

# YOUR WATER DONE WELL

**SUBMISSION BOOKLET: 4** 

**SUBMISSIONS NUMBERED: 301 – 418** 

**Booklet prepared: 14 March 2025** 

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Sub #	Name	Organisation	To be heard	Page
301	Carey Barnett	Ellesmere Sustainable Agriculture Incorporated		6 - 11
302	Geoffrey Griffiths			12
303	Heidi Jensen-Warren			13 - 15
304	Elaine Smart			16 - 18
305	Haydn Porritt		Yes	19 - 20
306	Dave Page		Yes	21 - 22
307	lan Denholm			23
308	Ralph Brown			24
309	Leonardo Ferreira			25
310	Mikayla Bovey			26
311	Carolyn Skinner			27
312	Peter Ising			28
313	Ronwyn Coulson			29
314	Katherine Molloy			30
315	Pete Forbes			31
316	Christopher Ward			32
317	Manjusha Ganta			33
318	Craig Reynolds			34
319	Andrew Livermore			35 - 36
320	Jude Will			37
321	Laurence Harkerss			38
322	Tanya Douglas			39 - 40
323	Tanya Douglas	Lincoln Residents and Community Association		41 - 42
324	Christine Ferguson			43
325	Peter Hartshorne			44

326	Mervyn Johns			45
327	Aaron Horan			46
328	Delwyn McKenzie		Yes	47
329	Jill O'Connor			48
330	Michael Lloyd			49
331	Eric Askin			50
332	Nikki Chippendale		Yes	51
333	Donald Reid			52
334	Nicola McDowell			53 - 55
335	Brian Lester		Yes	56 - 61
336	Lieuwe Doubleday		Yes	62 - 68
337	Catherine Payne			69
338	Aaron McGlinchy			70 - 71
339	Robin McKenzie			72
340	Viv Titmus			73 - 74
341	Barry Neil Manson			75 - 77
342	Maureen Flattery			78 - 80
343	Richard Frost			81 - 83
344	Calvin Payne		Yes	84 - 86
345	David Farmer		Yes	87
346	Douglas Marshall		Yes	88 - 95
347	Chris Reddell			96
348	Grace Taylor			97
349	Jane Elms	Prebbleton Community Association		98 - 99
350	Darryl Griffin		Yes	100 - 105
351	Jane Elms			106
352	Gareth Payne		Yes	107 - 109

353	Margaret Mary Nimmo			110 - 112
354	Lean Seng (Tony) Gan			113 - 115
355	Malcolm Gourlie			116
356	James Gourlie			117
357	Yvonne Evans			118 - 120
358	Jacinda Anderson			121 - 123
359	Mark Hunter			124 - 126
360	Talbot Janet			127 - 129
361	Carolyne Jones			130 - 132
362	Andrew Fischer			133 - 135
363	Sarah Manifold		Yes	136 - 138
364	Graeme Young		Yes	139 - 141
365	Clavin Clare			142 - 144
366	Susan Hunter			145 - 147
367	Samuel Wilshire	West Melton District Residents Association	Yes	148 - 152
368	Neville Strong			153 - 155
369	David Armstrong			156 - 158
370	Fred Bull			159 - 161
371	Graeme Dawson			162 - 164
372	John Verry	Malvern Community Board	Yes	165 - 172
373	Janet Mathewson			173 - 175
374	Patricia Clare			176 - 178
375	Alice Thorne			179 - 181
376	Margaret Lang-dale Hunt			182 - 184
377	Walker Brian			185 - 187
378	Patrick Van dePol			188 - 190
379	Stephen Ray			191 - 193

380         Steve Pudney         194 - 196           381         Andrew Howard         197 - 199           382         Lesley Palmer         200 - 202           383         Sonya Strahan         203 - 205           384         Eric Freeman         206 - 208           385         John Verry         Yes         209 - 211           386         Christopher Norton         212 - 214           387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         232 - 234           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm <th></th> <th>T</th> <th>T</th> <th>l</th> <th>1</th>		T	T	l	1
382         Lesley Palmer         200 - 202           383         Sonya Strahan         203 - 205           384         Eric Freeman         206 - 208           385         John Verry         Yes         209 - 211           386         Christopher Norton         212 - 214           387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         229 - 231           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         244 - 246           397         Vanessa Murray         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm         254           401	380	Steve Pudney			194 - 196
383         Sonya Strahan         203 - 205           384         Eric Freeman         206 - 208           385         John Verry         Yes         209 - 211           386         Christopher Norton         212 - 214           387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         229 - 231           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         247 - 249           397         Vanessa Murray         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm         254           401         Shanelle Carroll Pudney         255 - 257           402	381	Andrew Howard			197 - 199
384         Eric Freeman         206 - 208           385         John Verry         Yes         209 - 211           386         Christopher Norton         212 - 214           387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         232 - 231           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         244 - 246           397         Vanessa Murray         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm         254           401         Shanelle Carroll Pudney         255 - 257           402         Graham Gough         255 - 257           403	382	Lesley Palmer			200 - 202
385         John Verry         Yes         209 - 211           386         Christopher Norton         212 - 214           387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         229 - 231           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         244 - 246           397         Vanessa Murray         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm         254           401         Shanelle Carroll Pudney         255 - 257           402         Graham Gough         258 - 260           403         Gary Brown         261 - 263           404	383	Sonya Strahan			203 - 205
386         Christopher Norton         212 - 214           387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         229 - 231           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         244 - 246           397         Vanessa Murray         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm         254           401         Shanelle Carroll Pudney         255 - 257           402         Graham Gough         258 - 260           403         Gary Brown         261 - 263           404         Scott Halkett         264 - 266           405         Pietro Scal	384	Eric Freeman			206 - 208
387         William Gye         Yes         215 - 217           388         Sharon Howard         218 - 220           389         Ian Tennant         Yes         221 - 225           390         Sharon Ray         226 - 228           391         Connor van dePol         229 - 231           392         Bronwyn van dePol         232 - 234           393         Keith Taege         Yes         235 - 237           394         Helen Taege         238 - 240           395         Alan Hogg         241 - 243           396         Bruce Russell         Yes         244 - 246           397         Vanessa Murray         Yes         247 - 249           398         Philip Anderson         250 - 252           399         M Smithies         253 - 253           400         J Gourlie         Parkdale Farm         254           401         Shanelle Carroll Pudney         255 - 257           402         Graham Gough         258 - 260           403         Gary Brown         261 - 263           404         Scott Halkett         264 - 266           405         Pietro Scalia         267 - 269	385	John Verry		Yes	209 - 211
388       Sharon Howard       218 - 220         389       Ian Tennant       Yes       221 - 225         390       Sharon Ray       226 - 228         391       Connor van dePol       232 - 234         392       Bronwyn van dePol       232 - 234         393       Keith Taege       Yes       235 - 237         394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	386	Christopher Norton			212 - 214
389       Ian Tennant       Yes       221 - 225         390       Sharon Ray       226 - 228         391       Connor van dePol       229 - 231         392       Bronwyn van dePol       232 - 234         393       Keith Taege       Yes       235 - 237         394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       247 - 249         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	387	William Gye		Yes	215 - 217
390       Sharon Ray       226 - 228         391       Connor van dePol       229 - 231         392       Bronwyn van dePol       232 - 234         393       Keith Taege       Yes       235 - 237         394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	388	Sharon Howard			218 - 220
391       Connor van dePol       229 - 231         392       Bronwyn van dePol       232 - 234         393       Keith Taege       Yes       235 - 237         394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	389	Ian Tennant		Yes	221 - 225
392       Bronwyn van dePol       232 - 234         393       Keith Taege       Yes       235 - 237         394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	390	Sharon Ray			226 - 228
393       Keith Taege       Yes       235 - 237         394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	391	Connor van dePol			229 - 231
394       Helen Taege       238 - 240         395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	392	Bronwyn van dePol			232 - 234
395       Alan Hogg       241 - 243         396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	393	Keith Taege		Yes	235 - 237
396       Bruce Russell       Yes       244 - 246         397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	394	Helen Taege			238 - 240
397       Vanessa Murray       Yes       247 - 249         398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	395	Alan Hogg			241 - 243
398       Philip Anderson       250 - 252         399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	396	Bruce Russell		Yes	244 - 246
399       M Smithies       253 - 253         400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	397	Vanessa Murray		Yes	247 - 249
400       J Gourlie       Parkdale Farm       254         401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	398	Philip Anderson			250 - 252
401       Shanelle Carroll Pudney       255 - 257         402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	399	M Smithies			253 - 253
402       Graham Gough       258 - 260         403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	400	J Gourlie	Parkdale Farm		254
403       Gary Brown       261 - 263         404       Scott Halkett       264 - 266         405       Pietro Scalia       267 - 269	401	Shanelle Carroll Pudney			255 - 257
404         Scott Halkett         264 - 266           405         Pietro Scalia         267 - 269	402	Graham Gough			258 - 260
405 Pietro Scalia 267 - 269	403	Gary Brown			261 - 263
	404	Scott Halkett			264 - 266
406 Alan Mathewson 270 - 272	405	Pietro Scalia			267 - 269
270-272	406	Alan Mathewson			270 - 272
407 Christine Montrose Hogg 273 - 275	407	Christine Montrose Hogg			273 - 275

408	Pauline Scalia		276 - 278
409	Tara Norton		279 - 281
410	George Thorne		282 - 283
411	Owen Murray		284 - 286
412	Carly Norton		287 - 289
413	Stuart Murray		290 - 292
414	Francine Murray		293 - 295
415	Pauline Sewell		296 - 298
416	Kelvin Sewell		299 - 301
417	Heather Stanley		302 - 304
418	Rachel Inch		305 - 308

Full Name: Carey Barnett

Organisation: Ellesmere Sustainable Agriculture Incorporated

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

1.2 ESAI considers that this proposal will lead to an increase in non-democratic decision making with the WSCCO making important decisions and recommendations to the Council siloed within a governance structure that effectively excludes the wider public. While the document argues that future costs under a WSCCO structure would allow higher borrowing power, ESAI considers that this could well come at the cost of democratic decision making and accountability. 1.3 Selwyn has experienced excessive growth within the last 10 years which has continued to deliver major rates increases to all rate payers, not just those immediately reliant on Council administered drinking water, wasterwater and stormwater servicing. ESAI does not accept that the WSCCO model will deliver any reduction in rates relief over time but will exacerbate even more residential growth over rural land and further put at risk the environmental capacity of the district.

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

Yes

Please add your comments

ESAI also supports that stormwater, water race and land drainage asset management and services remain, as the document suggests, within the SDC in-house delivery model.

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

No

Please add your comments

See further comments in attached document or below: 4. Drinking Water 4.1. Predominantly ESAI members do not utilise Council reticulated water supplies or wastewater services at their rural properties. However, with substantial increases in population of towns throughout the Selwyn District, there is now a significant demand

for drinking and domestic water supply. The effects of this increase and the upgrading and/or use of existing or new groundwater supply wells needs to be considered when locating and operating such facilities. For example, protecting agricultural hinterland from reverse sensitivity effects caused by the location of towns' water supply wells should be explored appropriately before locating them near existing, permitted and legally operating agricultural activities. Determining alternative locations or water supply options which minimise impingement on other legal and permitted uses, and, reduce potential adverse environmental effects, should be paramount in decision making about securing safe and adequate drinking water supplies for towns. Recommendation: 4.2 That SDC pursues alternative location options to town groundwater supply to ensure agricultural land is protected against land use restrictions caused by the inappropriate location of water supply wells and their protection zones in or near rural areas. 5. Waiora One Water Strategy 5.1 ESAI is extremely concerned that the Waiora One Water Strategy was constructed and consequently implemented without consultation or input from ratepayers. Freshwater is highly significant to all those residing within the district and ESAI is disappointed that the Council has decided that such an important overarching guiding strategy should not trigger wider engagement under the Significance and Engagement Policy. However, and in comparison, the Council is consulting on this lower tier, 'Your Water Done Well', document. ESAI therefore questions the rationale of the progression of these documents in the consultation context. 6. Thank you for considering this submission. Should any gueries arise from this submission then please direct them to the address for service contacts.



