



YOUR WATER DONE WELL

HEARING BOOKLET

Booklet prepared: 14 March 2025

Note: The following written submissions are unedited and unchanged. They may include errors or offensive information. They are the opinion of the submitter and the Council takes no responsibility for them. Where a submission or part of a submission constitutes hate speech, or otherwise is in breach of law, the submission has been omitted or redacted in this public version. All contact details have been removed.

| Hearing Schedule Thursday 20 March 2025 | | | | |
|---|-----------------|-------|-------------------------|-----------------------------------|
| (5 Min) | Starting Page # | Sub # | Person | Organisation |
| 1.00 pm | | | Opening | |
| 1.10 pm | 4 | 228 | Edward Parker | |
| 1.15 pm | 6 | 271 | Christine Parker | |
| 1.20 pm | 8 | 352 | Gareth Payne | |
| 1.25 pm | | | | |
| 1.30 pm | 11 | 267 | Harvey Polglase | Darfield Residents Association |
| 1.35 pm | | | | |
| 1.40 pm | 13 | 350 | Darryl Griffin | |
| 1.45 pm | | | Overrun/reflection time | |
| 1.50 pm | 19 | 346 | Douglas Marshall | |
| 1.55 pm | | | | |
| 2.00 pm | 27 | 283 | Samuel Wilshire | |
| 2.05 pm | 28 | 367 | Samuel Wilshire | West Melton Residents Association |
| 2.10 pm | 33 | 226 | Basil and Trudi Meyer | |
| 2.15 pm | | | | |
| 2.20 pm | 37 | 273 | Mark Alexander | Rolleston Residents Association |
| 2.25 pm | | | | |
| 2.30 pm | 39 | 297 | Denise Carrick | Lincoln Voice |
| 2.35 pm | | | Overrun/reflection time | |
| 2.40 pm | | | | |
| 2.45 pm | | | | |
| 2.50 pm | 42 | 335 | Brian Lester | |
| 2.55 pm | | | | |
| 3.00 pm | | | Afternoon Tea | |
| 3.05 pm | | | Afternoon Tea | |
| 3.10 pm | | | Afternoon Tea | |
| 3.15 pm | | | Afternoon Tea | |

| | | | | |
|---------|----|-----|-------------------------------------|--|
| 3.20 pm | 48 | 254 | Susan Farmer | |
| 3.25 pm | 49 | 345 | David Farmer | |
| 3.30 pm | | | | |
| 3.35 pm | 50 | 174 | Steve Garbett | |
| 3.40 pm | 52 | 363 | Sarah Manifold | |
| 3.45 pm | | | | |
| 3.50 pm | | 298 | Kenneth May | |
| 3.55 pm | | | | |
| 4.00 pm | | | Overrun/reflection time | |
| 4.05 pm | 55 | 393 | Keith Taege | |
| 4.10 pm | | | | |
| 4.15 pm | 58 | 364 | Graeme Young | |
| 4.20 pm | | | | |
| 4.25 pm | | | | |
| 4.30 pm | 61 | 336 | Lieuwe Doubleday | |
| 4.35 pm | | | | |
| 4.40 pm | 68 | 328 | Delwyn McKenzie | |
| 4.45 pm | 69 | 295 | Helen Stevenson | |
| 4.50 pm | 70 | 259 | Gail Harkerss | |
| 4.55 pm | | | Overrun/reflection time | |
| 5.00 pm | 71 | 296 | Allison Rosanowski - Joining Online | |
| 5.05 pm | 72 | 344 | Calvin Payne | |
| 5.10 pm | 75 | 142 | Nadine Butcher | |
| 5.15 pm | 77 | 385 | John Verry | |
| 5.20 pm | 81 | 372 | John Verry | Malvern Community Board |
| 5.25 pm | 88 | 396 | Bruce Russell | John Verry speaking for Bruce Russell |
| 5:30 pm | | | Closing Karakia | |

