		
Point Number	176.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: do not want it		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	177	Submitter:	Lisa Jones
Documents:	Your Water Done Well		
Point Number	177.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District		

Staff Recommendation		Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	177.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	177.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	178	Submitter:	Kirsty Wilde
Documents:	Your Water Done Well		
Point Number	178.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Asking the ratepayer to agree to a possible \$2000+ increase in payments per year to establish the WSCCO is out of touch with the cost of living crisis. People simply cannot afford this.	
Staff Recommendation		While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in	

reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.

Point Number	178.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Agreeing with this option as a way to reduce costs to the rate payer.

Staff Recommendation	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.

Point Number	178.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	179	Submitter:	Tom Moorby

Documents:	Your Water Done Well

Point Number	179.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater.

Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	179.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	179.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	180	Submitter:	Kerry McFetridge
Documents:	Your Water Done Well		
Point Number	180.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: From a cost perspective overall, it seems cheaper to do this in-house. Other councils are doing this - is it possible to share services? If the issue is really greater borrowing, this should be clearer, but how much would this extra borrowing cost?		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Point Number	180.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Is it possible to share services with other councils? Do we really need to replicate services?		
Staff Recommendation	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades. Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.		
Point Number	180.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: None other than my other comment.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	181	Submitter:	Martin Russell
Documents:	Your Water Done Well		
Point Number	181.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District		

Submitter Number:	182	Submitter:	John Bradley
Documents:	Your Water Done Well		
Point Number	182.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	182.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	182.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	183	Submitter:	Charlotte Rietveld

Documents: [Your Water Done Well](#)

Point Number	183.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** We do not believe that a new entity will have sufficient time to produce cost and service efficiencies over a 10 year period of expected return. The SDC already has governance capabilities to provide this service, albeit in an altered form, and should maximise the lifespan of existing entities and capabilities. To change to a new entity would require a whole new level of bureaucracy and it appears that regional entities are only enlarging - why set up a whole new entity that may very well need to be replaced with a mega-entity within 10 years.

Staff

Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	183.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** As detailed before, this is the most cost efficient means of achieving the job at hand. To do anything other would be to waste governance and infrastructure funds on an entity that has a high chance of being decommissioned before the 10 year pay-back is up.

Staff

Recommendation

The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.

Point Number	183.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Thank you for the excellent council website submitter information (short video, precise points etc) offered to support this decision.

Staff Recommendation	Comment acknowledged.

Submitter Number:	184	Submitter:	Ian Burney
Documents:	Your Water Done Well		

Point Number	184.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Aside from not providing enough information as to what changes need to be covered, I have worked in local government and silo working is bad for the Council and the community especially in the case of essential services. Also, rather than borrowing more to just do what the government asks, SDC should stand more for fighting for what your community needs and wants at an affordable price. This long term decision should not be made without comprehensive consultation with the community and rushed through before all of the facts are available. Any reasonable organisation with good leadership would not proceed with a major structural decision like this without the all the facts being known and with full bi-directional consultation with it's key stakeholders and understanding of the stakeholders desire. As I understand, local councillors have been asked to hold / attend community meetings on this matter and have ignored these requests. I can't see how these councillors can therefore truly represent the views of their community which makes the whole process very undemocratic.

Staff Recommendation	Comment acknowledged.

A statement of expectation would be put in place between the Council and WSCCO, and shared service agreements established to ensure the organisations' relationship and strategies are aligned.

Drop-ins were held in all four wards, and some councillors chose to also hold their own meetings, or speak at residents' association meetings. There was an online session for those able to access the internet and this was recorded and made available after the fact.

Point Number	184.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This is a key service that needs to operate within the Council not as external silo. Cost should be managed to meet the community requirements whilst standing up to legislation to represent the community that you serve rather than moving to an external model just to increase borrowing capacity and ultimate debt.		
Staff Recommendation	Comment acknowledged. Council has submitted on previous Bills and this response is addressing the current legislative requirements before Council.		
Point Number	184.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	185	Submitter:	Trish Standfield
Documents:	Your Water Done Well		
Point Number	185.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: After having attended a public consultation forum and reading through the submission i don't feel that there has been sufficient information to make me vote any other way. For now the SDC has the ability to retain these services inhouse and use their existing staff who have the best understanding of the area and how water is used etc. I feel the SDC is moving too quickly on this and should take a more considered approach By transistioning the control to a third party does not appear to be in the best interests of the community (in my view from what i have read or listened to).		
Staff Recommendation	Comment acknowledged.		

We recognise that our water team are a highly skilled and knowledgeable group of people who are passionate about delivering water services to our community. Staff who currently perform work that would be impacted by a CCO potentially becoming responsible for drinking and wastewater will be fully consulted on the impact of the transfer.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	185.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** as per previous comments

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	185.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** its too expensive and control is not local

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	186	Submitter:	Rachel Smith
Documents:	Your Water Done Well		
Point Number	186.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	186.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	186.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: An enormous waste of taxpayer money to set up and run an entire new company. SDC already charges a large amount of rates for this, and we should expect they have the competencies and cash flow to deliver our water within their existing system which we as rate payer have already be so heavily charged for.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC		

management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submitter Number:	187	Submitter:	Glenn Frauenstein
Documents:	Your Water Done Well		
Point Number	187.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The cost to rate payers, especially pensioners, is beyond reason and our pockets. A WSCCO is absolutely and irrefutably unnecessary. We have already, in Council employ, highly qualified and trained engineering personnel who are quite capable of making informed decisions w.r.t. water concerns into the future. A WSCCO would be an indictment against these employees. Moreover, adding yet another body to Bureaucracy would serve to make Council top heavy.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. Council does have a capable and knowledgeable team which will largely transfer to the WSCCO should it be established.		
Point Number	187.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: For reasons already mentioned in previous question.		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	187.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	188	Submitter:	Richard Williams
Documents:	Your Water Done Well		
Point Number	188.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: Going with the Council recommendation		
Staff Recommendation	Comment acknowledged. It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	188.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	188.3	Category	1-Questionnaire > 1.3-Comments

Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Ownership must remain fully with Council
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Submitter Number:	189	Submitter:	Rachel Barker
Documents:	Your Water Done Well		
Point Number	189.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I feel creating WSCCO would have huge start up costs and would mean the community will not have a voice as governance would be transferred to an independent board. It also seems very risky if the WSCCO ran into financial distress.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA). A WSCCO would have a Letter of		

Expectation from SDC which would set out the expectations of the entity, that coupled with regular meetings discussing progress and the financial position would mitigate the risks of financial distress.

Point Number 189.2

Category 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** The council up to now has successfully managed the water services for Selwyn. Retaining the services in-house would ensure cost efficiency and accountability to the rate payers (well, as much as they currently have).

Staff

Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number 189.3

Category 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** I think it is a dangerous option - the community cannot risk losing local control to a bureaucratic structure, risking loss of accountability, community input and cost efficiency.

Staff

Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number: 190

Submitter: Tim Ure

Documents: [Your Water Done Well](#)

Point Number	190.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** The consultation documentation does not include visibility of the effects on rural properties such as with a water race and whether they will be disproportionately required to fund the start up of a CCO. By incorporating a CCO model there would be a lack of visibility and accountability from elected members in the operation of the network given this would be done at arms length. Much of the benefits are the increased available funding that can be accessed by going to a CCO model. I might be mis-understanding but given SDC has very high growth and subsequently a lot of capital contributions, relatively simple water supply and wastewater disposal compared to other Councils, it is concerning that the additional funding is seen as a benefit, and therefore should Council be more looking to balance the books rather than create opportunity to create a legacy of debt funding?

Staff

Recommendation

The consultation addresses the future delivery of reticulated water and wastewater services. Rating and water charge examples are included in the Consultation Document as stated on page 18, including for rural properties with restricted water supply connections or no connected services. Costs to properties that do not have any connection to Council services are outlined in the LTP. Please refer to the FAQs on our consultation page for a further breakdown of Urban and Rural costs. Water races are not included in this consultation and will remain as part of in-house service delivery.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.

Point Number	190.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** I am sceptical that there will be significant long term operational savings with a CCO having been involved in water maintenance over the last 10 years. As demonstrated with the Wellington Water situation there is reduced accountability over a long period of time when CCO's are engaged in critical infrastructure.

Staff Recommendation	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	190.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Per above		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	191	Submitter:	Jesse Le Lievre
Documents:	Your Water Done Well		
Point Number	191.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	191.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	191.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	192	Submitter:	Neil Mugford
Documents:	Your Water Done Well		
Point Number	192.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	192.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	192.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Set up costs would be a concern as well as doubling or more the number of staff involved. All these costs could be wasted if a new government changes things again.		
Staff Recommendation	Comment acknowledged. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	193	Submitter:	James Proudlove
Documents:	Your Water Done Well		
Point Number	193.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Incouncil water management works very satisfactory. Why change this when it works well for all rate payers at present.		
Staff Recommendation	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in-house solution is a possible outcome following deliberations. We know with regulation		

it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Point Number	193.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** My water rates are quite manageable at present & I fear the setting up of the proposed WSCCO will add unforeseen costs to our already burgeoning rates for Selwyn Council. Also, what do you mean by "more specialised governance?" Shall ALL members of governance be voted onto this Council by elections every three years, or will members be appointed by Ngai Tahu, the local Maori tribe? If that is the case, I want nothing to do with WSCCO.

Staff

Recommendation

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

The board will be appointed through a public recruitment process and the skills will be assessed against a skills matrix. A skill matrix would be developed that sets out the required mix of skills of the board, which can include Mana Whenua expertise and competencies. The board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Point Number	193.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** The,"in- house water delivery model," works perfectly well. I oppose the WSCCO proposed set up.

Staff

Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submitter Number:	194	Submitter:	Sue Jarvis
Documents:	Your Water Done Well		
Point Number	194.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Would prefer it was continued to be done in house by the council , so, hopefully, the community will be consulted.		
Staff Recommendation	Comment acknowledged.		
Point Number	194.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	194.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	195	Submitter:	June McLachlan
Documents:	Your Water Done Well		

Point Number	195.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This is a 'cart before the horse', unlegislated, premature, grandiose, bordering on criminal proposition. SLOW THE HORSE DOWN. We do not need to be leaders in this field. Most of our infrastructure is new. A WSCCO may free SDC to leverage more; but rate payers will still be paying for EVERYTHING.		
Staff Recommendation	Comment acknowledged. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.		
Point Number	195.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As rate payers we would have a greater voice if kept in house,		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Point Number	195.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: A new entity would have the freedom to spend & charge uncontrollably. This would very much be too risky for our rate payers		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	196	Submitter:	J Herd
Documents:	Your Water Done Well		
Point Number	196.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	196.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	196.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: A new entity should not be set up, as it will be too expensive and have		

Staff Recommendation	duplication of governance/management services. The existing model of delivering inhouse should be kept. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submitter Number:	197	Submitter: CHRIS ROBERTS
Documents:	Your Water Done Well	
Point Number	197.1	Category 1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:	
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	197.2	Category 1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:	

Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	197.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	198	Submitter:	Mario Franzoni
Documents:	Your Water Done Well		
Point Number	198.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I strongly oppose moving to the WSCCO model due to the added burden of increased costs which are astronomical to rate payers which are already battling with economic downturn challenges as well as the foreseen and added layer of bureaucracy to the council model which is unnecessary		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		

Point Number	198.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Please see previous comment		
Staff Recommendation	Comment acknowledged.		

Point Number	198.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Please see previous comment		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	199	Submitter:	Alison Outram
Documents:	Your Water Done Well		

Point Number	199.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	199.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	199.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	200	Submitter:	Tracey Wyllie
Documents:	Your Water Done Well		
Point Number	200.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	200.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	200.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	201	Submitter:	Lan-Kuang Chuang
Documents:	Your Water Done Well		
Point Number	201.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Please don't waste rate payers money to a private company, they are only wanting get most profits.		
Staff Recommendation	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income.		
Point Number	201.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Council is much more reliable than a private company.		
Staff Recommendation	Current water management by Council is provided to a high standard, a WSCCO option would provide a more focused governance model.		
Point Number	201.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	202	Submitter:	Cherry Li
Documents:	Your Water Done Well		

Point Number	202.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Extra layer added that reduces visibility and accountability. Current council relationship with subsidiaries have not shown a good track record to bring benefit to the community. Additional cost to run a separate organisation. No confidence this will be done right and done well

Staff Recommendation A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. A CCO would remain subject to LGOIMA as Council is.

Point Number	202.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	202.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	203	Submitter:	Wayne Sargerson
Documents:	Your Water Done Well		
Point Number	203.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: To: Selwyn District Council Subject: Submission on proposed water services council controlled organization (WSCCO) I appreciate the opportunity to provide feedback on Selwyn District Council's proposal regarding the future management of our water services. As a resident and stakeholder in the community, I strongly oppose the establishment of a WSCCO for drinking water and wastewater services. My submission outlines the reasons for my opposition including governance concerns, potential service delivery risks, financial uncertainty, and lack of proven success in similar models. A WSCCO introduces a separate governing body distancing decision making from direct council control and community oversight. Given that water services are essential public assets, removing them from direct democratic control reduces transparency and limits resident's ability to hold decision makers accountable. The experience of Wellington Water Limited highlights these risks, as multiple councils sharing ownership have faced governance challenges, leading to inefficiencies and slow responses to community concerns. Past instances, such as the operational issues at Wellington Water have demonstrated that creating a separate entity does not necessarily improve water service quality. The risk of infrastructure failures, service disruptions and inadequate investment in long-term maintenance remains high. Moreover, the Seaview Wastewater Treatment Plant case in Lower Hutt shows that even within a WSCCO framework, persistent service quality issues such as odor management can remain unsolved for years		

causing ongoing dissatisfaction among residents. The proposal lacks sufficient financial projections regarding the long-term costs of establishing and maintaining a WSCCO. While council claims this model will be more efficient there is no clear evidence supporting this. Historical examples including privatised water services in the UK show that such transitions can lead to increased costs for consumers due to inefficiencies and regulatory gaps. Additionally, if unforeseen financial difficulties arise ratepayers may ultimately bear the burden of increased charges or additional levies to cover operational shortfalls. The consultation document acknowledges that keeping water services under council management remains an option. While some changes will be required due to new legislation, retaining in-house control ensures that Selwyn District Council maintains full oversight and accountability. Other councils, such as Cherbourg Aboriginal Shire Council in Queensland, have experienced severe water service failures due to inadequate operational structures, reinforcing the importance of strong local control and accountability. In conclusion given the governance risks, service delivery concerns, financial uncertainties, and the lack of proven success in similar models, I strongly urge Selwyn District Council to reject the proposal to establish a WSCCO. Instead, I support retaining in-house management of water services, ensuring that decisions remain accountable to the local community and that investments are made directly into Selwyn's water infrastructure rather than an external entity. I request that the council seriously consider the risks and review alternative ways to meet legislative requirements without compromising service quality, affordability, or local governance.

**Staff
Recommendation**

Comment acknowledged.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Wellington Water was a management company delivery services but not responsible for the maintenance of the assets, this is different to the model applied here. There will be external central government oversight (which did not exist in the Wellington Water example), and a statement of expectations and charter will be established between Council and any CCO. The external scrutiny would also apply to an in-house delivery model, but the governance structure would be unchanged.

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.

Point Number

203.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** To: Selwyn District Council Subject: Submission on proposed water services council controlled organization (WSCCO) I appreciate the opportunity to provide feedback on Selwyn District Council's proposal regarding the future management of our water services. As a resident and stakeholder in the community, I strongly oppose the establishment of a WSCCO for drinking water and wastewater services. My submission outlines the reasons for my opposition including governance concerns, potential service delivery risks, financial uncertainty, and lack of proven success in similar models. A WSCCO introduces a separate governing body distancing decision making from direct council control and community oversight. Given that water services are essential public assets, removing them from direct democratic control reduces transparency and limits resident's ability to hold decision makers accountable. The experience of Wellington Water Limited highlights these risks, as multiple councils sharing ownership have faced governance challenges, leading to inefficiencies and slow responses to community concerns. Past instances, such as the operational issues at Wellington Water have demonstrated that creating a separate entity does not necessarily improve water service quality. The risk of infrastructure failures, service disruptions and inadequate investment in long-term maintenance remains high. Moreover, the Seaview Wastewater Treatment Plant case in Lower Hutt shows that even within a WSCCO framework, persistent service quality issues such as odor management can remain unsolved for years causing ongoing dissatisfaction among residents. The proposal lacks sufficient financial projections regarding the long-term costs of establishing and maintaining a WSCCO. While council claims this model will be more efficient there is no clear evidence supporting this. Historical examples including privatised water services in the UK show that such transitions can lead to increased costs for consumers due to inefficiencies and regulatory gaps. Additionally, if unforeseen financial difficulties arise ratepayers may ultimately bear the burden of increased charges or additional levies to cover operational shortfalls. The consultation document acknowledges that keeping water services under council management remains an option. While some changes will be required due to new legislation, retaining in-house control ensures that Selwyn District Council maintains full oversight and accountability. Other councils, such as Cherbourg Aboriginal Shire Council in Queensland, have experienced severe water service failures due to inadequate operational structures, reinforcing the importance of strong local control and accountability. In conclusion given the governance risks, service delivery concerns, financial

uncertainties, and the lack of proven success in similar models, I strongly urge Selwyn District Council to reject the proposal to establish a WSCCO. Instead, I support retaining in-house management of water services, ensuring that decisions remain accountable to the local community and that investments are made directly into Selwyn's water infrastructure rather than an external entity. I request that the council seriously consider the risks and review alternative ways to meet legislative requirements without compromising service quality, affordability, or local governance. Thanks for considering this submission.
Wayne Sargerson

Staff Recommendation

Comment acknowledged in Q1.1.

Point Number 203.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** A Water Services Council Controlled Organisation (WSCCO) presents several risks and challenges that make it a poor choice for managing Selwyn's water services. Here is a breakdown of my concerns 1. Governance and Accountability Risks A WSCCO operates at arm's length from the council, reducing direct democratic control. Decision-making becomes less transparent, making it harder for residents to hold leaders accountable. Past examples (e.g., Wellington Water) show governance failures, slow responses, and lack of clear accountability. 2. Service Delivery Risks A separate entity does not guarantee better water management—Wellington Water and other WSCCOs have had major issues with service quality and infrastructure failures. Potential service disruptions and delays in upgrades or maintenance due to complex governance structures. 3. Financial Uncertainty The long-term financial impact of setting up and maintaining a WSCCO is unclear. Residents could face higher costs if the WSCCO struggles financially similar to water privatisation failures overseas. If a WSCCO faces funding shortfalls, ratepayers may be forced to cover unexpected costs. 4. Loss of Local Control Decisions about Selwyn's water could eventually be influenced by external factors, especially if other councils join later. Keeping services in-house ensures the council remains directly responsible to residents and can adapt to local needs. 5. Unproven Benefits There is no clear evidence that a WSCCO would outperform an improved in-house model. Other councils (e.g., Cherbourg Aboriginal Shire Council in Australia) have struggled with outsourced water management, showing the risks of moving away from direct control. Conclusion A WSCCO creates more risks than benefits, including governance failures, service quality issues, financial uncertainty, and reduced local control. Keeping Selwyn's water services in-house is the best way to ensure accountability, reliability, and affordability for the community.

Staff Recommendation

Comment acknowledged.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework

will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing.

A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. It is anticipated a Board would be appointed via an appointment panel where there is independent, CCO and Council representation. Bill 3 of Local Water Done Well legislation sets out that Directors must be independent and that there must be an appropriate skill mix among the Directors to allow for the effective governance of a water services entity. The same requirement would not exist for an in-house delivery model and they services would continue to be governed by councillors.

Submitter Number:	204	Submitter:	Kevin Mallon
Documents:	Your Water Done Well		
Point Number	204.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I think that setting up a new organisation will simply add another layer of costs. I understand the value of having a separate organisation from a borrowing perspective but given that the majority of Selwyn's water infrastructure is new, there should be little need for significant one off costs for some time to come. Consideration also needs to be given to Ngai Tahu's petition to have control of the South Island's fresh water, there is no understanding what this will mean to the individual councils so setting up a totally separate organisation at this time is not in the best interests of the rate-payers.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government		

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and our current borrowing cap of 280% to fund all of Council's projects. Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the region's growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.

Council is unable to delay this given the need to present a Water Services Delivery Plan (WSDP) by 3 September 2025.

Point Number	204.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Currently the water delivery model is working, it fits in with the current rates structure and, while it has it's own costs, there is not a layer of management and other overheads, which at this time will add little if any value to the rate-payers

Staff Recommendation

Positive endorsement of current water delivery model is acknowledged.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number	204.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	205	Submitter:	Robyn Murphy
Documents:	Submission #205 - Robyn Murphy		

Point Number	205.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** No, I do not support the proposed transition of the SDC drinking and wastewater assets to a new Water Services Council Controlled Organisation (WSCCO), with stormwater services remaining within the Council. Local Control - Local representatives understand our community's needs. Accountability - Council members are elected and accountable for service quality. Service Quality - Concerns about maintaining current service levels.

Staff Recommendation

Comment acknowledged.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number	205.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Yes, I prefer the SDC to continue with an in-house water delivery model. Local Control - Decisions made by local representatives. Accountability - Direct accountability to residents. Service Continuity - Avoids disruptions from transitioning. Community Trust - Greater trust in a familiar system.

Staff Recommendation

A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic

work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

If a decision is made to establish a CCO, transition will occur over a period of time with a shared service model initially to ensure no drop in level of service.

Point Number 205.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** The case for a single authority CCO is weak. The Council already handles water services and meets government requirements, making a CCO unnecessary. However, if a multi-authority CCO with economies of scale and cross-boundary management were needed, the Council could reconsider the CCO option in the future.

Staff Recommendation The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submitter Number: 206 **Submitter:** Jason Cadogan

Documents: [Your Water Done Well](#)

Point Number 206.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** By adding in essay additional costs to rate payers, try better do another more cost effective model. Us ratepayers are not open cheque books we are all not got extra cash to burn. Increase developers fees to help pay.

Staff Recommendation While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number	206.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	206.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Ridiculous.

Staff Recommendation	Comment acknowledged.

Submitter Number:	207	Submitter:	Mark Palmer

Documents:	Your Water Done Well

Point Number	207.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Setting up a separate organisation will bring with it additional unnecessary setup costs and another structure. It will be a pit the council will need to pour mor money into, and leaving the stormwater with the council will make things clumpy Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).			
Point Number	207.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Makes sense to keep it in house - that how it's already done -keeping it in house it will be easier to control costs - well it should be. Council need to be held more accountable for their function - keeping it in house with strong leadership will be a better way to go, and mean that council can't simply blame a separate entity for failures Staff Recommendation A new WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the CCO including the ability to align strategic work programmes. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.			
Point Number	207.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? No Comment: Staff Recommendation Council acknowledges there are no more comments.			

Submitter Number:	208	Submitter:	Joe Glamuzina
Documents:	Your Water Done Well		
Point Number	208.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	208.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	208.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	209	Submitter:	Stephen Harrington

Documents: Your Water Done Well			
Point Number	209.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	209.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	209.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	210	Submitter:	Candice Harrington
Documents: Your Water Done Well			
Point Number	210.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	210.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	210.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? No Comment: Staff Recommendation Council acknowledges there are no more comments.			

Submitter Number:	211	Submitter:	Ian McIntosh
Documents:	Your Water Done Well ; Your Water Done Well Submissio		

Comments Supporting The Submission On "Your Water Done Well"

1. Page 7 of your Consultation Document (CD) says "The projected costs for maintaining the current water services model for drinking water and wastewater are \$857 million over years 2-10 of the Long-Term Plan 2024-2034"

That is \$95 million per year for 9 years.

It is absolutely unbelievable that for such new towns that are Lincoln, West Melton & Rolleston, thanks to the significant urban growth that has happened in the last 20 years, that this amount of money is needed to bring the towns up to standard.

As well, on Page 15 of CD it is stated "Council has a good level of compliance" in relation to regulatory standards & on Page 5 "The Council believes this proposal will build on the great work already done by SDC."

I cannot reconcile that so much money is needed to fix a problem that exists in a water system that already has "good compliance" and is building on "great work already done".

Considering that the old parts of the Selwyn towns are outnumbered by the developments over the past 20 years, what is required to meet new standards sounds like serious incompetence by engineers, planners or Council.

2. What is it going to cost for mana whenua to be consulted? They bring zero engineering skills. If they do, they should be paid as engineering consultants based solely on merit.

3. Page 15 of the CD says that "further investment is required for further investment to manage our growing population". How come capital infrastructure investment has not been modelled into new development costs by developers for the past 20 years. This is unbelievable.

Sincerely

Ian McIntosh.

Point Number	211.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	Comment acknowledged. Investment planned is currently detailed in the Council's 2024-34 LTP and 30 Year Infrastructure Strategy. Council has and continues to invest significantly in water services. The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and our current borrowing cap of 280% to fund all of Council's projects. Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the region's growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.		

As stated on page 16 of the Consultation Document, 'Modelling is based on assumptions drawn from the Council's Long-Term plan, accounting for additional regulatory and operating costs of a new entity'. Development Contributions are built into the modelling as part of the LTP process. An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Point Number	211.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:**

Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	211.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** I am extremely surprised that setting up specialists in water management is costing more than doing it in house. Surely experts should make the task cheaper, so I do not accept that the project will be more expensive for rate payers.

Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	212	Submitter:	Judith Sachdeva

Documents: Your Water Done Well			
Point Number	212.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	212.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	212.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Please include an assurance that at no point in the future will water services in Selwyn be privatised; as in sold or taken over by any person, persons or corporation that is not wholly and only owned by all the taxpayers and/or residents of Selwyn.		
Staff Recommendation	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		

Submitter Number:	213	Submitter:	Susan Mayo
Documents:	Your Water Done Well		

Point Number	213.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	213.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	213.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	214	Submitter:	Bryan Tubb
Documents:	Your Water Done Well		
Point Number	214.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water		

Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** This will be a huge mistake for Selwyn Ratepayers, massive amounts of debt will be racked up, no public consultation on big decisions. It will create another level of overpaid bureaucrats who can please themselves on how they spend ratepayer money. This is the biggest decision that has to be made in the history of Selwyn Council, and you give the people three weeks to decide? You come up proposal and the first our elected councillor's is wednesday last week and its all finalised and been printed! The legislation has not been finished in parliament and passed? What are we making a decision on again? This decision is being rushed on the ratepayers only 4 months out from election time?? This is the decision for a newly elected council who have three years to make the right decision for the rate payers, not a desperate Council who is fast running out of their borrowing cap! The Mayor who sits on the board of the LGFA who wants Selwyn to be first to sign up to this absolute nonsense. Conflict of interest springs to my mind! I could go on and on about all the bad things about this whole proposal.

**Staff
Recommendation**

Comment acknowledged. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	214.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a		

future in-house water delivery model? No **Comment:** As said in my previous comment. There is no legislation from parliament to be able to make any informed decisions, this needs to wait till after local body elections, and the legislation is passed in parliament. This whole thing is an absolute disgrace. This council has so badly managed the council finances in the last few years that I wouldn't trust them with the type of money they are trying to get their hands on. I would be seriously considering selling up and moving out of Selwyn if the WSCCA gets established! It is high time the majority of the elected councillors stood up to the staff, the Mayor, and do what it is right for the ratepayers who voted then in to Council.

**Staff
Recommendation**

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

The approach proposed is driven off existing legislation as set out in the Water Services Preliminary Arrangements Act, an Act that has been through formal approval by the Crown. Bill#3 is in the final stages of approval by the Crown which we expect in June. Regardless, the requirement to submit a Water Services Delivery Plan by 3 September is set out in legislation.

Point Number

214.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** It is a disgrace that this is even being contemplated, WAIT TILL THE LEGISLATION HAS BEEN FINISHED! Wait till after the Local body elections, stop wasting rate payer money, stop lying to the ratepayers, stop the Mayor trying to set up a cash cow that will make him look good in the eyes of the politicians, stop borrowing millions of dollars from LGFA, learn to budget, learn to look at the economic environment! It staggers me who with the rates rises, the massive population growth the number of new properties that have been built in Selwyn over the past 15 years that the council still needs to borrow millions of dollars. The amount of rates revenue coming in now compared to then must be mind blowing. The Selwyn infrastructure is mostly new and modern, is put in by the developers, development contributions, new connection charges that get charged to every new section, where is all this money going. Maybe the rate payers should be asking for an audit, a breakdown of where the millions of dollars are going. WSCCA, Absolute joke its a no from me!

**Staff
Recommendation**

Comment acknowledged.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around

September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number	214.4	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Full discloser, I have already made a submission but I am told that due to not selecting yes in either option, my submission wouldn't count. This will add another layer of highly paid individuals. Ratepayers already pay people to manage our water services. I choose no to both options because there has been no legislation passed in parliament regarding the setting up of such agencies. I see the setting up of the WSCCA as an underhanded way of securing more debt for the council to inflict on the Ratepayers, creating intergenerational debt. I feel the Mayor has a conflict of interest as he sits on the board I believe of the LGFA, and wants Selwyn District Council to be the first in the country to set their ratepayers up for a huge unsustainable debt. So I say no to WSCCA

Staff Recommendation

Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.

Point Number	214.5	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This the best of a bad situation, we shouldn't be doing anything until government has finalised legislation. There should be no decisions made till after the local body elections. A new council should be able to take more time than 3 weeks to make the biggest decision for the Selwyn Councils since the amalgamation. The WSCCA will have no accountability to the ratepayers, no input or very little input from elected Councillors. And a massive ability to borrow millions of dollars using ratepayers properties as the security, with ratepayers having no

Staff Recommendation	say. I am staggered that any Councillor would be prepared to put that kind of organisation into being without legislation finalised. The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number	214.6	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? Yes Comment: Very dangerous concept, setting something like that up without government legislation in place is would quite frankly be negligent and a disgrace.		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	215	Submitter:	Sally Lrmon
Documents:	Your Water Done Well		

Point Number	215.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	215.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	215.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: The councils inability to manage sicon/corde effectively means I have no faith in management of our money being spent this way with zero accountability, at least if kept in house is (the ratepayers) have an ability to fire mismanagement at the next election Also I have absolutely no desire to saddle my grandchildren with the debt proposed by have a wscco		
Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	216	Submitter:	Bevan Sutherland
Documents:	Your Water Done Well		
Point Number	216.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Learn how to manage your assets efficiently. Another layer of management and all the costs that go with it is not the answer.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	216.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	216.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: A condensed consultation period for a material change in delivery is unacceptable.		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10		

years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	217	Submitter:	David Henshall
Documents:	Your Water Done Well		
Point Number	217.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The price of rates is getting unaffordable. Need to look at other options. The average family wont be able to afford this.		
Staff Recommendation	We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	217.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: We have been drinking tap water for years and we are fine and never got sick		
Staff Recommendation	Comment acknowledged.		

Point Number	217.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Where is the risk assessment that was done in order to determine the proposed model?		
Staff Recommendation	Comment acknowledged. If a decision is made to establish a CCO, transition will occur over a period of time with a shared service model initially, to ensure no drop in level of service.		

Submitter Number:	218	Submitter:	Marcus Waters
Documents:	Your Water Done Well		
Point Number	218.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I believe an in house option could be as effective as wscoco. It simply needs to be resourced and skilled appropriately. A separate organization creates relationship, IT and data, and strategy alignment risks.		
Staff Recommendation	The WSCCO would have the additional benefit of a professional board. Shared service agreements would be established to ensure organisation relationship and strategies are aligned. Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.		
Point Number	218.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a		

future in-house water delivery model? Yes Comment: Least risk option if resourced. The legislation requires the inhouse finances are ring fenced so has separation from other Council activities.	
Staff Recommendation	The WSCCO would have the additional benefit of a professional board.
Point Number	218.3
Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:
Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	219	Submitter:	David Butcher
Documents:	Your Water Done Well		
Point Number	219.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: •The government's legislation on this matter has not been finalized. •The Your Water Done Well Consultation Document lacks sufficient detail, it is also missing data in the Example, which is misleading. •Lack of Public Consultation - 2 weeks is not enough for the whole district to be informed •Requires a Local Referendum so they are informed. •Selwyn District is expanding and has newer infrastructure compared to many other regions.		
Staff Recommendation	New Government legislation passed in September 2024 requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is		

aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

SDC have followed the consultation approach as set out under the Water Services Preliminary Arrangements Act and have used a consultation approach that also recognises our current Significance and Engagement Policy. We recognise the challenge of speed, but the decision is needed to enable council to meet its legislative deadline of 3 September to deliver a WSDP.

Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.

Point Number	219.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** They already have specialists o Selwyn District is expanding and has newer infrastructure compared to many other regions. The model presented in the document lacks sufficient detail and transparency - it shows increases in the SDC inhouse and in the WSCCO data it is missing years and those years missed have the same data repeated showing WSCCO to be cheaper. The rate payer can vote who looks after us and infrastructure.

Staff

Recommendation

Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the region's growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.

Point Number	219.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: The data set model in the Documentation has been falsified to make WSCCO look cheaper - this is fraudulent! How can the WSCCO even create a data set when the legislation has not been finalized? How do local and central governments expect ratepayers to afford the costs of setting up a new entity? - This transition could place a significant financial burden on the community. - If this new entity fails, who will be responsible for the financial consequences? Just looks like 3 waters re branded!		
Staff Recommendation	Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled. The approach proposed is driven off existing legislation as set out in the Water Services Preliminary Arrangements Act, an Act that has been through formal approval by the Crown. Bill#3 is in the final stages of approval by the Crown which we expect in June. Regardless, the requirement to submit a Water Services Delivery Plan by 3 September is set out in legislation.		

Submitter Number:	220	Submitter:	Yvonne Stiles
Documents:	Your Water Done Well		
Point Number	220.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	220.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	220.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	221	Submitter:	MARK STANLEY
Documents:	Your Water Done Well		
Point Number	221.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	221.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	221.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	222	Submitter:	Kevin Stanley
Documents:	Your Water Done Well		

Point Number	222.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	222.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	222.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	223	Submitter:	Joanne Morris
Documents:	Your Water Done Well		

Point Number	223.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I believe it would cost more in the long run. I believe the control would be given to a company who only goal is to make profits. I don't think they will care that its the peoples hard earned money at stake.

Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income.

Point Number	223.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This is the councils job and we have the right to vote differently if we do not like the results. We have no power if its a private company we just have no say.

Staff Recommendation It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number	223.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: As i have said they will be out to make money off us the rate payers. We don't have any left to give.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	224	Submitter:	Richard Haffner
Documents:	Your Water Done Well		
Point Number	224.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The consultation documents are nothing more than a sales pitch, and given the Mayors preference to the previous government's '3 waters' scheme, I do not trust the new proposals to be in our best interest.		
Staff Recommendation	Comment acknowledged.		
Point Number	224.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Yes, the system works, it has a proven track record.		
Staff Recommendation	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.		

Point Number	224.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: The WSCCO model talks of further borrowing being made available. Further borrowing generates repayments and interest charges. No mention of repayments is mentioned, nor the 'dead money' of interest on the borrowing. All increased costs are only cited on maintaining the in house system. WSCCO is a very bias sales pitch, that is economic with the truth.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	225	Submitter:	DAVID MACKENZIE
Documents:	Your Water Done Well		
Point Number	225.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is not very good idea if it is going to inrease the price of the rates that some home owners are struggling to pay now .Its getting ridiculous how many thins the councilors want to bring in without ratepayers wanting or knowing about .		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	225.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Because it will stop a double up of people needed to run them		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while		

maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	225.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	226	Submitter:	Basil and Trudi Meyer
Documents:	Submission #226 - Basil and Tr		

Point Number	226.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Defer decision until more info on requirements available. We don't need additional bureaucracy.

Staff Recommendation	We are required to have selected a model to submit our WSDP in early September, which is why a body of councils are now out consulting. This could be changed in time, if needed, but we will already have substantially invested in the selected model.

Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Point Number	226.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** For council and ratepayers direct control remains.

Staff**Recommendation**

A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

Point Number

226.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:**

Risk of losing local control of CCO, expensive setup with not even all requirements known at this stage. Keeping water service in-house ensures accountability and community input. Seems rushed!

Staff**Recommendation**

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	227	Submitter:	Heiko Mueller-Cajar
Documents:	Your Water Done Well		
Point Number	227.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The proposal does significantly increase the costs to rate payer for providing some of the most basic council's tasks. Minimal promised cost reductions in a decade from now are best a pie in the sky based on unsubstantiated assumptions. I suggest the council focusses on its task of providing efficient and effective water services instead of on increasing complexity and cost for providing some of their core services by outsourcing these tasks.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer. Management of water services in-house is one of the possible options.		
Point Number	227.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Water services are one of the councils care tasks. You better do that and get it right. So far I am not aware of any example where outsourcing of councils core services resulted in a cost reduction to rate payers.		

Staff Recommendation	Comment acknowledged. The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' consultation document. Cost efficiencies are realised in the longer term 2033/2034.		
Point Number	227.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	228	Submitter:	Edward Parker
Documents:	Your Water Done Well		
Point Number	228.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Based upon my reading of the consultation document there is no real advantage for ratepayers to move Council drinking water and wastewater assets into a new Water Council Controlled Organisation (WSCCO). The rates and water service charges must increase if assets are moved into a WSCCO. There will be duplication of staff and many transition costs that will have to be recovered. The consultation document shows a 10 year period before any possible and unknown cost savings are made, yet there is no evidence to support this. The only advantage of a WSCCO, that I can see, is its ability to raise capital easier than a Council can, yet there are no records of any project that would need that advantage. Add to this that the Selwyn District Council (SDC) has a very high credit rating, a WSCCO is not needed. It appears that the SDC has not given the ratepayers all the facts it has. Why is this? The SDC currently manages our water infrastructure very effectively and fairly economically. Why make the change to a WSCCO? We would also lose any say that we have through our Councillors or at the ballot box if a WSCCO is set up. Any individual or organisation that is managing a service and an asset well would be crazy to move that service to a contractor when costs would increase, risks would increase, and there would be a lack of say in how the service and assets were managed in the future. I urge		

the SDC to retain the drinking water services and wastewater services inhouse. Thank you Eddie Parker

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

There is no proposed change to how or who capital is raised from. The LGFA is providing additional financing to assist high growth councils with Local Water Done Well allowing for borrowing up to 500% of operating revenue.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number

228.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** The Selwyn District Council (SDC) is currently managing the water and waste water infrastructure quite well, also much of the infrastructure is relatively new due to big growth within the district. What change this system when it appears to be working well ? The ratepayer would be disadvantaged by any move to establish a Water Services Council controlled organisation (WSCCO)

Staff

Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC

management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number	228.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	229	Submitter:	Ellen Cavanagh
Documents:	Your Water Done Well		

Point Number	229.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	229.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		

Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	229.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	230	Submitter:	Rose Harrison
Documents:	Your Water Done Well		
Point Number	230.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	230.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	230.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter Number:**

231

Submitter:

Yvonne Reid

Documents:

[Your Water Done Well](#)

Point Number

231.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** The Government has yet to pass Local Government (Water Services) Bill 3 which SDC are basing their preferred option on.

Staff

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Recommendation**Point Number**

231.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Cost

Staff

The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' consultation document. Cost efficiencies are realised in the longer term 2033/2034.

Recommendation**Point Number**

231.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Rate payers we would have no say in appointment of Board members of WSCCO. It is premature to be setting this up when Bill 3 hasn't been passed. Expense of setup and running of WSCCO

Staff

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for

Recommendation

economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	232	Submitter:	Cristene Trenuela-Chan
Documents:	Your Water Done Well		
Point Number	232.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	232.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	232.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	233	Submitter:	Mike Beynon
Documents:	Your Water Done Well		
Point Number	233.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	233.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	233.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: It costs farr too much and will put our rates up far too much and thats after they have gone up already this year		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	234	Submitter:	Ann-Maree Ozanne
Documents:	Your Water Done Well		
Point Number	234.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This will take away the control and the community voice on what we need.		
Staff Recommendation	A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. A CCO would remain subject to LGOIMA as Council is.		
Point Number	234.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: There will be greater control over delivery of these service and lower overall cost with this option.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or		

CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' consultation document. Cost efficiencies are realised in the longer term 2033/2034.

Point Number	234.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This external model will result in significantly higher costs which has been shown by other LGA's.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	235	Submitter:	Geraldine Scott
Documents:	Your Water Done Well		

Point Number	235.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Our rates cost far to much for alot of stuff we dont need and will never use already. We dont need another charge for the council to add another division of itself. Our water was perfectly fine before you started adding all your chemicals last year, now it is undrinkable and smells like a pool.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Point Number	235.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** I prefer you went back to leaving our clean water from the ground, filtered and not full of "cleaners". There was nothing wrong with the southbridge water supply before you ruined it and made it un drinkable.

Staff Recommendation

Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Point Number	235.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff Recommendation

Council acknowledges there are no more comments.

Submitter Number:	236	Submitter:	Rita Garland

Documents: Your Water Done Well			
Point Number	236.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	236.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	236.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	237	Submitter:	Keith Wills
Documents: Your Water Done Well			
Point Number	237.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This is just another cost that will be passed onto the rate payers. We are already paying too much!			
Staff Recommendation We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.			
Point Number	237.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Hopefully this will be and continue to be a cheaper option.			
Staff Recommendation The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' consultation document. Cost efficiencies are realised in the longer term 2033/2034.			
Point Number	237.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? Yes Comment: All I can see is more people employed nothing will change except it will cost the rate payers more money \$\$\$\$			
Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.			

Submitter Number:	238	Submitter:	Justine Dodds
Documents:	Your Water Done Well		
Point Number	238.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** These assets should remain council owned. Transferring to another entity (although proposed to be council owned) risks sale of these assets in the future. The council already has one of the most up to date Water/Waste water programs, so why change this? Adding a new entity will add further red tape and therefore more cost to the rate payers.

Staff Recommendation

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.

Additional access to funding will be important to support significant growth in Selwyn District.

A separate entity does provide the benefit of having specialised governance with expertise in the sector.

Point Number

238.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** As per comments in question 1

Staff Recommendation

Comment acknowledged.

Point Number

238.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** This seems to be a done deal by the council, but I hope that you do in fact take into account the responses by ratepayers to this submission

Staff Recommendation

A proposal has been submitted for community feedback, and no decision will be made until 2 April 2025.

Submitter Number:

240

Submitter:

Linus Meyer

Documents: Your Water Done Well			
Point Number	240.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Keep it the same		
Staff Recommendation	Comment acknowledged.		
Point Number	240.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	240.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	241	Submitter:	Sam Carrick
Documents: Your Water Done Well			
Point Number	241.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District		

Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** There is inadequate evidence-based information provided by SDC on the benefits of moving to a WSCCO - where is the detailed business case that should set this out? The rating information indicates that cost-wise to ratepayers there is no clear benefit to ratepayers, with the WSCCO costing substantially more in 8 of the next 9 years of projections provided. Why does the WSCCO cost flatline in years 5-9? I struggle to believe that! - such a major assumption really requires a full justification, which is not provided.

Staff Recommendation

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

Point Number

241.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Given the big information gaps on the WSCCO, and its is clearly more costly to ratepayers in 8 of the next 9 years, then I see no clear evidence-based rationale to take-on the risks of splitting up the current council. There is no evidence provided that the current inhouse approach is underperforming to warrant such a big restructuring. I also have concerns that there is no examples of WSCCO's that are actually working really well in the NZ context. I also have concerns on there is no clear information that the benefits of transparency and accountability mechanisms to

	ratepayers, that the current inhouse model has, will be guaranteed in the WSCCO approach. Staff Recommendation The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities. Performance monitoring framework in the Statement of Expectations and a charter which sits alongside.
Point Number 241.3 Category 1-Questionnaire > 1.3-Comments Comments: Question: Do you have any comments on the WSCCO model? Yes Comment: Please see my earlier comments. I also have concerns over why the council continues to justify the WSCCO as being important so that they can access more debt - but no evidence is provided on the current state of water infrastructure? What are the gaps in our current LTP investment plan? If they existed then surely they would have been set-out to ratepayers when setting the LTP - it was only completed less than a year ago. How can SDC show such enthusiasm to increase our debt so significantly, without the detailed evidence to justify this? We would be crazy as ratepayers to endorse the council to do this - yet if we support the WSCCO, then it appears we would be endorsing this potential debt increase with no evidence on why it is needed. Staff Recommendation As stated on page 16 of the consultation document, modelling is based on assumptions drawn from Council's current Long-Term Plan, accounting for additional regulatory and operating costs of a new entity. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.	

Submitter Number:	242	Submitter:	Alan Maccalman
Documents:	Your Water Done Well		
Point Number	242.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Why do we need to creat and fund a new seperate entity this is why we have a district council		
Staff Recommendation	As highlighted on page 12 of the consultation document there are a number of benefits to the Selwyn Ratepayers: Enhanced Service Delivery; Dedicated Water Governance; Resilience and Adaptability and Community Benefits.		
Point Number	242.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	242.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This would lead to increases in rates and cost households even more with no direct benefit		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	243	Submitter:	Brian Deans
Documents:	Your Water Done Well		
Point Number	243.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	243.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	243.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Just adds costs another board ceo etc does not add efficiency		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	244	Submitter:	Terry Anderson
Documents:	Your Water Done Well		
Point Number	244.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: 1. As per the LGA, under the term, "Council Controlled Organisation", the council is required to only have a 50 % share in securities and therefore a 50% share of voting rights for any decisions made by the CCO. This opens the possibilities for other entities to enter the "organisation" over which the ratepayers will have no say, stifling competition and efficiency. 2. The Table of Projected costs to ratepayers is grounds enough to reject the proposal. It shows significant rate rises which deliver no tangible benefits to ratepayers. The impression given in the consulting document, that costs will converge in the final year of the 10-year plan is pure speculation and cannot in anyway be guaranteed, as there are many factors outside the Council control in WSCCO model. 3. The proposal adds a layer of management which adds complexity and cost to the delivery of water services and shields the council from direct accountability to ratepayers. 4. The proposal is impelled by the National parties "Water Done Well policy" which posits that ratepayers assets will remain exclusively in their control, as opposed to a 3-water Co-Governance model, yet we see as much control by a central bureaucracy under their plan. They are encouraging Councils to form "joint" WSCCO's that will drive debt even higher. The next logical step in their plan would be for Selwyn to combine with other Councils to establish a mega-borrowing entity that, infused with borrowed money, is likely to fast track implementation of their version of imperative infrastructure. On the other hand, a more frugal council, acting independently, would resist such reckless expenditure and ease the debt burden on current and future rate[payers. 5. I'm interested in the reason for not including storm water management in the WSCCO model. This 2024 Proposed Act specifically mentions this aspect of water management, which is extremely important in water recovery and flood mitigation. What costs await ratepayers in this area? 6. The Proposed act has a clause titled Schedule 1, Part 1 Provisions relating to this Act as enacted "There are no transitional, savings, or related provisions in this Act as enacted." We can see that there is no intention to ameliorate the costs of implementing their strategy. This is a gross abuse and should be grounds enough to reject the Bill, yet the councils will meekly accept this impost. in summary, I adamantly reject the Council's proposal.		
Staff Recommendation	Comment acknowledged.		

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Borrowing enables Council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Splitting out stormwater from the other surface waters (water races, and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains in Council. Stormwater also integrates with Transport and Open Space assets.

This is a misunderstanding. This provision in the Bill does not refer to finances, it is a technical legal reference as to how the Bill interacts with other pieces of legislation and can be found in most other Acts of Parliament which don't have phased dates of enactment/dates they take effect. Council also has no power to reject an order of Parliament (which the Bill will become once law). Council has placed a submission on certain points before the Select Committee and the Mayor has spoken to these. This is the extent of Council's ability to influence the outcome. Council will be required to comply with the law in whatever form Parliament enacts.

Point Number

244.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a

	future in-house water delivery model? Yes Comment: For the reasons pointed out in question 1
Staff Recommendation	Comment acknowledged.

Point Number	244.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	245	Submitter:	John McNamara
Documents:	Your Water Done Well		
Point Number	245.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It should stay within council		
Staff Recommendation	Comment acknowledged.		
Point Number	245.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	245.3	Category	1-Questionnaire > 1.3-Comments

Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: We don't need a council controlled organisation draining ratepayers of more money and pushing up rates when the council is already providing this service.
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submitter Number:	246	Submitter:	Sharlene Sallabanks
Documents:	Your Water Done Well		
Point Number	246.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	246.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	246.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** It would be at a considerable cost to ratepayers, when rates rises are already at peak percentages. The council should apply for an extension to the consultation period. There is no need to risk such an important position to be seen at the first/a frontrunner to adopt new policy. The council should seek to utilise the already established Corde, which would significantly lower the cost of setting up a new WSCCO.

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

Submitter Number:	247	Submitter:	Angela Berry

Documents: Your Water Done Well			
Point Number	247.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It would be a better option to deliver water services through an in-house water delivery model.		
Staff Recommendation	Comment acknowledged.		
Point Number	247.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: I would rather see these services remain within the council. This option will also cost rate payers less, which is an important consideration for many.		
Staff Recommendation	The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' consultation document. Cost efficiencies are realised in the longer term 2033/2034.		
Point Number	247.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Rates + water service charges will increase faster in the WSCCO model than in the "in-house" model. There is a promise that after the first 10 years the WSCCO will be cheaper than the in-house model but there is no evidence in the consultation document to support this. The consultation document has no evidence of any water services project that would require the extra borrowing ability that a WSCCO would have. extra borrowing means extra repayments. Sure it means more projects can be done sooner, but they will cost more overall if more is borrowed over a longer term.		
Staff Recommendation	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must		

outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	248	Submitter:	Fiona Newcombe
Documents:	Your Water Done Well		
Point Number	248.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: With rates at an all-time high and about to increase further it is incredulous that SDC would even consider this as a solution.		
Staff Recommendation	We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	248.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	248.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	249	Submitter:	Ryan Shepherd
Documents:	Your Water Done Well		
Point Number	249.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It sounds like an expensive undertaking, it's going to require more people, more management. Surely you have the staff to cater for what needs to be done at the moment without spending above and beyond.		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer		
Point Number	249.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	249.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter Number:**

250

Submitter:

Hilary Michie

Documents:

[Your Water Done Well](#)

Point Number

250.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Ratepayers do NOT want to fund the establishment of a new entity that involves paying for staff, vehicles, buildings and their maintenance when ratepayer-funded people with the requisite skills and knowledge are already on the council's staff. Further, the establishment of a new Water Services Council Controlled Organisation will mean the ratepayers' voices will count for even less than they do at the moment.

Staff**Recommendation**

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number

250.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	250.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	251	Submitter:	Veera Pathuri
Documents:	Your Water Done Well		

Point Number	251.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	251.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	251.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	252	Submitter:	Sue Stokes
Documents:	Your Water Done Well		

Point Number	252.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Privatisation of assets has never worked for the benefit of the consumer. Also the council needs to work within it budget and stop loaning money.

Staff Recommendation Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.

Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.

Point Number	252.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Be accountable.

Staff Recommendation A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

Point Number	252.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	253	Submitter:	Elizabeth Deans
Documents:	Your Water Done Well		
Point Number	253.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	253.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	253.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	254	Submitter:	Susan Farmer
Documents:	Your Water Done Well		
Point Number	254.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: as yet there has been no presentation to the ratepayers as to the perceived need to outsource care and control of these assets. the new legislation anticipated is not currently available. when it is discussions can be initiated with ratepayers allowing an appropriate time period within which to debate the factual requirements of good stewardship of the assets and the finances envisaged.		
Staff Recommendation	Comment acknowledged. The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.		
Point Number	254.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Selwyn district currently has excellent water facilities, the cost of which has already been borne by the ratepayers. firstly establish that there is a priority need to change any part of the current system and secondly determine what the options are. should the ratepayers agree with council presentations and the projected costs to the people a WSCCO can always be created later.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs. The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.		

Point Number	254.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: considering the fact that Selwyn district has such a good system already provided and maintained, the haste to hand it on to an other body of contractors with only three weeks notice to ratepayers but accompanying establishment costs, no accountability to those ratepayers and untenable and irreversible rates rises, can only be viewed as highly suspicious. in an election year this haste to commit Selwyn ratepayers to such a future with inadequate care to their voice on this matter will undoubtedly undermine further the trust in current Council members		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	255	Submitter:	Richard Daglish
Documents:	Your Water Done Well		
Point Number	255.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This has not worked in Auckland and why do we need another price hike in Rates as the multiple new subdivisions should be contributing much more money. Would this involve having some overpayed person at the head of this new company .New building building to house it and multiple new employees. Leave the water control as it is with the council		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Developers will still be required to pay development contributions. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around May. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number	255.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Council control inhouse is the only way to go

Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	255.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** It will fail just like Auckland

Staff Recommendation	Comment acknowledged.

Submitter Number:	256	Submitter:	Murphy Jill

Documents:	Your Water Done Well

Point Number	256.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water

Staff Recommendation		Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	256.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	256.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? Yes Comment: No to any kind of privatization	
Staff Recommendation		Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.	

Submitter Number:	257	Submitter:	Hilary Barrer
Documents:	Your Water Done Well		
Point Number	257.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This process is being rushed through with insufficient detailed information being supplied. A decision does not need to be made this early in the year.	

Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. We are required to have selected a model to submit in our WSDP by 3 September which is why a body of councils are out consulting. Implementation time is flexible but not model choice. We must choose in-house or CCO. This could be changed in time if needed, but we will already have substantially invested in in-house.

Point Number	257.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	257.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	258	Submitter:	Mark U

Documents: Your Water Done Well			
Point Number	258.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	258.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	258.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	259	Submitter:	Gail Harkerss
Documents: Your Water Done Well			
Point Number	259.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I would be very concerned to see this be at arm length from the Council and rate payers. I am worried about the ability to borrow large sums of money. I also believe such an entity is adding a layer of unnecessary costs by setting up a new infrastructure which will duplicate many of the costs that exist within the Council already.

Staff Recommendation

A WSCCO is designed to improve efficiency, not add unnecessary bureaucracy or duplicate roles. While there are initial setup costs, these are balanced by the long-term financial and operational benefits of having a dedicated water entity.

One key advantage is access to higher borrowing limits through the Local Government Funding Agency, allowing the cost of essential infrastructure upgrades to be spread over a longer period. This helps reduce the immediate financial impact on ratepayers while ensuring safe and reliable water services for the future.

Point Number

259.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** I think the infrastructure already exists within the Council along with the necessary management. This model gives greater accountability to rate payers and also will not increase the rates as much as the projected costs with the other proposed model.

Staff Recommendation

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number

259.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** This model concerns me greatly as there are less controls around how it is managed, its ability to borrow. which is ultimately the responsibility for the rate payer to repay. I am also concerned that the Council appears to be rushing in with no good reason prior to the legislation even being passed which also worries me.

Staff Recommendation

We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council

or the WSCCO to ensure they make good decisions for the benefit of the community.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	260	Submitter:	Lindsay Robertson
Documents:	Your Water Done Well		
Point Number	260.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Because the government have not written the new legislation I think the SDC have tried to pre-empt what will be in it. Because of this the costing figures they have supplied are meaningless.		
Staff Recommendation	Comment acknowledged. The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.		
Point Number	260.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a		

future in-house water delivery model? Yes **Comment:** Once the government have written the new legislation and we the rate payers have more information, then perhaps this consultation process should occur. If we chose WSCCO option we cannot go back, and we the rate payers will in the future have no input into how these services are delivered.

Staff

Recommendation

Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals. The options are being carefully considered and examined to ensure that the final outcome is sustainable.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number

260.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** The information supplied is inadequate to make a decision. The time frame in which this has been delivered is too short and not given rates payers adequate time to comment. The WSCCO model will ensure that the rate payers of Selwyn (now an in the future) will be lumbered with unnecessary debt.

Staff

Recommendation

We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model

or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	261	Submitter:	Maree Chalmers
Documents:	Your Water Done Well		
Point Number	261.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	261.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	261.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	262	Submitter:	Sandra Robertson
Documents:	Your Water Done Well		
Point Number	262.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	262.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	262.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: The council are putting the cart before the horse in proposing this. The legislation has not been done yet, we should wait to understand exactly what is required. The consultation document was pitifully short on detail and information. It was so short on information that we cannot make an informed decision. It appears some are on an ego trip and wanting to be the first out of the blocks. I have yet to see any evidence this system works. It appears to remove the ability for ratepayers to have their say on how water is managed, and opens us up to millions of dollars in generational debt. Hierarchy will be duplicated doubling costs. The consultation period has been way too short for the immensity of this decision, and councillors and council representatives have been conspicuous by their absence. This is not a decision the outgoing councillors should be making. It will be a dump and run on their part. This decision has far reaching consequences and time should be taken before irreversible decisions are made.		

Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	263	Submitter:	Betty Walls
Documents:	Your Water Done Well		
Point Number	263.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District		

Staff Recommendation		Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	263.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	263.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	264	Submitter:	Gaylene Weir
Documents:	Your Water Done Well		
Point Number	264.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: No advantage in changing when SDC water system is one of the best in the country, only a burden to rate payers with horrendous rate increases without this added expense. WSCCO will cost us the rate payers more. The rates will not go down over 10 year period as promising (that will never happen, this council just seems to want to spend spend spend,	

	this is our money and alot of people are already hurting with the huge rate rises last year and again this year no doubt. No more borrowing tighten your belts and help your rate payers		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.		
Point Number	264.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: already managing inhouse why change when this is working well Keep costs down		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	264.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? Yes Comment: dont do it, an astronomical cost that is not needed. pull your heads in.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	265	Submitter:	Sally Dunbar
Documents:	Your Water Done Well		
Point Number	265.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This should remain as is.		
Staff Recommendation	Comment acknowledged.		
Point Number	265.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	265.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This should not happen due to it costing ratepayers to set up and run when it's not necessary		
Staff Recommendation	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.		

Submitter Number:	266	Submitter:	Vanessa Robinson

Documents: [Your Water Done Well](#)

Point Number	266.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I would appreciate greater transparency from your team. Currently, we are only servicing the interest on our existing debt, and it appears that your inability to secure additional funding is prompting this change. If managing these issues in-house has proven challenging, I must ask: what has been done over the past 15 years? During my tenure managing a company that frequently collaborated with you on water and wastewater projects, I became well-acquainted with your operations. Selwyn has a capable and knowledgeable team already in place, which raises concerns that this initiative may prioritize borrowing more funds rather than focusing on the best interests of the Selwyn ratepayers. We simply cannot afford to incur millions in additional debt, especially when we are already struggling to manage our current obligations. I quote: Council infrastructure and property executive director Tim Mason said while it will be up to the community to decide, a CCO would allow the council to borrow more for new infrastructure and pay it off over a longer period. The KEY HERE IS LETTING THE COMMUNITY DECIDE!

Staff

Recommendation

Council does have a capable and knowledgeable team which will largely transfer to the WSCCO should it be established.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

Community views will be considered in the decision-making process further to s78 of the Local Government Act.

Point Number	266.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** As I have previously mentioned, you have been managing this internally, and your team is fully capable of handling it. We have already invested in the infrastructure, and as a community, we cannot afford to squander our funds to enrich the affluent while neglecting those in need. It is imperative that you gauge the current situation and exercise caution regarding expenditures that exceed our budget. I urge you to extend the timelines for each initiative and reconsider projects that we cannot financially support. If this pattern of overspending continues, we risk jeopardizing our financial stability. It may be necessary for you to regain control

of the situation or delegate responsibilities to someone within the current council who can manage it effectively. The continuous increases in our rates are untenable; they only serve to alienate residents. I am increasingly frustrated by the lack of responsiveness to the concerns of us ratepayers, as well as the persistent encroachments from property investors attempting to disrupt our community and convert our cherished lifestyle blocks into residential housing.

Staff

Recommendation

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Point Number

266.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:**

The current model lacks transparency, relying on theoretical projections rather than concrete data. This approach risks creating an environment where blame is shifted among stakeholders if community feedback is disregarded. Furthermore, I understand that there are plans to impose charges on residents who maintain their own water and sewage systems, despite the fact that your organization neither installs nor maintains these services. This strategy seems misaligned with the financial realities of your ratepayers, their existing assets, and your current expenditures. I strongly urge you to reconsider this approach, as it could lead to significant backlash from the community, who may feel that their concerns are being overlooked. It is essential to prioritize fiscal responsibility and eliminate unnecessary expenditures on initiatives that do not resonate with the community's needs. While aspirations for luxury items are common, it is crucial to live within our means. I encourage your team to take a step back and reflect on these important considerations.

Staff

Recommendation

A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

A comparison of an urban and rural property water rates and charges, under a Council future in-house and WSCCO model is available in the FAQs on our consultation page.

**Submitter
Number:**

267

Submitter:

Harvey Polglase for Darfield
Residents Association

Organisation: Darfield Residents Association

Documents: [Your Water Done Well](#); [SUBMISSION TO COUNCIL WATER DO](#)

267



SUBMISSION TO COUNCIL ON WATER DONE WELL PROPOSAL

The Darfield Residents Association Inc. is opposed to the Council plan to set up a separate WSCCO. Our opposition is based on the following points:

1. Council acknowledge that, with set up costs suggested around \$2 million, there will be an ongoing additional increase in rates with a WSCCO up until at least 2033/34 when some marginal savings appear. With the projected rate rises already in the Long Term Plan, further increases are unacceptable.
2. There is general agreement that the current state of Selwyn water infrastructure is good, particularly compared to other Councils. This reflects credit on existing staff and Council decisions and there is no reason to expect this to deteriorate in the future. The suggestion that a WSCCO could bring in specialized governance and management begs the question of why it is felt this is presently lacking.
3. Much is made of the enhanced borrowing capacity of a WSCCO but, quite apart from questioning the need for greatly increased borrowing, the interest costs on this will fall on existing ratepayers, not the long term beneficiaries.
4. It is suggested the borrowing may be required for as yet unspecified additional legislative requirements. Surely it is sound planning to wait to see what those requirements might be before committing to a system which may not need the extra capital.
5. Council set out a Long Term Plan last year which was so fixed in stone there was no opportunity to submit on it for this year and presumably setting up a WSCCO will have major impact on this plan. There is a general consensus among ratepayers that extra costs at this time are unacceptable unless there is good justification for them. The obvious answer for Council regarding water services is to stick with the working in-house model, with provision to review around 2033/34 if legislative requirements and finances then show a real need for change.

Harvey Polglase

Chairman

Darfield Residents Association Inc.