To: Selwyn District Council

> Freepost 104 653 P O Box 90 **ROLLESTON 7643**

Submission on: Your Water Done Well - Consultation Document

Date: 11 March 2025

Submission by: **Ellesmere Sustainable Agriculture Incorporated** 

Nigel Greenwood (Chairperson)

Ph 0272277687 E wontburn@gmail.com

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Ellesmere Sustainable Agriculture Inc 'Your Water Done Well' Submission, March 2025

#### SUBMISSION TO SELWYN DISTRICT COUNCIL YOUR WATER DONE WELL - CONSULTATION 2025

#### 1. INTRODUCTION

- 1.1 Ellesmere Sustainable Agriculture Incorporated (ESAI) welcomes the opportunity to submit on the Selwyn District Council Your Water Done Well - Consultation Document 2025.
- 1.2 ESAI submits on various documents and plans relevant to the ESAI catchment area and makes constructive proposals whenever the opportunity is provided and/or directly requested. This catchment area is bounded by the southern banks of the Selwyn Waikirikiri River, State Highway 1, the northern banks of the Rakaia River, Te Waihora Lake Ellesmere and the east coast.
- 1.3 ESAI's feedback represents the views of 100 farming members and rate payers within its catchment area. This catchment group largely represents long established generational family farmers who operate a mixture of farming enterprises including land uses of: dairy; sheep; beef; arable grain and small seed vegetable production; horticulture including fresh market and processed vegetables and berry production.
- 1.4 With ESAI having been established in the mid 1990's, the group is recognised as not only one of New Zealand's eldest catchment collectives but one of the country's most successful; priding itself on respectful and collaborative partnerships/relationships with central government agencies, Environment Canterbury, Selwyn District Council (SDC), Te Taumutu Runanga, other catchment groups and Central Plains Water Limited. ESAI has a strong focus on supporting its farmer members and achieving excellent agricultural and environmental outcomes. In 2023 ESAI won the Environment and Sustainability Award at the Sensational Selwyn Awards which recognised the outstanding contribution the group had made to improving environmental and agriculture outcomes in the area. In particular, the award recognised the success of the Ministry for Primary Industries, ESAI and farmer funded Tinaku (Germinate Growth) Project which achieved the restoration of 60 riparian sites within the catchment area, educated farmers on improved environmental farming systems and planning, along with undertaking a variety of 'state of the environment' monitoring programmes.
- 1.5 ESAI is focused on the transparency of rate setting, rates equity and both the overall and relative cost of local government on rural ratepayers in Ellesmere, alongside democratic decision-making processes.
- 1.6 ESAI does not wish to be heard with respect to this submission.
- 1.7 The following sets out ESAI's responses to information provided in the Consultation Document following the relevant heading titles.

- QUESTION ONE: Do you support the proposed transition of the SDC drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council?
- 1.1 No
- 1.2 ESAI considers that this proposal will lead to an increase in non-democratic decision making with the WSCCO making important decisions and recommendations to the Council siloed within a governance structure that effectively excludes the wider public. While the document argues that future costs under a WSCCO structure would allow higher borrowing power, ESAI considers that this could well come at the cost of democratic decision making and accountability.
- 1.3 Selwyn has experienced excessive growth within the last 10 years which has continued to deliver major rates increases to all rate payers, not just those immediately reliant on Council administered drinking water, wasterwater and stormwater servicing. ESAI does not accept that the WSCCO model will deliver any reduction in rates relief over time but will exacerbate even more residential growth over rural land and further put at risk the environmental capacity of the district.
- QUESTION TWO: Do you prefer that the SDC continues with a future in-house water delivery model?
- 2.1 Yes
- 2.2 ESAI also supports that stormwater, water race and land drainage asset management and services remain, as the document suggests, within the SDC in-house delivery model.
- 3. QUESTION THREE: Do you have any comments on the WSCCO model?
- 3.1 No further comments over and above those mentioned in paragraphs 1.2, 1.3 and 2.2 above.

#### **FURTHER COMMENTS**

- 4. Drinking Water
- 4.1. Predominantly ESAI members do not utilise Council reticulated water supplies or wastewater services at their rural properties. However, with substantial increases in population of towns throughout the Selwyn District, there is now a significant demand for drinking and domestic water supply. The effects of this increase and the upgrading and/or use of existing or new groundwater supply wells needs to be considered when locating and operating such facilities. For example, protecting agricultural hinterland

Ellesmere Sustainable Agriculture Inc 'Your Water Done Well' Submission, March 2025

1

from reverse sensitivity effects caused by the location of towns' water supply wells should be explored appropriately before locating them near existing, permitted and legally operating agricultural activities. Determining alternative locations or water supply options which minimise impingement on other legal and permitted uses, and, reduce potential adverse environmental effects, should be paramount in decision making about securing safe and adequate drinking water supplies for towns.

#### Recommendation:

4.2 That SDC pursues alternative location options to town groundwater supply to ensure agricultural land is protected against land use restrictions caused by the inappropriate location of water supply wells and their protection zones in or near rural areas.

#### 5. Waiora One Water Strategy

- 5.1 ESAI is extremely concerned that the Waiora One Water Strategy was constructed and consequently implemented without consultation or input from ratepayers. Freshwater is highly significant to all those residing within the district and ESAI is disappointed that the Council has decided that such an important overarching guiding strategy should not trigger wider engagement under the Significance and Engagement Policy. However, and in comparison, the Council is consulting on this lower tier, 'Your Water Done Well', document. ESAI therefore questions the rationale of the progression of these documents in the consultation context.
- 6. Thank you for considering this submission. Should any queries arise from this submission then please direct them to the address for service contacts.

Ellesmere Sustainable Agriculture Incorporated 12 March 2025

Full Name: Geoffrey Griffiths

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

I understand that it is intended that there will be charges to rural ratepayers. This will include those who have their own water bore and septic tank. It is difficult to understand how you can be charged for something you don't and can't receive. I understand the need to recover the cost of water and waste water infrastructure but this cost should be shared amongst those who use the service. You cannot charge somebody for a service you are not providing and can't provide even if the person wanted it.

Full Name: Heidi Jensen-Warren

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 only support the in house model, whereby the Selwyn District Council retains full autonomous control over our water services and assets. We as residents, investors and rate payers in Selwyn bought our home and investment property here as we believed that the Selwyn District Council was a Council that served the community and could stand on it's own feet, serving locals first and not falling to any coercion from the central government or outside influences. I strongly believe in the benefit of localised services and localised government, after all if we are to believe we as New Zealanders live in a functional democracy then we as rate payers, residents and citizens have a right to have a functioning autonomous and reliable and accountable local council to deliver services to the community. We pay very high rates in Selwyn and because of this it is paramount that our water services are controlled 100 percent by our local community/council. Water is our life force, it is much more than roading or kerbside collection, we depend upon it to keep ourselves clean, to drink, to water our beautiful gardens, fruit trees and flowers, to supply our children and pets with plentiful abundant pure water. I believe we as residents have a social and ethical responsibility to retain 100 percent control over what goes into our water and what needs to be filtered out. We choose to live in Selwyn because we want to be part of the community and the landscape here, as a first world developed country we expect and demand autonomy over our local water supply. As a mother and wife I am very concerned about keeping our water 100 percent pure, uncontaminated, unmedicated and free from 'big ideas' from politicians or unelected health officials or bodies. Keeping the Selwyn water supply free from fluoride, chlorine, additives increases the value and desirability of the area to any potential new comers. I want the council to understand that the majority of New Zealanders and even foreigners who choose to migrate here are invested in living in a 100 percent pure and natural environment, of which water is a large component. Unadulterated natural water is a huge draw-card to families and individuals. Let's keep our vital infrastructure and services 100 percent local. Keep democracy and accountability to ratepayers and residents alive. I would like to conclude that you reap what you sow. We as locals collectively build the home, the town, the city that will house future generations. Let's build this place with a solid locals first foundation that respects the autonomy and individuality of it's residents. Such a place will be a model to emulate not only elsewhere in New Zealand but also internationally. "100 percent pure water, no if's no buts." Should be the slogan that the SDC can pride itself upon.

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

Yes

Please add your comments

As I stated before I only support the in-house model whereby the council works with locals and rate payers to deliver water and water services with a localised approach. We the people of this district deserve localised control over and ownership of our water and water services. We need to control the quality of the water and keep and maintain a 100 percent pure unadulterated water supply abundant and plentiful to our residents. For the health, harmony and future of this community we need to be the leaders and guardians of our water bodies, drinking water and waste water. We have a social, ethical and moral duty to maintain ownership and control over the most precious of natural assets- water. Keep our water in local hands and maintain the standard of living to our communities liking! No flouride, no chlorine, no contaminants, no ifs and no buts. Water should remain water. Something to drink, to cleanse ourselves with, to provide life to plants, animals and humans. I am passionate about this as it is deeply personal to me. From a cultural point of view I see water as something divine. The carbohydrates and proteins that our bodies use as food are metabolized and transported by water in the bloodstream. Water's "stickiness" (from surface tension) plays a part in our body's ability to transport these materials all through ourselves. No less important is the ability of water to transport waste material out of our bodies. According to Dr. Jeffrey Utz, Neuroscience, pediatrics, Allegheny University, different people have different percentages of their bodies made up of water. Babies have the most, being born at about 78%. By one year of age, that amount drops to about 65%. In adult men, about 60% of their bodies are water. However, fat tissue does not have as much water as lean tissue. In adult women, fat makes up more of the body than men, so they have about 55% of their bodies made of water. This is a small example of how by our very composition all the human residents, young and old, male or female, have a unique relationship with water and therefore it should be noted by our council that it is incredibly important that we as residents choose to maintain control and autonomy over our water supply/services. It is after all a vital part of us.

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

Yes

Please add your comments

A very bad idea. There is no point in entertaining this. We, the people, voted the last government out due to our large concerns over the Three Waters model. We hated the idea of a central government or outside water agency lording it up over everybody

regarding our precious water and control over it. Keep democracy alive. Local first and foremost. WSCCO OUT!

Full Name: Elaine Smart

Organisation: Wish to speak to the submission: No

Darkeld Library 12/3/25

# 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*	Elaine \$	
Last name*	Smart	
Are you suhm	oitting on behalf of an organisation?*	



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



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



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

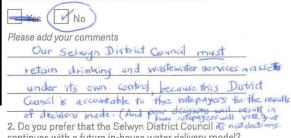
Submissions are part of the public consultation process and are a public record. Anonymous submissions will not be accepted. Submissions including names are published on our website and in official documents so please do not include any personal information in the content of your submission you would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



continues with a future in-house water delivery model?