Wishing to be heard - timing to be confirmed

| Page # | Sub # | Person |
|---------------|--------------|-------------------|
| 91 | 9 | Gary Martini |
| 92 | 275 | L Gourlie |
| 94 | 298 | Kenneth May |
| 97 | 305 | Haydn Porritt |
| 99 | 332 | Nikki Chippendale |
| 100 | 387 | William Gye |
| 103 | 397 | Vanessa Murray |

Submitter Number: 228

Full Name: Edward Parker

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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)

.Do you have any comments on the WSCCO model? Comments

No

Please add your comments

Submitter Number: 271

Full Name: Christine Parker

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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.

Submitter Number: 352

Full Name: Gareth Payne

Organisation:

Suburb: Annat

Wish to speak to the submission: Yes

12 March 25
Oakfield Library

Submission Form

Selwyn District Council is conducting a public consultation in response to The Local Government (Water Services Preliminary Arrangements) Act 2024 in relation to the arrangements for its delivery of water services into the future.

The Council's proposal is:
To transition Selwyn District Council drinking and wastewater assets and services into a new publicly owned Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within the Council.

Please read the consultation document and information available online at selwyn.govt.nz/yourwater

You can make a submission using this form, or by completing the online submission form at selwyn.govt.nz/yourwater

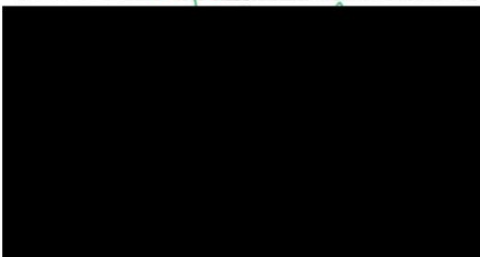
If you need extra space for your submission, use additional paper and attach it to this form. Please include your first and last name on the additional paper.

Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* Gareth Payne

Last name* Payne



Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

Anyone can make a submission. Submissions will only be used for the purpose of this consultation process. All submissions will be considered by Council before making a decision.

Privacy statement

Submissions are part of the public consultation process and are a public record. Anonymous submissions will not be accepted. Submissions including names are published on our website and in official documents so please do not include any personal information in the content of your submission you would prefer to be kept private.

While contact details (address, phone number and email address) are provided to elected members along with your feedback to be considered when making their decisions, contact details will not be made publicly available on the Council's website or official documentation.

If someone requests a copy of submissions through the Local Government Official Information and Meetings Act 1987, name and contact details must be supplied. If you have good reason as to why your personal details and/or feedback should be kept confidential please contact yourwater@selwyn.govt.nz outlining your reasons.

Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

- Council should not be using debt secured against ratepayers homes.
- I do not consent to my home being used as collateral for council debt.

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

- Innovate, Do Your Job, Serve the district, focus on critical infrastructure.



3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

I will Present at hearing.

Return this submission form by:

- Dropping it off with our Customer Service Teams at:
 - Council Rolleston Offices, 2 Norman Kirk Drive, Rolleston
 - Te Ara Ātea, 56 Tennyson Street, Rolleston
 - Darfield Library, 1 South Terrace, Darfield
 - Leeston Library, 19 Messines Street, Leeston
 - Lincoln Library, 22 Gerald Street, Lincoln
- Posting it to:
 - Freepost 104 653
PO Box 90
Rolleston 7643

All posted submissions must be received by Council by 5pm, 12 March 2025. Please allow time for your submission to be delivered by this deadline.

- Scanning and emailing it to yourwater@selwyn.govt.nz

 **Selwyn**
DISTRICT COUNCIL

352

Submitter Number: 267

Full Name: Harvey Polglase

Organisation: Darfield Residents Association

Wish to speak to the submission: Yes

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

No

Please add your comments

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

We do not need the costs associated with an additional bureaucracy which will increase ratepayer charges until at least 2034.