Point Number 267.1

Category 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water

Staff Recommendation	Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Comment acknowledged. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed. One key advantage is access to higher borrowing limits through the Local Government Funding Agency, allowing the cost of essential infrastructure upgrades to be spread over a longer period. This helps reduce the immediate financial impact on ratepayers while ensuring safe and reliable water services for the future. An in-house solution is a possible outcome following deliberations. We know with regulation it will look different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.		
Point Number Comments: Staff Recommendation	267.2 Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Point Number Comments: Staff Recommendation	267.3 Question: Do you have any comments on the WSCCO model? Yes Comment: We do not need the costs associated with an additional bureaucracy which will increase ratepayer charges until at least 2034. Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there	Category	1-Questionnaire > 1.3-Comments

will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submitter Number:	268	Submitter:	Andrea Clemens
Documents:	Submission #268 - Andrea Cleme		
Point Number	268.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	268.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	268.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	269	Submitter:	Angela Hart
Documents:	Submission #269 - Angela Hart		
Point Number	269.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	269.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: CCOs can be very difficult for councils to manage I prefer Council to retain full control		
Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.		
Point Number	269.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	270	Submitter:	Graeme Gemmill
Documents:	Submission #270 - Graeme Gemmi		
Point Number	270.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	270.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	270.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	271	Submitter:	Christine Parker
Documents:	Your Water Done Well ; Submission #271 - Christine Pa		
Point Number	271.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Selwyn District Council has done a great job at managing and maintaining our current water infrastructure, and has done so in a cost effective manner, for the benefit of the ratepayers. I see no reason to change the current system (if it ain't broke, don't fix it) and believe we should keep it in-house. If at some point in the future this needs to be reviewed, please report back to the ratepayers with your proposal as to why a council owned organisation should be formed.		
Staff Recommendation	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. The Preliminary Arrangements Act sets out that only one round of consultation needs to be completed before a decision is made and implemented. There will be no further consultation.		
Point Number	271.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: All towns in Selwyn are in a growth mode, meaning much of the water infrastructure is relatively new. Council has managed this growth and infrastructure well, and I see no reason why, with increased resources as the district grows, the in-house model should be changed. Under the current system, Council reports to the people, the very people who voted them in, and many of these people are struggling financially at the current time. Retaining an in-house delivery ensures accountability, cost efficiency, and community input. I know the council has been leading the way on many issues in local government, but this doesn't mean we have to lead in every area. There may be a need to re-look at this in the future, but now is not the time.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	271.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** My comments don't so much relate to the WSCCO model, but my findings as I have endeavoured to seek information and understand this document. For such an important issue, we have only been given two options. Surely the need to revisit a WSCCO model could be considered. On Tuesday 4 March I went to the Council office in Rolleston to obtain copies of the document to pass to neighbours and friends as many people seem unaware of this project (as I was until recently when I attended a Residents and Ratepayers meeting). I want to be fully informed and believe we all should be. I was given 19 copies of the document and told "this is all we have". I was astounded that with such an important project 19 copies were all that were available. I had also checked the Council's website for dates and times of public meetings, but I could find no information. I mentioned this to the person I dealt with at the Council office and, after checking, they admitted the information was missing and advised it would be added. There were four meetings in total; three taking place during the week at 6 pm for one hour, and another taking place at 10 am on a Saturday. These times would hardly seem suitable for many people returning home from work, and those with families to feed. Surely, surely the meeting times should be planned to fit in around schedules of the people to whom you are seeking feedback, and not your staff. I attended a meeting at the Lincoln library on the evening of Thursday 6 March at 6 pm. I spoke to several staff members. I advised the lead person that I had only been able to obtain 19 copies of the document. He was shocked and told me that there were "cartons of them". I informed him that the staff didn't know as I was told only 19 were available. I also told him that the meeting venues, dates and times were also not available on the Council website, and that I had drawn this to the attention of staff. I asked other staff members present what the turnout to the meetings had been like, and I was informed that it was very poor. I said this was probably because the meetings were not advertised sufficiently. In light of the lack of publicity advising of the meetings by the Council, the fact that people had to go and pick up the consultation documents, and the limited time in which people could respond to this proposal by 12 March, I would suggest that this whole process be started over so that every resident and ratepayer in the district has an opportunity to learn about this project and make a submission. My suggestions are: 1. The consultation document (and there are cartons of them) be delivered to every household 2. Meetings be openly advertised, and held at more suitable times for residents to attend. Also that they be held in venues large enough for people to be addressed and to ask questions so we can hear what others have to say, unlike at the library where we were seen individually by staff. I would

	have been interested to hear concerns of others. 3. And a new date for closing of comments.
Staff Recommendation	Community consultation followed the same process as for the Long-Term Plan and Representation Review held last year. We have a digital version of the consultation document online which people are able to print themselves. Printed copies do come at a cost to Council, so we print in smaller quantities to avoid wastage. Drop-ins were held in all four wards, and some councillors chose to also hold their own meetings, or speak at residents' association meetings. There was an online session for those able to access the internet and this was recorded and made available after the fact.

Submitter Number:	272	Submitter:	Mary Quayle
Documents:	Your Water Done Well		
Point Number	272.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	272.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	272.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff

Council acknowledges there are no more comments.

Recommendation**Submitter Number:**

273

Submitter:

Mark Alexander for Rolleston Residents Association

Organisation:

Rolleston Residents Association

Documents:

[Your Water Done Well](#)

Point Number

273.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** On the information in the consultation document there is no clear advantage for ratepayers in the next decade if a WSCCO is created. . Rates + water service charges will increase faster in the WSCCO model than in the "in-house" model. There is a promise that after the first 10 years the WSCCO will be cheaper than the in-house model but there is no evidence in the consultation document to support this. The promise that charges/rates will go down after Year 10 is the promise every council makes in the 10 year Long Term Plan (LTP). In every subsequent LTP the decrease at year 10 is not realised. The consultation document has no evidence of any water services project that would require the extra borrowing ability that a WSCCO would have. The SDC already has the best credit rating a council can have, therefore a WSCCO can not borrow money at an interest rate lower than council itself. Council has to guarantee any WSCCO borrowing to enable the wholly own WSCCO to borrow. So where's the savings coming from? Commonsense says extra borrowing means extra repayments. Sure it means more projects can be done sooner, but they will cost more overall if more is borrowed over a longer term. Councilors state that there is more information not in the consultation document that would better explain the rationale and need for a WSCCO !!! Why, then, is that information not in the consultation document? Does council not trust our community to understand this information? On the basis on extremely short timeframes & incomplete documentation the Rolleston Residents Association ask the Selwyn District Council to retain in-house management of potable and waste water assets and services.

Staff**Recommendation**

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	273.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Retaining in-house management of potable and waste water assets and services is the best model for Selwyn's ratepayers. If in the future a WSCCO needs to be reconsidered then the retention of in-house management allows this. The converse is not true. If the WSCCO model is adopted and this turns out to be the wrong decision it will be much more expensive to reverse the creation of the WSCCO. Prudence would recommend that the Selwyn District Council choose the option that has the least impacts on rates and charges to Selwyn's ratepayers, that is retain in-house management of potable water and waste water services and assets.		

Staff Recommendation	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals. The options are being carefully considered and examined to ensure that the final outcome is sustainable.		
Point Number	273.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: The consultation document did not identify any projects that would require any additional borrowing that WSCOO would provide that aren't already in the Selwyn District Council Long Term Plan (LTP). Vague statements about that their may be a need at a future point for funding for unidentified projects at some unidentified time are simply not good enough. Our community signed off on the LTP last year with the assurance from Council and elected members that this was the plan for 10 years. The consultation document doesn't identify any changes to the LTP. Creation of the WSCOO will impose extra costs on our community in which many ratepayers are already struggling to pay their rates and charges. If Council has more information why wasn't this extra information in the consultation document?		
Staff Recommendation	The submitters response is acknowledged. There are no extra projects planned under the WSCCO. The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO. A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.		

Submitter Number:	274	Submitter:	Rafael Vial
Documents:	Your Water Done Well		
Point Number	274.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I don't believe Council can manage a CCO well, seeing how CORDE has been handled. Also, we will not have an Annual Plan since council has claimed that the budget changes within the LTP		

		and Annual Plan would be minimum, however implementing a CCO would have big costs implications.
Staff Recommendation	A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship. If the proposed WSCCO goes ahead yes there will be an impact on the Annual Plan.	
Point Number	274.2	Category 1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	274.3	Category 1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation	Council acknowledges there are no more comments.	

Submitter Number:	275	Submitter:	L Gourlie
Documents:	Your Water Done Well		
Point Number	275.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: WASCCO will be an expensive, multi-layered barrier between ratepayers & accountability through elected Councillors. No consultation or accountability to the people who own the assets and pay the bills. Consultation is of course relative - Mayor Sam has made up his mind - so a Chair has already been appointed to a non existant body. Mayor		

Sam has form signing agreements without consultation - the ODT's headline ..." Mayor blasted over 'wrong and abusive process". And it's One of the supposed benefits of a WASCCO is the ability for the entity to borrow more money than in-house entity - no consultation, no accountability. Ratepayers saddled with more debt and higher rates. ENOUGH!

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

A proposal has been submitted for community feedback, and no decision will be made until 2 April 2025. Any budget allocated to the programme team is there to support water services delivery regardless of the delivery model chosen.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

Point Number

275.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Apparently in-house entity is unable raise money at the level of a WSCCO - this is a real bonus, - accountability and consultation in the in-house model, whats not to like? And perhaps in time the Carter Group in particular will have to pay a realistic contribution toward their developments rather than the ratepayer subsidizing the company's subdivisions and contributing directly to their profits.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured

under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number 275.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Empire building by of Mayor Sam, who states in a video that Selwyn's WSCCO will be nothing like Wellington's entity and it's water woes. He can't know that and its disingenuous to say otherwise - Wellingtons entity is being mightily ripped off by contractors on top of other problems. Selwyn as a new post-earthquake district has for the most part new infrastructure - no EQ damage, no 50 year old pipes and if Selwyn does have compromised infrastructure then ratepayers money has been squandered on other non-infrastructure spending. Medical Centre - leave that to Govt or the market.. If there are problems requiring larger sums that an in-house model can deliver then ratepayer money has been

Staff Recommendation Comment acknowledged.

Submitter Number: 276 **Submitter:** John Benefield

Documents: [Your Water Done Well](#)

Point Number 276.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Water is an essential part of day to day living requirements and control must be retained by the residents via the Council. Councillors are democratically elected triennially which gives residents an opportunity to have input on major issues of importance such as water. Ratepayers can also have input via the District Plan Review annually in a democratic society which New Zealand prides itself on. Passing control to an autonomous body will result in the users being denied input into issues involving water/water disposal. So often changes of services etc. in NZ have been sold with the promise of greater efficiencies and better services. In so

many instances we are still waiting to see or benefit from those promises. Don't let your ratepayers and residents down again. We do not need another "change for change sake". Where do the returns from "CORDE" go?. I haven't seen any figures showing a return or benefit to Selwyn District Council. This proposal to form another entity will result in more increases in costs to ratepayers over which they will have no control. Selwyn District Council/Councillors have lost touch with their Ratepayers/Residents current financial position. Many cannot afford the proposed increase in rates for the next financial year let alone future years. Every year individuals or Businesses assess investment to expansion, redevelopment or improvements according to ability to finance or service debt. Local Government should be doing the same and focus on essential or needed expenditure and deferring "Nice to Haves" until they are affordable. Your Ratepayers are not "Cash Cows".

Staff Recommendation

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

The WSCCO will focus on the essential work of water and wastewater services.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

CORDE returns go back to Selwyn District Council as Council it still 100% shareholder of CORDE.

Point Number

276.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Control must remain with the duly elected Council in any true democracy. Ratepayers through Selwyn District Council have invested in infrastructure which is the envy of many regions/districts/Cities of NZ. Now is the opportunity to reap the benefits of that investment. Remember, we are a democracy which entitles the ratepayers to rights and the council has no mandate to remove that right. The Oxford Dictionary definition of Democracy "A system of Government by the whole population or all the eligible members of an area, typically through elected Representatives".

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for

economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number 276.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Control by any Quasi/Quango runs the risks of higher rates for bottom line performance ratings. Previous actions of privatization by Central Governments have not resulted in better performance of better service which Selwyn Ratepayers are entitled too in a true democracy.

Staff Recommendation Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Submitter Number: 277 **Submitter:** Stephen Matthews

Documents: [Your Water Done Well](#)

Point Number 277.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Setting up a WSCCO appears to be an expensive and inefficient way to manage some of the water services

Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 277.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	277.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	278	Submitter:	Peter Baylis
Documents:	Your Water Done Well		
Point Number	278.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The council have not got all the information from the Government. The council has be delivering the water now so why waste more ratepayers money on a new entity. Wait until all the information is received from the Government and so then we can be informed.		
Staff Recommendation	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.		
Point Number	278.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: You will still be doing the storm water so why would you not do all 3 waters and save ratepayer paying for 2 entities to perform the same job water.		

Staff Recommendation	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage). We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	278.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Why is no viable option to join with other councils for a joint WSCCO?		
Staff Recommendation	Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.		

Submitter Number:	279	Submitter:	Joe Morris
Documents:	Your Water Done Well		
Point Number	279.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I feel that moving to WSCCO has the possibility of introducing additional layers of bureaucracy that may slow down any decision-making process, restricting future innovation and upgrades in water infrastructure and technology. With Bureaucracy comes the added feeling of a loss of control of local oversight and accountability. Not to mention the added cost of another organisation with the community footing the bill, while we are struggling with the cost of living.		
Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an		

opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Point Number	279.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Keeping the in-house water delivery model allows for greater local oversight and accountability, enabling the community to have a say in how their water services are managed, possibly fostering a closer relationships between us and the council, leading to more responsive services tailored to our own needs. Managing all services under one roof can streamline operations, potentially reducing administrative overhead and improving coordination between departments (e.g., drinking water, wastewater, and stormwater). Reducing the costs incurred on the rate payers.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number	279.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	280	Submitter:	Sean Rooney
Documents:	Your Water Done Well		
Point Number	280.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Moving into a WSCCO will result in rates and water service charges that will increase at a faster rate than the in-house model. This will also allow the Council (WSCCO) to increase borrowings that will be at an unsustainable level. I do not have confidence that this Council can control its spending in a prudent manner.		
Staff Recommendation	Comment acknowledged. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.		
Point Number	280.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It is a sensible approach as it is not known (at this stage) what the finalised legislation will look like. In fact, the Council should have applied for an extension so it could have all the facts at hand instead of rushing in and developing an incomplete WSCCO model.		
Staff Recommendation	The Preliminary Arrangements Act, passed in September 2024 provides the framework for water services delivery and requires councils to submit Water		

Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Point Number	280.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: You have failed to explain the rationale and need for a WSCCO when the in-house model is currently meeting our needs. The community have asked a lot of questions that have not been answered, therefore cannot be expected to make a decision in favour of a WSCCO.		
Staff Recommendation	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document.		

Submitter Number:	281	Submitter:	Tonya Frew
Documents:	Your Water Done Well		
Point Number	281.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater.		

Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	281.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	281.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	282	Submitter:	Vitor Centeno
Documents:	Your Water Done Well		
Point Number	282.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We can't afford more debt associated with a WSCCO and more rate rises in the short term. SDC and its mayor and councillors are making impossible to afford living in Selwyn		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. Borrowing enables Council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost		

over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

Point Number 282.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** We can't afford more debt associated with a WSCCO and more rate rises in the short term. SDC and its mayor and councillors are making impossible to afford living in Selwyn

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 282.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** We've lost any trust in Sam Broughton and the councillors. They are doing nothing to ease the cost of living crisis for the Selwyn population, in fact they are making it way worse, therefore we don't trust anything they propose

Staff

Recommendation

Comment acknowledged.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number: 283 **Submitter:** Samuel Wilshire

Documents: [Your Water Done Well](#)

Point Number 283.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: No punctuation, so this question can read two ways. I bet submitters got confused by question 1. Staff Recommendation Comment acknowledged.			
Point Number	283.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Given when a family max out their credit card, they reduce spending and pay down the debt. Normally they don't simply pick up a new credit card with the same limit... For new infrastructure the proposed plan of expenditure is obscene in the WMSCCO model. Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.			
Point Number	283.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? Yes Comment: Second time writing this as it timed out. The consultation process is flawed, we've had numerous different answers to the same questions depending on what drop in session I attended. Staff earmarked to shift to CCO are running and participating in drop in sessions and advocated for CCO model, if these council staff receive a severance or redundancy package this would most definitely be considered a conflict of interest. Currently the CFO can't confirm or deny after 11 months what's owed, to who and what the rates of interest are. Why would residents trust you to borrow \$1 more let alone \$600,000,000? Where's the 2 million dollars gone that was allocated for the establishment team? And why is the council suggesting this amount will need to be topped up for something we haven't decided on yet? Staff Recommendation The ultimate decision to establish a WSCCO rests with the elected officials and not staff. As a result, we do not believe there has been a conflict of interest.			

Submitter Number:	284	Submitter:	Anna-Lisa van Tuinen
Documents:	Your Water Done Well		
Point Number	284.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The cost of this to rate payers will be unaffordable for many - especially single income households and pensioners		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	284.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Provided that this is not a cost that will increase (such as the approx. \$2000 described to be added onto rates)		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	284.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: N/A		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	285	Submitter:	Anita Vulling
Documents:	Your Water Done Well		
Point Number	285.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It should stay in the council as is , so there is more local control and lower cost plus better accountability Comment: It should stay in the council, so there is more local control and lower cost plus better accountability		
Staff Recommendation	The cost implications of the in-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' consultation document. Cost efficiencies are realised in the longer term 2033/2034. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	285.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: See previous comments Also the council needs to operate within budget instead of aiming for more loans = more debt and more vulnerable		
Staff Recommendation	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.		
Point Number	285.3	Category	1-Questionnaire > 1.3-Comments

Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: It should stay 100 % under control of the local council plus it creates more rates. This means rate payers and council will have to go in more debt.
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	286	Submitter:	Kathreen Joy Haylock
Documents:	Your Water Done Well		
Point Number	286.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Council already have expertise in running water services. With the addition of a few key people it should be able to fulfill the government requirements. We do not need a separate organisation. Corde is a separate council controlled organisation with vehicles provided to employees that do not require them, and not enough accountability to ensure our rates money is spent efficiently. My belief is that a WSCCO would also require excessive spending to set up with too many managers on high salaries and perks. Stormwater pipes run alongside the other pipes, Maintenance will be easier to co-ordinate if all services are kept together.		
Staff Recommendation	Comment acknowledged. A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. A CCO would remain subject to LGOIMA as Council is. Funds are required under		

legislation to be ringfenced for the spending on water. Please note the CCO will continue a volume-based charging model of water charges, there will be no rates charged for water.

Surface waters (stormwater, water races, and land drainage) will remain in-house due to the interaction with other Council assets particularly transportation and open spaces.

Point Number	286.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Council already have expertise in running water services. With the addition of a few key people it should be able to fulfill the government requirements. If the council is concentrating on it's baseline services, it should be able to keep the water rate under control. Ensuring all new housing developments add rainwater tanks for garden watering would be a start. Has the new Foodstuff building added rainwater tanks to water their landscaped plants? Selwyn has the advantage of having new water networks in many areas due to new growth, that should have been largely paid for by developers. They can then concentrate on older established towns that may need updated services which I am sure have been budgeted for in long term plans.

Staff Recommendation

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number	286.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** The WSCCO will cost to set up and I cannot see that as a effective use of our rates. Councilors were not prepared to confirm that water rates would not go up more under a WSCCO in the future than under an in house model. That gives

Staff Recommendation	me no confidence in a WSCCO. The government has not yet finalized their requirements. Waiting to network with other councils on a knowledge base could be worthwhile. I am aware they do not wish to work with Selwyn DC on a physical basis. A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Submitter Number:	287	Submitter:	Karren Madden
Documents:	Your Water Done Well		
Point Number	287.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The Council should aim to keep the debt ceiling as low as possible. A new WSCCO will raise the debt ceiling beyond what the Council/Rate payers can afford. A new WSCCO will not be controlled by Council and there may be issues in the future when Council don't like the decisions the WSCCO implement. Where is the legislation, has it been confirmed and released?		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.		

Point Number	287.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Kept it in-house and keep it simple. Keep the debt level low and keep Council in control.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Point Number	287.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: There needs to be more consultation with the rate payers, once a WSCCO is implemented there will be no turning back. The decision needs to be held off until the local elections are complete, and the legislation is finalised.		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	288	Submitter:	Helena Immers
Documents:	Your Water Done Well		

Point Number	288.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	288.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The council seeks submissions from the effected parties, the rate payers, relating to the proposal that all of Selwyn District's water supply and wastewater assets be transferred into an entity described as a WSCCO, which at its inception, will be 100% owned by the Council. On the surface it appears that assets owned 100% by the Council will be transferred into an entity which is also 100 % owned by the Council. Why would the Council bother to consult the ratepayers on such an absurd idea? I note that the 10-year plan, which was approved in 2024, made adequate provisions to meet projected expenditure for these services, yet the Councils own modelling proposes that costs will increase by almost \$80 Million under the new delivery model. 25/26 \$148 X 30000 = \$4,440,000 26/27 \$248 X 30000 = \$7,440,000 27/28 \$687 X 30000 = \$20,610,000 28/29 \$565 X 30000 = \$16,950,000 29/30 \$473 X 30000 = \$14,190,000 30/31 \$343 X 30000 = \$10,290,000 31/32 = \$203 X 30000 = \$6,090,000 Total \$79,980,000 The Council appears determined to push forward in this regard in response to the pending Local Government (Water Services Preliminary Arrangements) Act 2024, which states: 2 Commencement (3) Any provision of this Act that has not come into force by 1 July 2025 comes into force then. Disappointingly, despite the costs of implementing this new arrangement, central government has passed the cost onto ratepayers, as per Schedule 1: Part 1 Provisions relating to this Act as enacted There are no transitional, savings, or related provisions in this Act as enacted. I note that the Act requires consultation with ratepayers, as per 62 Alternative requirement: consultation (1) This section applies if a territorial authority— (a) is deciding whether or not to establish, join, or amend— (i) a water services council-controlled organisation; (b) when adopting its water services delivery plan, is making decisions in relation to an anticipated or proposed model or arrangement for delivering water services in its water services delivery plan (see section 13(1)?(k)); (2) Before a territorial authority makes a decision described in subsection (1), it is required to undertake consultation only once. (3) A territorial authority that makes a decision described in subsection (1)?(a) is not required to undertake any further consultation before making a decision described in subsection (1)?(b). Disappointingly, we see that once the public has been consulted, once, on the		

establishment of a WSCCO, the Council is not obligated to consult further on the proposed arrangement for delivering water services. This takes the matter out of the control of ratepayers. I also note that in section 68 68 Exemption from cost-effectiveness review (1) This section applies if a territorial authority— (a) is deciding whether or not to establish, join, or amend a WSCCO; or (d) has established, joined, or amended a WSCCO; or (f) has changed its water services delivery arrangements as part of an anticipated or proposed model or arrangement for delivering water services in its water services delivery plan. (2) The authority is not required to undertake a review under section 17A of the LGA2002 in relation to the WSCCO, the anticipated or proposed model or arrangement for delivering water services, We see here that the WSCCO is exempted from providing a cost effectiveness review for the first 5-years after it comes into force. 69 Repeal of section 68 Section 68 and this section are repealed on the date that is 5 years after this section comes into force. This is a shortfall in the legislation by not providing transparency in the first 5-years.

Uncalled capital Defined as that portion of subscribed capital that has yet to be paid for buy the shareholders. The incentive for the Council to enter into this arrangement seems to be the source of lower cost loans. This is a false economy as it places our assets at risk in the event that a “call” is made on the outstanding capital pledged by the WSCCO. Also, by entering into long term financial arrangement we are passing debt onto future generations for infrastructure which could have been delayed by decades. The most alarming aspect of this decision-making process, is that despite the consultation underway, the council is not obligated to vote according to the ratepayers views: LGA 2002 77 Requirements in relation to decisions (1) A local authority must, in the course of the decision-making process,— (a) seek to identify all reasonably practicable options for the achievement of the objective of a decision; and (b) assess the options in terms of their advantages and disadvantages; But, there is no obligation to agree with the ratepayers views. The only recourse for ratepayers is to remove the offending Councillors at the next election after the damage is done. Thin edge of the wedge This move by the council is motivated by a desire to comply with the current coalition government's desire to change the funding modelling for local governments. It works best when local councils combine to form regional borrowing entities that have a greater asset base that can securitise loans of very large sums. For this reason the Act allows for joint WSCCO's to be formed from several local authorities. The Act, by allowing council shareholdings to drop to 50%, opens the door for private equity partners to enter the market. The council, with this view in mind, would seek to pass such amendments to the WSCCO, hoping that an apathetic ratepayer base would not object. The current submission process would do nothing to halt that trajectory as it is an inadequate consultation process and can be ignored anyway. Summary With an election in October 2025 it is utterly untenable for the SDC to rush through this proposed change to delivery of our water services. We do not need to be the first guinea pig of a centralist government model that passes burdens onto ratepayers, as opposed to taxpayers. Selwyn has already invested large sums into water infrastructure which have provided minimal benefit to existing ratepayers. They have been based on ESG policies which are questionable at best. We do not need another layer of bureaucracy standing between ratepayers and service providers; it adds cost and weakens the role of ratepayers in deciding how these services are provided.

**Staff
Recommendation**

Comment acknowledged.

The benefit of the WSCCO model means there would be dedicated water-focused operational and governance experts in water delivery, infrastructure funding, and long-term debt management, ensuring compliance with new regulations and improving service delivery for growing communities. The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility).

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA).

As part of the Delivery Model Options there was an option for Territorial Authorities to explore new Delivery models including joint local Government arrangements. SDC consulted with other Councils, however this was currently not a viable option, although this could be considered in the future.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC. If another Council joined the SDC WSCCO in time, they would bring their own assets which would grow the asset pool proportionally and shares would be issued in proportion to that asset value contributed. The equity value of SDC's shares in WSCCO would remain the same.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.

Point Number	288.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	289	Submitter:	Brendon Wilshire
Documents:	Submission #289 - Brendon Wils		

Point Number	289.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	289.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	289.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	290	Submitter:	Steven Bruce-Jones
Documents:	Submission #290 - Steven Bruce		
Point Number	290.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The Council just want to palm off the responsibility		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	290.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The ratepayers at least have some say in the matter		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or		

CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number 290.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Another level of bureaucracy that the ratepayers have no control of. More cost. Developers pay for infrastructure.

Staff Recommendation Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Submitter Number: 291 **Submitter:** Max user

Documents: [Your Water Done Well](#)

Point Number 291.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** I am tentatively optimistic that a WSCCO would benefit Selwyn. I have concerns that the time to make a decision and consult is only 8 weeks when this will impact the region for many years to come. Personally I am not available for the dates set up for community outreach which is a shame.

Staff Recommendation The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number 291.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** The consultation document outlines that the WSCCO has scope for more future benefits than the status quo.

Staff Recommendation It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.

Point Number 291.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:
Question: Do you have any comments on the WSCCO model? Yes **Comment:** I wish the consultation period was longer to allow for more community outreach for such a large decision.

Staff Recommendation Comment acknowledged.

Submitter Number: 292 **Submitter:** Andrew Jorgensen

Documents: [Your Water Done Well](#)

Point Number	292.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Not interested in paying profit for water. Adding contractors to the process introduces extra cost for no real gain		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	292.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: better control of the water. costs are tracked properly		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	292.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	293	Submitter:	Marie Stafford
Documents:	Your Water Done Well		

Point Number	293.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: we are happy to keep this as is.		
Staff Recommendation	Comment acknowledged.		

Point Number	293.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	293.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	294	Submitter:	Murray Winsloe
Documents:	Submission #294 - Murray Winsl		

Point Number	294.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District		

Staff Recommendation		Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	294.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	294.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	295	Submitter:	Helen Stevenson
Documents:	Your Water Done Well		
Point Number	295.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is unethical to commit to such a multi generational debt load, especially as nothing can be known about the future interest rate changes, and it is completely unacceptable to just keep	

raising rates . Borrowing up to 500% of total revenue is total madness - unless ALL the people on the WSCCO board and in management are held accountable and liable for the debt repayment !!! That would work - because that financial responsibility would make them pause and rethink their blithe overspending. It is undemocratic to have an organisation that is not accountable to voting rate payers - unelected people have NO place in councils, and have absolutely NO right to make financial decisions that affect rate payers.

Staff Recommendation

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number

295.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This is the democratic option - the council is held accountable to the rate payers, and when we dont like your decisions , we vote you OUT !

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number

295.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** To repeat, it is completely undemocratic to have an unelected organisation that is able to have a financial influence and apply a resulting financial burden on rate payers - there MUST be accountability to us, the rate payers. Without us, the council would have NO revenue ! Therefore , the Mayor and councillors should think VERY carefully about their decision, every decision in fact !

**Staff
Recommendation**

Comment acknowledged.

**Submitter
Number:**

296

Submitter:

Allison Rosanowski

Documents:

[Your Water Done Well](#)

Point Number

296.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** This process was supposed to be a consultation with the community. The Consultation document is clear that the Council's preference is for a WSCCO. The Council already employs people to manage water and waste water. If a WSCCO is the outcome these people must be made redundant. this costs. Any employment process for a new body must be an open process. Already the Council has employed two people to manage the process. Will their contacts finish and new positions be advertised on the open market? Directors' fees will be another new cost. Rate payers will not elect Directors. The carrot proposed by the present government for establishing a WSCCO is increased borrowing . Governments change. Selwyn currently is managing water and waste water successfully so there is no reason to abandon Council control. My understanding is that for WSCCO's to be economic they should provide for a population of a minimum of 200.000 people. Selwyn does not have that population. Our neighbouring Councils are keeping water and waste services inhouse. So should Selwyn.

**Staff
Recommendation**

Comment acknowledged.

We are bound to follow the legal guidelines provided under the Local Government Act, and the Water Services Preliminary Act regarding connection with the community and they have provided the parameters for us to work within for decision making. We will abide by the good faith and consultation process in the Employment Relations Act. In the event a transfer of staff is deemed necessary, impacted staff would be fully consulted with on any

proposed changes before any final decisions in regarding employment are made.

Directors' fees will be a cost needed for the Proposed CCO, the current modelling has taken the predicted costs into consideration.

Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Community feedback has highlighted the importance of economic sustainability. To support the region's rapid population growth, there needs to be a clear and shared understanding of the economic sustainability threshold, what level of investment is needed now to ensure long-term value and resilience. Well-planned infrastructure enables managed growth, supports housing and employment opportunities, and delivers broad economic benefits. Without timely investment, the region risks falling behind demand, placing pressure on services and missing the opportunity to realise the full economic potential of growth.

Point Number

296.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Present Council controlled system is working well. Ratepayers have some control through three yearly elections. A WSCCO would distance ratepayers from the expected services. While there has been considerable work to produce the figures in the Consultation document the basis for these figures are estimates.

Staff Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

Point Number	296.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Puts distance between rate payers and service delivery.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	297	Submitter:	Denise Carrick for Lincoln Voice
Organisation:	Lincoln Voice		
Documents:	Your Water Done Well ; Water Done Well Lincoln Voice		

It is clear that the council does not have adequate information or understanding to run a fair and informed consultation with ratepayers, let alone make such substantive changes to SDC organisational structure, as well as substantively restructuring household rates and council debt. To proceed with the WSCCO model in the current rushed process appears to have a number of risks and borders on reckless Governance.

Based on the very limited and confusing information thus far by SDC, we feel that the only responsible governance decision is to not proceed with the WSCCO at this point in time.

Stick with the in-house management of water services, whilst completing the detailed business case evaluation, wait for the uncertainty around the legislative changes to settle with full clarity, and learn from the responses (and mistakes) of other councils. The desire to lead that has been expressed by SDC is folly and exposes ratepayers to unnecessary risks. It is our understanding that it is not a 'now or never' situation for setting up a WSCCO, the council can decide to do this at a later date, once they (and ratepayers) have the full business case and legislative changes available.

Reasons why we feel the council should not proceed with the WSCCO model at present:

1. **There has been inadequate consultation documentation and underpinning data** for ratepayers to be able to make an informed decision. From observing the large number of questions from ratepayers, through various online and in-person forums, it is clear the 14 pages of 'glossy' consultation documentation has been confusing in content and also does not provide the level of information that ratepayers need for informed decisions. Many fundamental questions have been asked by ratepayers, and the council has not been able to answer those straight away. Many answers to questions have been just as confusing (as outlined below).
2. **Where is the accompanying detailed business case evaluation?** - this is standard practice for Government cabinet decisions, and these are publicly released (e.g. regulatory impact analysis, cost-benefit analysis). This is also standard practise for decisions by boards and executives of medium-large businesses.
3. **Where is the evaluation of the current state of our water services delivery?** The council has not provided ratepayers any 'baseline' documentation of the current state in: a) The current state of our drinking and sewage network; b) what works are already planned to be completed over the next decade via the LTP; c) where is the shortfall in works?
4. **Where is the independent analysis of our current in-house approach?** The short 'glossy' consultation document provides no information on the in-house delivery model. Where is the independent evaluation of the councils' current water services delivery group? If they are doing a good job as we assume, then why would we want to change this without some very good evidence-based reasons.
5. **Councillors do not have the understanding that is needed to answer basic questions from their ratepayers.** It is clear that through the drop-in-sessions, facebook posts, and the live-stream that the councillors don't have a clear picture of the options and consequent implications of each. Core questions of what is wrong with our current in-house management? How will this affect my total rates bill? How will the council debt change? - have been either glossed over, answered with waffle, or met with inconsistent numbers.
6. **The legislation is not complete. It is clear this proposal is based on a series of guesses** on what the final requirements and implications of the Government

legislative changes will be. Councillors and staff have said this directly on the livestream Q&A.

Relying on a substantive proportion of guesswork is close to reckless Governance to push through such huge structural changes to both the SDC organisation, rating structure, and ratepayer debt arrangements.

7. There is no clear evidence-based rationale on why SDC should lead ahead of other councils in setting up a WSCCO.

8. The WSCCO is not more cost-effective over the next the decade. The cost-benefit of the WSCCO has been continuously asserted by the council during the consultation, yet their own figures in the rating examples show that it is only in year 9 of the outlook (2033/34) that the WSCCO option would be marginally cheaper. In the next 7 years (up to 2031/34) it is substantially more expensive. After year 9 there is no information provided that justify the SDC claim that the WSCCO will be cheaper to ratepayers in the medium to long-term - such assertions need evidence!

9. Why does the WSCCO cost flatline after the next 5 years, but the cost of the in-house model keeps increasing? The only reason the WSCCO appears to eventually be cheaper in 9 years time is that after year 5 its cost to ratepayers is claimed to flatline at \$2668 /yr - but no evidence or reasons are provided. What business or service can say that they will keep their fee the same for 5 years?