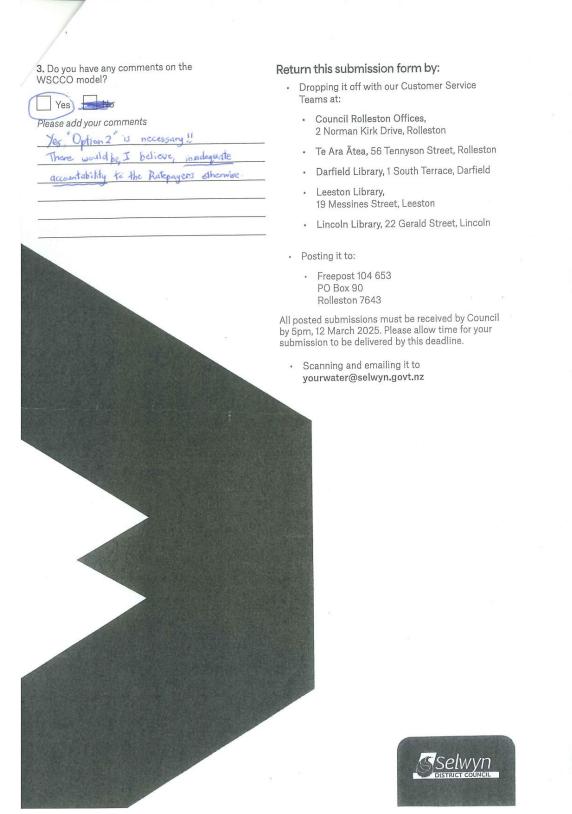


Please add your comments

The Selwyn District has approximately doubled in population - and this means more funds from the Ratepayers 1 Maintenance of existing water services must continue and improve where

poor usynel installation has been disintegrating?

500 needs to decide whicher land developers for homes on other



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.

Full Name: Dave Page

**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. Given the Q&A says that the LTP has all the projects required (and I assume are staged timewise and costed appropriately) then it is unclear why SDC has pushed for the WSCCO option which allows increased borrowing but has some apparent negative ratepayer impact e.g. increased rates near term and I assume increased ratepayer underwriting liability. 2. Without the consultation listing extra projects or costs or regulatory compliance requirements needing the extra funding then there seems no requirement for a higher cost CCO 3. SDC has said that a letter of expectations would be in place with the WSCCO but I think there needs to be much more explanation of controls and compliance requirements provided to ratepayers to give confidence that a CCO would work best, given recent media about other CCO performance.

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

Yes

Please add your comments

1. I recall that we have been told that the water infrastructure is in relatively good shape, if so that would indicate good planning and performance is in place. 2. The costs are higher for ratepayers it seems with the CCO option but the benefits are unclear. 3. A CCO has additional management and operating costs and it it would make sense to merge with the other surrounding growth local authorities to split these costs if a CCO goes ahead.

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

Yes

Please add your comments

If it was explained what additional benefits ratepayers would get with a CCO given the apparent good track record of SDC water teams, and what over and above additional

investment is required for specific projects requiring more funding then opting for a CCO would be a clearer choice.

Full Name: Ian Denholm

Organisation:

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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 do not support the council separating of the activities currently covered by the council. The separating of these activities will lead to greater costs to all rebate payers. We only need to look at other councils that have separated these activities, the out comes of this has lead to more operating costs with higher wages being demanded for the staff through these separated entities. The funding model that is used for supporting new subdivisions clearly does not meet the required costs, this now leads to present ate payers covering the difference.

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

Yes

Please add your comments

This model works, more work needs to be done on who pays if upgrades of pipes are required if a new subdivision is attaching to existing infrastructure.

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

No

Please add your comments

Nil

Full Name: Ralph Brown

Organisation: Suburb: Greendale

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn 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

Please add your comments

I'm persuaded by Sam Broughton's clarification of the difference between the two options and much prefer the long-term focus. (Whoever thought of videos separated into bite-sized chunks deserves a medal.)

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

No

Please add your comments

Too short-term. Water should be planned for generations.

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

Yes

Please add your comments

Like the long-term focus, ability to raise funds.

Full Name: Leonardo Ferreira

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 don't think is the right decision to be making right now the country is in recession and you guys have been already taking any penny that we had left.

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

Full Name: Mikayla Bovey

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Either way its going to be more expensive but i value simplified billing

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

Full Name: Carolyn Skinner

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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 very opposed to our water services being put into a WSCCO because of the huge costs of setting this body up which will be put onto ratepayers, many of whom are on fixed incomes and are already struggling without the increased costs of funding this entity adding to their burden. I don't want the extra initial costs of setting up WSCCO in these economically challenged times, nor do I want to see access to the higher debt limits that can be taken on by this body which we will be as ratepayers, liable for.

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

Yes

Please add your comments

In house management gives accountability to the community, local control and capacity/input from the community unlike the suggested WSCCO model. The present system has been well managed and maintained. "If it ain't broke, why fix it!"

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

Yes

Please add your comments

I feel this model takes away the voice of the community/ratepayers. It worries me that they as an independent board can take on large amounts of debt without consultation with the ratepayers who will have to service this in increased costs in their already escalating rates!

Full Name: Peter Ising

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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

Everything seems so rushed and vague. There is no guarantee that a CCO can do an as good as or better job than a rate-payers owned (??!) asset management. What if the CCO fails (or another government is elected)?

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

Yes

Please add your comments

By your own admission, SDC '3-waters' is doing well - and given our high rates, they are committed to, and must keep doing well. So there is no need to change

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

No

Please add your comments

A general comment. This feels like another stab in the back by our council, and another excuse to increase rates even more, way, way above our national inflation rate. Being a pensioner, this all make me anxious. The affordability of living in here really worries me. With so many new subdivisions and so many new rate-payers in this district I don't understand much of this. Our infrastructure (3-waters) should be reasonably new and up-to-date and I would have thought that rate-increases should be a lot lower than what we got last year and will get in future. Something is not right!

Full Name: Ronwyn Coulson

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Nc

Please add your comments

Full Name: Katherine Molloy

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn 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

Please add your comments

I support the setup of the new WSCCO, but still have reservations about accountability to rate payers, a proven reliability in delivery of services, & the assurance by council that standard rates will have associated water costs removed, not just swallowed up & therefore no rates relief, given that the water services component has been separated out and invoiced separately.

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

No

Please add your comments

I like the idea of a focused water services organisation that has the ability to focus on getting things done right. Provided of course that they have good guidance from council and have a fully accountable board.

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

Yes

Please add your comments

I have concerns about how the board is appointed and whether or not the right people with skillsets directly related to water services are involved. Furthermore, I am concerned that the 'Waiora One Water Strategy' implications are not fully discussed in the document. It is just glossed over. What does the statement in the document referencing the strategy actually equate to in the end? The future of our water is exceptionally important, and we need to get it right for all. 3 weeks is not long enough to consult on such a long term, high cost council decision.

Full Name: Pete Forbes

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Full Name: Christopher Ward

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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 see no value in creating yet another Council business as this leaves it open to be sold off in future years at the whim of Council. Keep the Selwyn District Council drinking and wastewater assets and services in-house. Retain and build the skills etc to run it within Council so you are not relying on buying-in expensive contractors from the private sector. Council will thus retain the expertise to run the water services efficiently and effectively and remain directly involved with those who use and benefit from great water services done well.

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

Yes

Please add your comments

Keep the Selwyn District Council drinking and wastewater assets and services in-house. Retain and build the skills etc to run it within Council so you are not relying on buying-in expensive contractors from the private sector. Council will thus retain the expertise to run the water services efficiently and effectively and remain directly involved with those who use and benefit from great water services done well.

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

Yes

Please add your comments

As I have said above, I don't agree with the WSCCO model - keep it in-house.

Full Name: Manjusha Ganta

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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?

No

Please add your comments

Do you have any comments on the WSCCO model? Comments

No

Please add your comments

Full Name: Craig Reynolds

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Council should provide this as a core service in house. without any gold plating.

# 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

It introduces a layer of overhead I don't htink is necessary or justified, and transitions to a for-profit model. The only way I would support a CCO model is if it was clearly non-profit in focus, and deliberately structured so as to be hard to change from that focus. Perhaps somehting like the old electricity boards that were community owned.

Full Name: Andrew Livermore

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn 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

Please add your comments

As a ratepayer in Selwyn since 2011, I would like to make the following points: • Selwyn District is one of New Zealand's fastest-growing local authorities, with ~80,000 people currently, expecting to grow by another 30,000+ over the next 10 years. So, Selwyn needs a capability of building enough capacity in its water and wastewater network to meet or exceed this demand. • Selwyn also faces unique challenges connected to climate-driven changes such as extreme weather patterns, rising temperatures, and increased pressure on water and wastewater infrastructure. Climate change will bring additional cost to maintain availability and the quality of water in Selwyn District. Wastewater networks are equally vulnerable to climate-related stressors, particularly flooding. Resilient upgrades and higher frequency maintenance will be needed, as Selwyn adapts to the impacts. As an example, I'm not sure what the total costs of the May 2021 flooding were, but these types of events will occur more frequently than previously thought (e.g. see briefing to the incoming minister, in particular the annexes at the end https://www.dpmc.govt.nz/sites/default/files/2024-02/bim-2023-nema.pdf) • I also note that Civil Construction Costs have increased by ~30% in the last three, but with rates increasing 7.7% that means there is effectively less budget to deliver the quantum of work needed (i.e. if we want water services to keep pace with the volume of work needed, then rates need to keep up with civil construction costs). Additionally, most local authorities only deliver 70-80% of their capital programmes, so I am concerned that are we building enough to keep up with forecast population growth and the impacts of climate change? • Consultation is a method of obtaining feedback, it however also has significant limitations which must be carefully considered. In particular: o The complexity of the LWDW means minority voices will most likely be overrepresented, as the majority of rate payers will struggle to understand what is needed and why. It has taken me a few days of asking lots of people in the water industry a lot of questions to actually understand what a CCO means, how it actually works, and the longer-term value it can bring. There has been some great information and videos on the topic provided by Selwyn, but some people will just struggle with the concept and value a CCO creates, and hence will either remain silent or jump to

conclusions that are not valid. o Overemphasis with vocal opposition is usually a subset of ratepayers which overshadows quieter support from the broader community. I've seen many Facebook groups drumming up support for their opinions, with much of what is written not actually factually correct. Or misconstruing answers to mean something else. Although I respect their individual views and concerns, much of what is written is focused on short term concerns and misses the point of the longer-term capability we need in Selwyn. • Hence, I want the decisions makers to think long term about this decision, and not be distracted by the short-term nay sayers who are hung up about the cost predominantly. The reality is, if they don't get quality water and wastewater service they expect, it will be the same people forming Facebook groups and criticising you for doing a poor job! So, we need a CCO as it is the only way we will get a purpose-built organisation with the technology, capability and certainty to deliver to the future demands of Selwyn.

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

Nο

Please add your comments

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

Yes

Please add your comments

I want a CCO, as it will: • Provide specialist expertise for water management, drawing on technical expertise that councils may not have in-house. • Deliver long-term infrastructure investment, focusing on the long-term planning and funding needed for maintaining, upgrading, and expanding water infrastructure. Reducing the risk of shortterm budget pressures undermining essential investments. • Maintain communitycentred governance, ensuring local governance representation, transparency, and accountability through strong partnerships with Selwyn District Council and the community. • Deliver economies of scale with a focus on cost efficiency, sharing resources, technology, and expertise. The CCO should have more freedom but with clear accountability to operate efficiently and achieve agreed milestones and metrics. • Dedicate resources implementing climate-resilient strategies such as future-proofed water services that adapt to changing environmental conditions while safeguarding resources for future generations. • Create increased transparency and performance monitoring, as CCO's operate under a governance framework that requires clear performance targets, frequent reporting, and external audits. • Enhance partnerships with Iwi and Community Stakeholders, as water management carries significant cultural and environmental importance for mana whenua. A CCO provides an opportunity to strengthen co-governance models and work in partnership with iwi. We have an opportunity to lead by example and be seen as the exempla. I understand the reasons and how a CCO will showcase how effective, modern water management can function at a district level. By focusing on innovation and efficiency, the Selwyn CCO will serve as a model for other councils or regions. Please make it happen, not just for me, but for the future generations of Selwyn.