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.

Submitter Number: 350

Full Name: Darryl Griffin

Organisation:

Wish to speak to the submission: Yes

Submission Form

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Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* Darryl
Last name* Grafton

Are you submitting on behalf of an organisation?

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

Please refer to attached

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

Please refer to attached



3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

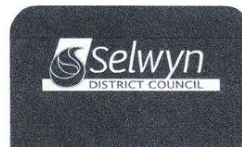
Please refer to attached

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Rolleston 7643

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- Scanning and emailing it to
yourwater@selwyn.govt.nz



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

Submitter Number: 346

Full Name: Douglas Marshall

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

Refer to my previous comment.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

See my attached submission

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 | 45,577 | 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 | 55,509 | 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 | 65,872 | 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.

Your Water Done Well | 17

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. Pasuing 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

Submitter Number: 283

Full Name: Samuel Wilshire

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

No punctuation, so this question can read two ways. I bet submitters got confused by question 1.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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?

Submitter Number: 367

Full Name: Samuel Wilshire

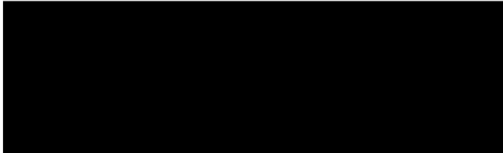
Organisation: West Melton District Residents Association

Wish to speak to the submission: Yes

Submitter details

Please note: all fields marked with an asterisk () are compulsory. These details will be used for the purpose of contacting you about this consultation.*

First name* Samuel
Last name* Wilshire



Are you submitting on behalf of an organisation?*

Yes

*If yes, please state the name of the organisation**

West Melton District Residents Association

Do you wish to attend a hearing to present your submission in person?*

Yes

If yes, someone will be in contact with you to arrange the date and time.

Anyone can make a submission. Submissions will only be used for the purpose of this consultation process. All submissions will be considered by Council before making a decision.

Privacy statement

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as to why your personal details and/or feedback should be kept confidential please contact yourwater@selwyn.govt.nz outlining your reasons.

Questions

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

No

Please add your comments

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.

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

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.

3. Do you have any comments on the WSCCO model?

Yes

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 WSCCO 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 WSCCO 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 WSCCO 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 cante 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 WSSCO 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 WSSCO 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

Submitter Number: 226

Full Name: Basil and Trudi Meyer

Organisation:

Wish to speak to the submission: Yes

Submission Form

Selwyn District Council is conducting a public consultation in response to The Local Government (Water Services Preliminary Arrangements) Act 2024 in relation to the arrangements for its delivery of water services into the future.

The Council's proposal is:

To transition Selwyn District Council drinking and wastewater assets and services into a new publicly owned Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within the Council.

Please read the consultation document and information available online at selwyn.govt.nz/yourwater

You can make a submission using this form, or by completing the online submission form at selwyn.govt.nz/yourwater

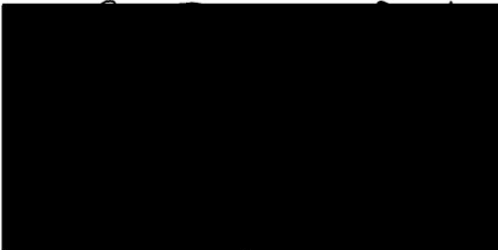
If you need extra space for your submission, use additional paper and attach it to this form. Please include your first and last name on the additional paper.

Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* BASIL & TRUDI

Last name* MEYER



Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

Defer decision until
more info on requirements
available.

We don't need additional bureaucracy

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model? .