10. The council has not been able to clearly outline what the effects will be on total rates to households. This has been asked for numerous times, across consultation forums since the start of the consultation, yet has not been provided. The only information provided has been for just the sewage and drinking water component. In reality though ratepayers do care about changes to their total rates bill. We expect that if a WSCCO is set up then the SDC component of the total rates bill will decrease. But how that translates through to the total rates bill is still a mystery to ratepayers - this should not be the case, and this information should have been available to ratepayers from the start of the consultation.

11. There is no clarity on the mechanisms that would be used to ensure that the WSCCO will be accountable to ratepayers. This requires independent efficiency evaluations to be conducted regularly, and full transparency to ratepayers. Based on the limited information available around CORDE, the current CCO of SDC, then we question the council's commitment to transparency around the WSCCO. At least with an in-house model ratepayers can directly ask councillors to seek this information, or if necessary, use an OIA mechanism.

Point Number	297.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

Staff Recommendation

Comment acknowledged.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes

in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Council is unable to delay this given the need to present a WSDP by 3 September 2025.

Our consultation document recognises the options we have considered for water services delivery, along with the modelling to support each option.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. In-house delivery was included, as the second option in the consultation and outlined in the financial modelling.

The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

Point Number	297.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	297.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	298	Submitter:	Kenneth May
Documents:	Submission #298 - Kenneth May		
Point Number	298.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Staff of the SDC are employed to ensure appropriate installation of those water services, and creating a WSCCO will only cause duplication.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		

Point Number	298.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: They have the skills and staff. Should CORDE become the WSCCO, we will end up with the tail wagging the dog.		
Staff Recommendation	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed. CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.		
Point Number	298.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Flawed in concept and an unacceptable addition to rates and ratepayers costs.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	299	Submitter:	Joann van der Salm
Documents:	Submission #299 - Joann van de		
Point Number	299.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:			
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	299.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:			
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	299.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Comment:			
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	300	Submitter:	Jack van der Salm
Documents:	Submission #300 - Jack van der		
Point Number	300.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water			

Staff Recommendation		Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	300.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	300.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Comment: Staff Recommendation Council acknowledges there are no more comments.	

Submitter Number:	301	Submitter:	Carey Barnett for Ellesmere Sustainable Agriculture Incorporated
Organisation:	Ellesmere Sustainable Agriculture Incorporated		
Documents:	Your Water Done Well ; ESAI sub YWDW draft 1 05032025		



To: Selwyn District Council
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Submission on: **Your Water Done Well – Consultation Document**

Date: 11 March 2025

Submission by: **Ellesmere Sustainable Agriculture Incorporated**

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**SUBMISSION TO SELWYN DISTRICT COUNCIL
YOUR WATER DONE WELL - CONSULTATION 2025**

1. INTRODUCTION

- 1.1 Ellesmere Sustainable Agriculture Incorporated (ESAI) welcomes the opportunity to submit on the Selwyn District Council *Your Water Done Well - Consultation Document 2025*.
- 1.2 ESAI submits on various documents and plans relevant to the ESAI catchment area and makes constructive proposals whenever the opportunity is provided and/or directly requested. This catchment area is bounded by the southern banks of the Selwyn Waikirikiri River, State Highway 1, the northern banks of the Rakaia River, Te Waihora Lake Ellesmere and the east coast.
- 1.3 ESAI's feedback represents the views of 100 farming members and rate payers within its catchment area. This catchment group largely represents long established generational family farmers who operate a mixture of farming enterprises including land uses of: dairy; sheep; beef; arable grain and small seed vegetable production; horticulture including fresh market and processed vegetables and berry production.
- 1.4 With ESAI having been established in the mid 1990's, the group is recognised as not only one of New Zealand's eldest catchment collectives but one of the country's most successful; priding itself on respectful and collaborative partnerships/relationships with central government agencies, Environment Canterbury, Selwyn District Council (SDC), Te Taumutu Runanga, other catchment groups and Central Plains Water Limited. ESAI has a strong focus on supporting its farmer members and achieving excellent agricultural and environmental outcomes. In 2023 ESAI won the Environment and Sustainability Award at the Sensational Selwyn Awards which recognised the outstanding contribution the group had made to improving environmental and agriculture outcomes in the area. In particular, the award recognised the success of the Ministry for Primary Industries, ESAI and farmer funded Tinaku (Germinate Growth) Project which achieved the restoration of 60 riparian sites within the catchment area, educated farmers on improved environmental farming systems and planning, along with undertaking a variety of 'state of the environment' monitoring programmes.
- 1.5 ESAI is focused on the transparency of rate setting, rates equity and both the overall and relative cost of local government on rural ratepayers in Ellesmere, alongside democratic decision-making processes.
- 1.6 ESAI does not wish to be heard with respect to this submission.
- 1.7 The following sets out ESAI's responses to information provided in the Consultation Document following the relevant heading titles.

1. QUESTION ONE: Do you support the proposed transition of the SDC drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council?

- 1.1 No
- 1.2 ESAI considers that this proposal will lead to an increase in non-democratic decision making with the WSCCO making important decisions and recommendations to the Council siloed within a governance structure that effectively excludes the wider public. While the document argues that future costs under a WSCCO structure would allow higher borrowing power, ESAI considers that this could well come at the cost of democratic decision making and accountability.
- 1.3 Selwyn has experienced excessive growth within the last 10 years which has continued to deliver major rates increases to all rate payers, not just those immediately reliant on Council administered drinking water, wastewater and stormwater servicing. ESAI does not accept that the WSCCO model will deliver any reduction in rates relief over time but will exacerbate even more residential growth over rural land and further put at risk the environmental capacity of the district.

2. QUESTION TWO: Do you prefer that the SDC continues with a future in-house water delivery model?

- 2.1 Yes
- 2.2 ESAI also supports that stormwater, water race and land drainage asset management and services remain, as the document suggests, within the SDC in-house delivery model.

3. QUESTION THREE: Do you have any comments on the WSCCO model?

- 3.1 No further comments over and above those mentioned in paragraphs 1.2, 1.3 and 2.2 above.

FURTHER COMMENTS

4. Drinking Water

- 4.1. Predominantly ESAI members do not utilise Council reticulated water supplies or wastewater services at their rural properties. However, with substantial increases in population of towns throughout the Selwyn District, there is now a significant demand for drinking and domestic water supply. The effects of this increase and the upgrading and/or use of existing or new groundwater supply wells needs to be considered when locating and operating such facilities. For example, protecting agricultural hinterland

1. QUESTION ONE: Do you support the proposed transition of the SDC drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council?

- 1.1 No
- 1.2 ESAI considers that this proposal will lead to an increase in non-democratic decision making with the WSCCO making important decisions and recommendations to the Council siloed within a governance structure that effectively excludes the wider public. While the document argues that future costs under a WSCCO structure would allow higher borrowing power, ESAI considers that this could well come at the cost of democratic decision making and accountability.
- 1.3 Selwyn has experienced excessive growth within the last 10 years which has continued to deliver major rates increases to all rate payers, not just those immediately reliant on Council administered drinking water, wastewater and stormwater servicing. ESAI does not accept that the WSCCO model will deliver any reduction in rates relief over time but will exacerbate even more residential growth over rural land and further put at risk the environmental capacity of the district.

2. QUESTION TWO: Do you prefer that the SDC continues with a future in-house water delivery model?

- 2.1 Yes
- 2.2 ESAI also supports that stormwater, water race and land drainage asset management and services remain, as the document suggests, within the SDC in-house delivery model.

3. QUESTION THREE: Do you have any comments on the WSCCO model?

- 3.1 No further comments over and above those mentioned in paragraphs 1.2, 1.3 and 2.2 above.

FURTHER COMMENTS

4. Drinking Water

- 4.1. Predominantly ESAI members do not utilise Council reticulated water supplies or wastewater services at their rural properties. However, with substantial increases in population of towns throughout the Selwyn District, there is now a significant demand for drinking and domestic water supply. The effects of this increase and the upgrading and/or use of existing or new groundwater supply wells needs to be considered when locating and operating such facilities. For example, protecting agricultural hinterland

from reverse sensitivity effects caused by the location of towns' water supply wells should be explored appropriately before locating them near existing, permitted and legally operating agricultural activities. Determining alternative locations or water supply options which minimise impingement on other legal and permitted uses, and, reduce potential adverse environmental effects, should be paramount in decision making about securing safe and adequate drinking water supplies for towns.

Recommendation:

- 4.2 That SDC pursues alternative location options to town groundwater supply to ensure agricultural land is protected against land use restrictions caused by the inappropriate location of water supply wells and their protection zones in or near rural areas.

5. Waioara One Water Strategy

- 5.1 ESAI is extremely concerned that the Waioara One Water Strategy was constructed and consequently implemented without consultation or input from ratepayers. Freshwater is highly significant to all those residing within the district and ESAI is disappointed that the Council has decided that such an important overarching guiding strategy should not trigger wider engagement under the Significance and Engagement Policy. However, and in comparison, the Council is consulting on this lower tier, 'Your Water Done Well', document. ESAI therefore questions the rationale of the progression of these documents in the consultation context.

6. Thank you for considering this submission. Should any queries arise from this submission then please direct them to the address for service contacts.

*Ellesmere Sustainable Agriculture Incorporated
12 March 2025*

Ellesmere Sustainable Agriculture Inc 'Your Water Done Well' Submission, March 2025

Point Number	301.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services		

to remain within Council? No **Comment:** 1.2 ESAI considers that this proposal will lead to an increase in non-democratic decision making with the WSCCO making important decisions and recommendations to the Council siloed within a governance structure that effectively excludes the wider public. While the document argues that future costs under a WSCCO structure would allow higher borrowing power, ESAI considers that this could well come at the cost of democratic decision making and accountability. 1.3 Selwyn has experienced excessive growth within the last 10 years which has continued to deliver major rates increases to all rate payers, not just those immediately reliant on Council administered drinking water, wastewater and stormwater servicing. ESAI does not accept that the WSCCO model will deliver any reduction in rates relief over time but will exacerbate even more residential growth over rural land and further put at risk the environmental capacity of the district.

Staff Recommendation

Comment acknowledged.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	301.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** ESAI also supports that stormwater, water race and land drainage asset management and services remain, as the document suggests, within the SDC in-house delivery model.

Staff Recommendation

Comment acknowledged. Stormwater, water races and land drainage are proposed to be retained by Council under either delivery model.

Point Number	301.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? **No Comment:** See further comments in attached document or below: 4. Drinking Water 4.1. Predominantly ESAI members do not utilise Council reticulated water supplies or wastewater services at their rural properties. However, with substantial increases in population of towns throughout the Selwyn District, there is now a significant demand for drinking and domestic water supply. The effects of this increase and the upgrading and/or use of existing or new groundwater supply wells needs to be considered when locating and operating such facilities. For example, protecting agricultural hinterland from reverse sensitivity effects caused by the location of towns' water supply wells should be explored appropriately before locating them near existing, permitted and legally operating agricultural activities. Determining alternative locations or water supply options which minimise impingement on other legal and permitted uses, and, reduce potential adverse environmental effects, should be paramount in decision making about securing safe and adequate drinking water supplies for towns. Recommendation: 4.2 That SDC pursues alternative location options to town groundwater supply to ensure agricultural land is protected against land use restrictions caused by the inappropriate location of water supply wells and their protection zones in or near rural areas. 5. Waiora One Water Strategy 5.1 ESAI is extremely concerned that the Waiora One Water Strategy was constructed and consequently implemented without consultation or input from ratepayers. Freshwater is highly significant to all those residing within the district and ESAI is disappointed that the Council has decided that such an important overarching guiding strategy should not trigger wider engagement under the Significance and Engagement Policy. However, and in comparison, the Council is consulting on this lower tier, 'Your Water Done Well', document. ESAI therefore questions the rationale of the progression of these documents in the consultation context. 6. Thank you for considering this submission. Should any queries arise from this submission then please direct them to the address for service contacts.

**Staff
Recommendation**

All drinking water supplies are subject to a Source Water Risk Management Plan. Environment Canterbury are responsible for the setting of Community Drinking Water Protection Zones which takes into consideration any affected party. Surrounding land use is a major consideration when any new source is being considered.

Our Waiora One Water Strategy has forms part of the Council's wider strategic direction for Waikirikiri Selwyn. It aligns with other plans and strategic documents including the District Plan and Selwyn District strategies. The Waiora One Water Strategy, used in conjunction with Council's other strategies, forms one part of a suite of guidance materials that will direct planning, development and investment across Council. Its implementation will require integrated planning across land, water and infrastructure and these decisions will be made through Council's 30 Year Infrastructure Strategy, 10-year Long-term Plan and its Annual Plans, all of which are subject to consultation with the community.

Submitter Number:	302	Submitter:	Geoffrey Griffiths
Documents:	Your Water Done Well		
Point Number	302.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	302.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	302.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: I understand that it is intended that there will be charges to rural ratepayers. This will include those who have their own water bore and septic tank. It is difficult to understand how you can be charged for something you don't and can't receive. I understand the need to recover the cost of water and waste water infrastructure but this cost should be shared amongst those who use the service. You cannot charge somebody for a service you are not providing and can't provide even if the person wanted it.		
Staff Recommendation	The consultation addresses the future delivery of reticulated water and wastewater services. Rating and water charge examples are included in the consultation document as stated on page 18, including for rural properties with restricted water supply connections or no connected services. Costs to properties that do not have any connection to Council services are outlined in the Long Term Plan. Please refer to the FAQs on our consultation page for a further breakdown of Urban and Rural costs.		

Submitter Number:	303	Submitter:	Heidi Jensen-Warren
Documents:	Your Water Done Well		
Point Number	303.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I only support the in house model, whereby the Selwyn District Council retains full autonomous control over our water services and assets. We as residents, investors and rate payers in Selwyn bought our home and investment property here as we believed that the Selwyn District Council was a Council that served the community and could stand on it's own feet, serving locals first and not falling to any coercion from the central government or outside influences. I strongly believe in the benefit of localised services and localised government, after all if we are to believe we as New Zealanders live in a functional democracy then we as rate payers, residents and citizens have a right to have a functioning autonomous and reliable and accountable local council to deliver services to the community. We pay very high rates in Selwyn and because of this it is paramount that our water services are controlled 100 percent by our local community/council. Water is our life force, it is much more than roading or kerbside collection, we depend upon it to keep ourselves clean, to drink, to water our beautiful gardens, fruit trees and flowers, to supply our children and pets with plentiful abundant pure water. I believe we as residents have a social and ethical responsibility to retain 100 percent control over what goes into our water and what needs to be filtered out. We choose to live in Selwyn because we want to be part of the community and the landscape here, as a first world developed country we expect and demand autonomy over our local water supply. As a mother and wife I am very concerned about keeping our water 100 percent pure, uncontaminated, unmedicated and free from 'big ideas' from politicians or unelected health officials or bodies. Keeping the Selwyn water supply free from fluoride, chlorine, additives increases the value and desirability of the area to any potential new comers. I want the council to understand that the majority of New Zealanders and even foreigners who choose to migrate here are invested in living in a 100 percent pure and natural environment, of which water is a large component. Unadulterated natural water is a huge draw-card to families and individuals. Let's keep our vital infrastructure and services 100 percent local. Keep democracy and accountability to ratepayers and residents alive. I would like to conclude that you reap what you sow. We as locals collectively build the home, the town, the city that will house future generations. Let's build this place with a solid locals first foundation that respects the autonomy and individuality of it's residents. Such a place will be a model to emulate not only elsewhere in New		

**Staff
Recommendation**

Zealand but also internationally. "100 percent pure water, no if's no buts." Should be the slogan that the SDC can pride itself upon.

Comment acknowledged.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Under the Water Services Act 2021, councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

The Waioira One Water Strategy will be upheld regardless of any future changes in how water is managed or governed.

Point Number

303.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** As I stated before I only support the in-house model whereby the council works with locals and rate payers to deliver water and water services with a localised approach. We the people of this district deserve localised control over and ownership of our water and water services. We need to control the quality of the water and keep and maintain a 100 percent pure unadulterated water supply abundant and plentiful to our residents. For the health, harmony and future of this community we need to be the leaders and guardians of our water bodies, drinking water and waste water. We have a social, ethical and moral duty to maintain ownership and control over the most precious of natural assets- water. Keep our water in local hands and maintain the standard of living to our communities liking! No flouride, no chlorine, no contaminants, no ifs and no buts. Water should remain water. Something to drink, to cleanse ourselves with, to provide life to plants, animals and humans. I am passionate about this as it is deeply personal to me. From a cultural point of view I see water as something divine. The carbohydrates and proteins that our bodies use as food are metabolized and transported by water in the bloodstream. Water's "stickiness" (from surface tension) plays a part in our body's ability to transport these materials all through ourselves. No less important is the ability of water to transport waste material out of our bodies. According to Dr. Jeffrey Utz, Neuroscience, pediatrics, Allegheny University, different people have different percentages of their bodies made up of water. Babies have the most, being born at about 78%. By one year of age, that amount drops to about 65%. In adult men, about 60% of their bodies are water. However, fat tissue does not have as much water as lean tissue. In adult women, fat makes up more of the body than men, so they have about 55% of

Staff Recommendation	their bodies made of water. This is a small example of how by our very composition all the human residents, young and old, male or female, have a unique relationship with water and therefore it should be noted by our council that it is incredibly important that we as residents choose to maintain control and autonomy over our water supply/services. It is after all a vital part of us. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
Point Number Comments: Staff Recommendation	303.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? Yes Comment: A very bad idea. There is no point in entertaining this. We, the people, voted the last government out due to our large concerns over the Three Waters model. We hated the idea of a central government or outside water agency lording it up over everybody regarding our precious water and control over it. Keep democracy alive. Local first and foremost. WSCCO OUT! The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number: Documents:	304 Submitter: Elaine Smart Submission #304 - Elaine Smart
Point Number Comments:	304.1 Category 1-Questionnaire > 1.1-Council Proposal Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Our Selwyn District Council must

will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	305	Submitter:	Haydn Porritt
Documents:	Your Water Done Well		
Point Number	305.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: If the Waimakariri DC has made an assessment that it is more economical to keep the services in-house, then there needs to be some serious questions asked of the SDC existing operational efficiency and planning considering the vast majority of the infrastructure within the district is significantly newer than that of the WDC. Further, WDC they have focused on keeping rates down as a priority for their residents whereas SDC appears to think 15-20% rate increases year on year is acceptable, no doubt influenced by the Mayor's personal opinion that "it should be 20%". We see less for our rates than ever before whilst seeing many examples of the SDC burning money for the sake of it. Further, this attitude is why NO other council will work with SDC. The Waimakariri, Hurunui and Kaikoura DC work together to undertake a detailed review of five options, and continue to collaborate even thou the former chooses a different option from the latter. What does that say about the SDC performance and general attitude to delivering for its ratepayers.		
Staff Recommendation	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		

There is the future potential for a WSCCO to partner or merge with other WSCCOs.

Point Number	305.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** You are still keeping hold of the stormwater which for many doesn't exist on their properties yet are still billed for it. If the existing can't be run with the constraints of existing staff and within budget then there is a big problem. We don't need a huge sum of money being paid to people for redundancies to then move to the same job under another name nor do we need to have another "management group" to dilute the efficiencies further. Further, whilst under direct management of the council there is the ability for this performance to be reviewed, outside we have another CORDE burning rate payers money without question and an open chequebook.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Properties within a stormwater management area pay the targeted stormwater rate. Costs are recovered for the management of stormwater within the greater stormwater management area e.g. runoff from the roading network, flood protection etc.

Point Number	305.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** It is not needed. Changing names, creating another "group of management" and having no direct visibility to the ratepayer are designed to remove accountability of performance from the currently poorly planned and performing arrangement.

Staff Recommendation

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	306	Submitter:	Dave Page
Documents:	Your Water Done Well		
Point Number	306.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: 1. Given the Q&A says that the LTP has all the projects required (and I assume are staged timewise and costed appropriately) then it is unclear why SDC has pushed for the WSCCO option which allows increased borrowing but has some apparent negative ratepayer impact e.g. increased rates near term and I assume increased ratepayer underwriting liability. 2. Without the consultation listing extra projects or costs or regulatory compliance requirements needing the extra funding then there seems no requirement for a higher cost CCO 3. SDC has said that a letter of expectations would be in place with the WSCCO but I think there needs to be much more explanation of controls and compliance requirements provided to ratepayers to give confidence that a CCO would work best, given recent media about other CCO performance.		
Staff Recommendation	Comment acknowledged. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users. The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the in-house model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility). Performance monitoring framework in the Statement of Expectations and a Charter would sit alongside.		
Point Number	306.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: 1. I recall that we have been told that the water infrastructure is in relatively good shape, if so that		

would indicate good planning and performance is in place. 2. The costs are higher for ratepayers it seems with the CCO option but the benefits are unclear. 3. A CCO has additional management and operating costs and it would make sense to merge with the other surrounding growth local authorities to split these costs if a CCO goes ahead.

Staff

Recommendation

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other councils express an interest in integrating at a later time, this would be considered and worked through.

Point Number

306.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** If it was explained what additional benefits ratepayers would get with a CCO given the apparent good track record of SDC water teams, and what over and above additional investment is required for specific projects requiring more funding then opting for a CCO would be a clearer choice.

Staff

Recommendation

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document.

**Submitter
Number:**

307

Submitter:

Ian Denholm

Documents:

[Your Water Done Well](#)

Point Number	307.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I do not support the council separating of the activities currently covered by the council. The separating of these activities will lead to greater costs to all rebate payers. We only need to look at other councils that have separated these activities, the out comes of this has lead to more operating costs with higher wages being demanded for the staff through these separated entities. The funding model that is used for supporting new subdivisions clearly does not meet the required costs, this now leads to present ate payers covering the difference.		
Staff Recommendation	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage). While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	307.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This model works, more work needs to be done on who pays if upgrades of pipes are required if a new subdivision is attaching to existing infrastructure.		
Staff Recommendation	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed. Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured		

under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Point Number	307.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Nil		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	308	Submitter:	Ralph Brown
Documents:	Your Water Done Well		

Point Number	308.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: I'm persuaded by Sam Broughton's clarification of the difference between the two options and much prefer the long-term focus. (Whoever thought of videos separated into bite-sized chunks deserves a medal.)		
Staff Recommendation	Comment acknowledged. It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.		

Point Number	308.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: Too short-term. Water should be planned for generations.		

Staff Recommendation	Comment acknowledged.		
Point Number	308.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Like the long-term focus, ability to raise funds.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	309	Submitter:	Leonardo Ferreira
Documents:	Your Water Done Well		
Point Number	309.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I don't think is the right decision to be making right now the country is in recession and you guys have been already taking any penny that we had left.		
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.		
Point Number	309.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	309.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	310	Submitter:	Mikayla Bovey
Documents:	Your Water Done Well		
Point Number	310.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Either way its going to be more expensive but i value simplified billing		
Staff Recommendation	Comment acknowledged. The WSCCO option would continue with targeted billing for water and wastewater.		
Point Number	310.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	310.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	311	Submitter:	Carolyn Skinner
Documents:	Your Water Done Well		

Point Number	311.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I am very opposed to our water services being put into a WSCCO because of the huge costs of setting this body up which will be put onto ratepayers, many of whom are on fixed incomes and are already struggling without the increased costs of funding this entity adding to their burden. I don't want the extra initial costs of setting up WSCCO in these economically challenged times, nor do I want to see access to the higher debt limits that can be taken on by this body which we will be as ratepayers, liable for.

Staff Recommendation

Comment acknowledged.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.

Point Number	311.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: In house management gives accountability to the community, local control and capacity/ input from the community unlike the suggested WSCCO model. The present system has been well managed and maintained. "If it ain't broke,why fix it!"		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	311.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: I feel this model takes away the voice of the community/ratepayers. It worries me that they as an independent board can take on large amounts of debt without consultation with the ratepayers who will have to service this in increased costs in their already escalating rates!		
Staff Recommendation	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community. It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Submitter Number:	312	Submitter:	Peter Ising

Documents: [Your Water Done Well](#)

Point Number	312.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Everything seems so rushed and vague. There is no guarantee that a CCO can do an as good as or better job than a rate-payers owned (??!) asset management. What if the CCO fails (or another government is elected)?

Staff Recommendation

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	312.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** By your own admission, SDC '3-waters' is doing well - and given our high rates, they are committed to, and must keep doing well. So there is no need to change

Staff Recommendation

Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number	312.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** A general comment. This feels like another stab in the back by our council, and

another excuse to increase rates even more, way, way above our national inflation rate. Being a pensioner, this all make me anxious. The affordability of living in here really worries me. With so many new subdivisions and so many new rate-payers in this district I don't understand much of this. Our infrastructure (3-waters) should be reasonably new and up-to-date and I would have thought that rate-increases should be a lot lower than what we got last year and will get in future. Something is not right!

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.

Submitter Number:	313	Submitter:	Ronwyn Coulson
Documents:	Your Water Done Well		
Point Number	313.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	313.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	313.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	314	Submitter:	Katherine Molloy
Documents:	Your Water Done Well		
Point Number	314.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: I support the setup of the new WSCCO, but still have reservations about accountability to rate payers, a proven reliability in delivery of services, & the assurance by council that standard rates will have associated water costs removed, not just swallowed up & therefore no rates relief, given that the water services component has been separated out and invoiced separately.		
Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	314.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:** I like the idea of a focused water services organisation that has the ability to focus on getting things done right. Provided of course that they have good guidance from council and have a fully accountable board.

Staff**Recommendation**

It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.

Establishment of a CCO will benefit from specific water expertise both at a governance and management level.

Point Number

314.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** I have concerns about how the board is appointed and whether or not the right people with skillsets directly related to water services are involved. Furthermore, I am concerned that the 'Waioara One Water Strategy' implications are not fully discussed in the document. It is just glossed over. What does the statement in the document referencing the strategy actually equate to in the end? The future of our water is exceptionally important, and we need to get it right for all. 3 weeks is not long enough to consult on such a long term, high cost council decision.

Staff**Recommendation**

A skill matrix would be developed that sets out the required mix of skills of the board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Our Waioara One Water Strategy has forms part of the Council's wider strategic direction for Waikirikiri Selwyn. It aligns with other plans and strategic documents including the District Plan and Selwyn District strategies. The Waioara One Water Strategy, used in conjunction with Council's other strategies, forms one part of a suite of guidance materials that will direct planning, development and investment across Council. Its implementation will require integrated planning across land, water and infrastructure and these decisions will be made through Council's 30 Year Infrastructure Strategy, 10-year Long-Term Plan and its Annual Plans, all of which are subject to consultation with the community.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we

understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	315	Submitter:	Pete Forbes
Documents:	Your Water Done Well		
Point Number	315.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	315.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	315.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	316	Submitter:	Christopher Ward
Documents:	Your Water Done Well		
Point Number	316.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I see no value in creating yet another Council business as this leaves it open to be sold off in future years at the whim of Council. Keep the Selwyn District Council drinking and wastewater assets and services in-house. Retain and build the skills etc to run it within Council so you are not relying on buying-in expensive contractors from the private sector. Council will thus retain the expertise to run the water services efficiently and effectively and remain directly involved with those who use and benefit from great water services done well.		
Staff Recommendation	Comment acknowledged. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.		
Point Number	316.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Keep the Selwyn District Council drinking and wastewater assets and services in-house. Retain and build the skills etc to run it within Council so you are not relying on buying-in expensive contractors from the private sector. Council will thus retain the expertise to run the water services efficiently and effectively and remain directly involved with those who use and benefit from great water services done well.		
Staff Recommendation	The current 'in-house' management structure is responsible for the delivery of all Council delivered services. One of the benefits of the WSCCO is management and governance are focused solely on the delivery of water services and are considered specialists in water service delivery.		

Point Number	316.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: As I have said above, I don't agree with the WSCCO model - keep it in-house.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	317	Submitter:	Manjusha Ganta
Documents:	Your Water Done Well		
Point Number	317.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	317.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	317.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		

Staff Recommendation	Council acknowledges there are no more comments.

Submitter Number:	318	Submitter:	Craig Reynolds
Documents:	Your Water Done Well		

Point Number	318.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Council should provide this as a core service in house. without any gold plating.

Staff Recommendation	Current water management by Council is provided to a high standard, a WSCCO option would provide a more focused Governance model.

Point Number	318.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	318.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** It introduces a layer of overhead I don't think is necessary or justified, and transitions to a for-profit model. The only way I would support a CCO model is if it was clearly non-profit in focus, and deliberately structured so as to be hard to change from that focus. Perhaps something like the old electricity boards that were community owned.

Staff Recommendation	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an

opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submitter Number:	319	Submitter:	Andrew Livermore
Documents:	Your Water Done Well		

Point Number	319.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes **Comment:** As a ratepayer in Selwyn since 2011, I would like to make the following points: • Selwyn District is one of New Zealand's fastest-growing local authorities, with ~80,000 people currently, expecting to grow by another 30,000+ over the next 10 years. So, Selwyn needs a capability of building enough capacity in its water and wastewater network to meet or exceed this demand. • Selwyn also faces unique challenges connected to climate-driven changes such as extreme weather patterns, rising temperatures, and increased pressure on water and wastewater infrastructure. Climate change will bring additional cost to maintain availability and the quality of water in Selwyn District. Wastewater networks are equally vulnerable to climate-related stressors, particularly flooding. Resilient upgrades and higher frequency maintenance will be needed, as Selwyn adapts to the impacts. As an example, I'm not sure what the total costs of the May 2021 flooding were, but these types of events will occur more frequently than previously thought (e.g. see briefing to the incoming minister, in particular the annexes at the end <https://www.dpmc.govt.nz/sites/default/files/2024-02/bim-2023-nema.pdf>) • I also note that Civil Construction Costs have increased by ~30% in the last three, but with rates increasing 7.7% that means there is effectively less budget to deliver the quantum of work needed (i.e. if we want water services to keep pace with the volume of work needed, then rates need to keep up with civil construction costs). Additionally, most local authorities only deliver 70-80% of their capital programmes, so I am concerned that are we building enough to keep up with forecast population growth and the impacts of climate change? • Consultation is a method of obtaining feedback, it however also has significant limitations which must be carefully considered. In particular: o The complexity of the LWDW means minority voices will most likely be overrepresented, as the majority of rate payers will struggle to understand what is needed and why. It has taken me a few days of asking lots of people in the water industry a lot of questions to actually understand what a CCO means, how it actually works, and the longer-term value it can bring. There has been some great information and videos on the topic provided by Selwyn, but some people will just struggle with the concept and value a CCO creates, and hence will either remain silent or

jump to conclusions that are not valid. o Overemphasis with vocal opposition is usually a subset of ratepayers which overshadows quieter support from the broader community. I've seen many Facebook groups drumming up support for their opinions, with much of what is written not actually factually correct. Or misconstruing answers to mean something else. Although I respect their individual views and concerns, much of what is written is focused on short term concerns and misses the point of the longer-term capability we need in Selwyn. • Hence, I want the decisions makers to think long term about this decision, and not be distracted by the short-term nay sayers who are hung up about the cost predominantly. The reality is, if they don't get quality water and wastewater service they expect, it will be the same people forming Facebook groups and criticising you for doing a poor job! So, we need a CCO as it is the only way we will get a purpose-built organisation with the technology, capability and certainty to deliver to the future demands of Selwyn.

Staff Recommendation

Comment acknowledged.

It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.

The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO, this includes a significant budget for growth.

The WSCCO would have ability to borrow up to 500% of revenue vs Council 280%

We are bound to follow the legal guidelines provided under the Local Government Act, and the Water Services Preliminary Act regarding connection with the community and they have provided the parameters for us to work within for decision making.

Point Number	319.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:**

Staff Recommendation

It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	319.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** I want a CCO, as it will: • Provide specialist expertise for water management, drawing on technical expertise that councils may not have in-house. • Deliver long-term infrastructure investment, focusing on the long-term planning and funding needed for maintaining, upgrading, and expanding water infrastructure.