Full Name: Jude Will

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Waste of more rate payers money

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

Nο

Full Name: Laurence Harkerss

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 worried about the scope of potential borrowing which will lead to costs for ratepayers, so I consider the inhouse option to have better accountability and controls.

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

Yes

Please add your comments

There is already existing expertise within the Selwyn Council that can be utilised, and no need to set up an additional entity that will have its own infrastructure and duplicate costs and overheads.

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

Yes

Please add your comments

This is a more expensive option that has been moved from ratepayers and councillors in terms of accountability. I am concerned that the Council wants to move quickly on this. I agree water quality is important but believe this can be well managed in-house and doesn't require to be separated from Council operations. Council needs to always consider costs to ratepayers and manage budgets with care.

Full Name: Tanya Douglas

Organisation: Lincoln Residents and Community Association

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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

We don't believe they're has been enough information and clarity around a WSCCO provided to facilitate informed decision making. We believe it would be best placed to retain services in house to allow for additional time to understand the act still to be finalised and to decide whoxh option will ultimately serve selwyn effectively long term. We are opposed to the duplication of roles and the added expense ratepayers will need to cover. We understand that a WSCCO will not undertaken anymore projects or maintenance than the LTP already plans for, so we dont understand why council says we need to borrow millions more for no additional infrastructure.

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

Yes

Please add your comments

Rate payers deserve to know that the best option selected has been well thought through, planned and the implications of a decision either way are well understood. We don't see why service's can't be retained in house until this occurs. As far as we understand, council can change the model at a later date. It seems as though the decision is being rushed. Retaining in house also allows for council to maintain control of planning projects to ensure projects and maintenance can occur at the same time as other works to reduce the impacts on the community by only hvaing roadworks/ roading closed once.

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

Yes

Please add your comments

Council have said there won't be role duplication, however in the event a WSCCO is set up, both council and the cco will require tesms to focus on water as stormwater will still

be retained. There are also the additional costs for directors, and executive leadership roles that wouldnt occur if it is retained by council. These costs have not been made clear to the community, we were only provided with rating summaries. These costs are extra costs ratepayers have to bear, and when we are already expecting a 16% increase and the info provided for a WSCCO suggests an additional 12% thats a coat that alot of ratepayers are saying they wont be able to afford. If the work is planned for under the LTP with an expected increase of 16% why doea a WSCCO require a 12% increase? The increase is dirwctly related to thw additional debt a WSCCO would be able to take on. If we can Manage it in house under the LTP, there seems to be no real reason why we need to take on additional debt The Lincoln Residents and Community Association do not support the creation of a WSCCO.

Full Name: Tanya Douglas

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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 a ratepayer i am concerned about then effects a WSCCO will have on the financial burden will place on us, particularly those on a fixed income. The LTP already provides for the infrastructure required so it seems the only "benefit" for having a WSCCO is the ability to take on additional debt. If the adsition debt is requires to maintain services above what is already factored for, how did council sign off on a plan that didnt cover the costs and need for our infrastructure. The process feels like its been rushed and a glossy document was put together to give a percepption that a WSCCO is the best way to go, with council saying " they qant to be the first & lead the way" if a Wscco is the best way to go, why havent every other council optes for a WSCCO? My preference is to retain services in house, which qould allow more time for thorough investigation to understand the true impacts of having a WSCCO

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

Yes

Please add your comments

Please see prwvious comment. Council mamaged delivery qould provide council with full xontrol ovwe project's, maintenance and upgrades to ensure they align with timings of other projects, which ultimatwly should reduce costs as roading etc wont be dug up a 2nd time

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

Yes

Please add your comments

I do not support the creation of a WSCCO at this time. I sont aupport taking on millions of dollars of debt to fund a board of director's, and executive leadership team and other duplicated admin costs, not to mention us taxpayers bearing the cost of compnay tax

under a WSCCO. If any WSCCO is projected to make a profit, why do we the ratepayers have to bwar an increase in rates, when the entity is going to be profitable? Council have said a WSCCO would pay dividends to SDC so again, its.not clear why ratepaywrs would then require such large increases in rates. If a WSCCO is going to be profitable then ratepayers are a cash cow for council and are not going to get any additional services whether under council or as a cco. It is hard to see how a projected \$62 saving in 10 years time is possible given the additional roles & role duplication required to facilitate a CCO. Council have did they will be no role duplication but council require admin staff, Accountancy teams, HR and compliance/ regulatory teams and the creation of a WSCCO would also require all of these

Full Name: Christine Ferguson

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 DO NOT support the set-up of a new WSCCO. There will be more control of costs if drinking and wastewater assets and services are kept within Council, under elected representatives. All this borrowing is most unsatisfactory and is undesirable as it is a liability on the ratepayers forever, it seems.

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

Yes

Please add your comments

Keep control of assets and expenditure within the Selwyn District Council. That way things will have to be done within the budget and NOT borrow even more money. How will it ever be paid back, not to mention - meet the interest repayments?

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

Yes

Please add your comments

DO NOT GO DOWN the WSCCO path. Potentially TOO much money available to borrow, and impossibility of repayments over the generations of (ratepayers) WSCCO customers. Therefore drinking water and wastewater bills will become unaffordable. It make take dollars off Selwyn District Council rates, but is a falsehood as the accounts will still come, but from WSCCO instead.

Full Name: Peter Hartshorne

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

We know what is being delivered now and it is adequate. Why change

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

Yes

Please add your comments

I am happy with the current model

Do you have any comments on the WSCCO model? Comments

Nο

Full Name: Mervyn Johns

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 believe Council already have ample staff to do the job and will save on costs

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

Full Name: Aaron Horan

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Rates will go up either way but less if it stays in house.

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

Yes

Please add your comments

Yes but please fix the need for chlorination. I hate drinking swimming pools

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

Nο

Please add your comments

I selected that i dont have any comments.... yet you presented a comment box... mixed messages

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.

Full Name: Jill O'Connor

Organisation: Suburb: Whitecliffs

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 do not think it is necessary to support a whole new entity with all the huge set-up costs entailed, when the current system is working, albeit with requiring some streamlining and modification to meet future needs.

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

Yes

Please add your comments

As far as I am concerned this is working perfectly well, although I believe there will need to be some modifications required to meet future greater demands. I do not want another rates increase as I can barely afford what I have to pay now; I am a super annuitant who has no other income to support all the necessary household expenses.

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

No

Please add your comments

Costly and replicating a system that is already working well.

Full Name: Michael Lloyd

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

We will lose control over it once it is removed from the council. Keeping it inhouse allows us some control by voting who runs the council.

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

Yes

Please add your comments

This will allow for ongoing control over it as in been under the council it allows us some control by voting who runs the council.

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

No

Please add your comments

Once it is removed from the council, there decisions will be independent and no longer need to require answering to the voters

Full Name: Eric Askin

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

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

Full Name: Donald Reid

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn 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

Please add your comments

The current council is elected and therefore members are accountable /responsible for council decisions. Unelected members, who are chosen by council instead, are prone to political, ideological activism. Already we have pagean, spiritual, superstition and nonsense evident amongst council members, who engratiate themselves with Ngai Tahu by aiming to 'upholding the mana and mauri of all water'. They are welcome to do this in private but not force it upon rate payers.

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

Yes

Please add your comments

I support neither, due to the cunning insertion on p10 and p27 of a commitment to cogovern based on race. As for SDC wanting to be first in NZ to progress this cogovernance it is blatant virtue signalling and career advancement for particular individuals. Also the ACT is not even law yet and may never be..

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

Yes

Please add your comments

I am deeply concerned that SDC is prepared to use its ratepayers as pawns and inflict identity politics on them, while increasing our costs.

Full Name: Nicola McDowell

Organisation: Wish to speak to the submission: No

Lincoln Library 12/3/25

# **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 publish evened Water Services Council Controlled

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*	NIOLA &	_
Last name*	MCDOWELL	

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

	support the proposed transition of the
Selwyn [	District Council drinking and wastewater
	nd services into a new Water Services
Council	Controlled Organisation (WSCCO) with
stormwa	ter services to remain within Council?

	ia your coi		
31			

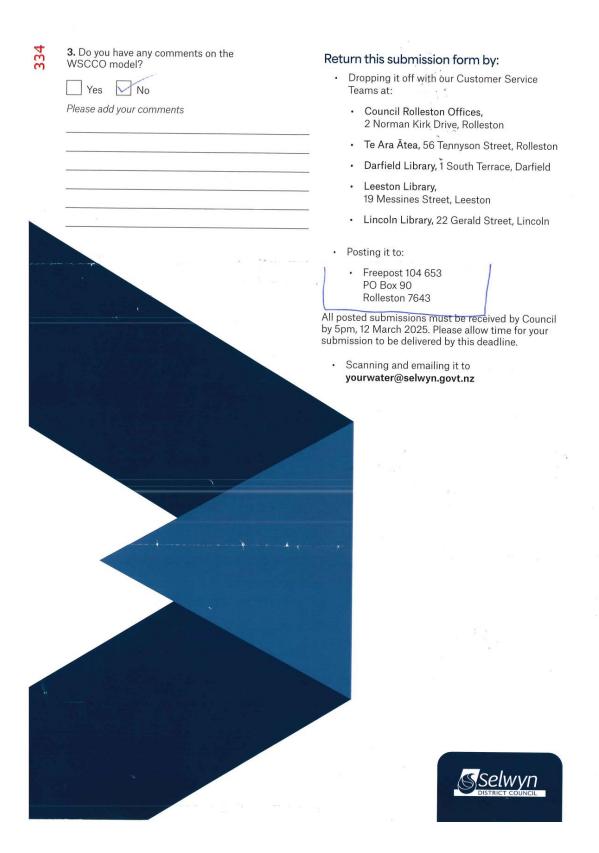
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

١

Please add your comments

Your Water Done Well | 23





Full Name: Brian Lester

Organisation: Wish to speak to the submission: Yes

### Supmission 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.

Brian	
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?\*

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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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.

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### Questions

Do you support the proposed transition of the Selwyn 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 V No	
Please add your comments	
see attached.	
y y	
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery mode	!?

✓ Yes No

Please add your comments

see attached Fundamental Punchor





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. <u>Comment:</u> 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: <u>Comment:</u> Nothing new here.

### 2. "Limited access to funding".

Where is the WSCCO going to get its funding? I suggest it is the same source as Council- charges to the Selwyn Community. Any debt raised by the WSCCO will presumably be secured by a charge over ratepayers- same as Council.



The discussion document refers to a Council limitation on borrowing of 280%, (presumably the debt-to-income ratio). The 2018/28 LTP set this at 130%, the 2021/31 LPT increased the ration 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.

Please note: I wish to be heard in relation to this submission.

Brian Lester.

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

#### **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 property
  consult.
- Councillors and the Mayor should be required to state their position on the matter so constituents can make informed decisions in the election.
- A key question not specifically addressed to ratepayers is whether they are
  prepared to wear more debt. The overarching thrust of the consultation advice in
  favour of the CCO is the ability to raise more debt overall. The justification for
  increased debt has not been articulated in a way that allows for informed
  decision making. This matter should be put to ratepayers by way of reasoned
  Long Term Plan discussions not by way of this rushed consultation.
- The Local Government (Water Services Preliminary Arrangements) (Watercare Charter) Order 2025 already (as from 1 April 2025) imposes reporting requirements on Auckland's Watercare CCO, performance standards and limits on Auckland's water services and there is nothing in that Order which suggests that the Selwyn Council water services personnel would be unable to comply with similar requirements.