☒ Yes ☐ No

Please add your comments

For council and ratepayers
direct control remains

3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

*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!*

Return this submission form by:

- Dropping it off with our Customer Service Teams at:
 - Council Rolleston Offices,
2 Norman Kirk Drive, Rolleston
 - Te Ara Ātea, 56 Tennyson Street, Rolleston
 - Darfield Library, 1 South Terrace, Darfield
 - Leeston Library,
19 Messines Street, Leeston
 - Lincoln Library, 22 Gerald Street, Lincoln
- Posting it to:
 - Freepost 104 653
PO Box 90
Rolleston 7643

All posted submissions must be received by Council by 5pm, 12 March 2025. Please allow time for your submission to be delivered by this deadline.

- Scanning and emailing it to
yourwater@selwyn.govt.nz



Submitter Number: 273

Full Name: Mark Alexander

Organisation: Rolleston Residents Association

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

The consultation document did not identify any projects that would require any additional borrowing that WSCCO would provide that aren't already in the Selwyn District Council Long Term Plan (LTP). Vague statements about that there 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 WSCCO 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?

Submitter Number: 297

Full Name: Denise Carrick

Organisation: Lincoln Voice

Wish to speak to the submission: Yes

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

No

Please add your comments

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

Do you have any comments on the WSCCO model? Comments

No

Please add your comments

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.

Submitter Number: 335

Full Name: Brian Lester

Organisation:

Wish to speak to the submission: Yes

Lincoln Living 11/3/25

Submission Form

Selwyn District Council is conducting a public consultation in response to The Local Government (Water Services Preliminary Arrangements) Act 2024 in relation to the arrangements for its delivery of water services into the future.

The Council's proposal is:

To transition Selwyn District Council drinking and wastewater assets and services into a new publicly owned Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within the Council.

Please read the consultation document and information available online at selwyn.govt.nz/yourwater

You can make a submission using this form, or by completing the online submission form at selwyn.govt.nz/yourwater

If you need extra space for your submission, use additional paper and attach it to this form. Please include your first and last name on the additional paper.

Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* Brian

Last name* Lester

Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

see attached.

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

see attached. Fundamental Function of Council.

335

3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

See attached.

I wish to be heard in
relation to this submission

2

Return this submission form by:

- Dropping it off with our Customer Service Teams at:

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- Posting it to:

- Freepost 104 653
PO Box 90
Rolleston 7643

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- Scanning and emailing it to
yourwater@selwyn.govt.nz

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 LTP 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.

Submitter Number: 254

Full Name: Susan Farmer

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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

Submitter Number: 345

Full Name: David Farmer

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

This will be less accountable and add further financial burden to Selwyn over the long term.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

No large setup costs plus greater accountability.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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!

Submitter Number: 174

Full Name: Steve Garbett

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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

WSSCO overheads and the cost of additional debt with no guarantee of a reduction from 2034 onwards.

Do you have any comments on the WSSCO model? Comments

Yes

Please add your comments

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.

Submitter Number: 363

Full Name: Sarah Manifold

Organisation:

Wish to speak to the submission: Yes

Submission Form

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Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* SARAH

Last name* MANIFOLD

[Redacted]

Email address [Redacted]

Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

Selwyn water should be managed and run by Council. as this is their responsibility!

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

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.

Your Water Done Well | 23

3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

A separate body would entail duplication of administrative functions leading to higher costs for the rate payer.

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 - Leeston Library, 19 Messines Street, Leeston
 - Lincoln Library, 22 Gerald Street, Lincoln
- Posting it to:
 - Freepost 104 653
PO Box 90
Rolleston 7643

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- Scanning and emailing it to yourwater@selwyn.govt.nz



Submitter Number: 393

Full Name: Keith Taege

Organisation:

Wish to speak to the submission: Yes

Submission Form

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Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* Keith
Last name* Taege



Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments



3. Do you have any comments on the WSCCO model?

☐ Yes ☐ No

Please add your comments

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yourwater@selwyn.govt.nz



Submitter Number: 364

Full Name: Graeme Young

Organisation:

Wish to speak to the submission: Yes

364 Submission Form

Selwyn District Council is conducting a public consultation in response to The Local Government (Water Services Preliminary Arrangements) Act 2024 in relation to the arrangements for its delivery of water services into the future.