Reducing the risk of short-term budget pressures undermining essential investments. • Maintain community-centred governance, ensuring local governance representation, transparency, and accountability through strong partnerships with Selwyn District Council and the community. • Deliver economies of scale with a focus on cost efficiency, sharing resources, technology, and expertise. The CCO should have more freedom but with clear accountability to operate efficiently and achieve agreed milestones and metrics. • Dedicate resources implementing climate-resilient strategies such as future-proofed water services that adapt to changing environmental conditions while safeguarding resources for future generations. • Create increased transparency and performance monitoring, as CCO's operate under a governance framework that requires clear performance targets, frequent reporting, and external audits. • Enhance partnerships with Iwi and Community Stakeholders, as water management carries significant cultural and environmental importance for mana whenua. A CCO provides an opportunity to strengthen co-governance models and work in partnership with iwi. We have an opportunity to lead by example and be seen as the exemplar. I understand the reasons and how a CCO will showcase how effective, modern water management can function at a district level. By focusing on innovation and efficiency, the Selwyn CCO will serve as a model for other councils or regions. Please make it happen, not just for me, but for the future generations of Selwyn.

**Staff
Recommendation**

Comment acknowledged.

A WSCCO would ensure specialist focus and funding on water infrastructure.

A skill matrix would be developed that sets out the required mix of skills of the board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).

**Submitter
Number:**

320

Submitter:

Jude Will

Documents:

[Your Water Done Well](#)

Point Number

320.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water

Staff Recommendation		Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Waste of more rate payers money Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.	
Point Number	320.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	320.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	321	Submitter:	Laurence Harkerss
Documents:	Your Water Done Well		
Point Number	321.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I am worried about the scope of potential borrowing which will lead to costs for ratepayers, so I consider the inhouse option to have better accountability and controls.	
Staff Recommendation		Comment acknowledged. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer	

by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	321.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** There is already existing expertise within the Selwyn Council that can be utilised, and no need to set up an additional entity that will have its own infrastructure and duplicate costs and overheads.

Staff Recommendation

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	321.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** This is a more expensive option that has been moved from ratepayers and councillors in terms of accountability. I am concerned that the Council wants to move quickly on this. I agree water quality is important but believe this can be well managed in-house and doesn't require to be separated from Council operations. Council needs to always consider costs to ratepayers and manage budgets with care.

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	322	Submitter:	Tanya Douglas for Lincoln Residents and Community Association
Organisation:	Lincoln Residents and Community Association		
Documents:	Your Water Done Well		
Point Number	322.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We don't believe they're has been enough information and clarity around a WSCCO provided to facilitate informed decision making. We believe it would be best placed to retain services in house to allow for additional time to understand the act still to be finalised and to decide whoxh option will ultimately serve selwyn effectively long term. We are opposed to the duplication of roles and the added expense ratepayers will need to cover. We understand that a WSCCO will not undertaken anymore projects or maintenance than the LTP already plans for, so we dont understand why council says we need to borrow millions more for no additional infrastructure.		
Staff Recommendation	Comment acknowledged. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the		

customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Council is also investigating an in-house water delivery model as part of this consultation. However, keeping water services in-house does not mean things will stay the same - significant investment will still be required to meet new government legislation and compliance requirements. While both options have benefits and risks, the cost of upgrading and maintaining water infrastructure is unavoidable under the new legislative and regulatory framework. The legislation and regulatory changes have yet to be confirmed by central government.

Point Number	322.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Rate payers deserve to know that the best option selected has been well thought through, planned and the implications of a decision either way are well understood. We don't see why service's can't be retained in house until this occurs. As far as we understand, council can change the model at a later date. It seems as though the decision is being rushed. Retaining in house also allows for council to maintain control of planning projects to ensure projects and maintenance can occur at the same time as other works to reduce the impacts on the community by only hvaing roadworks/ roading closed once.

Staff Recommendation	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes

in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	322.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Council have said there won't be role duplication, however in the event a WSCCO is set up, both council and the cco will require tesms to focus on water as stormwater will still be retained. There are also the additional costs for directors, and executive leadership roles that wouldnt occur if it is retained by council. These costs have not been made clear to the community, we were only provided with rating summaries. These costs are extra costs ratepayers have to bear, and when we are already expecting a 16% increase and the info provided for a WSCCO suggests an additional 12% thats a coat that alot of ratepayers are saying they wont be able to afford. If the work is planned for under the LTP with an expected increase of 16% why doea a WSCCO require a 12% increase? The increase is dirwctly related to thw additional debt a WSCCO would be able to take on. If we can Manage it in house under the LTP, there seems to be no real reason why we need to take on additional debt The Lincoln Residents and Community Association do not support the creation of a WSCCO.

Staff Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	323	Submitter:	Tanya Douglas
Documents:	Your Water Done Well		
Point Number	323.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: As a ratepayer i am concerned about then effects a WSCCO will have on the financial burden will place on us, particularly those on a fixed income. The LTP already provides for the infrastructure required so it seems the only "benefit" for having a WSCCO is the ability to take on additional debt. If the adsitionl debt ia requires to maintain services above what is already factored for, how did council sign off on a plan that didnt cover the costs and need for our infrastructure. The process feels like its been rushed and a glossy document was put together to give a percepption that a WSCCO ia the best way to go, with council saying " they qant to be the first & lead the way" if a Wscco ia the best way to go, why havent every other council optes for a WSCCO? My preference is to retain services in house, which could allow more time for thorough investigation to understand the true impacta of having a WSCCO		
Staff Recommendation	Comment acknowledged. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. Council is also investigating an in-house water delivery model as part of this consultation. However, keeping water services in-house does not mean things will stay the same - significant investment will still be required to meet new government legislation and compliance requirements. While both options have benefits and risks, the cost of upgrading and maintaining water infrastructure is unavoidable under the new legislative and regulatory framework. The legislation and regulatory changes have yet to be confirmed by central government. SDC is the first of many councils to assess the value of a WSCCO. Council is currently consulting with the community whether to create a WSCCO or retain an in-house model noting this status quo is not an option. The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water		

Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	323.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Please see previous comment. Council managed delivery could provide council with full control over projects, maintenance and upgrades to ensure they align with timings of other projects, which ultimately should reduce costs as roading etc won't be dug up a 2nd time

Staff Recommendation	A WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.

Point Number	323.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** I do not support the creation of a WSCCO at this time. I don't support taking on millions of dollars of debt to fund a board of directors, and executive leadership team and other duplicated admin costs, not to mention us taxpayers bearing the cost of company tax under a WSCCO. If any WSCCO is projected to make a profit, why do we the ratepayers have to bear an increase in rates, when the entity is going to be profitable? Council have said a WSCCO would pay dividends to SDC so again, it's not clear why ratepayers would then require such large increases in rates. If a WSCCO is going to be profitable then ratepayers are a cash cow for council and are not going to get any additional services whether under council or as a cco. It is hard to see how a projected \$62 saving in 10 years time is possible given the additional roles & role duplication required to facilitate a CCO. Council have said they will be no role duplication but council require admin staff, Accountancy teams, HR and

	compliance/ regulatory teams and the creation of a WSCCO would also require all of these
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	324	Submitter:	Christine Ferguson
Documents:	Your Water Done Well		
Point Number	324.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I DO NOT support the set-up of a new WSCCO. There will be more control of costs if drinking and wastewater assets and services are kept within Council, under elected representatives. All this borrowing is most unsatisfactory and is undesirable as it is a liability on the ratepayers forever, it seems.		
Staff Recommendation	Control of costs also means deferral of cost or halting of required activity which may or may not occur. Please note one of the Government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which is some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motive. Borrowing enables Council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.		

Point Number	324.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Keep control of assets and expenditure within the Selwyn District Council. That way things will have to be done within the budget and NOT borrow even more money. How will it ever be paid back, not to mention - meet the interest repayments?		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.		

Submitter Number:	325	Submitter:	Peter Hartshorne
Documents:	Your Water Done Well		
Point Number	325.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We know what is being delivered now and it is adequate. Why change		
Staff Recommendation	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.		
Point Number	325.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: I am happy with the current model		
Staff Recommendation	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	325.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	326	Submitter:	Mervyn Johns
Documents:	Your Water Done Well		
Point Number	326.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I believe Council already have ample staff to do the job and will save on costs			
Staff Recommendation Comment acknowledged.			
Point Number	326.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:			
Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	326.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? No Comment:			
Staff Recommendation Council acknowledges there are no more comments.			

Submitter Number:	327	Submitter:	Aaron Horan
Documents:	Your Water Done Well		
Point Number	327.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Rates will go up either way but less if it stays in house.			
Staff Recommendation The current LTP modelling would require additional costs to what is included due to the central Government's regulatory updates.			

Point Number	327.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Yes but please fix the need for chlorination. I hate drinking swimming pools		
Staff Recommendation	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.		
Point Number	327.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: I selected that i dont have any comments.... yet you presented a comment box... mixed messages		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	328	Submitter:	Delwyn McKenzie
Documents:	Your Water Done Well		
Point Number	328.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I am opposed to this proposal due to the high cost it will incur for the next generation.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Point Number	328.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: How about supplying every household in Selwyn with a filter system for water? It could mean we wouldn't have to have our water chlorinated either, saving costs there.		
Staff Recommendation	Centralised treatment, with economy of scale, provides the most cost-effective solution.		

Point Number	328.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Outside experts/consultants can put the prices up anytime they like and they are also not elected representatives by Selwyn rate payers.		
Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	329	Submitter:	Jill O'Connor
Documents:	Your Water Done Well		

Point Number	329.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I do not think it is necessary to support a whole new entity with all the huge set-up costs entailed, when the current		

	system is working, albeit with requiring some streamlining and modification to meet future needs.		
Staff Recommendation	Comment acknowledged.		
Point Number	329.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As far as I am concerned this is working perfectly well, although I believe there will need to be some modifications required to meet future greater demands. I do not want another rates increase as I can barely afford what I have to pay now; I am a super annuitant who has no other income to support all the necessary household expenses.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs. We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.		
Point Number	329.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Costly and replicating a system that is already working well.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.		

Submitter Number:	330	Submitter:	Michael Lloyd
Documents:	Your Water Done Well		
Point Number	330.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We will lose control over it once it is removed from the council. Keeping it inhouse allows us some control by voting who runs the council.		
Staff Recommendation	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Point Number	330.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: This will allow for ongoing control over it as in been under the council it allows us some control by voting who runs the council.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	330.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Once it is removed from the council, there decisions will be independent and no longer need to require answering to the voters		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will		

also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	331	Submitter:	Eric Askin
Documents:	Your Water Done Well		
Point Number	331.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	331.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	331.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	332	Submitter:	Nikki Chippendale
Documents:	Your Water Done Well		
Point Number	332.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	332.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	332.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	333	Submitter:	Donald Reid
Documents:	Your Water Done Well		

Point Number	333.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: The current council is elected and therefore members are accountable /responsible for council decisions. Unelected members, who are chosen by council instead, are prone to political, ideological activism. Already we have pagean, spiritual, superstition and nonsense evident amongst council members, who engratiate themselves with Ngai Tahu by aiming to 'upholding the mana and mauri of all water'. They are welcome to do this in private but not force it upon rate payers.		
Staff Recommendation	It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. This will be balanced by the Annual Statement of Expectations that Council would sign off on to provide direction to the WSCCO.		
Point Number	333.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: I support neither, due to the cunning insertion on p10 and p27 of a commitment to co-govern based on race. As for SDC wanting to be first in NZ to progress this co-governance it is blatant virtue signalling and career advancement for particular individuals. Also the ACT is not even law yet and may never be..		
Staff Recommendation	Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy). The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.		
Point Number	333.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: I am deeply concerned that SDC is prepared to use its ratepayers as pawns and inflict identity politics on them, while increasing our costs.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-		

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	334	Submitter:	Nicola McDowell
Documents:	Submission #334 - Nicola McDow		
Point Number	334.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	334.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	334.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter
Number: 335

Submitter: Brian Lester

Documents: [Submission #335 - Brian Lester](#); [Submission #335 - Brian Lester](#)

335

Brian Lester

10th March 2025

To: Selwyn District Council

Submission: Water Services Council Controlled Organisation.

I wish to submit against the proposal by the Council to transfer the drinking and wastewater assets and service delivery to a WSCCO. In doing so, I will make the following points based on the discussion document prepared by the Council, and refer to the Dept Internal Affairs guidelines.

1. "Not an option"

The document states "maintaining current in-house delivery is not an option due to new legislation and increased compliance".

This statement is not correct. The DIA Guidance Document clearly states that Councils will continue to be able to deliver water services directly.

With respect to compliance, the requirement for safe and reliable drinking water and the collection and treatment/disposal of wastewater has been a fundamental function of local government for decades. While technical, the water services are not rocket science. If the Council believes it does not have the necessary skills and technical abilities inhouse, this indicates a major lack of leadership at governance and executive management level.

Council should have long term development plans, with asset management plans to support its service provision and growth.

Councils have a range of compliance requirements through many pieces of legislation both specific to the sector and general. Councils meet their obligations by employing competent and appropriately qualified staff and having systems in place to measure performance and ensure accountability.

As I read the Bill the Council will require;

- Set of objectives to manage and provide water services. Comment: should be in place now. May require review.
- Compliance with financial principle, matching revenue to expenditure. Comment: should be in place now. Separate rate, charges would be readily identifiable.
- Operating within planning and financial framework: Comment: Nothing new here.

2. "Limited access to funding".

Where is the WSCCO going to get its funding? I suggest it is the same source as Council- charges to the Selwyn Community. Any debt raised by the WSCCO will presumably be secured by a charge over ratepayers- same as Council.

The discussion document refers to a Council limitation on borrowing of 280%, (presumably the debt-to-income ratio). The 2018/28 LTP set this at 130%, the 2021/31 LPT increased the ratio to 160%, and the 2024/34 LTP further increased this to 220%. These increases come despite the increase in rates/income and now appears to be 280%.

There does not appear to be any limit. What happens to this limit is Council hands over 30% of its income to the WSCCO?

Long Term Plans should provide for sufficient funding for renewals and development, both through funding depreciation and development levies. Funding depreciation allows spreading capital costs/loan repayments over time, with development levies funding increased capacity for growth.

3. Cost Comparisons.

I requested a copy of the financial information related to the discussion document to enable further consideration of this submission. Despite empathising the purpose, the information had not been provided at this time.

Looking at the debt table- noting a 5 year gap- the debt associated with the WSCCO is \$14.218 million higher at the end of 2033/34 despite the WSCCO receiving some \$20 million more in operating revenue over that same period. This is forecasting a significant increase on your ratepayers for no quantified benefit. The rating examples show a cumulative 332% increase in the water/wastewater charges over the first 8 years, with a possible 2% reduction in year 9. This is on top of the 70% rate increase Council is proposing over the next 4 years, with the proposal Council is now suggesting an increase on 135% over this 4 year is acceptable (based on water/wastewater making up approximately 30% of a residential account).

How can Council believe the WSCCO to be a viable option?

4. "WSCCO can leverage more specialised governance".

The discussion document refers to "enhance efficiency and effectiveness in delivery". It does not elaborate in this.

What are the shortfalls that the Council has identified?

Why haven't these been addressed?

Auckland Watercare and Wellington Water currently work under this model. I would not consider either to be a success and there certainly appears to have been a significant loss of community (and owner) accountability.

5. In summary, I am strongly opposed to the transfer of the water/wastewater services to a WSCCO. The business case is definitely not there. If Council considers the current performance in providing these services is sub-standard, then take responsibility, rather than abdicate at a significant cost to our community.

Christchurch City and Dunedin are sounding out the possibility of working together to obtain better buying capacity for services. I would recommend Selwyn District work with its neighbours as a way to improve service capability.

Brian Lester.

Please note: I wish to be heard in relation to this submission.

Point Number	335.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** See attached

Staff Recommendation

Comment acknowledged.

Compliance risk can be managed in-house. The benefit of the WSCCO is the specific focus of a professional board.

Council has a 10 Year Asset Management Plan along with a 30 Year Infrastructure Strategy for water services and other asset types.

Development contributions have been appropriately set out in the Development Contribution Policy. Council fully funds a 20-year renewal programme.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

Through the Act there will be increased costs and compliance required, this means there will be added costs for either option taken.

SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement

of Expectations and "Charter" which prioritise service delivery and our communities.

Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.

Point Number	335.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** See attached. Fundamental function of Council

Staff Recommendation	Comment acknowledged.

Point Number	335.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** See attached. I wish to be heard in relation to this submission.

Staff Recommendation	Comment acknowledged.

Submitter Number:	336	Submitter:	Lieuwe Doubleday

Documents:	Your Water Done Well ; 2025 03 12 Sub LA Doubleday 17

Submission to Selwyn District Council - Your Water Done Well (the consultation)
12 March 2025 from Lieuwe Doubleday [REDACTED]

Preliminary Feedback

- The shortened format for consultation is unreasonably short and the level of detail in the consultation document is inadequate for informed decision making. By way of comparison, the Christchurch City Council (CCC) live streamed a full analysis of the management team's presentation of the process and decision making criteria for evaluation of the options. Their evaluation of each option and the detailed reasoning behind their recommendations is substantive and it is evident from the process they have followed that they have sought to treat their ratepayers as informed and interested decision makers.
- The decision making criteria adopted by CCC is instructive and directly relevant to the issues being considered by Selwyn District Council management team.
- The lack of time and importantly, the lack of detailed analysis suggests an element of predetermination in the desired outcome. Time and detail are irrelevant if the outcome has been predetermined.
- The decision is important for the future of the District. Accordingly the status quo could continue (i.e. the legislative programme doesn't rule out a change in approach at a later date) until at least the time of the local body elections later this year. At that time a decision to CCO or not could be the subject of a local body referendum. This would give the Council the time necessary to properly consult.
- Councillors and the Mayor should be required to state their position on the matter so constituents can make informed decisions in the election.
- A key question not specifically addressed to ratepayers is whether they are prepared to wear more debt. The overarching thrust of the consultation advice in favour of the CCO is the ability to raise more debt overall. The justification for increased debt has not been articulated in a way that allows for informed decision making. This matter should be put to ratepayers by way of reasoned Long Term Plan discussions not by way of this rushed consultation.
- The Local Government (Water Services Preliminary Arrangements) (Watercare Charter) Order 2025 already (as from 1 April 2025) imposes reporting requirements on Auckland's Watercare CCO, performance standards and limits on Auckland's water services and there is nothing in that Order which suggests that the Selwyn Council water services personnel would be unable to comply with similar requirements.

**Submission to Selwyn District Council - Your Water Done Well (the consultation)
12 March 2025 from Lieuwe Doubleday**

Conceptual Problems with the Model – it will always cost more

A CCO will burden ratepayers with

- extra debt;
- a substantive increase in costs in the long term;
- less representation and accountability by Council and loss of control
- inefficiencies via the loss of integration of services,
- duplication of effort

It is inevitable that the proposed CCO will involve significantly more cost through:

- Set up and establishment costs involving legal structures, information systems, resource acquisition, costs of significant personnel change processes whether via redundancies, recruitment, or changed roles, and everything required to run a business
- Higher remuneration costs through duplication of management functions e.g. CCO Chief Executive, Chief Financial Officer, Chief Operating Officer, audit requirements, accounting and disclosure requirements .
- Change processes can and generally do give rise to loss of institutional knowledge and systems, the need for workarounds, and time to work out new ways of working. Realistically it can take upwards of 5 years to bed down new systems and processes. That comes with a significant cost.
- Duplication of separate governance processes and management processes (particularly under a 2 water model, with Stormwater being retained. The duplication is obvious)
- Duplication of billing systems
- Duplication of information systems, operational structures and processes (as between stormwater and other (non-drinking and waste water systems);
- Loss of benefits of economies of scale in overhead management, in shared services and expertise in related fields
- Loss of efficiencies which arise from integrated service management by the current council. A separate entity will require the forging of new ways of working, new relationships, slower and more convoluted decision making processes, more internal formal consultation.
- Schedule 2 Local Government (Water Services) Bill sets out the Contents of any transfer agreement. Clause 5 is instructive and highlights some of the integration issues which need to be compensated for in a transfer agreement.

When you consider the above - the cost differential will inure for the long term. There will never be a time when a CCO is cheaper than inhouse.

Submission to Selwyn District Council - Your Water Done Well (the consultation)
12 March 2025 from Lieuwe Doubleday [REDACTED]

A CCO will reduce public accountability and no one will take responsibility if issues arise – Ratepayers will be faced with ‘he said/ she said’ between Council and CCO.

The Council has not provided the evidential basis for its assertion that a CCO will be cheaper in the long run particularly when increasing debt attribution to water services appears different from the long-term plan. It is conceivable that assumptions are self-serving and the data being used is not comparing like with like. That is, apples are being compared with oranges. The data hasn’t been provided so we can’t check and we don’t have time to check. The accuracy of modelling will likely decline the further out the projections are made.

Even if the CCO came with a completely different employee cost structure i.e. with low labour rates (unlikely), it would have to be radically different to do better than an inhouse model. Rather it is more likely, that costs will increase. The projections for lower costs by a CCO are frankly not believable.

Governance

- The argument for specialist governance is an argument that favours dispensing with the democratic model. If the existing governance structure (which has successfully overseen what by all accounts is a very modern and effective water infrastructure department) is inadequate it begs the question as to whether other specialist functions of Council Governance are tarred by the same inadequacy.
- The 2022/23 Annual report states at page 16:
“Overall, Selwyn continues to maintain one of the least expensive and most reliable water networks in New Zealand. The independent Water New Zealand National Performance Report shows that for the third consecutive year, Selwyn had one of the lowest volumetric water charges in 2021/22, and among the newest water and wastewater pipes.”
- The long term Plan 2024 – 2034 records similar sentiments on pa15 of the plan:
“You have told us strongly in the past, and through our most recent feedback, that water is extremely important to you. In response to this, over a number of years, the Council has invested heavily in water services and Waikirikiri Selwyn has some of the best performing water infrastructure in the country.”

...

“This plan proposes to continue that strong investment in ensuring Waikirikiri Selwyn has some of the best water services in the country.” The report acknowledge change is a foot but notes “Any proposed changes in this space will be considered through future Annual or Long-Term Plans”.

One might add – Clearly not.

Submission to Selwyn District Council - Your Water Done Well (the consultation)
12 March 2025 from Lieuwe Doubleday [REDACTED]

Governance cont'd

- The governance options allowed by Government include a Consumer Trust model and this illustrates the point that a key component of oversight is public consumer protection and public equity. **That is best preserved by the inhouse model.**
- Good governance generally ensures contestability of advice where that is warranted. It appears as if the current Water Services personnel engaged by Council are delivering the goods and services in a professional manner and to a standard well recognised in the Country. Based on the argument in the Consultation document, that success appears to occur despite the current governance arrangements. There is no reason to anticipate that even with more regulation by the Commerce Commission that the inhouse team will perform more poorly than a CCO. Under both options more resource will be required – but as a comparator it is neutral.
- The Commerce Commission regulatory oversight of Watercare Services Limited¹ is indicative of the level of prescription and focus on transparency and accountability expected of any water care provider and the Council is more than capable of managing that process. This, by the way, narrows the governance focus because a lot of the thinking will already have been done by the Commission and its advisors. Certainly, there will be more reporting, but it is well within the ambit of the Council to manage that obligation.
- Creating a separate governance structure is pure duplication of costs. It is a waste of time and money and has significant drawbacks in effective service delivery for all the reasons articulated in the Christchurch City Council analysis.

The Debt Issue

- The rationale for more debt has not been evidenced or laid out clearly enough. If the question is do we want more intergenerational debt without good reason – the answer is clearly “No”!
- Given the high investment in water infrastructure in recent years and the modern state of Selwyn’s 5 waters infrastructure there is no reason for debt levels to rise significantly given other sources of funds.
- Selwyn District Council has relatively low debt ratios (the net debt percentage to Revenue is less than 220% of Revenue).

¹ Local Government (Water Services Preliminary Arrangements) (Watercare Charter) Order 2025, operative primarily from 1 April 2025.

Submission to Selwyn District Council - Your Water Done Well (the consultation)
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The Debt Issue cont'd

- The Long Term Plan 2024-34 forecasts a rapid decline in Network Infrastructure Capital expenditure (see p230 LTP). The more significant debt will arise in Transportation. P227 of the LTP illustrates the proposed debt is well within Council debt limits over the 10 year period.
- The LTP states that funding of growth capital expenditure related to water, wastewater will be by development contributions.
- The LTP at page 231 states:

Because many of the Council's assets are relatively new and have been fairly recently paid for by ratepayers through rates and development contributions, it is not fair for the Council to charge the full cost of depreciation to current ratepayers. The Council has therefore adopted a mixed approach to funding the cost of renewing its assets:

- *For water, wastewater, stormwater and water races, the average cost of renewal work that will be required over the next 30 years is included in the calculation of the amount of rates required each year. This is because renewal costs are variable year to year and this approach smooths the rates funding required.*

The Local Government (Water Services) Bill

The Bill as noted in its introduction is an adjunct to the Local Government (Water Services Preliminary Arrangements) Act 2024 (the Preliminary Arrangements Act) and the intention of the bill is to inform the development of water services delivery plans and the regulatory settings in which future services providers will operate. **There is no requirement that a CCO must be established. The inhouse model can continue.**

The Bill permits a Consumer Trust model which will act in the interests of the customers of a water organisation.

The Local Government (Water Services) Bill (as at 6th March 2025) permits the Territorial Authority to provide water services itself directly and designates them as "Water service providers". The inhouse option requires adherence to core requirements that apply to all water service providers. These include—

- a set of objectives, including that each provider must manage and provide water services in a cost-effective and financially sustainable manner;
- compliance with financial principles, including a requirement that revenue received from the provision of water services must be spent on those services; and

Submission to Selwyn District Council - Your Water Done Well (the consultation)
12 March 2025 from Lieuwe Doubleday

The Local Government (Water Services) Bill

- operating within the planning and reporting framework for water services in the Bill; and
- restrictions against privatization.

Interestingly, additional requirements (not less) are imposed on water organizations (CCOs) as regards

- independent corporate governance and limits on the scope of company activities.
- scrutiny via Parts 1 to 7 of the Local Government Official Information and Meetings Act 1987. Part 7 will only apply to Board meetings (excluding Board committee meetings).

CCOs will be given a range of powers already possessed by water service providers:

- to charge customers for water services delivery; and
- to require development contributions for growth-related capital costs through a modified version of the development contributions regime in the Local Government Act 2002 (the LGA 2002); and so on .. on it goes.

The in-house team are more than capable (with more resources) to achieve compliance.

Is the current model broken?

If the current model ain't broke don't fix it.

Can we influence the future?

In terms of the argument that the Council wants to be a shaper as opposed to a follower this is 'spin' beyond words. In any proposal Selwyn along with others will have a voice. You can "shape" from your current position – just as effectively.

Will you be more accountable 'in house'?

This is more likely.

Point Number	336.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** The proposed costs are unnecessary creating more intergenerational debt is not welcome. The current inhouse team have done a great job.

Staff Recommendation

Comment acknowledged.

SDC is the first of many councils to assess the value of a WSCCO. Council is currently consulting with the community whether to create a WSCCO or retain an in-house model noting that status quo is not an option.

Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC's significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Borrowing enables Council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure

investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	336.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	336.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment:		
Staff Recommendation	Comments are acknowledged in Q1.1.		

Submitter Number:	337	Submitter:	Catherine Payne
Documents:	Your Water Done Well		

Point Number	337.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	337.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	337.3	Category	1-Questionnaire > 1.3-Comments
Comments: Question: Do you have any comments on the WSCCO model? No Comment: Staff Recommendation Council acknowledges there are no more comments.			

Submitter Number:	338	Submitter:	AARON MCGLINCHY
Documents:	Your Water Done Well		
Point Number	338.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: SDC are rushing towards a WSCCO without provide sufficient detail and justification to residents, and to councilors. Throughout the consultation process there have been numerous calls for more			

detail. Some information has been provided, but it is piecemeal, and the short consultation period is inadequate to properly consider the proposal. Furthermore the decision to appoint people into roles at a CCO Establishment body is premature, and only serves as evidence SDC do not truly wish to consult - you have made a decision, and are now engineering the process towards that outcome. This is not democracy, and it is not good governance. The chief reason you give for moving to a CCO is the ability to borrow more money. No information has been provided on the actual needs for more borrowing, nor the implications of this on rates (and shifting rates over to water service charges is glossed over, with no transparency as to the combined cost to households over time). You should pause this process, retain FOR NOW the existing in-house management that is an option the Government allows) and do a proper analysis of the options, what the costs/benefits of in-house vs a WSCCO. DO NOT RUSH THIS DECISION.

**Staff
Recommendation**

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Council has appointed an establishment chair on a short-term contract and there is a fixed term contract Programme Director. Due to the timeframes for developing Water Services Delivery Plans (WSDP) some activity is occurring simultaneously to ensure we can meet regulatory deadlines regardless of whether a WSCCO or enhanced in-house delivery option is chosen.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

Point Number

338.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** As above - FOR NOW retain services in house, and do a properly considered cost-benefit analysis. Provide details as to why increased borrowing would be necessary, and the

implications if that borrowing ability is not available. In addition, exploring the option of using Corde should be done - do not simply say they're doing a good job so we don't want to change things, or we have "move at pace". That is a cop out, and incredibly poor management. Make decisions based on evidence and rationale, not trite sound bites from the Mayor.

**Staff
Recommendation**

Comment acknowledged.

CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

Point Number

338.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** The Wellington City experience of a Water CCO does not give any confidence in that approach. Corde were being lined up to manage three waters for Selwyn. They have the former head of Auckland Water on their board. If we are to go to a CCO we should include full assessment of utilising our existing CCO, so as to avoid duplicate costs of staff, CEO, board... We need proper information as to why a CCO is better than the existing in house service. What is wrong with the in-house service. The only reasoning given so far seems to be "we can borrow more money" - but why do you need to borrow, how much, for what reason... SDC have been criticised by the auditor's office for their poor practice/performance. The lack of detail provided in the consultation documents, and the many subsequent questions from ratepayers that should have been fundamental to council making any decision on even what model(s) to consult on, reinforce that SDC is ill equipped to prepare proper business cases for this sort of venture. The half baked process that has been rushed through (yet again) is a major concern. Councilors should have been asking the sorts of questions ratepayers have been asking. In the absence of answers they should have instructed staff to go back to the drawing board. The Government requirements action by Sept, but retaining the status quo for now is a legitimate action, and does not preclude in future establishing a WSCCO if and when a proper analysis is undertaken and shared with residents.

**Staff
Recommendation**

Comment acknowledged.

Wellington Water is a management company that delivers water services but not responsible for the maintenance of the assets, this is different to the model applied here. There will be external central government oversight (which did not exist in the Wellington Water example) and a statement of expectations and charter will be established between Council and any CCO. The external scrutiny would also apply to an in-house delivery model, but the governance structure would be unchanged.

SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.

SDC is the first of many councils to assess the value of a WSCCO. Council is currently consulting with the community whether to create a WSCCO or retain an in-house model noting that status quo is not an option.

Submitter Number:	339	Submitter:	Robin McKenzie
Documents:	Your Water Done Well		
Point Number	339.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It seems to me that a council-controlled independent body with the council being the only shareholder is just a way for the council to reap any monetary benefits as charges skyrocket, whilst transferring any blame. The appointed WSCCO board will not be accountable to the ratepayer as elected councilors are. Please ask your consciences what will be the least painful outcome for the people you represent.		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	339.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	339.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	340	Submitter:	Viv Titmus
Documents:	Your Water Done Well		
Point Number	340.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	340.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	340.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Why is there a rush to move forward rather than take a more considered approach with more time to assess options. I think we should remain with the inhouse model for now and shift models in the future if we need too. I don't like the fact that you have already hired staff and invested money in the WSCCO model. We should be in discussions with the government and pushing back on some of their proposals and obtaining some concessions that would be valuable and suitable for Canterbury rural conditions, as we are already operating 3 waters in the Selwyn District area we should already have the skills knowledge and experience to continue this operation in house, but if we lack those they should be sourced and used in house. We should not be incurring increased costs in duplicating extra systems and management structures. I would like more information on how confident you are that from year 10 the drinking and wastewater rates are predicted to be lower than what is in the published Long-Term Plan 2024-2034. If the WSCCO is brought into operation and it is found that it is no longer needed is there any guarantee that the SDC would disestablish the WSCCO and what would the costs be to do this. SDC borrowing should be limited to the current 280% of revenue, not increase to 500% under WSCCO because the attitude of some boards controlling these finances tend to use the maximum available finance and thus have no control of future expenses and liabilities which will fallback directly onto the ratepayers. This should not be allowed to happen. If WSCCO does proceed then all the SDC residents should vote in the controlling board members.

**Staff
Recommendation**

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework

will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submitter Number:	341	Submitter:	Barry Neil Manson
Documents:	Submission #341 - Barry Neil M		
Point Number	341.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	341.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	341.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	342	Submitter:	Maureen Flattery
Documents:	Submission #342 - Maureen Flat		
Point Number	342.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We don't need another organisation. It's the council's job.		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.		
Point Number	342.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Just leave our water as it is.		
Staff Recommendation	Comment acknowledged.		