# Submission to Selwyn District Council - Your Water Done Well (the consultation) 12 March 2025 from Lieuwe Doubleday

#### Conceptual Problems with the Model - it will always cost more

A CCO will burden ratepayers with

- extra debt;
- · a substantive increase in costs in the long term;
- less representation and accountability by Council and loss of control
- inefficiencies via the loss of integration of services,
- duplication of effort

It is inevitable that the proposed CCO will involve significantly more cost through:

- Set up and establishment costs involving legal structures, information systems, resource acquisition, costs of significant personnel change processes whether via redundancies, recruitment, or changed roles, and everything required to run a business
- Higher remuneration costs through duplication of management functions e.g.
   CCO Chief Executive, Chief Financial Officer, Chief Operating Officer, audit requirements, accounting and disclosure requirements.
- Change processes can and generally do give rise to loss of institutional knowledge and systems, the need for workarounds, and time to work out new ways of working. Realistically it can take upwards of 5 years to bed down new systems and processes. That comes with a significant cost.
- Duplication of separate governance processes and management processes (particularly under a 2 water model, with Stormwater being retained. The duplication is obvious)
- Duplication of billing systems
- Duplication of information systems, operational structures and processes (as between stormwater and other (non-drinking and waste water systems);
- Loss of benefits of economies of scale in overhead management, in shared services and expertise in related fields
- Loss of efficiencies which arise from integrated service management by the current council. A separate entity will require the forging of new ways of working, new relationships, slower and more convoluted decision making processes, more internal formal consultation.
- Schedule 2 Local Government (Water Services) Bill sets out the Contents of any transfer agreement. Clause 5 is instructive and highlights some of the integration issues which need to be compensated for in a transfer agreement.

When you consider the above - the cost differential will inure for the long term. There will never be a time when a CCO is cheaper than inhouse.

# Submission to Selwyn District Council - Your Water Done Well (the consultation) 12 March 2025 from Lieuwe Doubleday

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 iand 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.

65

#### 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.

<sup>&</sup>lt;sup>1</sup> Local Government (Water Services Preliminary Arrangements) (Watercare Charter) Order 2025, operative primarily from 1 April 2025.

#### 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 6<sup>th</sup> March 2025) permits the Territorial Authority to provide water services itself directly and designates them as "Water service providers". The inhouse option requires adherence to core requirements that apply to all water service providers. These include—

- a set of objectives, including that each provider must manage and provide water services in a cost-effective and financially sustainable manner;
- compliance with financial principles, including a requirement that revenue received from the provision of water services must be spent on those services; and

# Submission to Selwyn District Council - Your Water Done Well (the consultation) 12 March 2025 from Lieuwe Doubleday

### The Local Government (Water Services) Bill

- operating within the planning and reporting framework for water services in the Bill; and
- restrictions against privatization.

Interestingly, additional requirements (not less) are imposed on water organizations (CCOs) as regards

- independent corporate governance and limits on the scope of company activities.
- scrutiny via Parts 1 to 7 of the Local Government Official Information and Meetings Act 1987. Part 7 will only apply to Board meetings (excluding Board committee meetings).

CCOs will be given a range of powers already possessed by water service providers:

- · to charge customers for water services delivery; and
- to require development contributions for growth-related capital costs through a modified version of the development contributions regime in the Local Government Act 2002 (the LGA 2002); and so on .. on it goes.

The in-house team are more than capable (with more resources) to achieve compliance.

#### Is the current model broken?

If the current model ain't broke don't fix it.

#### Can we influence the future?

In terms of the argument that the Council wants to be a shaper as opposed to a follower this is 'spin' beyond words. In any proposal Selwyn along with others with have a voice. You can "shape" from your current position – just as effectively.

### Will you be more accountable 'in house?

This is more likely.

Full Name: Catherine Payne

Organisation:

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Νo

Full Name: AARON MCGLINCHY

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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

SDC are rushing towards a WSCCO without provide sufficient detail and justification to residents, and to councilors. Throughout the consultation process there have been numerous calls for more detail. Some information has been provided, but it is piecemeal, and the short consultation period is inadequate to properly consider the proposal. Furthermore the decision to appoint people into roles at a CCO Establishment body is premature, and only serves as evidence SDC do not truly wish to consult - you have made a decision, and are now engineering the process towards that outcome. This is not democrcay, and it is not good governance. The chief reason you give for moving to a CCO is the ability to boorow more money. No information has been provided on the actual needs for more borrowing, nor the implications of this on rates (and shifting rates over to water service charges is glossed over, with no transparency as to the combined cost to households over time). You should pause this process, retain FOR NOW the existing inhouse management that is an option the Government allows) and do a proper analysis of the options, what the costs/benefits of in-house vs a WSCCO. DO NOT RUSH THIS DECISION.

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

Yes

Please add your comments

As above - FOR NOW retain services in house, and do a properly considered costbenefit analysis. Provide details as to why increassed borring would be necessary, and the implications if that borrowing ability is not available. In addition, exploring the option of using Corde should be done - do not simply say they're doing a good job so we don't want to change things, or we have "move at pace". That is a cop out, and incredibly poor management. Make decisions based on evidence and rationale, not trite sound bites from the Mayor.

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

Yes

Please add your comments

The Wellington City experience of a Water CCO does not give any confidence in that approach. Corde were being lined up to manage three waters for Selwyn. They have the former head of Auckland Water on their board. If we are to go to a CCO we should include full assessment of utilising our existing CCO, so as to avoid duplicate costs of staff, CEO, board... We need proper informatio as to why a CCO is better than the existing in house service. What is wrong with the n-house service. The only reasoning given so far seems to be "we can borrow more money" - but why do you need to borrow, how much, for what reason... SDC have been criticised by the auditor's office for their poor practice/performance. The lack of detail provided in the consultation documents, and the many subsequent questions from ratepayers that should have been fundamental to council making any decision on even what model(s) to consult on, reinforce that SDC is ill equipped to prepare proper business cases for this sort of venture. The half baked process that has been rushed through (yet again) is a major concern. Councilors should have been asking the sorts of questions ratepayers have been asking. In the absence of answers they should have instructed staff to go back to the drawing board. The Government requirements action by Sept, but retaining the status quo for now is a legitimate action, and does not preclude in future establishing a WSCCO if and when a proper analysis is undertaken and shared with residents.

Full Name: Robin McKenzie

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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 seems to me that a council-controlled independent body with the council being the only shareholder is just a way for the council to reap any monetary benefits as charges skyrocket, whilst transferring any blame. The appointed WSCCO board will not be accountable to the ratepayer as elected councilors are. Please ask your consciences what will be the least painful outcome for the people you represent.

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

Full Name: Viv Titmus

**Organisation:** 

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Why is there a rush to move forward rather than take a more considered approach with more time to assess options. I think we should remain with the inhouse model for now and shift models in the future if we need too. I don't like the fact that you have already hired staff and invested money in the WSCCO model. We should be in discussions with the government and pushing back on some of their proposals and obtaining some concessions that would be valuable and suitable for Canterbury rural conditions, as we are already operating 3 waters in the Selwyn District area we should already have the skills knowledge and experience to continue this operation in house, but if we lack those they should be sourced and used in house. We should not be incurring increased costs in duplicating extra systems and management structures. I would like more information on how confident you are that from year 10 the drinking and wastewater rates are predicted to be lower than what is in the published Long-Term Plan 2024-2034. If the WSCCO is brought into operation and it is found that it is no longer needed is there any guarantee that the SDC would disestablish the WSCCO and what would the costs be to do this. SDC borrowing should be limited to the current 280% of revenue, not increase to 500% under WSCCO because the attitude of some boards controlling these finances

tend to use the maximum available finance and thus have no control of future expenses and liabilities which will fallback directly onto the ratepayers. This should not be allowed to happen. If WSCCO does proceed then all the SDC residents should vote in the controlling board members.

Full Name: Barry Neil Manson Organisation: Wish to speak to the submission: No

Lerston Library 8/3/21

# 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**

2

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* Barry Neil
Last name* Manson
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

Selwyn Distr assets and se Council Cont	port the proposed transition of the ict Council drinking and wastewater ervices into a new Water Services rolled Organisation (WSCCO) with ervices to remain within Council?
Yes V	No
Please add yo	our comments
	^
	efer that the Selwyn District Council th a future in-house water delivery model?
Yes	No
Please add yo	our comments

Your Water Done Well | 23

76

<b>3.</b> Do you have any comments on the WSCCO model?	Return this submission form by:
Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
	Te Ara Ātea, 56 Tennyson Street, Rolle:
	Darfield Library, 1 South Terrace, Darfie
	<ul> <li>Leeston Library,</li> <li>19 Messines Street, Leeston</li> </ul>
	Lincoln Library, 22 Gerald Street, Library, 22 Gerald Street, Library, 22 Gerald Street, Library, 22 Gerald Street, 22 Gerald Street, Library, 22 Gerald Street, Library, 22 Gerald Street, 22 Gerald St
	Posting it to:
*	<ul> <li>Freepost 104 653</li> </ul>
	PO Box 90 Rolleston 7643
	All posted submissions must be received by Couby 5pm, 12 March 2025. Please allow time for your submission to be delivered by this deadline.
	<ul> <li>Scanning and emailing it to</li> </ul>
	yourwater@selwyn.govt.nz
	A Selwyr

Full Name: Maureen Flattery

Organisation: Wish to speak to the submission: No

Leester Library 8/3/2+

# **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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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* Mouseen Flattery
Last name* Flatfory
Are you submitting on behalf of an organisation?*
Yes V No
If yes, please state the name of the organisation*
Do you wish to attend a hearing to present your submission in person?*
Yes V No
If ves. someone will be in contact with you

to arrange the date and time.

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#### **Privacy statement**

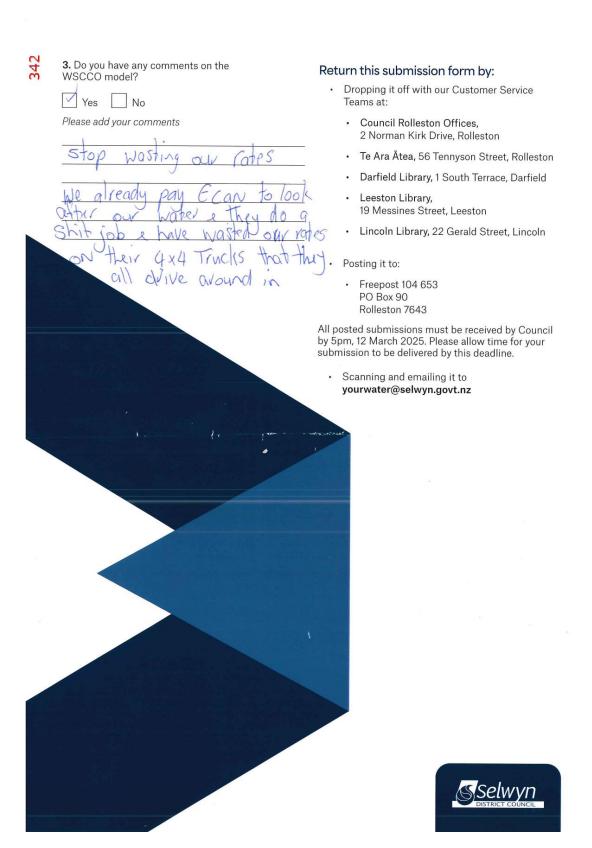
Submissions are part of the public consultation process and are a public record. Anonymous submissions will not be accepted. Submissions including names are published on our website and in official documents so please do not include any personal information in the content of your submission you would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