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Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* Braeme

Last name* Young

Are you submitting on behalf of an organisation?

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

Yes. Since when did the Council start making policy based on religious beliefs? Why has water been personalised?

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

We do not need to double up on infrastructure and personnel.

364

3. Do you have any comments on the WSCCO model?

☒ Yes ☒ No

Please add your comments

Bill: could you please explain
in symbol english what
this page means.

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- Scanning and emailing it to yourwater@selwyn.govt.nz

Submitter Number: 336

Full Name: Lieuwe Doubleday

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

The proposed costs are unnecessary creating more intergenerational debt is not welcome. The current inhouse team have done a great job.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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 [REDACTED]

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)
12 March 2025 from Lieuwe Doubleday [REDACTED]

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 [REDACTED]

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.

Submitter Number: 328

Full Name: Delwyn McKenzie

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

I am opposed to this proposal due to the high cost it will incur for the next generation.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

Outside experts/consultants can put the prices up anytime they like and they are also not elected representatives by Selwyn rate payers.

Submitter Number: 295

Full Name: Helen Stevenson

Organisation:

Suburb: West Melton

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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 !

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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 !

Submitter Number: 259

Full Name: Gail Harkerss

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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.

Submitter Number: 296

Full Name: Allison Rosanowski

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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 contracts 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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

Puts distance between rate payers and service delivery.

Submitter Number: 344

Full Name: Calvin Payne

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

Do you have any comments on the WSCCO model? Comments

No

Please add your comments

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.

Submitter Number: 142

Full Name: Nadene Butcher

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

*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!

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

- ****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!

Submitter Number: 385

Full Name: John Verry

Organisation:

Wish to speak to the submission: Yes

Submission Form

Selwyn District Council is conducting a public consultation in response to The Local Government (Water Services Preliminary Arrangements) Act 2024 in relation to the arrangements for its delivery of water services into the future.

The Council's proposal is:

To transition Selwyn District Council drinking and wastewater assets and services into a new publicly owned Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within the Council.

Please read the consultation document and information available online at selwyn.govt.nz/yourwater

You can make a submission using this form, or by completing the online submission form at selwyn.govt.nz/yourwater

If you need extra space for your submission, use additional paper and attach it to this form. Please include your first and last name on the additional paper.

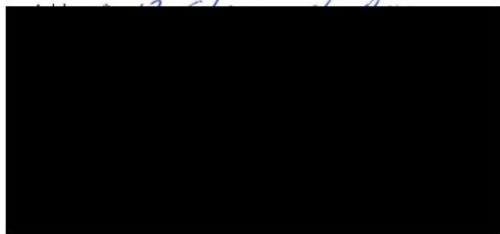
Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* John

Last name* VERRY

Address* 12 Selwyn Drive



Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

Anyone can make a submission. Submissions will only be used for the purpose of this consultation process. All submissions will be considered by Council before making a decision.

Privacy statement

Submissions are part of the public consultation process and are a public record. Anonymous submissions will not be accepted. Submissions including names are published on our website and in official documents so please do not include any personal information in the content of your submission you would prefer to be kept private.

While contact details (address, phone number and email address) are provided to elected members along with your feedback to be considered when making their decisions, contact details will not be made publicly available on the Council's website or official documentation.

If someone requests a copy of submissions through the Local Government Official Information and Meetings Act 1987, name and contact details must be supplied. If you have good reason as to why your personal details and/or feedback should be kept confidential please contact yourwater@selwyn.govt.nz outlining your reasons.

Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

To greater risk & startup
costs to grow on ratepayers
also a long m/b to unknown

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

In-house has good water supply
& water infrastructure better
than in most areas of the water

Your Water Done Well | 23



3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

*consultation time have to short
for complexity + lack of information
available*

Return this submission form by:

- Dropping it off with our Customer Service Teams at:
 - Council Rolleston Offices,
2 Norman Kirk Drive, Rolleston
 - Te Ara Ātea, 56 Tennyson Street, Rolleston
 - Darfield Library, 1 South Terrace, Darfield
 - Leeston Library,
19 Messines Street, Leeston
 - Lincoln Library, 22 Gerald Street, Lincoln
- Posting it to:
 - Freepost 104 653
PO Box 90
Rolleston 7643

All posted submissions must be received by Council by 5pm, 12 March 2025. Please allow time for your submission to be delivered by this deadline.

- Scanning and emailing it to
yourwater@selwyn.govt.nz



385

Submitter Number: 372

Full Name: John Verry

Organisation: Malvern Community Board

Wish to speak to the submission: Yes

Submission Form

Selwyn District Council is conducting a public consultation in response to The Local Government (Water Services Preliminary Arrangements) Act 2024 in relation to the arrangements for its delivery of water services into the future.

The Council's proposal is:

To transition Selwyn District Council drinking and wastewater assets and services into a new publicly owned Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within the Council.

Please read the consultation document and information available online at selwyn.govt.nz/yourwater

You can make a submission using this form, or by completing the online submission form at selwyn.govt.nz/yourwater

If you need extra space for your submission, use additional paper and attach it to this form. Please include your first and last name on the additional paper.

Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* Malvern Community Board

Last name* pp John Verry, Deputy Chair

Are you submitting on behalf of an organisation?*

☒ Yes ☐ No

If yes, please state the name of the organisation*

Malvern Community Board

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

Anyone can make a submission. Submissions will only be used for the purpose of this consultation process. All submissions will be considered by Council before making a decision.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

Refer attached

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

Refer attached

372

3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

Refer Attached

Return this submission form by:

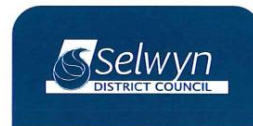
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PO Box 90
Rolleston 7643

All posted submissions must be received by Council by 5pm, 12 March 2025. Please allow time for your submission to be delivered by this deadline.

- Scanning and emailing it to
yourwater@selwyn.govt.nz

Mode of submission

Submission circulated to MCB and approved at MCB meeting held 11th March 2025.





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 odd-set 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 it's 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**
 - 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%).
 - SDC retains direct control over operational costs and infrastructure investments.
 - Prevents excessive debt accumulation and unquantified financial risks which will be borne by the ratepayers.
2. **Local Accountability with SDC Control**
 - Keeps decision-making within SDC rather than outsourcing it to the WSCCO of which SDC is the sole shareholder.
 - Ensures service delivery aligns with local priorities rather than corporate interests.
3. **Service Reliability & Workforce Stability**
 - Maintains a stable and experienced local workforce, retaining existing knowledge and avoiding redundancy payments.
 - Reduces reliance on external contractors and the risks associated with WSCCO having skills shortages.
4. **Strategic Flexibility & Long-Term Sustainability**
 - 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.
 - Ensures infrastructure planning aligns with Selwyn's growth and sustainability goals.
5. **Minimal Disruption & Implementation Feasibility**
 - 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.

Submitter Number: 396

Full Name: Bruce Russell

Organisation:

Wish to speak to the submission: Yes

Submission Form

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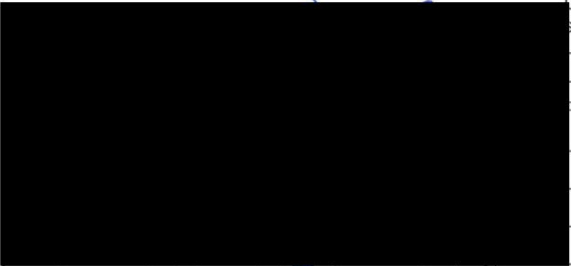
If you need extra space for your submission, use additional paper and attach it to this form. Please include your first and last name on the additional paper.