Point Number	342.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Stop wasting our rates we already pay ECAN to look after our water & they do a shit job & have wasted our rates on their 4x4 Trucks that they all drive around in.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	343	Submitter:	Richard Frost
Documents:	Submission #343 - Richard Fros		
Point Number	343.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We do not need another organisation. That means more wages and rates being wasted.		
Staff Recommendation	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.		
Point Number	343.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number

343.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Do you job that's our rates pay you for.

Staff**Recommendation**

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

**Submitter
Number:**

344

Submitter:

Calvin Payne

Documents:

[Your Water Done Well](#); [Calvin Payne - Water Services](#)

Your Water Done Well Consultation

As we know Water is the elixir of life, in fact most of us humans are made up of 60% water. It is second only to oxygen to sustain human and most other life on our planet.

Therefore decisions made regarding the future supply of clean, safe, reliable and efficient water must be taken carefully.

The current fast track requirement from our Central Government means that all local councils in New Zealand have to comply with the requirements of the Local Government (Water Services Preliminary Arrangements) Act 2024 in submitting a Water Services Delivery Plan (WSDP).

Most Councils are consulting on some or all of the options available under the act. I understand that SDC is only consulting on two options and has one of the tightest timeframes for consultation and decisions regarding the delivery plan.

It is obvious from some of the submissions that there is some confusion as to the questions and what they mean. For example some people have answered yes to both questions!

Selwyn District Council Water Services

Selwyn is in a unique situation that most of our infrastructure is relatively new and that we should be able to manage it efficiently with our existing resources that were in most cases involved in the initial installation. We also have a very diverse system which involves newer urban systems, older rural isolated systems and many farms and lifestyle blocks with their own supplies and waste facilities. These all require local knowledge and consideration not a one size fits all approach that a WSCCO may produce.

Information Supply

The consultation document contains the summary information but lacks detail including the basis of increased costs regarding the WSCCO.

Drop in sessions seem to have been organised at the last minute and produced a large number of key questions which need answers before a reasoned submission can be made.

This has put staff under pressure to provide quick answers to very important questions.

Options

The consultation document only allows for two options:

1. WSCCO for two waters only and all the extra costs this involves
2. In house status quo with enhancements to meet Government requirements

There are other options which seem to have been dismissed and these should also be explained and considered carefully.

WSCCO

The initial information provided suggests that a WSCCO will be very expensive to set up and involve a duplication of staff and services.

In New Zealand we have limited engineering resources in most fields and we should look more towards shared services with other authorities rather than duplicating in each individual district.

Recommendation

My recommendation is that Council considers restarting the consultation process with more detailed information available and has more drop in sessions that are advertised well in advance, similar to the My Future Town workshops.

As this decision is so important to our future in Selwyn it would seem that a two stage process similar to the Representation Review Consultation would have been appropriate. An initial stage with more options and then a final stage with more limited options. It would also have allowed for questions to have been answered in good time ready for an informed decision made by Councillors that is backed up by Community feedback.

I do not believe that a WSCCO is the right option at this time for Selwyn. I believe we should support our awesome staff and build on our current water supply and waste services teams.

A WSCCO introduces risks for increased cost, duplication of services, financial risks and increased commercial risk. It would also result in multiple recouping of overheads and profit, often called clipping the ticket!

Finally the advertised date for submission of a Water Services Delivery Plan seems to be the 1/9/25. This is unfortunate as it falls one month before a local election. Selwyn District Council seems to be suggesting a decision by 1/7/25.

I recommend that this important decision is delayed until after the local election so that the decision makers will then be responsible for the decision they make about our future water services in Selwyn.

Thank you for reading my submission.

Point Number	344.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	Comment acknowledged.		

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Drop-in sessions were held in the four wards in person, and online, and a recording posted. There was an FAQ section on our consultation page which was regularly updated with answers to questions we were receiving, and Mayor Sam Broughton also filmed and posted videos answering some key questions.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Council does have a capable and knowledgeable team which will largely transfer to the WSCCO should it be established.

Shared service agreements would be established to ensure organisation relationship and strategies are aligned.

Council must present a WSDP by the 3 September 2025 and we are working to confirm the position in advance of our new financial year on 1 July 2025.

Point Number	344.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	344.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Comments acknowledged in Q1.1.		

Submitter Number:	345	Submitter:	David Farmer
Documents:	Your Water Done Well		
Point Number	345.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This will be less accountable and add further financial burden to Selwyn over the long term.		
Staff Recommendation	It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	345.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: No large setup costs plus greater accountability.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government		

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number	345.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Why is SDC rushing to move ahead of legislation? What vested interests does this serve? There is nothing to be gained from this for the ratepayer, and everything to lose!		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	346	Submitter:	Douglas Marshall
Documents:	Your Water Done Well ; SDC water plan - Douglas Marsh		

Submission to Selwyn District Council – Your water done well

Introduction

Thank you for the opportunity to make this submission.

I don't currently own property in Selwyn District that is connected to a council owned water or wastewater system. But that may change in the future, so I feel obligated to take an interest in this proposal.

The consultation document in my view was easy to read although I felt that it did not adequately raise, discuss and provide information on all the issues that I thought were relevant. The online questions and answers that have been provided and regularly updated on the council website were very helpful.

The council has to submit a water services delivery plan by early September and so is under pressure to make a decision on the delivery method.

My view is that decision to form a WSCCO has some logic. But there are several additional matters that I believe need further consideration before a final decision is made. These matters are noted further on in my submission.

The graph included in your consultation document explaining projected WSCCO net debt to operating revenue is below. I am unsure what the graph looks like for an in-house delivery, but I can assume it is similar in the first 2 years to below. My red circle on the graph suggests that you have some time before additional borrowing capacity to meet your funding needs is required.



This graph represents the WSCCO operating with a 500% debt limit which includes the Long-Term Plan programme-related work programme and the expected operating costs of the WSCCO.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled above.

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Yes, lodge a water services plan by the deadline but select the inhouse delivery until all matters regarding inhouse v WSCCO are considered and resolved.

The legislation allows changes to original water service delivery plans to be made.

What I would propose is that you appoint a governance group of specialists, and any other expertise deemed appropriate now to deliver the plan and then work through the detail on whether the in-house or the WSCCO approach is best.

Selwyn District Council has done well to fund the infrastructure required for water services over the past 25 years with reasonable rates and charges that have allowed:

- improvements to services levels,
- expansion of existing water service networks, and
- delivery of infrastructure to service the extraordinary population growth in recent decades.

Have confidence that you can take a bit more time now to ensure all ideas from this consultation process are considered and answered before you make your final delivery structure decision.

Some operational concerns

Some will argue that the following points will all be sorted during the implementation phase of establishing the WSCCO and do not need to be considered now. Well fair enough but I think it is important to consider the differences now in how the inhouse v WSCCO solutions will answer these questions.

Success in delivering water services will focus on the quality of the service provided at an affordable charge but small things matter.

Customer enquiries – currently ratepayers can ring, email or send a facebook or similar digital message to council on water service issues and say a question about the state of maintenance at the park near their property. The inhouse model will see the council centralised customer service team gather all answer and send a single answer. Under the WSCCO, ratepayers will probably have to send 2 messages. I appreciate that the consultation document says that the council will provide some services to the WSCCO, and perhaps it is for this reason of a one stop customer services shop. But as you will see below, I don't think the WSCCO should be required to buy its support services from the council.

Debt collection of unpaid charges – currently council has several methods it uses for collecting unpaid rates and water meter charges. The Local Government (Rating) Act provides the tools including the ability to collect rates from a mortgagee. Under the WSCCO model the company will send separate charges for water services which is appropriate but I don't believe they will have the same collection tools. This means that there is an added cost for the WSCCO to manage.

How often will the new WSCCO need to invoice? Currently in Selwyn, rates are paid 4 times a year. The WSCCO may decide to invoice every month just like power, phone and internet companies do to smooth out their cashflows. Perhaps not a big issue but nevertheless a change that might occur which has not been commented on now

Paying my bills – I now have 2 accounts to pay under the WSCCO. Again, not a big issue but the territorial councils in Canterbury and the Regional Council got together many years ago to

collect both council's rates on one rates assessment or invoice. This was done to make the process easier for ratepayers by only having to pay one charge, not town and has some cost savings. The splitting out of the water services charges from council rates creates two accounts to pay thus increasing ever so slightly the admin cost for our ratepayers.

Settlement of rates on property sale and purchase transactions – similar to above, not a big issue but now a lawyer has to make contact with 2 entities to ensure all rates and charges are collected. Or will it be like phone and power charges where the property owners have to manage who owes what on a sale. More admin to undertaken with a system of separate water service charges from the council rates invoice.

Income tax – the WSCCO will have to pay income tax but how much is not discussed in this document. It maybe that the Government are going to provide exemptions to WSCCO.

Pause your decision on service delivery structure and make sure such matters as above are resolved as to how they will work.

Governance

One of the main reasons for the proposed introduction of the WSCCO is to place greater governance focus on the delivery of water services. The WSCCO solution results in additional costs relating to directors, executive roles and technical support. The cost to do so is to be expected and arguably not unreasonable but the alternate option of a council committee or sub-committee would arguably not be as expensive.

The council has had previous experience with appointing experts to governance roles on council committees and paying those appointees for their governance services.

Currently the Audit and Risk Committee has 2 independent appointees and the former Izone Industrial Park development committee of the council had 4 independent appointees during its 18 years of existence.

The decision to create a WSCCO could be paused while the specific detail related to the operating of a WSCCO v an inhouse unit are identified and reviewed for appropriateness by a governance board that could become the WSCCO board if that is deemed on further investigation still to be the best method of delivery compared to the in-house.

CORDE

The question/answer part of your water services information on the council website explains that council have considered the transfer of the proposed WSCCO activities to CORDE. The answers provided as to why this would not work are reasonable, and I believe appropriate.

But there is no comment/statement as to whether consideration was given to transferring the water maintenance activities of CORDE to the new WSCCO thus providing:

- A larger team to working on the water service issues being the former council staff who currently focus on strategy and day to day maintenance issues and the current CORDE members who deliver on these aspects to the council. The need to have a business relationship of scoping work, delivering on the scope and finally the payment by the WSCCO to CORDE for their services is reduced thus creating efficiencies
- Remove a layer of intercompany relationship that is not needed with this new focus on water services

- Allow the remaining water service functions in CORDE to focus on the civil construction activities that CORDE has successfully delivered in recent years

I am sure that a future piece of work for the WSCCO will revolve around whether the current delivering of services by CORDE on behalf of council is still appropriate. Perhaps now is the time to consider those questions.

How does council control the impact of water charges and rates in the future?

I would argue that successive councils of Selwyn have correctly prioritised water and wastewater charges since 1989 when on amalgamation, the new council committed to levy targeted rates for water services.

Installing water meters and charging part of the cost of water services using meter charges for every connected property approximately 10 years showed real leadership. (Rolleston has had water meter charges for all properties since 1995).

The District wide charging of water services targeted rates was the final stage in implementing a funding system for water services which gave clarity of water service cost, provided certainty of funding and ultimately means that the changes this council has to implement to meet its water services obligations under legislation are not as significant as others.

Under an in-house approach for the water services, the council has an ability to increase the targeted rates to generate the income required for water services, while holding or even reducing rates to ensure that the overall annual rates rise is reasonable.

But with an arms length WSCCO setting its water services charges, subject to the regulatory framework for pricing under the act, the council will not have the same oversight on level of charges for water services and rates for the other services it provides.

In reality that is probably appropriate as water services are seen as one of the priority services to be delivered by a council. The council and the WSCCO must be able to work together to work out the appropriate charges needed for all council owned services, but it will be a slightly more involved process with the WSCCO involved than if all is in-house.

Increased charges

The increases proposed under the WSCCO are significant and arguably unreasonable.

I appreciate that the new act requires the water delivery model to be financially sustainable by September 2028, but the impost on ratepayers with WSCCO charges is excessive. The LTP approach is more reasonable and needs to be re-considered if for nothing else due to the increases in LTP charges are not so rapid.

The graph below from your consultation documents notes a significant drop off on capital funding which is replaced by a significant lift in operating charges in the WSCCO model.

I can see no explanation as to why this "switch" in funding sources is required.

Drinking Water and Sewerage Funding Impact Statement (excluding Stormwater)				
	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	34,010	40,007	45,571	74,929
Total application of operating funding (B)	31,586	34,187	36,857	51,462
Surplus / (deficit) of operating funding (A-B)	2,424	5,820	8,720	23,467
Total sources of capital funding (C)	67,893	59,998	54,576	495
Total applications of capital funding (D)	70,317	65,818	63,296	23,962
Surplus / (deficit) of capital funding (C-D)	(2,424)	(5,820)	(8,720)	(23,467)

The above table outlines the projected costs for the delivery of water through a WSCCO. Years 1-3 show an increase in charging, over time this cost reduces as we reflect the efficiencies in service.

Drinking Water and Sewerage Funding Impact Statement (excluding Stormwater) CCO Modelling				
	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	37,233	45,452	61,286	69,060
Total application of operating funding (B)	33,355	36,581	49,609	49,137
Surplus / (deficit) of operating funding (A-B)	3,878	8,871	21,977	19,923
Total sources of capital funding (C)	66,316	57,001	41,613	4,095
Total applications of capital funding (D)	70,194	68,872	63,591	24,017
Surplus / (deficit) of capital funding (C-D)	(3,878)	(8,871)	(21,977)	(19,923)

Based on the anticipated changes in legislation.

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If council does decide that it needs to follow the increased charges under the WSCCO model, then it needs to commence an urgent review of all other council services provided and their cost. Some services that the council provides that are deemed no longer a priority will need to cease while others will need to have their funding from rates reduced.

The consultation document states many times the important role of increased governance in delivering water services in the future. This statement is appropriate as governance focus on water services does need to change.

But ratepayers are right to expect the same level of governance diligence to be used on the balance of council services with a focus on reduce the future rates impacts relating to the balance of council activities, commencing from 1 July 2025. The rate increases as outlined in the 2024 to 2034 LTP are significant and arguably not sustainable.

If it is agreed and accepted by communities that water services are a priority and need to have financially sustainable levels of funding, it must follow that other council services need their priority considered and where appropriate, the level of services adjusted to reduce the impact on future rates levels.

Ratepayers can't be expected to have to pay significantly more for their water services, without also expecting the council to consider what other services have a lower future priority to be delivered which could thus reduce the \$ level of rates that are paid for lower priority services.

The ability to borrow at greater levels is helpful but the ability of ratepayers to pay the water service charges, and their rates for other council services needs careful consideration to ensure reasonable levels of combined water service charges and property rates.

Pause your decision and make sure that you have considered adequately all issues.

Development contribution

In the last 2 weeks, the Government announced changes to the current development contribution framework replacing it a development levy funding approach. Detail was limited but may offer the council some new funding sources which would reduce the WSCCO charges or the council's LTP charges. Pausing your decision as to the delivery solution will allow more time for this major government change on funding to be released which will help ensure you make the right decision.

Uncalled Capital being called – an unlikely event??

This statement, or words to this effect, are included in council documentation. That is not an unreasonable statement to make but very few ratepayers will realise that they will be rated to fund a request for uncalled capital to be paid by the council to the WSCCO.

To be fair, the arrangement of ratepayers being levied rates to fund a default on loans is how the current debt support arrangements work under the LGFA, so this arrangement is nothing new.

But most councils who are members of the LGFA also guarantee the borrowings of each other. This guarantee arrangement keeps borrowing costs as low as possible in the Local Government sector, but it does have a risk albeit low.

The risk must increase in the future now that council water service delivery will increase borrowings for the sector and thus the chance of a default does increase.

The profile of this risk occurring must be carefully monitored to minimise any liability risk to the council and its ratepayers from a default.

Support charge being a credit to the general rates

The consultation document states that there is a credit against the general rate due to overhead revenue being received.

An overhead cost of the council normally includes such in house services as finance & accounting, information technology, communications which are spread across all council services on an agreed costing methodology. Each council services costs (including overheads) are then funded by a charge/fee, external income, targeted rate or general rate

This statement raises several questions/doubts that need checking/resolving:

- Why is the revenue being credited against general rates and not the cost centre incurring the cost to "balance the books as such"
- Why is the WSCCO being asked to pay for overhead services from the council? Would it not be better to allow the WSCCO governance and management to decide how they will source such services? Initial support might be required and some staff involved in support services may transfer to the WSCCO, but it would not be appropriate to think that with all the changes that the WSCCO will be implementing compared to the in-house model, that support services would not be one of those service subject to change as to how provided.
- A support service being paid by a CCO to a council can be defined as a management fee. Such fees, and charges such as rent paid to a council, can be defined as transactions on which the income tax is payable.
- why are these overheads being charged to the WSCCO and why does the council think that the WSCCO will want to pay the council for those services.

Pause your decision making on the delivery solution so that all matters related to the WSCCO are resolved.

Thank you for the chance to submit

Douglas Marshall

Point Number	346.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I can see the logic for the ESCCO decision but I think there are more matters that need to be considered before the final delivery option is selected

Staff Recommendation

Comment acknowledged.

The projected chart that was included in the consultation paper illustrates the net debt position in dollars along with the total operating revenue as the dark purple line. The borrowing limit is 500% of operating revenue with the limit illustrated as the red line (using the right hand axis) and the modelled ratio as a percentage as the green line (also using the right hand axis). Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.

Operating charges are the costs require to operate the water services. Capital funding is the capital projects required to develop and grow the asset base required to supply water services to the ratepayer.

A model which required the WSCCO to pay Council for the true cost of any services shared, ensures that general rate funds are not used to cross-subsidise water activity, where the resource would not be required but for provision of services to the WSCCO.

The reduced overheads of SDC would be credited against the specific costs centres which would then be allocated to the remaining activities of the SDC. If the proposed WSCCO goes ahead this detailed modelling will be completed.

Council have established a Project Management Office to create the WSCCO should the decision be made to proceed on the 2 April.

Positive endorsement of current SDC Management and Council is acknowledged. The WSCCO would have the additional benefit of a professional board.

CORDE is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services

Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

Debt collecting would need to follow a normal business process, using an external debt collector if/when required.

An operating model will determine the billing mechanisms and frequency between SDC and a WSCCO.

CCOs are not automatically tax-exempt and treated under the same rules as a normal company. If the proposed WSCCO goes ahead further work will be done to look at whether a tax exemptions can be granted.

We are required to have selected a model to submit our WSDP in early September, which is why a body of councils are now out consulting. This could be changed in time, if needed, but we will already have substantially invested in the selected model.

New Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. Council is continuing to review all information as we proceed with the development of the Water Services Delivery Plan.

Minister Bishop announced the changes early March. The levy system will be implemented through a Local Government (Infrastructure Funding) Bill. The legislation is expected to be introduced in September 2025 and enacted in mid-2026. The Government intends to take a phased approach allowing local authorities and developers time to adapt to the new system so that it applies from 2027. As the changes are not yet in place we are not in a position to state what the impact will be to ratepayers and/or debt. New Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the

consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

As noted in our Consultation Document, we have limitations in what we can fund with the LGFA 280% borrowing cap. Council will have oversight of a CCO through good governance mechanisms.

As part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.

An operating model will determine what/if any overhead charge SDC would pass to a WSCCO. As an example, if there was an initial hybrid model, SDC would pass those costs across to a WSCCO. Similarly, if costs for insurance have already been paid for a period of time for water assets, a proportionate charge for the relevant time period may also be charged to a WSCCO.

Point Number	346.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Refer to my previous comment.		
Staff Recommendation	Comment acknowledged in Q1.1.		
Point Number	346.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: See my attached submission		

Staff Recommendation	Comment acknowledged in Q1.1.

Submitter Number:	347	Submitter:	Chris Reddell
Documents:	Your Water Done Well		

Point Number	347.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** I would support the move to WSCCO only if it can be de-politized. Its Board needs to be appointed outside of Council so it is not constantly being changed and having to deal with constantly changing priorities from Council. Also, it will need to have long term goals/deliverables that are outside of the 3 year council election cycle. Any proposed Board needs to take a long-term view of its activities and what it needs to deliver. While a Board needs to have some input from those with expertise in 3 waters management experience it also needs Board members who are capable of asking good questions, reading papers, and understand governance. Good governance needs more than just industry expertise.

Staff Recommendation If established, the WSCCO will have its own constitution and will be directed by a binding Statement of Expectation from Council provided each year to the WSCCO. A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Point Number	347.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Please see my comments from the previous question.

Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	347.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: As I have previously said, if a WSCCO model is chosen then it must be de-politized and arms-length removed from Council and its focus on 3 year elections cycles. I also think that if a WSCCO is chosen then the storm water function in urban areas should be included in it. I understand there are challenges to this in rural areas but largely rural areas do not use either Drinking water or Waste water infrastructure.		
Staff Recommendation	Comment acknowledged. Establishment of a CCO would place responsibility for decisions on investment in water infrastructure with the CCO.		

Submitter Number:	348	Submitter:	Grace Taylor
Documents:	Your Water Done Well		
Point Number	348.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Your short, lacking detail , consultation has failed to convince me that having a CCO for water services is going to be beneficial to the ratepayer. In effect, a CCO creates a new bureaucracy which aside from the significant set-up costs, will need to be wrangled with by the Council . The loss of integration of services will create inefficiencies, slow down decision making and problem solving. It will be much easier having all moving parts within one Council realm and management under the oversight of one CEO.		
Staff Recommendation	A WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.		
Point Number	348.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a		

	future in-house water delivery model? Yes Comment: You are doing a great job with water now. Back yourselves! You can do this in-house. May require additional specialized expertise so recruit and their addition can be of benefit to the entire organization.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	348.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? Yes Comment: A WSCCO is probably intended for less functioning councils. You are high functioning! You don't need this. It appears the main motivator for your WSCCO model option is to enable the Council access to a higher debt ceiling. You might want to re-think the real life impacts of that on your ratepayers, especially those on fixed incomes. These discussions need to be had during the long term plan consultations, not hidden as an unexpected (for some) consequence of this imperfect consultation process.		
Staff Recommendation	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.		

Submitter Number:	349	Submitter:	Jane Elms for Prebbleton Community Association
Organisation:	Prebbleton Community Association		
Documents:	Your Water Done Well		
Point Number	349.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: *We are concerned that without all relevant legislation passed there are too many unknown factors. *We are concerned that a future change in legislation could mean that a District Council			

could lose control over local water Services and meeting local needs. *We are concerned about the SDC governing the WSCCO, both in managing the multiple risks, especially regarding the 'uncalled capital', as well as maintaining/managing local control and transparent processes of a public service. We are also concerned that future community consultations on the relevant water topics would no longer take place. *We are concerned that a) the short length of the consultation period; b) that no education sessions for residents were pre-planned (the drop-in sessions that Committee members attended had more unanswered questions than answered); c) that when some 'education' was forthcoming a week of the consultation period had already gone, and some of this was somewhat bias in favour of a WSCCO; d) that the consultation document was lacking in details; e) that we gained a deeper understanding reading information on other District Councils website. **We would like to acknowledge and congratulate Cr Sophie McInnes for her part in the live on-line session on Wednesday 5th March. We valued her clear and honest answers.

**Staff
Recommendation**

Comment acknowledged.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

As part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful

that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Point Number	349.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** *Due to the many unknown variables, we prefer this option so that control of our water remains with elected representatives who understand local needs and priorities. * Continuity of service as the area continues to develop and grow. * We are concerned with the cost of establishing a WSCCO when the infrastructure needed is already established within SDC. While there may be some long-term financial benefits of a WSCCO, we also need to reinforce the financial strain that many households are currently under, and although we understand that the SDC will need to make changes to meet the new legislation we believe that is a preferred option.

Staff Recommendation

Control of costs also means deferral of cost or halting of required activity which may or may not occur. Please note one of the government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which is some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motive.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.

Point Number	349.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** This is a potential model for the future when legislative requirements are in place, more information is available, and greater clarity of the costs, benefits

and risks are made public. Again, we are concerned about the rushed approach for public consultation and the lack of proactive education for the community prior to the consultation timeframe. We applauded councils such as Ashburton District Council who are utilising a 4-week consultation period. We find it necessary to remind SDC that this topic is their daily work, many in the community work full time and have prior commitments so are unable to 'drop tools' and learn about 'Your Water Done Well' and/or be able to attend last minute drop-in sessions. They are instead influenced by 'on-line warriors'. We would have liked to have the opportunity to hold an information session in Prebbleton however there wasn't sufficient time. Only one of the three ward SDC Councillors made contact with the Prebbleton Community Association, and with good luck, we had a meeting that same week and could meet with them.

**Staff
Recommendation**

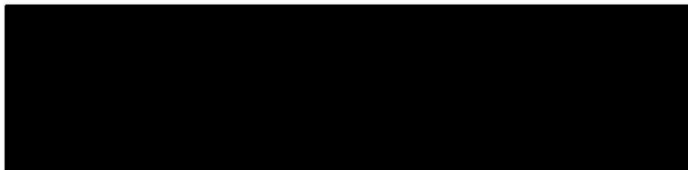
The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	350	Submitter:	Darryl Griffin
Documents:	Submission #350 - Darryl Griff ; Submission #350 - Darryl Griff ; Submission #350 - Darryl Griff		

Submission to Selwyn District Council

Your Water Done Well

Submitter's details:



Selwyn District has a relatively modern water and sewage reticulation system and has made some significant and good decisions, with its communities, about them over the last 25 years or so, including targeted and district wide charges. In my opinion there are very good reasons to retain a modified in-house water delivery model with respect to drinking and wastewater assets and services, as well as stormwater assets and services. At the very least the Council should keep these services in-house at this time.

I acknowledge that the Government of the day has the certain authority to make decisions about what the Council can and cannot do. Despite that, I am particularly concerned at the erosion of local democracy that is steadily occurring and the ultimate effect that will have. Local government is a critical part of New Zealand's legal structure, and it is important that councils retain the ability to be able to respond promptly and effectively to meet the expectations, desires and demands of their residents. Local governments are well placed to know what their communities require and have the flexibility to quickly respond to local needs - Wellington does not.

Enhancing local democracy and localism was a key theme of my submission to the Council's consultation on its representation review and remains the key aspect of my submission on 'your water done well'. In a representative democracy the elected councillors are elected by the citizens in much the same way as government members are elected. Removing responsibility from elected councillors and interfering with the relationship that has been built over many years between the councillors and their residents reduces their realm of responsibility and weakens their accountability.

As more and more decision-making authority of elected members is constrained or eroded by the government, the less interest local citizens are likely to take in local government. In the UK recently a survey undertaken by the Local Government Chronicle identified that the limited decision-making authority of councillors as a major reason for poor voter turnout at local government elections. The UK local government system is highly centralised and there is extensive use of nationally determined performance targets and that puts constraints on council decision-making.

In that same vein, reducing the scope of councillor discretion here is likely to diminish the willingness of people to stand for elected office, as the opportunities to 'make a difference' will be considerably less when local governments are not empowered.

Local governments provide for communities to be involved in making decisions and councillors should resist, as far as it is possible, limits and constraints that impact their decision-making powers.

The Discussion Document notes a risk that political interference leads to leaky pipes – I don't see any evidence of that at Selwyn. As noted previously, the Council's decisions regarding targeted and district wide charging are profound and any political risk would have been at the election box.

The current Government's reform program that includes 'local water done well' appears to be reducing local government to a tightly constrained delivery agency. 'Local water done well' is being promoted as ensuring that the council will continue to control its water assets either by the establishment of a Water Services Council Controlled Organisation (WSCCO) or by a modified in-house option. There is no option for the status quo at this time even when the council is performing well with water services. The Commerce Commission as the economic regulator with significant control over investment and pricing, and Taumata Arowai setting standards both for the infrastructure and water quality, leaves very little discretion to the councils. Effectively the councils will be acting as agents of central government. Putting the water and wastewater assets and services into a WSCCO will further distance local water from the community. The Selwyn District Council with an in-house model will still have to comply with the new regulations but retaining the service in-house allows the Council to continue to fully represent the interests of its community and provides that community with the means to interact with the Council directly on water issues.

Water and water services are a significant activity in terms of capital investment and especially the capacity of highly qualified and experienced professional staff. The transition to a WSCCO will be very significant and the impacts will be felt right across the organisation. Even though there may have to be changes from the way things are done at present, and that may see water activity ring fenced as a 'business unit', the retention in-house of such a unit covering all water services will ensure the Council has much greater capacity and have far reaching beneficial effects across the whole organisation. There are also significant environmental issues associated with water and retaining all water services in a single in-house business unit will have meaningful environmental advantages to the Council and its communities.

In terms of financial investment, the Council has indicated that borrowing for the activity will be constrained to 280% of income in an in-house model as compared with 500% in a WSCCO. The financial effect examples provided by the Council seem to be 'like for like' in that there does not seem to be allowance made for the WSCCO to borrow at that 500% level. That suggests confirmation of my contention that the current assets are relatively young and very well maintained, and that extended borrowing will not be required. If extended borrowing is required for additional assets and service extensions, would they not be paid for by the new regime being proposed for contributions from the developments that they are to service? At this time, we do not know the details of the 'new' development contributions regime, but they appear as if they are to be more liberal than in the past and allow for some future growth expansion. That will be a benefit to the work programme and require less borrowing.

In addition, the financials provided show that the in-house costs over a 10-year period for an urban residential property with sewerage are \$19,667 compared with \$22,328 for a WSCCO. They also show that those costs under a WSCCO will remain static in years 3 to 4 and again from years 5 to 9, yet the additional costs of a WSCCO covering governance and management will continue each year. It seems disingenuous to suggest that the costs will ultimately be less for residents in the longer term. It was noticeable, during the panel discussion streamed over the internet, that the two elected members treated with some humour the contention that costs would not rise or would not rise as much with a CCO model. That did not give me confidence in the financial predictions. For my money I would rather retain the ability to be consulted and to influence democratically, even if the costs in-house were to be slightly higher. And that is not a given.

It is also noted in the consultation document that at 335 litres/per person/per day Selwyn's water usage is higher than the New Zealand average which I understand is 227 litres/per person/per day. There is no explanation given for that difference. There must be a cost to that too, yet the water charges in Selwyn seem to be comparable or better for the consumer when compared with many other local authority areas. That is difficult to reconcile, but some credit must be attributable to the efficient way water is currently managed in Selwyn and the good decisions made to date. And if so, that is another very good reason to keep the water assets and services in-house.

The Council's preferred option of transferring water to a WSCCO indicates that more specialised governance would result. There is nothing to stop the Council appointing specialised persons as governors to a separate water services business unit 'committee' in the in-house model and, in fact, there is every incentive to do so – and there has always been that option in the past. Perhaps a question might be asked - why has it not done so? The Council has used this provision for other committees and reaped the advantages of having done so. Independent operation of water does not, in itself, provide for any advantages and simply moves water one step further away from the community's influence.

As I see it, Selwyn's Elected Members first responsibility, in considering this matter, is to determine what the best outcome is for the community. The consultation document and assessment suggest that a WSCCO is the best option for the Council (the organisation) under the circumstances proposed by the Government. As that is different to the best outcome for the community then the decision on these two options must be for the in-house provision of water services including stormwater.

Thank you for the opportunity to submit on future water services and the opportunity to present my submission in person.

Darryl Griffin

Point Number	350.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water

**Staff
Recommendation**

Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Please refer to attached

Positive endorsement of current SDC management is acknowledged.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Comment around decision-making authority is more related to our focus on implementing the findings of our recent Representation Review.

Minister Bishop announced the changes early March. The levy system will be implemented through a Local Government (Infrastructure Funding) Bill. The legislation is expected to be introduced in September 2025 and enacted in mid-2026. The Government intends to take a phased approach allowing local authorities and developers time to adapt to the new system so that it applies from 2027. As the changes are not yet in place we are not in a position to state what the impact will be to ratepayers and/or debt.

Water Supply and Wastewater are currently charged based on usage and the number of connections that a ratepayer has at equal rates across the region. The modelling that has been prepared does not change the way in which the water charges are calculated.

This matter is more related to our focus on implementing the findings of our recent Representation Review.

An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

As stated on page 16 of the Consultation Document, modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. If the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled above.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected

this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Water supply and wastewater are currently charged based on usage and the number of connections that a ratepayer has at equal rates across the region. The modelling that has been prepared does not change the way in which the water charges are calculated.

We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.