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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 Vo
Please add your comments We don't need another Organisation. Its the councils job.
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?
Yes No
Please add your comments JUST Leave our WOTP/ 95 14 15
Your Water Done Well   23
Your Water Done Well 1 23



Full Name: Richard Frost

Organisation: Wish to speak to the submission: No

Leasten Library 8/3/25

# 343

# **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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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.

parpood or contacting you are	
First name* Richard	
Last name* F/o St	
Λ Λ	
Email address*	
	04
Are you submitting on behalf of an organisation	1?"
Yes No	
If yes, please state the name of the organisation*	
Do you wish to attend a hearing to present your	r
submission in person?*	
Yes No	
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If yes, someone will be in contact with you	
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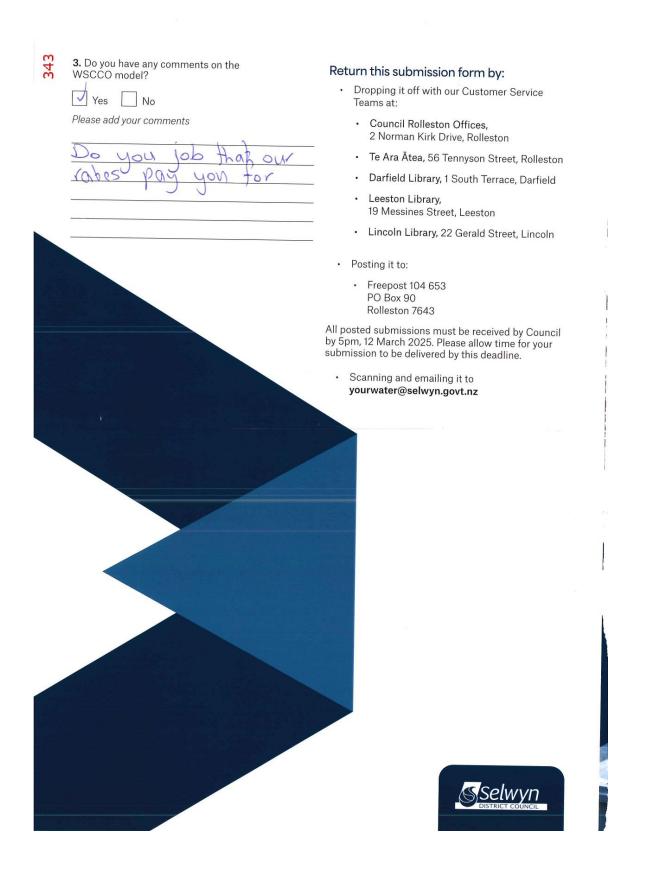
1. Do you support the proposed transition of the

#### Questions

Selwyn 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
Organisation. That means more Hages being Washed  2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?  Yes No
Please add your comments

X

Your Water Done Well | 23



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.

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!

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.

16 | Selwyn District Council

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 it 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.

	2025/2026 LTP \$'000	2026/2027 LTP \$'000	2027/2028 LTP \$'000	2033/2034 LTP \$'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

(2,424) 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 efficiences in service.

		_			_		_	
Drinking	Water and	Sewerage	Funding	Impact	Statement	(excluding	Stormwater)	CCO Modelling

	2025/2026 LTP \$'000	2026/2027 LTP \$'000	2027/2028 LTP \$'000	2033/2034 LTP \$'000
Total operating funding (A)	37,233	45,452	61,286	69,060
Total application of operating funding (B)	33,355	36,581	33,309	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	03,872	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.

Surplus / (deficit) of capital funding (C-D)

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

Full Name: Chris Reddell

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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 support the move to WSCCO only if it can be de-politized. Its Board needs to be appointed outside of Council so it is not constantly being changed and having to deal with constantly changing priorities from Council. Also, it will need to have long term goals/deliverables that are outside of the 3 year council election cycle. Any proposed Board needs to take a long-term view of its activities and what it needs to deliver. While a Board needs to have some input from those with expertise in 3 waters management experience it also needs Board members who are capable of asking good questions, reading papers, and understand governance. Good governance needs more than just industry expertise.

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

Yes

Please add your comments

Please see my comments from the previous question.

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

Yes

Please add your comments

As I have previously said, if a WSCCO model is chosen then it must be de-politized and arms-length removed from Council and its focus on 3 year elections cycles. I also think that if a WSCCO is chosen then the storm water function in urban areas should be included in it. I understand there are challenges to this in rural areas but largely rural areas do not use either Drinking water or Waste water infrastructure.

Full Name: Grace Taylor

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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

Your short, lacking detail, consultation has failed to convince me that having a CCO for water services is going to be beneficial to the ratepayer. In effect, a CCO creates a new bureaucracy which aside from the significant set-up costs, will need to be wrangled with by the Council. The loss of integration of services will create inefficiencies, slow down decision making and problem solving. It will be much easier having all moving parts within one Council realm and management under the oversight of one CEO.

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

Yes

Please add your comments

You are doing a great job with water now. Back yourselves! You can do this in-house. May require additional specialized expertise so recruit and their addition can be of benefit to the entire organization.

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

Yes

Please add your comments

A WSCCO is probably intended for less functioning councils. You are high functioning! You don't need this. It appears the main motivator for your WSCCO model option is to enable the Council access to a higher debt ceiling. You might want to re-think the real life impacts of that on your ratepayers, especially those on fixed incomes. These discussions need to be had during the long term plan consultations, not hidden as an unexpected (for some) consequence of this imperfect consultation process.

Full Name: Jane Elms

Organisation: Prebbleton Community Association

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

\*We are concerned that without all relevant legislation passed there are too many unknown factors. \*We are concerned that a future change in legislation could mean that a District Council could lose control over local water Servies and meeting local needs. \*We are concerned about the SDC governing the WSCCO, both in managing the multiple risks, especially regarding the 'uncalled capital', as well as maintaining/managing local control and transparent processes of a public service. We are also concerned that future community consultations on the relevant water topics would no longer take place. \*We are concerned that a) the short length of the consultation period; b) that no education sessions for residents were pre-planned (the drop-in sessions that Committee members attended had more unanswered questions than answered); c) that when some 'education' was forthcoming a week of the consultation period had already gone, and some of this was somewhat bias in favour of a WSCCO; d) that the consultation document was lacking in details; e) that we gained a deeper understanding reading information on other District Councils website. \*\*We would like to acknowledge and congratulate Cr Sophie McInnes for her part in the live on-line session on Wednesday 5th March. We valued her clear and honest answers.

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

Yes

Please add your comments

\*Due to the many unknown variables, we prefer this option so that control of our water remains with elected representatives who understand local needs and priorities. \* Continuity of service as the area continues to develop and grow. \* We are concerned with the cost of establishing a WSCCO when the infrastructure needed is already established within SDC. While there may be some long-term financial benefits of a WSCCO, we also need to reinforce the financial strain that many households are

currently under, and although we understand that the SDC will need to make changes to meet the new legislation we believe that is a preferred option.

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

Yes

Please add your comments

This is a potential model for the future when legislative requirements are in place, more information is available, and greater clarity of the costs, benefits and risks are made public. Again, we are concerned about the rushed approach for public consultation and the lack of proactive education for the community prior to the consultation timeframe. We applauded councils such as Ashburton District Council who are utilising a 4-week consultation period. We find it necessary to remind SDC that this topic is their daily work, many in the community work full time and have prior commitments so are unable to 'drop tools' and learn about 'Your Water Done Well' and/or be able to attend last minute drop-in sessions. They are instead influenced by 'on-line warriors'. We would have liked to have the opportunity to hold an information session in Prebbleton however there wasn't sufficient time. Only one of the three ward SDC Councillors made contact with the Prebbleton Community Association, and with good luck, we had a meeting that same week and could meet with them.

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*	Grittin	

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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?

Your Water Done Well | 23

1 1 1 0	Council Controlled Organisation (WSCCO) with
	stormwater services to remain within Council?
	Yes V No
	Please refer to attached
Are you submitting on behalf of an organisation?*  Yes No	Do you prefer that the Selwyn District Council
res vi No	continues with a future in-house water delivery model?
If yes, please state the name of the organisation*	✓ Yes  No
	Please add your comments
Do you wish to attend a hearing to present your submission in person?*	Please refer to attached
✓ Yes No	
If yes, someone will be in contact with you to arrange the date and time	

X

3. Do you have any comments on the WSCCO model?	Return this submission form by:
Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments Nease refer to attached	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
	Te Ara Ātea, 56 Tennyson Street, Rolleston
	Darfield Library, 1 South Terrace, Darfield
	<ul> <li>Leeston Library,</li> <li>19 Messines Street, Leeston</li> </ul>
	Lincoln Library, 22 Gerald Street, Lincoln
	Posting it to:
	<ul> <li>Freepost 104 653</li> <li>PO Box 90</li> <li>Rolleston 7643</li> </ul>
	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.
	<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
	Selwyn

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.

1

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 inhouse 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.

2

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 inhouse 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

Full Name: Jane Elms

**Organisation:** 

Wish to speak to the submission: No

# Do you support the proposed transition of the Selwyn District 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

While this concept has potential, having experts managing such a vital resource, unfortunately I do not feel like I have sufficient information to answer yes. I believe this is being rushed, from a national level, when legislation is still unclear about the future of this model. As such I feel like this is a risk that is too big for SDC. I am concerned that a future change in legislation could mean that a District Council could lose control over local water Servies and meeting local needs, or that a WSCCO could be too focused on business outcomes to focus on community needs.

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

Yes

Please add your comments

At this point in time, from the information that has been made available to the community, this seems to be the option with less risks, from financial implications to governance.

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

Yes

Please add your comments

This model has potential in the future when we have more information. I appreciate it is difficult to meet the meets of all locals with the information you provide however a District Council works for the people, not the other way around. Multiple levels of detail needed to be provided, as did pre-planned education sessions with people who could actually answer the questions, and answer them honestly, that includes saying 'we don't know that yet'.

Full Name: Gareth Payne

Organisation: Suburb: Annat

Wish to speak to the submission: Yes

Darfield Library 25

# **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*	Gareth	Payne	
Last name*	Paure	J	

Are you submitting on behalf of an organisation?\*

Yes V 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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#### **Ouestions**

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?