Submitter details

Please note: all fields marked with an asterisk () are compulsory. These details will be used for the purpose of contacting you about this consultation.*

First name* Bruce

Last name* Russell



Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

*If yes, please state the name of the organisation**

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

1. Do you support the proposed transition of the Selwyn 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 ☒ No

Please add your comments

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

3. Do you have any comments on the WSCCO model?

☐ Yes ☐ No

Please add your comments

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 - Council Rolleston Offices,
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PO Box 90
Rolleston 7643

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- Scanning and emailing it to
yourwater@selwyn.govt.nz

Submitter Number: 9

Full Name: Gary Martini

Organisation:

Wish to speak to the submission: Yes

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

No need to increase an already bloated council head count as you are currently coping with the workload within the current structure... Additioanlly, water is not a person therefore does not required mumbo jumbo protection which will no doubt require \$ to cross palms of the special people.

Do you have any comments on the WSCCO model? Comments

No

Please add your comments

Submitter Number: 275

Full Name: L Gourlie

Organisation:

Suburb: Halswell

Wish to speak to the submission: Yes

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

No

Please add your comments

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!

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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

Submitter Number: 298

Full Name: Kenneth May

Organisation:

Wish to speak to the submission: Yes

Submission Form

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Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* KENNETH

Last name* MAY

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

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☐ Yes ☒ No

Please add your comments

Staff of the SDC are employed to ensure appropriate installation of those water services, and creating a WSCCO will only cause duplication.

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

They have the skills and staff. Should CORDE become the WSCCO, we will end up with the tail wagging the dog.

3. Do you have any comments on the WSCCO model?

☒ Yes ☐ No

Please add your comments

Elcaved in concept and an
unacceptable addition to rates
and ratepayers costs

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Submitter Number: 305

Full Name: Haydn Porritt

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

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.

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

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.

Do you have any comments on the WSCCO model? Comments

Yes

Please add your comments

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.

Submitter Number: 332

Full Name: Nikki Chippendale

Organisation:

Wish to speak to the submission: Yes

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

No

Please add your comments

Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

Please add your comments

Do you have any comments on the WSCCO model? Comments

No

Please add your comments

Submitter Number: 387

Full Name: William Gye

Organisation:

Wish to speak to the submission: Yes

Submission Form

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Submitter details

Please note: all fields marked with an asterisk (*) are compulsory. These details will be used for the purpose of contacting you about this consultation.

First name* William

Last name* Gye

Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

If yes, someone will be in contact with you to arrange the date and time.

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Questions

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☐ Yes ☒ No

Please add your comments

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☒ Yes ☐ No

Please add your comments

3. Do you have any comments on the WSCCO model?

☐ Yes ☐ No

Please add your comments

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yourwater@selwyn.govt.nz

Submitter Number: 397

Full Name: Vanessa Murray

Organisation:

Wish to speak to the submission: Yes

Submission Form

I need
to know
more about

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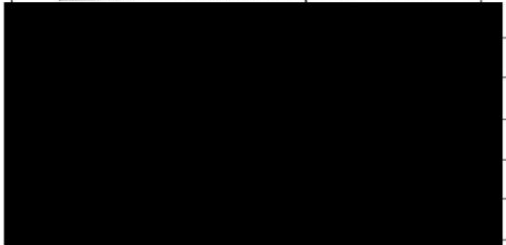
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Submitter details

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First name* Vanessa

Last name* Murray



Are you submitting on behalf of an organisation?*

☐ Yes ☒ No

If yes, please state the name of the organisation*

Do you wish to attend a hearing to present your submission in person?*

☒ Yes ☐ No

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done Well Thank
you

Questions

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☐ Yes ☐ No

Please add your comments

SDC needs to
tell rate payers
more

2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

☐ Yes ☐ No

Please add your comments



3. Do you have any comments on the WSCCO model?

☐ Yes ☐ No

Please add your comments

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