Point Number	350.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Please refer to attached

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Comment is acknowledged in Q1.1.

Point Number	350.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Please refer to attached

Staff Recommendation	Comment is acknowledged in Q1.1.

Submitter Number:	351	Submitter:	Jane Elms

Documents:	Your Water Done Well

Point Number	351.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: While this concept has potential, having experts managing such a vital resource, unfortunately I do not feel like I have sufficient information to answer yes. I believe this is being rushed, from a national level, when legislation is still unclear about the future of this model. As such I feel like this is a risk that is too big for SDC. I am concerned that a future change in legislation could mean that a District Council could lose control over local water Servies and meeting local needs, or that a WSCCO could be too focused on business outcomes to focus on community needs.		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	351.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: At this point in time, from the information that has been made available to the community, this seems to be the option with less risks, from financial implications to governance.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial		

modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number	351.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: This model has potential in the future when we have more information. I appreciate it is difficult to meet the needs of all locals with the information you provide however a District Council works for the people, not the other way around. Multiple levels of detail needed to be provided, as did pre-planned education sessions with people who could actually answer the questions, and answer them honestly, that includes saying 'we don't know that yet'.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	352	Submitter:	Gareth Payne
Documents:	Submission #352 - Gareth Payne		
Point Number	352.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Council should not be using debt secured against ratepayers homes. I do not consent to my home being used as collateral for council debt.		
Staff Recommendation	The debt under the proposed WSCCO will be secured by the uncalled capital from SDC. SDC does not have right to claim individual houses unless in extreme circumstances on unpaid rates. The proposed WSCCO would have no direct claim on houses.		
Point Number	352.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:			
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Innovate, do your job, serve the district, focus on critical infrastructure			
Staff Recommendation	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		

Point Number	352.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Question: Do you have any comments on the WSCCO model? Yes Comment: I will Present at hearing.			
Staff Recommendation	Comment acknowledged.		

Submitter Number:	353	Submitter:	Margaret Mary Nimmo
Documents:	Submission #353 - Margaret Mar		

Point Number	353.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: This is wrong. You will be creating more hardship for households. Other councils have rejected it, Wellington is a mess.			
Staff Recommendation	While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs. Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like		

Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.

Wellington Water is a management company for water delivery services but not responsible for the maintenance of the assets, this is different to the model applied here. There will be external central government oversight (which did not exist in the Wellington Water example), and a statement of expectations and charter will be established between Council and any CCO. The external scrutiny would also apply to an in-house delivery model, but the governance structure would be unchanged.

Point Number	353.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	353.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Just think of the cost of setting it up - no proof that it will work except that they will do it for profit!

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number:	354	Submitter:	Lean Seng (Tony) Gan

Documents:	Submission #354 - Lean Seng (T

Point Number	354.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Lack of evidence to support service efficiency and cost effectiveness of this proposal. Instead, potentially added admin & running costs in areas such as HR & management. Also diminished accountability to the community.		
Staff Recommendation	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document. A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.		
Point Number	354.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The setup and business structure are also in place, the council's management of water hasn't been an issue thus far, so why fix something that isn't broken.		
Staff Recommendation	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	354.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Why aren't other options such as working in collaboration with other councils being considered or presented as alternative options? How about working with Christchurch Council? Lack of evidence-based costing and the projected meagre savings in 10 years aren't given the community the confidence that they won't face cost blowout in future which will be a huge burden to the community.

Staff**Recommendation**

Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing.

Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.

Submitter Number:

355

Submitter:

Malcolm Gourlie for Parkdale

Organisation:

Parkdale

Documents:[Your Water Done Well](#)**Point Number**

355.1

Category

1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Water infrastructure in Selwyn largely new, any new projects should be funded by developers and not ratepayers. No new entity required at a cost disproportionate to what actually needs to be done - replicating what already exists within the council, with new staff brought in as required on fixed term contracts. Planning and ongoing water infrastructure should be in house, after consultation and with costings accountable to the ratepayer.

Staff**Recommendation**

Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require

developers to contribute and whether there is flexibility to adjust these amounts in the future.

An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Point Number 355.2

Category 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Give ratepayers a break.

Staff Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 355.3

Category 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Central Plains Water Scheme owned and built by the Selwyn District Council & Christchurch City Council, established to provide water storage and irrigation on the Canterbury Plains. Wildly 'successful' in that it enabled peak dairy on the plains lighter soils leading to dirty water, high nitrate levels, river, stream and lake pollution. Ratepayers now have to pay through the nose to have their water chlorinated and water sources re-engineered against pollution, caused by peak dairy created by the Selwyn District Council. Has there ever been a return on the investment? A positive return that is.

Staff Recommendation

Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Submitter Number: 356

Submitter: James Gourlie

Documents: [Your Water Done Well](#)

Point Number	356.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Too high a cost to ratepayers		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	356.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Lower cost to ratepayers		
Staff Recommendation	The current LTP modelling would require additional costs to what is included due to the central Government's regulatory updates.		
Point Number	356.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Not working elsewhere even where three or four councils have banded together to keep costs down - lower N.I.		
Staff Recommendation	Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.		

Submitter Number:	357	Submitter:	Yvonne Evans
Documents:	Submission #357 - Yvonne Evans		

Point Number	357.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It's our money, not yours! Consult with the community. I do not trust the council at all! Stop increasing charges! Stop over-spending! Keep borrowing to a minimum! Not more! Keep to essential, basics, only! I am furious that the council stopped consultation on the Annual Plan! You need to be held accountable, to the community over your constant overspending instead of sticking to just the basics only!		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	357.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	357.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: The WSCCO would come with massive start-up costs (eg. office equipment, vehicles, + a management team) all funded by ratepayers, when our rates are fast becoming unaffordable, so we don't want or need that expense. The WSCCO would strip ratepayers of their voice, transferring governance to an independent board with no input from the community. If by retaining water services in-house, decision makers remain accountable to ratepayers and not an external organisation. There is also the risk factors on page 5. So keep in-house water service delivery. To ensure accountability, cost efficiency + community input compared to the opposite, of all of these because of the WSCCO.		
Staff Recommendation	Comment acknowledged. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	358	Submitter:	Jacinda Anderson
Documents:	Submission #358 - Jacinda Ande		
Point Number	358.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	358.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	358.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	359	Submitter:	Mark Hunter
Documents:	Submission #359 - Mark Hunter		
Point Number	359.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	359.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:			
		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	359.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	360	Submitter:	Talbot Janet
Documents:	Submission #360 - Talbot Janet		
Point Number	360.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Why reinvent the wheel, setting up a new organisation and still under council control?		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.		
Point Number	360.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Our water. It should be under Council control and part of normal Council procedures.		

Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	360.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: The model is not ok and water should remain with the Council.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	361	Submitter:	Carolyn Jones
Documents:	Submission #361 - Carolyn Jones		
Point Number	361.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Comment: No more unnecessary expenses for ratepayers thank you.		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	361.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	361.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	362	Submitter:	Andrew Fischer
Documents:	Submission #362 - Andrew Fisc		
Point Number	362.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	362.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	362.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	363	Submitter:	Sarah Manifold
Documents:	Submission #363 - Sarah Manif		
Point Number	363.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Selwyn water should be managed and run by Selwyn District Council as this is their responsibility!		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.		
Point Number	363.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: I prefer to let the responsibility of the water be left with The Council and our democratically elected representatives. Creating a new body will entail more costs!		
Staff Recommendation	Control of costs also means deferral of cost or halting of required activity which may or may not occur. Please note one of the government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which is some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and		

the decoupling of critical, life supporting infrastructure investments from political motive.

Point Number 363.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** A separate body would entail duplication of administrative functions leading to higher costs for the rate payer.

Staff Recommendation We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number: 364 **Submitter:** Graeme Young

Documents: [Submission #364 - Graeme Young](#); [Submission #364 - Graeme Young](#)

Point Number 364.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Since when did the Council start making policy based on religious beliefs? Why has water been personified?

Staff Recommendation Council has not made policy based on religious beliefs. Council is required to meet the legislative and regulatory framework in place and set by the Crown and we set out the specific approach in our Long-term and Annual Plans.

Point Number 364.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a

future in-house water delivery model? Yes **Comment:** We do not need to double up on the infrastructure and personale.

Staff

Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number

364.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** P11 could you please explain in symbol english what this page means.

Staff

Recommendation

Page 11 of the consultation document outlines the proposal for a Water Services Council Controlled Organisation (WSCCO) to manage drinking water and wastewater services, while stormwater remains under Council control. This model would create an independent, Council-owned entity with a specialist board focused on water services, aiming to improve efficiency, governance, and long-term planning. The WSCCO would take responsibility for planning, funding, building, and maintaining water infrastructure, ensuring reliable and sustainable services for the community.

Under this structure, water assets and associated debt would transfer to the WSCCO, but Council would retain ownership as the sole shareholder. The organisation would secure funding through the Local Government Funding Agency (LGFA), with Council providing uncalled capital security of at least \$450 million to support financial stability.

This means that as part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.

If approved, the WSCCO is set to begin operations on 1 July 2025, aiming to enhance service quality while maintaining strong oversight and financial sustainability.

Submitter Number:	365	Submitter:	Clavin Clare
Documents:	Submission #365 - Clavin Clare		
Point Number	365.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Why another organisation , the Council already has control over water. Is this 3 waters in another disguise		
Staff Recommendation	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council. Three Waters was repealed by the Government in early 2024 and replaced with Local Water Done Well. LWDW is designed to provide more flexible options than Three Waters.		
Point Number	365.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: More infrastructure, more costs why.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Point Number	365.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Waste of money Less control rate payers will have little say on what happens. More costs to the rate payers who are struggling with rate payments as it is.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	366	Submitter:	Susan Hunter
Documents:	Submission #366 - Susan Hunter		
Point Number	366.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater.		

Comments from all submitters will be taken into consideration during Council deliberations.			
Point Number	366.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	366.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	367	Submitter:	Samuel Wilshire for West Melton District Residents Association
Organisation:	West Melton District Residents Association		
Documents:	Submission #367 - Samuel Wilsh		
Point Number	367.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Information from council has been vague and contradicting, rating example provided at drop in sessions second line down from 2029/2030 figure hasn't		

changed till 2034 although drop in sessions assured me that inflation was allowed for in the calculation, it would appear this is not the case.

No mention has been made for rural properties with own well and septic tank yet comments regarding rural supply have been mentioned by staff and councillors .

What does a 'in house model' look like for rural properties and what does a 'WSCCO model' look like for farms?

Even when requesting further information in regards to SDC debt, questions still haven't been answered even when given a extension and numerous emails, my community is losing faith in our council which saddens me, as its significantly more difficult to regain trust with constituents once faith has been lost.

The provided resources for this submission process (rating examples) claims a 10% anticipated compliance cost increase yet 2027/2028 34% is the actual estimate. It's hard to take this process seriously when contradictions are on the same page.

Resource documents also mention the LTP in each example, yet councillors have claimed that LTP goals are no longer achievable, why mention them then?

Many have the opinion that the decisions been made, the money is already being spent, staff lined up to shift roles and building for WSCCO already has establishment team housed.

With recent news articles on Wellingtons CCO we should be heeding these warnings. They have completely lost control, lost accountability and can't even request resignations at this stage.

With the in house model we elect those who control our second most valuable asset only second to our people in the WSCCO model we don't.

Comment acknowledged.

**Staff
Recommendation**

In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

The consultation addresses the future delivery of reticulated water and wastewater services. Rating and water charge examples are included in the Consultation Document as stated on page 18, including for rural properties with restricted water supply connections or no connected services. Costs to properties that do not have any connection to Council services are outlined in the LTP. Please refer to the FAQs on our consultation page for a further breakdown of Urban and Rural costs.

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

As noted in our Consultation Document, our modelling is based what is reflected within our Long-Term Plan.

A proposal has been submitted for community feedback, and no decision will be made until 2 April 2025. Any budget allocated to the programme team is there to support water services delivery regardless of the delivery model chosen.

Wellington Water is a management company for water delivery services but not responsible for the maintenance of the assets, this is different to the model applied here. there will be external central government oversight (which did not exist in the Wellington Water example) and a statement of expectations and charter will be established between Council and any CCO. The external scrutiny would also apply to an in-house delivery model, but the governance structure would be unchanged.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number

367.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

We have some of the most modern, beautiful and compliant systems in New Zealand (excluding a couple of systems of our 27) our rates have been used to make our supplies above and beyond compliant, wasn't SDC one of the first to roll out UV treatment? The figures for the WSCCO don't make sense. We have the systems in place, the staff engaged the vehicles, facilities, and compliance already. Why bake the cake twice and claim its better value.

Faith in Selwyn's borrowing amongst our organisation has been eroded, simple questions get elongated answers with little substance regarding finance and many of our fixed income residents are already paying their fair share and some.

We had a 108.33% volumetric charge increase that was back dated to before the price increase, what was this volumetric charge increase for and what does it encompass? Although the inhouse model isn't perfect for many of our residents it comes with direct accountability not a third party that can hide behind bureaucracy and council.

**Staff
Recommendation**

Given Selwyn has been steadily preparing for the roll out of 3 waters one would think we are more than prepared than others to hit the ground running. We have some of the best water treatment systems in the country, and prior to chlorination the best tasting water IMO nationwide.

Comment acknowledged.

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number 367.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSSCO model? Yes **Comment:**

The figures are unrealistic, and can't be correct given interest rates from the LGFA aren't fixed so how would we know what the repayments will be if we don't know the interest to service these loans, this appears to be blue sky guess work as a community I would like to formally request how these calculations were made. SDC then suggest a need for a further six hundred million dollars in funding without any real explanation in the 24 page document.

long term plan "this way" mentioned a need to comply with 3 water guidelines 13 times, where has that money gone? Or where's the infrastructure these comments were created for?

Additionally if the replacement value of these assets are as follows

:Water supply \$184 million (across 30 schemes)
:Wastewater \$311 million (across 14 schemes)
:Stormwater \$70 million (22 schemes) figures collected from 30-Year Infrastructure Strategy 2021-2051

This total figure for replacement of these systems from 2021 estimates is \$565 million which I assume is full replacement value (like for like) yet projected cost to maintain these services (which isn't clear if this calculation is including stormwater) are estimated at \$857 million from year 2-10 by those figures we could completely replace everything we had in 2021 and still have \$292 million remaining and were currently not discussing stormwater in this model.

Council subscribing to uncalled capital to the value of \$450 million to ensure that WSSCO can utilise LGFA funding, this figure \$195 million off full replacement value.

A lot of discussion has been around commercial waste for pines resource

I would ask if this need is predominantly coming from IZONE? And if so, why has the sprawl of this commercial development been allowed to continue if we don't have the infrastructure to cater for it?

No mention of rural supplies, the comments made in council about the WSSCO paying dividends back to council, should really be used to offset the cost to rate payers, not to flush cashflow for council to enable more drawing of debt.

Still awaiting an answer and so are others on what the severance/redundancy package would look like for staff transferring from SDC to the WSSCO this has continued to remain unanswered as has the question, were these same people who currently work for SDC running the drop in sessions and why hasn't this been considered a conflict of interest.

In conclusion, SDC has given its residents a 24 page glossy mag with very little substance, been evasive when asked questions that should be easily obtained but those departments, gave constituents 3 week deadline with conflicting evidence IMO, when other councils have given 4 weeks and mentioned numerous times in the workshops "when WE make our decision" implying it's down to council (even this issue was raised by a standing councillor)

Water rating examples appear flawed (no inflation for 7 years?) no information as to how compliance would look for rural settings, many had concerns regarding comments borrowing more, so rates come down and we lower debt.

Mentions in legislation about shared supply, what are the limitations of this? Shared wells between two or more dwellings? Woolsheds? (public would use once yearly)

the biggest risk in regards to providing water services to the fine residents of Selwyn is illness and death. That should be number one on the councils Risk assessment, unfortunately this isn't even mentioned, but most other risks have been covered. Our people should be first and foremost but that also shouldn't give carte blanche attitudes towards the massive spending proposed.

I do wonder what the AA financial rating would be if we were to transfer over \$495 million dollars of Selwyn's water assets (replacement value in 30 year infrastructure strategy) to the WSSCO sadly it works both ways, you can't just shift debt and liability without including assets, I wish we could!

This process has been rushed, information has been hard to obtain and resource documents are missing substance to make an informed decision. I believe there's been conflicts of interest, I had three people on the 12th disclose they couldn't find the link to make a submission on the your water done well

page, submission documents on Tuesday at Darfield library were not displayed and had to be asked for.

I feel like we owe the community a better consultation process. I believe I have a reasonable grasp on the scenario and my questions are still unanswered, I'd hate to think of how ill-informed the average public are as this has taken easily a solid day of my time.

We can always revisit the WSCCO at a later date if it's the wish of the people, but we cannot wind back to an in-house model after starting the WSCCO without huge cost and grief.

I Samuel Wilshire to the best of my abilities confirm what has been stated is true and accurate given the information given to me to make my submission.

Thank you for your time to read this submission

**Staff
Recommendation**

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

At the time that the Long-Term plan was published the revised Local Government (Water Services Preliminary Arrangements) Act had not yet been enacted.

The capital projects included in the LTP and WSCCO modelling also relate to growth and level of service projects, rather than pure maintenance of the existing asset base.

Water charges will be ring-fenced under legislation to service water delivery activities and cannot be returned to Council as profit for use on other activities, as such would be reinvested back into water delivery. There is no current intention to use the WSCCO to deliver dividend to Council.

A LGOIMA response was provided to the submitter ahead of the hearings. This noted that due to the fact a final decision has not been made by council, any activities post that are not able to be predicted, and we are not in a position to consider staff impacts including redundancy costs or other specific impacts . The LGOIMA was refused on this basis, as the information requested was not held by Council. It was however noted that in the event a transfer of staff is deemed necessary, impacted staff would be fully consulted with on any proposed changes before any final decisions in regarding employment are made. No staff assisting with the drop-in session from consultation have any conflicts of interest in accordance with Council's Code of Conduct and Conflict of Interests Policy.

In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and

wastewater connected households rather than requiring an increase in the water charges.

The extent of what is defined as a 'water supply' is set by the Water Services Authority — Taumata Arowai. This responsibility does not fall under the management of the Selwyn District Council. Providing safe water to our communities via our reticulated network supplies is our top priority.

The ultimate decision to establish a WSCCO rests with the elected officials and not staff. As a result, we do not believe there has been a conflicts of interest.

The assets relating to water would also be transferred across to the proposed WSCCO along with an appropriate recognition of the debt between SDC and WSCCO. If the proposed WSCCO goes ahead, we will assess the potential impact on the both the SDC and the WSCCOs ratings.

Council is required to make a decision on model of delivery being either in-house or standalone CCO (as the two options consulted on) this year, with a detailed WSDP delivered to government in September 2025 outlining how Council will implement the model. The WSDP plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. While implementation of the model could be delayed, a decision regarding choice of model cannot, as the timeframe is set by the Preliminary Arrangements Act which is already in force. If Council were to select in-house and want to change to a CCO model later this would require a full redesign of the WSDP, consultation and undoing of any work that has been done internally to enable a redesigned in-house delivery model to comply with new regulation and legislation. Changing the decision at a later date, would incur significant costs either way.

Submitter Number:	368	Submitter:	Neville Strong
Documents:	Submission #368 - Neville Stro		
Point Number	368.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? Yes Comment: WSCCO process: Early information		

	provided indicates the water systems appear to be more sustainable and hopefully more economical in the long term. Thus, this process appeals to me!		
Staff Recommendation	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.		
Point Number	368.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	368.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? Yes Comment: See Q2 comments. Thanks!		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	369	Submitter:	David Armstrong
Documents:	Submission #369 - David Armstr		
Point Number	369.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: New organisation requires significant rate payer funding to establish and is not easily accessible to rate payer feedback - further removed from the democratic process, thus not as accountable.			

Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	369.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Selwyn has one of the best water infrastructures in the country so why change this. Also there is good institutional knowledge concerning water infrastructure in the differing communities which should be preserved. Also council is more accountable to rate payers.		
Staff Recommendation	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	370	Submitter:	Fred Bull
Documents:	Submission #370 - Fred Bull		

Point Number	370.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: As a rate payer a separate entity but still Council controlled sounds more like a useless expensive double dipping opportunity to me.		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	370.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Read again answer to Question 1.		
Staff Recommendation	Comment acknowledged.		
Point Number	370.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Read again answer to question one		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	371	Submitter:	Graeme Dawson
Documents:	Submission #371 - Graeme Dawso		

Point Number	371.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: I am not in favour of the setting up of a new organisation and the costs involved if only to have access to borrowing more money.		
Staff Recommendation	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer.		
Point Number	371.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: The Council must borrow and spend responsibly not just at the whim of a new unproven organisation.		
Staff Recommendation	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.		
Point Number	371.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: To many times Council has gone down a new road at the behalf of so called experts and at the cost of unparalleled rate rises. Please live within a budget.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	372	Submitter:	John Verry for Malvern Community Board
Organisation:	Malvern Community Board		
Documents:	Submission #372 - John Verry ; Submission #372 - John Verry		



Date: Wednesday 11th March 2025

Chair: Bruce Russell, QSM, JP

MCB Submission: SDC – Your Water Done Well

Additional information

Kei te rangatira, tēnā koe

Introduction

The Malvern Community Board appreciates the opportunity to submit feedback on the Selwyn District Council's "Your Water Done Well" consultation. This submission is informed by MBC elected members community engagement across the Malvern Ward and relevant information on the water reforms (Local Water Done Well) from across the Motu.

Key concerns, include but are not limited to, those raised by the community in the Malvern Ward, and most likely throughout the Selwyn District - being:

- ❖ the **extremely short timeframe for submissions**, approximately three (3) weeks – accepting this is within what the legislation allows. The primary concern centres around the reasonableness of such a tight timeframe when the issues are complex. This could have been partially addressed if SDC had given advance notice of the proposed consultation and links to relevant documentation on Central Government's Water Reforms in December 2024.
- ❖ the **information provided by SDC was lacking in substance**. This is evident in reading the Consultation Document and was evidenced further by the majority of questions, and some statements, at the various Drop-In sessions held by SDC. In fact, feedback from some persons who attended more than one Q & A make it clear that are legitimately concerned that there was a lack of consistency in the information provided as between SDC staff (including members of the Senior leadership team). This is at best not helpful and may make the consultation process nugatory! It is acknowledged that information provided by SDC after the consultation commenced has, to some extent, been helpful – the Q & A's and videos. The lack of detailed financial and operational (infrastructure) information in the Consultation Document has been

- **Open Communication:** A two-way dialogue must be fostered where sufficient accurate and relevant information is shared transparently, so the community feels encouraged to participate.
- **Adequate Information & time:** Providing clear, detailed, and accessible data is essential to allow ratepayers time to make informed contributions (Submissions).
- **Active Listening & Respect:** Stakeholder concerns must be acknowledged and addressed to foster trust and engagement.

Community Engagement & Legislative Context

The Board has collaborated extensively with Residents'/Community Associations and others in the Malvern Ward and beyond. However, SDC's drop-in sessions attracted limited attendance, with some sessions drawing only a handful of participants, while a comparable session in Leeston had approximately sixty (60) attendees. This raises questions about the adequacy – effectiveness of SDC's engagement strategy.

The *Local Government (Water Services Preliminary Arrangements) Act 2024* establishes the "Local Water Done Well" framework for all Councils and outlines the preliminary arrangements for water services delivery as required by Central Government. However, as the final legislative requirements remain uncertain, questions are raised as to why the extremely short consultation period. The feedback would have been more likely than not to better inform SDC in adopting the most prudent and sustainable service delivery model if SDC had provided prior advance notice to the ratepayers, not to mention the Malvern Community Board and Residents'/Community Associations. However, it is not conceded that the feedback provided is not of an acceptable standard. The feedback is fit-for-purpose and should be evaluated and duly considered by the Councillors.

In the October 2025 Local Government elections, there is little doubt that the principle of *Localism* will be central to the Selwyn District Council's decision on whether to manage water services in-house or establish a Water Services Council-Controlled Organisation for drinking water and wastewater. *Localism* emphasizes community-driven decision-making, ensuring that service delivery reflects local needs and priorities rather than being dictated by central government mandates. Keeping water services under direct council management (In-house) preserves local accountability, transparency, and responsiveness to ratepayers. Conversely, proponents of a WSCCO may highlight potential efficiency gains and specialist management but will the anticipated cost-saving offset the high initial start-up costs and risks and actually be delivered? Voters will have the opportunity to influence this decision by electing representatives who align with their preferred approach, making *Localism* a key factor in shaping Selwyn's water services strategy.

The Board strongly supports what its members have found through their community engagement that

- **SDC must select a model that delivers the necessary infrastructure while preserving community ownership and democratic decision-making and overall the community Board members engaged with are of the predominant view SDC should retain all three (3) waters In-house.**

A further not insignificant advantage is that retaining Water Services In-house is not only the more cost-effective approach in the short term, but reduces risks associated with the establishment of the WSCCO and retains accountability to the ratepayers.

Concerns with the WSCCO Model

The Consultation Document proposes establishing a **Water Services Council Controlled Organisation (WSCCO)** (Drinking water and Wastewater) as an alternative to in-house delivery. However, significant concerns exist regarding this approach, of which SDC looking to divest only 2-Waters = Drinking water and Wastewater is but one aspect. This is important given the significant work SDC has successfully undertaken on wastewater in Darfield and Kirwee and the current uncertainty in regard to connections – which aging a WSCCO will likely only increase uncertainty!

- **Financial Risks:** The proposal suggests that SDC could be required to commit "no less than \$450 million" in uncalled capital to support WSCCO borrowing. Water CCOs can borrow up to **500% of their operating revenue**, significantly increasing financial exposure.
 - **Uncertain Costs & Rate Impacts:** The Consultation Document lacks specific cost estimates. Instead, it uses vague phrases like "would likely... expected to increase... predicted to be lower..."—highlighting a high degree of uncertainty. The only clear certainty is that a **YES vote to the WSCCO model would result in increased costs and higher rates at least in the short term** when rates are already high.
 - **Duplication of Services:** Establishing a new WSCCO entity would require additional support services—Financial, Human Resources, Legal, IT, and Management—many of which SDC already exist and would provide capability in-house.
 - **Accountability & Governance Risks:** Moving to a WSCCO reduces direct democratic control. Ratepayers' ability to have a say in future decisions would be significantly diminished compared to an in-house model.
- ➔ The Board's community engagement indicates a high level of realistic concern as to whether the potential benefits of a WSCCO outweigh the considerable risks.
-

Why In-House Delivery is the Preferred Model

The in-house model ensures that SDC retains full control over governance, funding, and operational decision-making. This approach is consistent with best practices from others Councils – accepting each Council will have their own best-solution. However that fact that many Councils, are proposing initially to retain Water Services In-house – does this need signal a need for a re-evaluation especially if (as the Board's community engagement has indicated) there is – at least in Malvern, substantial community (ratepayer) support to retain Water Services in-house as the evidence and rigorous analysis undertaken across the motu has demonstrated cost efficiencies and stronger local accountability through in-house water service delivery. Accepting that each model had advantages and disadvantages.

Key Advantages of In-House Water Service Delivery for SDC:

1. **Cost Efficiency & Financial Prudence**
 - o High setup costs and transition expenses associated with WSCCO are avoided at a time when current increases in rates are massive (cf. to Council's in the area having increases around 10%).
 - o SDC retains direct control over operational costs and infrastructure investments.
 - o Prevents excessive debt accumulation and unquantified financial risks which will be borne by the ratepayers.
2. **Local Accountability with SDC Control**
 - o Keeps decision-making within SDC rather than outsourcing it to the WSCCO of which SDC is the sole shareholder.
 - o Ensures service delivery aligns with local priorities rather than corporate interests.
3. **Service Reliability & Workforce Stability**
 - o Maintains a stable and experienced local workforce, retaining existing knowledge and avoiding redundancy payments.
 - o Reduces reliance on external contractors and the risks associated with WSCCO having skills shortages.
4. **Strategic Flexibility & Long-Term Sustainability**
 - o Enables SDC to collaborate with other Councils to improve efficiencies and share expertise and if the need should arise in the future increased co-operation.
 - o Ensures infrastructure planning aligns with Selwyn's growth and sustainability goals.
5. **Minimal Disruption & Implementation Feasibility**
 - o Retaining in-house water service delivery avoids unnecessary complexity, restructuring, and transition challenges and expenses borne by ratepayers.

Given the large investment in wastewater, especially infrastructure, in Darfield and Kirwee, there is an extremely high, one could say 'unacceptable' risk to ratepayers, noting there is a surplus of monies raised from the Investigatory Targeted Rates collected.

Key Reasons for Supporting In-House Water Service Delivery:

- SDC water **infrastructure is relatively new** and in better condition than most of the Motu.
- Ensures **local control and accountability** through direct oversight by elected representatives.
- **Minimises financial risk** by avoiding unquantified debt obligations and setup costs.
- Builds upon existing infrastructure, systems, and skilled workforce, ensuring **service continuity and efficiency**.
- Retains **flexibility in funding mechanisms** (e.g., rates, targeted rates, volumetric pricing).
- Avoids **unnecessary duplication** of administrative and operational functions.

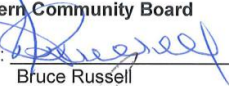
Conclusion

- The Malvern Community Board strongly urges the Selwyn District Council listen to the ratepayers and community concerns to **retain in-house water service delivery** as the preferred model under the "Your Water Done Well" framework. While the WSCCO model is presented as an unknown alternative, increased initial costs, the lack of financial clarity, increased debt exposure, and reduced democratic oversight make it a far riskier option which from the Board's community engagement ratepayers and people of Malvern have overwhelmingly expressed to be unacceptable.

While the WSCCO model may offer some potential efficiencies, the significant financial and governance risks outweigh the benefits. The Board firmly submits that in-house water service delivery is the **most responsible, cost-effective, and sustainable** choice for the Malvern Ward and the Selwyn District.

We appreciate the Council's consideration of our submission and look forward to the opportunity to make an oral submission and continue engagement on this critical issue.

Malvern Community Board

Chair: 
Bruce Russell

Deputy Chair: 
John Verry

Elected Members:


Phil Freeman


Sharn Nu'u


Calvin Payne

THIS 11th Day of March 2025.

Point Number	372.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water

Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Refer attached

**Staff
Recommendation**

Comment acknowledged.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals. The options are being carefully considered and examined to ensure that the final outcome is sustainable.

Drop-in sessions were held in the four wards in person, and online, and a recording posted. There was an FAQ section on our consultation page which was regularly updated with answers to questions we were receiving, and Mayor Sam Broughton also filmed and posted videos answering some key questions.

As suggested the cost benefit of the in-house model is a short-term benefit. The initial additional costs help in setting up the water services for the future while improving quality of service without the cost immediately falling on the ratepayer.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA).

Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.

An in-house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Point Number 372.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Refer attached		
Staff Recommendation	Comment acknowledged in Q1.1.		

Point Number	372.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? Yes Comment: Refer attached		
Staff Recommendation	Comment acknowledged in Q1.1.		

Submitter Number:	373	Submitter:	Janet Mathewson
Documents:	Submission #373 - Janet Mathwe		

Point Number	373.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn’s drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	373.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	373.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment: Staff Recommendation Council acknowledges there are no more comments.		