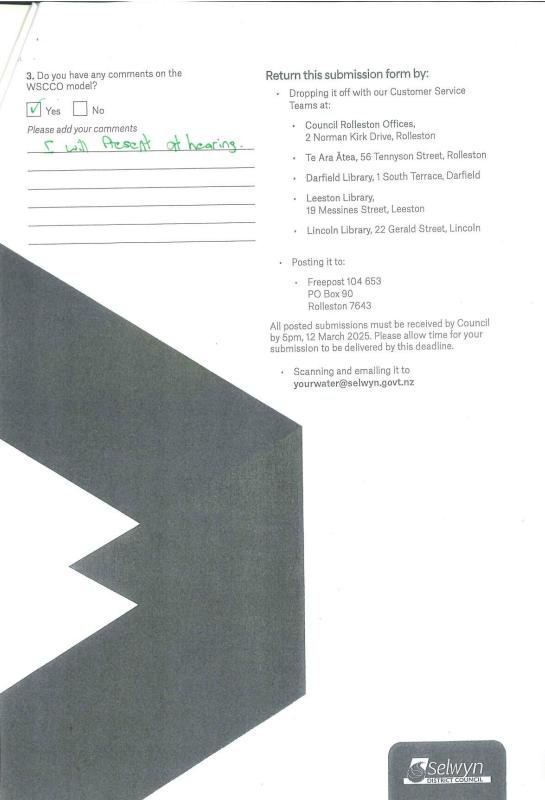
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2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

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Your Water Done Well | 23

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Full Name: Margaret Mary Nimmo

### **Submission Form**

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First nam	e* margaret Mary
Last nam	e* Nimmo
	ubmitting on behalf of an organisation?*
Yes	No
If yes, plea	ase state the name of the organisation*
	ish to attend a hearing to present your
	on in person?*
Yes	No
	neone will be in contact with you
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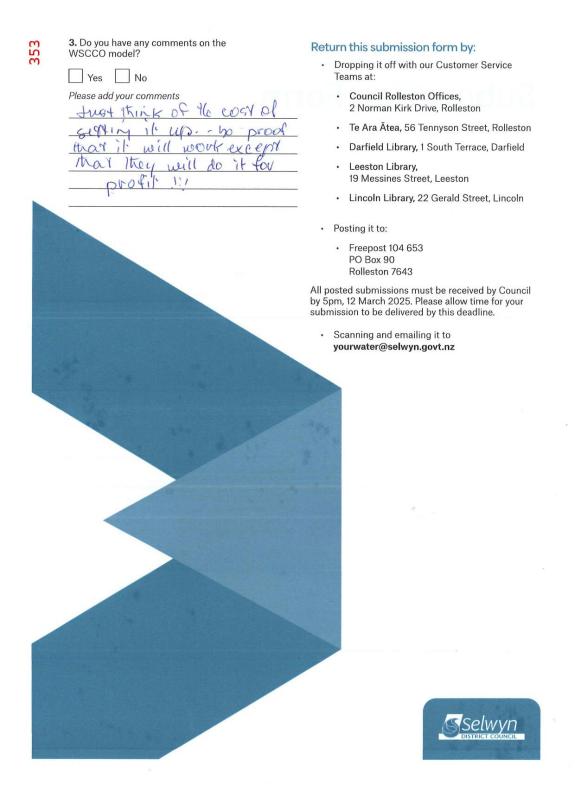
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1. Do you support the proposed transition of the Selwyn District Council drinking and wastewater

### Questions

Council Co	l services into a ontrolled Orgar er services to re	nisation (W	SCCO)	with	
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Yes No	1	
llease add your comments		



Full Name: Lean Seng (Tony) Gan

Darkeld Library 11/3/25

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First name*	legn	Seine	( I ONY	
Last name*	Gan		]-	
Are you subr	mitting on	behalf of a	n organisation	?*
Yes	No			
If yes, please	state the r	name of the	organisation*	

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

	Yes	/	No			
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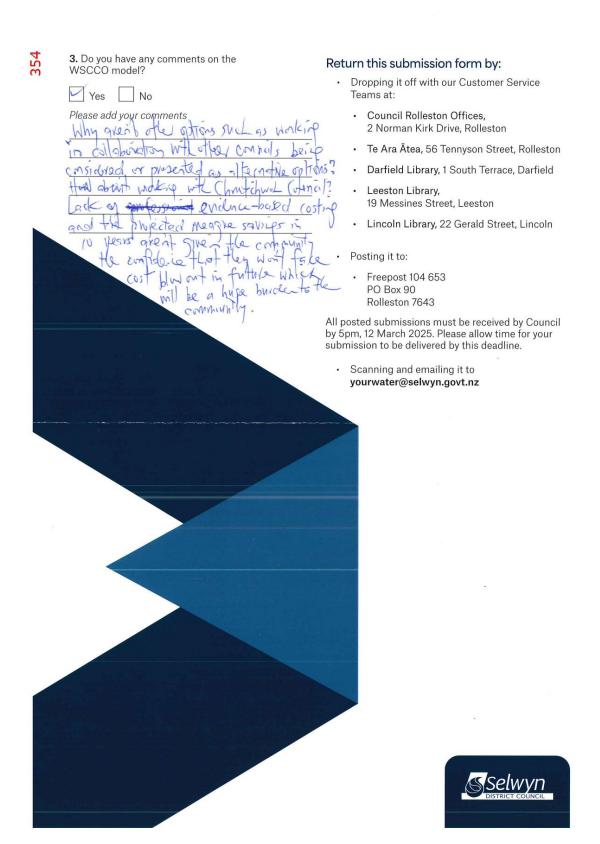
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1. Do you support the proposed transition of the

### Questions

Selwyn 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  Lack of RV, der co support service efficiency
and cost deflectioners of this Propusal. Insteady/ potentially added admix a running costs in grows
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?
Yes No
Please add your comments The setup and punioss structure greats in
place, the Conneil's management of Water hosn't



Full Name: Malcolm Gourlie

Organisation: Suburb: Halswell

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Water infrastructure in Selwyn largely new, any new projects should be funded by developers and not ratepayers. No new entity required at a cost disproportionate to what actually needs to be done - replicating what already exists within the council, with new staff brought in as required on fixed term contracts. Planning and ongoing water infrastructure should be in house, after consultation and with costings accountable to the ratepayer.

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

Yes

Please add your comments Give ratepayers a break.

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

Yes

Please add your comments

Central Plains Water Scheme owned and built by the Selwyn District Council & Christchurch City Council, established to provide water storage and irrigation on the Canterbury Plains. Wildly 'successful' in that it enabled peak dairy on the plains lighter soils ....leading to dirty water, high nitrate levels, river, stream and lake pollution. Ratepayers now have to pay through the nose to have their water chlorinated and water sources re-engineered against pollution, caused by peak dairy created by the Selwyn District Council. Has there ever been a return on the investment? A positive return that is.

Full Name: James Gourlie

Organisation: Suburb: Halswell

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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
Too high a cost to ratepayers

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

Yes

Please add your comments Lower cost to ratepayers

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

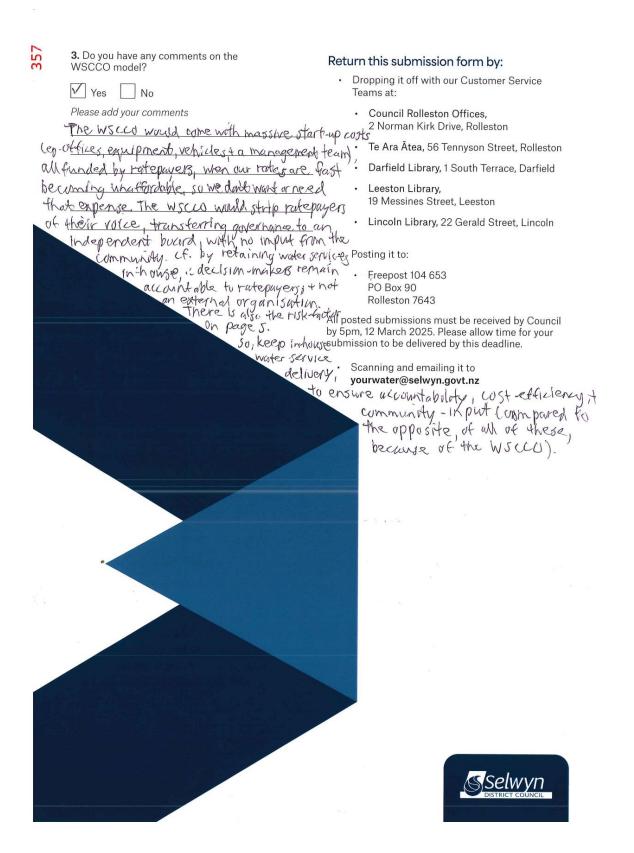
Yes

Please add your comments

Not working elsewhere even where three or four councils have banded together to keep costs down - lower N.I.

Full Name: Yvonne Evans

I am furious that the council stopped consultation on the Annual Plan! You need to be held accountable to the community over your constant a verspending, instead of Anyone can make a submission. Submissions will only (1) Selwyn District Council is conducting a public be used for the purpose of this consultation process. consultation in response to The Local Government (Water Services Preliminary Arrangements) Act All submissions will be considered by Council before 2024 in relation to the arrangements for its delivery making a decision. of water services into the future. Privacy statement The Council's proposal is: Submissions are part of the public consultation To transition Selwyn District Council drinking and wastewater assets and services into a new process and are a public record. Anonymous publicly owned Water Services Council Controlled submissions will not be accepted. Submissions including names are published on our website and Organisation (WSCCO) with stormwater services in official documents so please do not include any to remain within the Council. personal information in the content of your submission you would prefer to be kept private. Please read the consultation document and information available online at While contact details (address, phone number and selwyn.govt.nz/yourwater email address) are provided to elected members along with your feedback to be considered when You can make a submission using this form, or by completing the online submission form at making their decisions, contact details will not be made publicly available on the Council's website or selwyn.govt.nz/yourwater official documentation. If you need extra space for your submission, If someone requests a copy of submissions use additional paper and attach it to this form. through the Local Government Official Please include your first and last name on the Information and Meetings Act 1987, name and contact additional paper. details must be supplied. If you have good reason as to why your personal details and/or feedback should be kept confidential please contact Submitter details yourwater@selwyn.govt.nz outlining your reasons. Please note: all fields marked with an asterisk (\*) are compulsory. These details will be used for the purpose of contacting you about this consultation. Keter to my comments on next pup Questions 1. Do you support the proposed transition of the First name\* Selwyn District Council drinking and wastewater Evans assets and services into a new Water Services Last name\* ouncil Controlled Organisation (WSCCO) with tormwater services to remain within Council? Please add your comments charges! umarty a minimum to essential Are you submitting on behalf of an organisation?\* 2. Do you prefer that the Selwyn District Council Yes No continues with a future in-house water delivery model? I see my reasons If yes, please state the name of the organisation\* V Yes Please add your comments Do you wish to attend a hearing to present your submission in person?\* Yes No If ves. someone will be in contact with you to arrange the date and time. Your Water Done Well | 23



Full Name: Jacinda Anderson

Partield Library 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.

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#### Submitter details

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First name*	-Jacinla
Last name*	andusco-

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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	V	No
Yes	~	No

Please add your comments

Are vou	submitting	on	behalf	of	an	organisation?
, mo jou	000111119					3

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.

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

V Yes No

Please add your comments





Full Name: Mark Hunter

Darkeld Library 11/3/25

## **Submission Form**

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#### Submitter details

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First name\* MARK

Last name*	HUMDER
— Are you subi	A
Yes	No
If ves, please	state the name of the organisation*

Do you wish to attend a hearing to present your

submission in person?\*

Yes V No

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#### **Ouestions**

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

			-

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

./	Voc	1
*	165	

Yes V No Please add your comments

Please add your comments

Your Water Done Well | 23

359



Full Name: Janet Talbot

Dafreld Library 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.

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#### Submitter details

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First name\* Tanet

Last name\* TALBO

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### Questions

 Do you support the proposed transition of the Selwyn 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 V N

Please add your comments

why reinvert the wheel setting up a new amonisation

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

8

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

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

Yes No

Please add your comments

Council Control & part of

roranal Council (nocedures.

Your Water Done Well | 23

360

360

Full Name: Carolyne Jones
Organisation:
Wish to speak to the submission: No

Darkerld Litrary 1/13/25

# 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.

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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.

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

Do you wish to attend a hearing to present your

If yes, someone will be in contact with you

submission in person?\* Yes No

to arrange the date and time.

First name\* CAROLINE JONES

Last name\*

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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 uncil Controlled Organisation (WSCCO) with mwater services to remain within Council?

Yes No ase add your comments

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

Yes No

Please add your comments

Your Water Done Well | 23

361





Full Name: Andrew Fischer

## ubmission 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.

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#### Submitter details

submission in person?\* Yes No

to arrange the date and time.