Submitter Number:	374	Submitter:	Patricia Clare
Documents:	Submission #374 - Patricia Cl		
Point Number	374.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Remain as it is. Staff Recommendation Comment acknowledged.		
Point Number	374.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? No Comment: We cannot afford the ridiculous amount of money proposed. Rate payers cannot afford money especially on the pension		

Staff Recommendation	We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.		
Point Number	374.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Listen to the people you are supposed to be representing. Stop more money debts thanks. No more communities use what we already have. Please listen to your people who put you in your jobs.		
Staff Recommendation	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		

Submitter Number:	375	Submitter:	Alice Thorne
Documents:	Submission #375 - Alice Thorne		
Point Number	375.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water		

Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number 375.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Comments: Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	

Submitter Number: 376 Documents: Submission #376 - Margaret La	Submitter: Margaret Lang-dale Hunt
Point Number 376.1 Category 1-Questionnaire > 1.1-Council Proposal Comments: Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number 376.2 Category 1-Questionnaire > 1.2-Future In-house Delivery Model Comments:	

Staff Recommendation	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Submitter Number:	377	Submitter: Walker Brian
Documents:	Submission #377 - Walker Bria	
Point Number	377.1	Category 1-Questionnaire > 1.1-Council Proposal
Comments:		
Staff Recommendation	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: There is enough bureaucracy in what is recognised to be the worst council in NZ now. Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.	
Point Number	377.2	Category 1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		
Staff Recommendation	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	

Submitter Number:	378	Submitter: Patrick Van dePol

Documents: Submission #378 - Patrick Van			
Point Number	378.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:			
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	378.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:			
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	378.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Question: Do you have any comments on the WSCCO model? No Comment:			
Staff Recommendation	Council acknowledges there are no more comments.		
Submitter Number:	379	Submitter:	Stephen Ray
Documents: Submission #379 - Stephen Ray			

Point Number	379.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	379.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	379.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: A waste if ratepayers money		
Staff Recommendation	Comment acknowledged. We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		

Submitter Number:	380	Submitter:	Steve Pudney
Documents:	Submission #380 - Steve Pudney		

Point Number	380.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	380.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Leave as is		
Staff Recommendation	Comment acknowledged.		
Point Number	380.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	381	Submitter:	Andrew Howard
Documents:	Submission #381 - Andrew Howar		
Point Number	381.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:			
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	381.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:			
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	381.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Question: Do you have any comments on the WSCCO model? No Comment:			
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	382	Submitter:	Lesley Palmer
Documents:	Submission #382 - Lesley Palme		
Point Number	382.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water			

Staff Recommendation		Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	382.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	382.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	383	Submitter:	Sonya Strahan
Documents:	Submission #383 - Sonya Straha		
Point Number	383.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Setting up a new board is expensive, a 500% debt limit! Expensive, who and how is that paid for? For next 10 years	

	what is WSCCO rates increase and LTP rates increases added together for average urban home?		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers. Please refer to the FAQs on our consultation page for a breakdown of these costs.		
Point Number	383.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Governance has input from community and elected representatives. Therefore, decisions are accountable to rate payers. Council run water services are well run, cost manageable.		
Staff Recommendation	It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.		
Point Number	383.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? Yes Comment: WSCCO operating with a 500% debt limit!! What would that money be spent on for the next 10 years? How is that financially manageable? Our rates increases are already too high and hurting a lot of Selwyn residents. Some are selling		

because they can't afford the rates increases.- especially retired residents, there are many unanswered questions about WSCCO model. Having only 3 weeks for public submissions for this was disappointing, especially since it is so important!

**Staff
Recommendation**

We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

**Submitter
Number:**

384

Submitter:

Eric Freeman

Documents:

[Submission #384 - Eric Freeman](#)

Point Number

384.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	384.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	384.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	385	Submitter:	John Verry
Documents:	Submission #385 - John Verry		
Point Number	385.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: To great a risk & startup costs to onerous on ratepayers also a leap into the unknown.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-		

house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 385.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** In-house has good water staff & water infrastructure better than in most areas of the motu.

Staff Recommendation Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number 385.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Consultation timeframe too short for complexity & lack of information available.

Staff Recommendation The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number: 386 **Submitter:** Christopher Norton

Documents: [Submission #386 - Christopher](#)

Point Number	386.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	386.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	386.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	387	Submitter:	William Gye
Documents:	Submission #387 - William Gye		
Point Number	387.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

**Staff
Recommendation**

Point Number 387.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

**Staff
Recommendation**

Point Number 387.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:**Comment:**

Staff Recommendation Council acknowledges there are no more comments.

Submitter Number: 388 **Submitter:** Sharon Howard

Documents: [Submission #388 - Sharon Howar](#)

Point Number 388.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Council is not acting in the best interests of its rate payers

Staff Recommendation	Comment acknowledged.		
Point Number	388.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Work within a budget we aren't endless pits of money		
Staff Recommendation	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.		
Point Number	388.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Definitely not spending your own money		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	389	Submitter:	Ian Tennant
Documents:	Submission #389 - Ian Tennant ; Submission #389 - Ian Tennant		

SUBMISSION ON WSCCO PROPOSAL

The following submission relates to the above proposal and my objections to it.

Preamble: The council put out a 'Funding and Financing' policy, adopted in 2024, which states, relating to water services, on page 18: "Council is in the best position to respond to the expectation of communities it serves and to translate these needs into levels of service" and further on: "The council is well positioned to take a major leadership role in planning and managing assets and networks that deliver these essential services..." and "...that failure of these services has a devastating and far-reaching effect on the district".

This admirable statement is the base of my objection, which shall be elaborated on below. What has suddenly changed? I'm not aware of anything that necessitates such a dramatic shift. Council has a direct and inalienable responsibility to deliver the services it is trying to offload onto a WSCCO.

The costs concern me too, as I shall address below. I note with interest the statement in the 'Development Contributions' policy that there is a table on page 37, which sets out who pays capital development and their projected costs. It shows that all Lincoln water extension of service is to be funded from Development Contributions. Page 41 observes that the capital expenditure "brings little or no benefit to the existing communities"

Recent central government decisions may make it easier for Council to pass on capital works costs to the Developers. These decisions should certainly make it easier for Council to pass on costs and reduce the ratepayer burden.

The FAQs and Council's response make for interesting reading and form a useful framework to outline my concerns. The FAQ is followed by excerpts of council response, followed by my queries/objections.

FAQ: Why is the preferred model a WSCCO? "..... future-proof Selwyn's water infrastructure..." There is no indication of how this would happen better with a WSCCO than in-house. Especially given that, in the council's own words, that is well positioned to do this, as I quoted above.

Surely the council, as part of its core business responsibilities already has the expertise for safe water delivery? If that is not the case, then who has been delivering these services so far? If it is the case, then why is there a need to develop a whole new level of bureaucracy and associated cost to deliver the same result?

An observation: If about 30% of Council's income from rates is water-related, then I assume that the relevant costs in Council will be reduced by an equivalent amount. As the Council's CEO will be responsible for 30% less, then will the salary be reduced by a similar amount. Almost certainly not. Will the Council require staff currently involved in safe water provision be required to take positions in the new WSCCO?

If water services are no longer going to be a Council activity, then I'd like to assume the rates would be lowered by a commensurate amount. I strongly suspect this will not be the case. Why?

Assuming this proposal was adopted, what will be the explicit anticipated costs. I see some very concerning figures about increases over the next few years. Council has a requirement to act responsibly.

These costs of implementing the setting up and operation of a WSCCO over the next few years amount to a huge extra charge to existing ratepayers. These costs would be on top of the already extremely large 70.8% increases in rates, above current levels, already signaled in the latest LTP.

FAQ: Why has the Council decided the preferred model is a WSCCO? “.. A WSCCO would be managed by specialists in water delivery infrastructure financing long term debt management...”

Surely ALL these functions should already be carried out by existing staff. If that is not the case, who is making these decisions at the moment?

As a side note. Management is a separate skill from the nuts and bolts of delivery. I suspect this will lead to a whole new, and expensive to ratepayers, bureaucracy. This fear is well founded as further on it states the intention to set up a separate board to run the WSCCO.

I have other points I wish to make, but the exceptionally short time-frame means I have no time to include them in these comments but I do reserve the right to mention them when being heard on this submission.

Thank You for the opportunity to submit this

Ian Tennant.

Point Number	389.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** See attached

Staff Recommendation

Comment acknowledged.

The central Government is coming out with Local Government (Water Services) Bill 3, this requires SDC to look at how waters are managed. A new WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the CCO including the ability to align strategic work programmes.

There is no disconnect between the DC policy table on page 37 and the statement on page 41. Page 37 shows that for Lincoln the cost of water supply growth is 100% DC funded. This means that all cost to grow the Lincoln Water supply are paid by DC. Page 41 of the DC policy states "Most of the planned expenditure for water and sewerage is to provide additional capacity and will bring little or no benefit to the existing community". This refers to these projects being for the benefit of new properties rather than the existing community that are already connected to Water with cost being covered by DC's rather than any cost to the existing ratepayers.

The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' consultation document.

A separate entity does provide the benefit of having specialised governance with expertise in the sector rather than elected officials with competing objectives.

Due to and WSCCO establishment requirements, the removal of these water services from Council rates would not equate to an initial direct \$1 for \$1 shift, with financial modelling identifying that from year 10 these charges are predicted to be lower than the projected rates requirement published in the Long-Term Plan 2024-2034.

New Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. Council is continuing to review all information as we proceed with the development of the Water Services Delivery Plan.

Through the Act there will be increased costs and compliance required, this means there will be added costs for either option taken.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Due to the fact a final decision has not been made by Council, any activities post that are not able to be predicted, and we are not in a position to consider staff impacts including redundancy costs or other specific impacts. In the event a transfer of staff is deemed necessary, impacted staff would be fully consulted with on any proposed changes before any final decisions in regarding employment are made.

Debt is used to fund capital projects, debt is used to pay for a project over a long period of time instead of putting the burden on the rate payer all in one year. This provides equity and results in even rate increases. For the average increase to an urban household please see the FAQs on our consultation page that has a breakdown of costs.

While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number	389.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** See attached

Staff Recommendation	Comment acknowledged in Q1.1.

Point Number	389.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** See attached

Staff Recommendation	Comment acknowledged in Q1.1.

Submitter Number:	390	Submitter:	Sharon Ray

Documents:	Submission #390 - Sharon Ray

Point Number	390.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	390.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	390.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	391	Submitter:	Connor van dePol
Documents:	Submission #391 - Connor van d		
Point Number	391.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			

Staff Recommendation		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	391.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation		It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	391.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation		Council acknowledges there are no more comments.	

Submitter Number:	392	Submitter:	Bronwyn van dePol
Documents:	Submission #392 - Bronwyn van		
Point Number	392.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:	

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	392.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	392.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	393	Submitter:	Keith Taege
Documents:	Submission #393 - Keith Taege		
Point Number	393.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	393.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	393.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	394	Submitter:	Helen Taege
Documents:	Submission #394 - Helen Taege		
Point Number	394.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	394.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:			
		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	394.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	395	Submitter:	Alan Hogg
Documents:	Submission #395 - Alan Hogg		
Point Number	395.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn’s drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	395.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a		

Staff Recommendation	future in-house water delivery model? Yes Comment: Keep services in house. Keep control of all services, no privatisation of services. The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
Point Number Comments: Staff Recommendation	395.3 Category 1-Questionnaire > 1.3-Comments Question: Do you have any comments on the WSCCO model? No Comment: Council acknowledges there are no more comments.

Submitter Number: Documents:	396 Submitter: Bruce Russell Submission #396 - Bruce Russel
Point Number Comments: Staff Recommendation	396.1 Category 1-Questionnaire > 1.1-Council Proposal Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number	396.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	396.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	397	Submitter:	Vanessa Murray
Documents:	Submission #397 - Vanessa Murr		
Point Number	397.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Comment: SDC needs to tell rate payers more		
Staff Recommendation	Comment acknowledged.		
Point Number	397.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Point Number	397.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	398	Submitter:	Philip Anderson
Documents:	Submission #398 - Philip Ander		
Point Number	398.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: We already have the 3 water service at the moment and the council people employed to run this. Why the extra costs to ratepayers!!		
Staff Recommendation	The current LTP modelling would require additional costs to what is included due to the Central Government's regulatory updates. Additional access to funding will be important to support significant growth in Selwyn District.		
Point Number	398.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: As above just another cost to ratepayer which is an at time high. Leave it as is.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government		

regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Point Number 398.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:**

Waste of money.

Your saying that Local Water done well policy is not working?

Just another cost to ratepayers ie \$2000 per year??

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submitter Number: 399 **Submitter:** M Smithies

Documents: [Your Water Done Well](#)

Point Number 399.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Ratepayers can't afford this shiny new entity with it's need to borrow huge amounts with no accountability.

Staff

Recommendation

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for

economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Point Number 399.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** Elected representative oversight present when in-house.

Staff Recommendation It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Point Number 399.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Despite S Broughton's comments to the contrary, it's not working in Wellington - contractor rip offs. No accountability or oversight apparently.

Staff Recommendation Comment acknowledged.

Submitter Number: 400 **Submitter:** J Gourlie for Parkdale Farm

Organisation: Parkdale Farm

Documents: [Your Water Done Well](#)

Point Number 400.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Loss of direct accountability through elected councilors. No consultation. Borrowing and spending ratepayer funds with no accountability.

Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	400.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Cheaper overall - can't borrow as much as the WSCCO so have to spend more carefully, wisely and in a planned fashion. No middle management.		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	400.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Selwyn has new infrastructure, no need for large scale rebuilding or repairs. Make developers pay their share.		
Staff Recommendation	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.		

Submitter Number:	401	Submitter:	Shanelle Carroll Pudney
Documents:	Submission #401 - Shanelle Car		

Point Number	401.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	401.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Sick of rate increases for nothing :(		
Staff Recommendation	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.		
Point Number	401.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	402	Submitter:	Graham Gough
Documents:	Submission #402 - Graham Gough		

Point Number	402.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: Get rid of the ideas like "got to do something" because "something Might happen"		
Staff Recommendation	Comment acknowledged. The Preliminary Arrangements Act requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		
Point Number	402.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	402.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Comment: Most of our good drinking water goes to waste, encourage people to collect rain water.		
Staff Recommendation	Comment acknowledged.		

Submitter Number:	403	Submitter:	Gary Brown
Documents:	Submission #403 - Gary Brown		
Point Number	403.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	403.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	403.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	404	Submitter:	Scott Halkett
Documents:	Submission #404 - Scott Halkett		
Point Number	404.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	404.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	404.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	405	Submitter:	Pietro Scalia
Documents:	Submission #405 - Pietro Scali		

Point Number	405.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	405.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	405.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	406	Submitter:	Alan Mathewson
Documents:	Submission #406 - Alan Mathews		
Point Number	406.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** Add another layer of bureaucracy and layer of top end high cost personal duplicating what can be done by present system.

Staff Recommendation

A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Point Number

406.2

Category

1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** More cost effective, currently Council has the workmen/tech/tools to do the job why duplicate and add massive cost.

Staff Recommendation

Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Point Number

406.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:** No further comments to what I have already written.

Staff Recommendation

Comment acknowledged.

Submitter Number:

407

Submitter:

Christine Montrose Hogg

Documents: [Submission #407 - Christine Mo](#)

Point Number 407.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:**

Staff Recommendation It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number 407.2 **Category** 1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number 407.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Comment: Waste of money too much bureaucracy. Not in favour of increasing debt.

Staff Recommendation Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submitter Number: 408 **Submitter:** Pauline Scalia

Documents: Submission #408 - Pauline Scal			
Point Number	408.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	408.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	408.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	409	Submitter:	Tara Norton
Documents: Submission #409 - Tara Norton			

Point Number	409.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	409.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	409.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	410	Submitter:	George Thorne
Documents:	Submission #410 - George Thorn		
Point Number	410.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			

Staff Recommendation		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	410.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: Staff Recommendation It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.	
Point Number	410.3	Category	1-Questionnaire > 1.3-Comments
Comments:		Comment: Staff Recommendation Council acknowledges there are no more comments.	

Submitter Number:	411	Submitter:	Owen Murray
Documents:	Submission #411 - Owen Murray		
Point Number	411.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:		Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:	

Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	411.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	411.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	412	Submitter:	Carly Norton
Documents:	Submission #412 - Carly Norton		
Point Number	412.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	412.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	412.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	413	Submitter:	Stuart Murray
Documents:	Submission #413 - Stuart Murra		
Point Number	413.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	413.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:			
		Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:	
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	413.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
		Question: Do you have any comments on the WSCCO model? No Comment:	
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	414	Submitter:	Francine Murray
Documents:	Submission #414 - Francine Mur		
Point Number	414.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn’s drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	414.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		

Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	414.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter Number:	415	Submitter:	Pauline Sewell
Documents:	Submission #415 - Pauline Sewe		
Point Number	415.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Comment:		
Staff Recommendation			
Point Number	415.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	415.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Very difficult to understand both options.

Staff

Comment acknowledged.

Recommendation**Submitter
Number:**

416

Submitter:

Kelvin Sewell

Documents:

[Submission #416 - Kelvin Sewel](#)

Point Number

416.1

Category

1-Questionnaire > 1.1-Council
Proposal

Comments:

Comment:

Staff**Recommendation****Point Number**

416.2

Category

1-Questionnaire > 1.2-Future In-
house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:**

Staff**Recommendation**

It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.

Point Number

416.3

Category

1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? No **Comment:**

Staff**Recommendation**

Council acknowledges there are no more comments.

Submitter Number:	417	Submitter:	Heather Stanley
Documents:	Submission #417 - Heather Stan		
Point Number	417.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	417.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	417.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? No Comment:		
Staff Recommendation	Council acknowledges there are no more comments.		

Submitter
Number:

418

Submitter: Rachel Inch

Documents:

[Submission #418 - Rachel Inch](#)

418

Rachael Inch



Date: March 13th 2025

To:

Selwyn District Council

yourwater@selwyn.govt.nz

Submission on Proposed Service Delivery Model for Water Services

Dear Councillors,

I am writing to submit my feedback on the Council's proposal to establish a separate service delivery entity for local water services. First, I wish to sincerely thank the Council for accepting this submission a day after the formal deadline. I appreciate your willingness to consider my input. I needed time to research this matter properly.

Concerns with Consultation Process

I am making this submission under significant time pressure due to the limited consultation timeframe provided. I am extremely disappointed in the Council's engagement approach. This process is not only unjust — it falls short of your obligations to the community you represent.

While I acknowledge that central government has imposed time constraints, I urge the Council to ensure that future decisions of this magnitude are subject to **robust, meaningful, and well-publicised community consultation**. Should this level of consultation continue, I will seek to address this directly in person with Council.

I speak from experience — I authored the Social Impact Report on the Freshwater Regulations in the Ashburton District. That work clearly showed the significant consequences of poor consultation processes, particularly on social cohesion and community trust.

Assessment of the Council-Owned Organisation (COO) Model

In considering this proposal, I focused my research on existing water entities in New Zealand:

- **Watercare Services Limited (Auckland):** While often cited as a successful model for centralised and efficient water delivery, it has faced criticism for its limited responsiveness to local community needs.
- **Wellington Water Limited:** A shared governance model between multiple councils, which highlights the complexity and potential inefficiencies of coordinating across different priorities.

Key Concerns

Based on this review and my own understanding of our district's needs, I have serious reservations about the proposed COO model:

- Loss of democratic oversight and transparency
- Reduced community accountability and voice
- High setup and administrative costs
- Potential inequity through cost-recovery pricing models
- Council remains publicly accountable but loses total operational control

While I acknowledge the Council has proposed a 'Council-Owned Organisation' rather than a privatised entity, the same concerns around governance, democratic oversight, and community accountability still apply if safeguards are not in place.

We have seen in Selwyn how quickly decision-making can shift when a small, organised group gains influence. This model may increase that risk, while disempowering the broader community. The costs of establishing a new entity are also substantial, and the return on investment is uncertain — particularly if commercial frameworks are applied without community safeguards.

Acknowledged Potential Benefits

I acknowledge there are potential benefits, including:

- Access to specialist expertise
- Improved funding and borrowing capacity
- Opportunity for future collaboration with other councils

These factors may contribute positively to the long-term sustainability of water infrastructure — but only if the right governance and accountability mechanisms are in place.

Unanswered Questions

Significant gaps in the proposal remain, including:

- What level of control will the Selwyn community retain over its water assets?
- How will community engagement and oversight be maintained in the new structure?
- What is the primary objective — cost efficiency, compliance, specialisation, or all the above?

These uncertainties make it extremely difficult to support the proposal with confidence.

Ownership and Governance: While Council has indicated it will retain 100% ownership and appoint all directors; the proposed governance structure remains vague. Local control **must not** be reduced to mere technical ownership. The model must include formal mechanisms for genuine community representation and accountability.

Protection Against Future Regionalisation: I also note that Council has explicitly stated this is not a step toward joining a regional water entity or reverting to the former Three Waters structure. I agree that this entity must not become a backdoor pathway to regionalisation or future amalgamation **without explicit and renewed community consultation**.

Statement of Intent (SOI): The current draft SOI lacks the necessary detail to assure the community of long-term safeguards. It does not sufficiently address how community engagement will be preserved or provide transparent cost modelling. This further reinforces my call for a binding Memorandum of Understanding (MoU) and transparent cost implications.

Efficiency vs Bureaucracy: While the potential for operational efficiency is acknowledged, this outcome is not guaranteed. Without clear delivery benchmarks and accountability structures, there is a risk that the entity becomes an additional bureaucratic layer — detached from community needs and expectations.

Conditions for Support

I want to be clear that I am **open to supporting the Council's proposal** — but only if the following conditions are met in full. In my mind, these are not minor considerations; they are essential protections for the integrity and sustainability of this model:

- A **binding, long-term Memorandum of Understanding (MoU)** that protects community ownership, engagement, and accountability.
- A **balanced governance structure**, including a board made up of shareholders and experts, **with at least two dedicated community representatives**. A structure like the Alliance Group model, which includes both appointed and elected directors, may be appropriate.
- **Full and transparent cost implications for the community**, with clear modelling of potential financial impacts.
- A **formal commitment to equity and affordability**, not just cost recovery.

These conditions are not optional in my mind — they are essential safeguards. Without them, I cannot in good faith support this proposal.

Final Statement

This is a **generational decision** that will shape the future of water services in our district. If Council is committed to earning and keeping the community's trust, it must prioritise democratic protections, financial transparency, and equitable outcomes.

"When leaders stop listening, the people stop believing. And when belief fades, so does legitimacy — until power becomes a shadow, and governance a shell."

Please listen now — before that belief is lost.

Yours sincerely,

Rachael Inch

Point Number	418.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:

Comment:

Staff Recommendation

Point Number	418.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Comment:

Staff Recommendation

Point Number	418.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Comment:

**Staff
Recommendation**

The submitter's comments and experience are acknowledged by Council.

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.

A CCO would remain under the control of SDC as the only shareholder and be directed each year by a Statement of Expectation. A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

It is anticipated a board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

The benefit of the additional administrative costs will be a governance structure that includes water expertise that can provide greater management and strategy on the projects performed by the WSCCO.

The proposed charges for water will be consistent across the region on a per cubic metre charge with the 'Water Supply charge' continuing to be based on the number of connections.

The WSCCO would remain accountable to Council. A statement of expectation would be put in place between the Council and a WSCCO.

We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.

Establishment of a CCO will benefit from specific water expertise both at a governance and management level.

One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house.

There is the future potential for a WSCCO to partner or merge with other WSCCOs.

A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. It is anticipated a Board would be appointed via an appointment panel where there is independent, CCO and Council representation. Bill 3 of Local Water Done Well legislation sets out that Directors must be independent and that there must be an appropriate skill mix among the Directors to allow for the effective governance of a water services entity. The same requirement would not exist for an in-house delivery model and they services would continue to be governed by Councillors.

A CCO would remain under the control of SDC as the only shareholder and be directed each year by a Statement of Expectation. Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.

A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. The benefits of the proposed WSCCO are as outlined in the consultation document.

Your comment is on ownership and governance is acknowledged and staff will look to address this approach in the establishment of the WSCCO if this is confirmed. This will also be addressed through the development of the constitution and the letter of Expectation from SDC to the WSCCO.

The proposed model is being developed under the current legislative framework. Within this, councils can partner but would be done under whatever

model the Council has adopted for its WSDP. Any changes outside of this would require a change and would potentially trigger wider consultation again.

New Government legislation requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

If established, the WSCCO will have its own constitution and will be directed by a binding Statement of Expectation from Council provided each year to the WSCCO. A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Submitter Number:	419	Submitter:	Charlotte Barraclough
Documents:	Submission #419 - Charlotte Ba		
Point Number	419.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	419.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment:		
Staff Recommendation	It is acknowledged that the submitter supports a future in-house water delivery model. Comments from all submitters will be taken into consideration during Council deliberations.		

Point Number	419.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: There has not been enough information or time given to rate payers about the WSCCO model. The small amount of information that I have seen indicates the Selwyn rate payers can not afford this WSCCO model.		
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	420	Submitter:	Clint Madden
Documents:	Submission #420 - Clint Madden		

Point Number	420.1	Category	1-Questionnaire > 1.1-Council Proposal

Comments:			
Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment: The council should keep the debt as low as possible. Creating a WSCCO will raise the debt cap to high			
Staff Recommendation	Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.		
Point Number	420.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: yes council control is a better option and council have a good handel on the water already			
Staff Recommendation	Positive endorsement of current SDC management is acknowledged. A WSCCO would remain accountable to Council who in turn have accountability to ratepayers.		
Point Number	420.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Question: Do you have any comments on the WSCCO model? Yes Comment: Legislation need to be finalised before a WSCCO model is implemented. Council will lose to much control if a WSCCO is implemented.			
Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.		

Submitter Number:	421	Submitter:	Bronwen Quigley
Documents:	Submission #421 - Bronwen Quig		
Point Number	421.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	421.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: It would be far better to have an in house controll of our water in the future		
Staff Recommendation	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.		
Point Number	421.3	Category	1-Questionnaire > 1.3-Comments
Comments:	Question: Do you have any comments on the WSCCO model? Yes Comment: Government have not passed legislation yet		

Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number:	422	Submitter:	Jeff Quigley
Documents:	Submission #422 - Jeff Quigley		
Point Number	422.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:	Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No Comment:		
Staff Recommendation	It is acknowledged that the submitter does not support the proposal for an establishment of a WSCCO for Selwyn's drinking water and wastewater. Comments from all submitters will be taken into consideration during Council deliberations.		
Point Number	422.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:	Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes Comment: more control		
Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place		

between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

Point Number 422.3 **Category** 1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** not enough information. Government have not passed legislation yet

Staff

Recommendation

The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submitter Number: 423 **Submitter:** Helen Madden

Documents: [Submission #423 - Helen Madden](#)

Point Number 423.1 **Category** 1-Questionnaire > 1.1-Council Proposal

Comments:

Question: Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council? No **Comment:** This will create too much debt and will end up having the rate payers having to pay the short fall

Staff

Recommendation

We understand that rising costs are a major concern. Borrowing enables council to continue to provide the required infrastructure to the community while

limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users. The cost of the debt has been modelled based on the assume interest rate used in the LTP.

Point Number	423.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model

Comments:

Question: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? Yes **Comment:** This should stay in house and be controlled by our local council. This should save costs and have more control.

Staff Recommendation	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Point Number	423.3	Category	1-Questionnaire > 1.3-Comments

Comments:

Question: Do you have any comments on the WSCCO model? Yes **Comment:** Once this is turned over to WSCCO we will have no controll over what happens. It is not something that should be rushed.

Staff Recommendation	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model

or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submitter Number:	424	Submitter:	Vince Barry for National Public Health Service, Te Waipounamu Region, Health New Zealand – Te Whatu Ora
Organisation:	National Public Health Service, Te Waipounamu Region, Health New Zealand – Te Whatu Ora		
Documents:	Submission #424 - Vince Barry		

12 March 2025

Selwyn District Council
 2 Norman Kirk Drive
ROLLESTON 7614

Tēnā koutou

Advice on Your Water Done Well

1. This advice has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island including the Selwyn District.
2. NPHS Te Waipounamu recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.

General Comments

4. NPHS Te Waipounamu does not have a view on the preferred option for the delivery of water services in the Selwyn District. However, we are aware that the Council's Your Water Done Well plan may have significant implications for public health and as such should take into consideration the following factors:
 - The delivery of three waters services is maintained or strengthened and allowance is made for population growth. Council should continue to operate its existing three waters infrastructure and not reduce or withdraw services.
 - There is sufficient investment in drinking water and wastewater treatment plants to meet regulatory requirements.
 - There is sufficient investment in the renewal and maintenance of infrastructure to maintain levels of service in the medium and long term.
 - The chosen delivery model is cost effective and keeps costs manageable for users to protect people's health by ensuring access to safe drinking water and wastewater disposal is affordable.
 - Adequate resources are being allocated to higher risk communities, including those that are currently under-served or not serviced.

Sensitivity: General

- Intergenerational equity has been considered. This should include consideration of the impacts of climate change and ensuring this essential public health infrastructure is protected from extreme weather events.
 - If water metering and charging is considered, this should be equitable, and there should be provision for adequate water to be provided to meet health and sanitation requirements.
 - If stormwater is included, there should be evidence of discussions between local and regional councils on the interaction between the stormwater and flood protection systems so that flood risk is not increased.
 - Separate arrangements for different water services (drinking water, wastewater or stormwater) that are in different documents need to be coordinated and aligned.
 - While there is no specific requirement in the Local Government (Water Services Preliminary Arrangements) Act 2024 for iwi Māori to be consulted, the NPHS supports consultation with iwi Māori on Your Water Done Well.
5. The Your Water Done Well proposal generally implies that the above aspects will be considered, but some aspects would benefit from clearer articulation.

Sensitivity: General

Specific Comments

6. There is no reference in Your Water Done Well to servicing of higher risk communities and how those with higher needs will be approached. The current proposal also doesn't address plans to connect existing or future properties to the network. Council should ensure that these groups are considered in future planning whether it be through the council's own internal business unit or the proposed Water Services Council Controlled Organisation (WSCCO). Council also needs to ensure that there are mechanisms in place to ensure the WSCCO applies an equity lens to its operation.
7. Although intergenerational equity is mentioned in Your Water Done Well, climate change is not. Council should ensure that climate change is at the forefront of any plan development as the effects of extreme weather events will affect the provision of infrastructure such as drinking water, stormwater and wastewater. Consultation with other local and regional councils to reduce impact of drought and flood risk on the provision of drinking water and wastewater services should be imbedded in Council's approach to Your Water Done Well, as these risks are not restricted to council boundaries. There is no indication in the Your Water Done Well proposal that there has been such a discussion between Selwyn District Council and Environment Canterbury, for example.
8. The Your Water Done Well proposal does not discuss continued drinking water access for health and sanitation including life-preserving services, such as home dialysis. It is acknowledged that the supply of water for these purposes (such as exemptions for medical purposes) may be covered in other council plans. Passing control of water services to a WSCCO means that any matters of this nature covered by existing specific Council plans must also migrate to the new organisation. Further to this, there also needs to be a formalised process for residents who are unable to meet the costs of drinking water. We note that Section 25 of the Water Services Act requires a water supplier to ensure a minimum quantity of drinking water is to be provided.
9. We understand that if the new WSCCO is agreed as the delivery model, it will encompass drinking water and wastewater with stormwater services continuing to be delivered by an internal Council business unit. It will be important to coordinate and align the two delivery models since all these components of water services are interlinked and cannot be managed in isolation. As you will know, stormwater entering sewerage systems can create problems for treatment plants and lead to sewage overflows. We also note that stormwater services need to be aligned with flood protection planning undertaken by the regional council.
10. NPHS supports Council's intention to uphold the mana and mauri of all water in its decision making through the Waioira One Water Strategy and to work in partnership with iwi to sustainably manage water now and into the future.

Conclusion

11. NPHS Te Waipounamu does not wish to be heard with respect to this submission.

Sensitivity: General

Ngā mihi



Vince Barry

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Te Kāwanatanga o Aotearoa
New Zealand Government

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Point Number	424.1	Category	1-Questionnaire > 1.1-Council Proposal
Comments:			
	Comment:		
Staff Recommendation			

Point Number	424.2	Category	1-Questionnaire > 1.2-Future In-house Delivery Model
Comments:			
Staff Recommendation	Comment:		

Point Number	424.3	Category	1-Questionnaire > 1.3-Comments
Comments:			
Staff Recommendation	Question: Do you have any comments on the WSCCO model? Yes Comment: Council has developed 30-year masterplans for water and wastewater services to meet future growth demand. Council's 2024-34 LTP and 30-year Infrastructure sets out the investment required to maintain regulatory requirements. Council runs an advanced IDS renewal model and funds renewals over a 30-year timeframe. Affordability is one of the priorities for both delivery options. Council provides the same high level of service to all communities. Council is already fully metered (99.8%) on all on-demand supplies. Stormwater and flood protection interconnections is noted. Council's 'One Water Strategy' provides the framework for integrated water management. The above strategy was co-designed with Te Taumutu Runanga. Council provides the same high level of service to all communities. Planning is in place to connect or new properties within our water supply boundaries. There are currently no plans to extend the community supplies to subserviced private properties with the exception being the Ngati Moki marae. Climate change considerations will be a factor of planning with both options. Council maintains a register of customers on home dialysis. Should the WSCCO option progress, this list and requirement will be transferred to the WSCCO. Splitting out stormwater from the other surface waters (water races and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains with Council. Stormwater also integrates with Transport and Open Space assets. Council's Engineering Code of Practice sets out the designed LoS for stormwater. Co-ordination with the Regional Council is in place.		