If yes, someone will be in contact with you

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First name*	Andrew	
Last name*	Fischer	

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### Questions

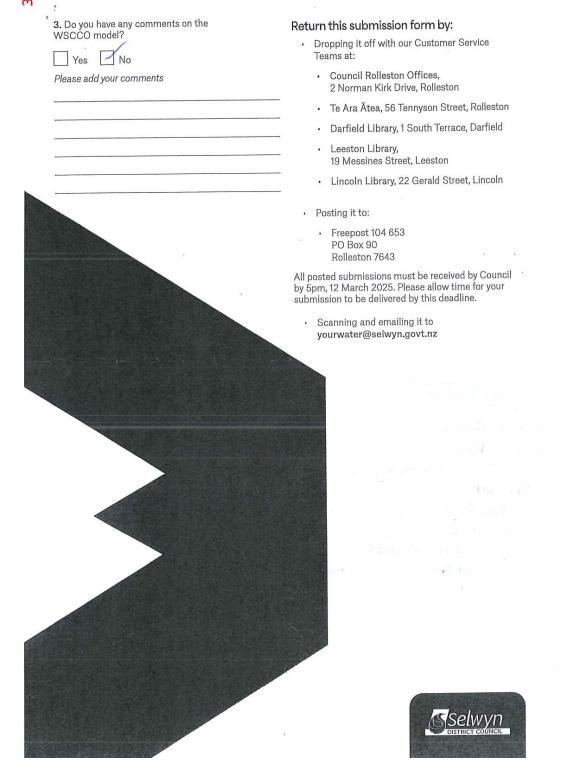
<ol> <li>Do you support the proposed transition of the Selwyn District Council drinking and wastewater</li> </ol>
assets and services into a new Water Services Council Controlled Organisation (WSCCO) with
stormwater services to remain within Council?

A	stormwater services to ren
	Yes No
	Please add your comments
Are you submitting on behalf of an organisation?*  Yes No	2. Do you prefer that the S continues with a future in-
If yes, please state the name of the organisation*	Yes No
Do you wish to attend a hearing to present your submission in person?*	Please add your comments
Ves No	

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

	/	
V	Yes	No





Full Name: Sarah Manifold

# 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.

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#### Submitter details

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First name\*

Last name\*

MANIFOLD

Are you submitting on behalf of an organisation?\*

Yes

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

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

Yes

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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 ormwater services to remain within Council?

lease add your comments

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

Yes

Please add your comments

**3.** Do you have any comments on the WSCCO model? Yes No Please add your comments

### 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



Full Name: Graeme Young

## 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:

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#### Submitter details

)

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First name* 6 raeme
Last name*
Are you submitting on behalf of all 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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#### Questions

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Selwyn District Council drinking and wastewater
assets and services into a new Water Services
Council Controlled Organisation (WSCCO) with
stormwater services to remain within Council?
the state of the s

Council Controlled Organisation (WSCCO) with stormwater services to remain within Council?
Yes No
Please add your comments  By Since when did the  and stort making policy
word on religious polices?
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
cop on infrastruture.
and personale.



Full Name: Clavin Clare

# 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

submission in person?\*

Yes No

to arrange the date and time.

If yes, someone will be in contact with you

First name\*

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

Calvin

Last name*	Clare			
Last Harris			Λ	1
Are you subm	iţting on behalf	of an organi	satio	n?*
Are you subm	/	or an organi	outre	
Yes y	No			
				4
If yes, please s	state the name o	of the organis	ation	1"
Do you wish t	o attend a hear	ing to preser	it yo	uı

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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 Why another organisation, the Council alreadys has contro over water  Is this 3 waters in another
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?  Yes No  Please add your comments  More infrastructure more  costs why

Your Water Done Well | 23

Full Name: Susan Hunter

Organisation: Wish to speak to the submission: No

Darfield Library 11/3/28

# **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.

-irst name"	20	217H

Are you submitting on benait of an organisation

Yes V No

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

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

Yes Vo 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 t	
Selwyn District Council drinking and wastew	ater
assets and services into a new Water Service	S
Council Controlled Organisation (WSCCO) w	ith
stormwater services to remain within Counci	?

	1	
Yes	V	No

Please add your comments

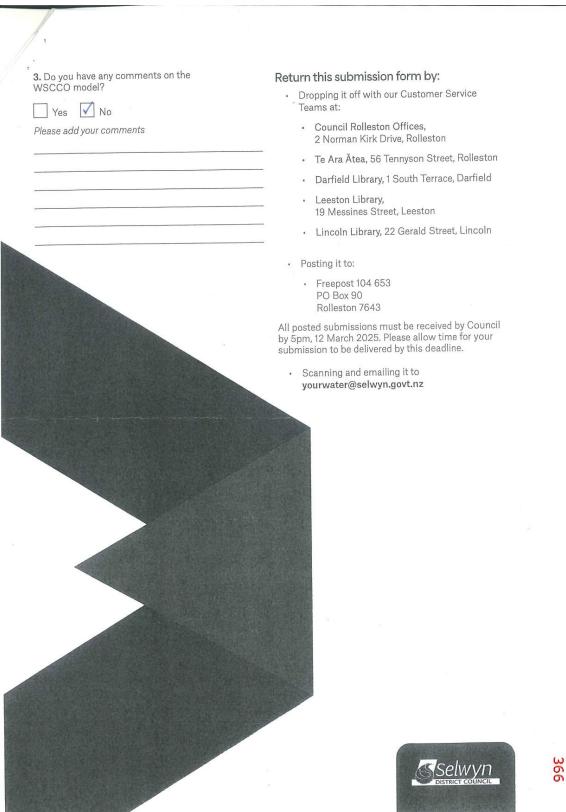
2. Do you	prefer tha	at the Selwyr	District Coul	ncil
continues	with a fu	ture in-house	water delive	ry model?

✓ Yes No

Please add your comments

Your Water Done Well | 23

366



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.

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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 WSSCO can utilise LGFA funding, this figure \$195 million off full replacement value.

A lot of discussion has been around commercial waste for pines resource

I would ask if this need is predominantly coming from IZONE? And if so, why has the sprawl of this commercial development been allowed to continue if we don't have the infrastructure to cater for it?

No mention of rural supplies, the comments made in council about the 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 WSCCO at a later date if it's the wish of the people, but we cannot wind back to an in-house model after starting the WSCCO without huge cost and grief.

I Samuel Wilshire to the best of my abilities confirm what has been stated is true and accurate given the information given to me to make my submission.

Thank you for your time to read this submission

Full Name: Neville Strong

Organisation: Wish to speak to the submission: No

1. A. 12/3/25

# Submission Form

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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

8

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* NEVILLE
Last name* STRONG
Are you submitting on behalf of an organisation?*
Yes No
If yes, please state the name of the organisation*
, yes, product state the name of the cognition
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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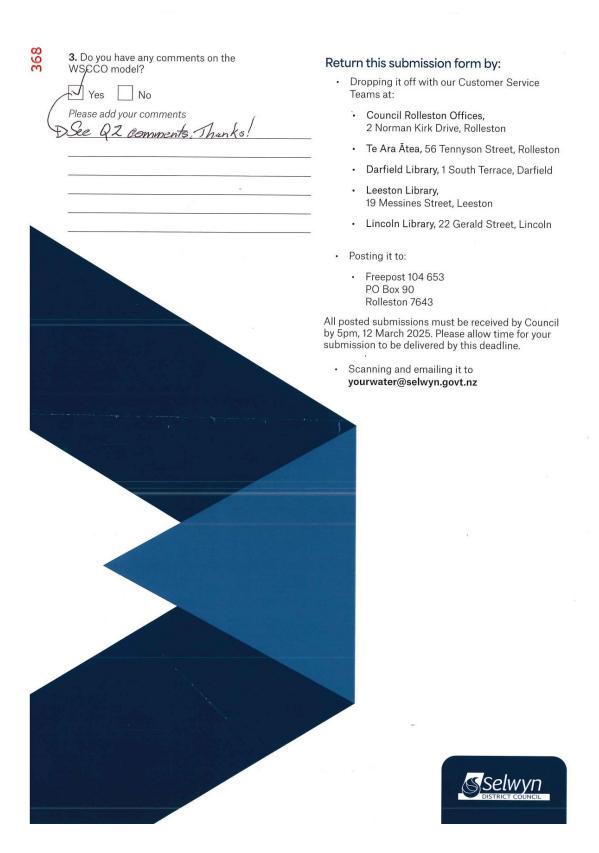
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#### Questions

	EA CONTRACTOR AND A CONTRACT CONTRACT CONTRACT CONTRACT CONTRACTOR CONTRACT
	Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council?
ı	Yes No
	Please add your comments WSCCO process: Early information provided indicates The water systems appear to be more
	in the long term . Thus, this process appeals to me!
	Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?
	Yes No
	Please add your comments
	Your Water Done Well   23



Full Name: David Armstrong

Organisation: Wish to speak to the submission: No

Oarfield Library 11/3/25

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### Submitter details

First name\* Davio

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

Last	name* PRINSTRONE
	1.16.6
Are	you submitting on behalf of an organisation?
	Yes No
If ve	es, please state the name of the organisation*
II ye	o, produce didice in the manner of the control of t
D-	you wish to attend a hearing to present your
	mission in person?*
	Yes No
	es, someone will be in contact with you
to a	rrange the date and time.

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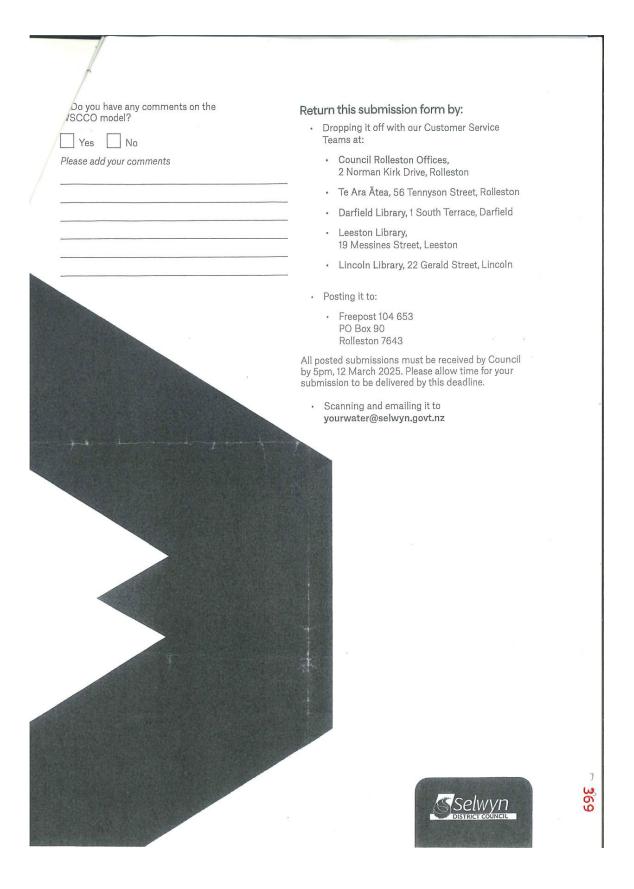
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### Ouestions

Do you support the proposed transition of the Selwyn 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
New organisation requires significant rate
payer funding to establish and is not easily
accessable to side prages feedback - further
removed from the domocratic process that
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?
✓ Yes No
Please add your comments
Selwyn has one of the best moter intrastructures
in the country so why change this. Also
thosa is good institutional knowledge contention
water intenstructure in the didering community
which should be piece vol. Your Water Done Well   23
Dies county is more character boile to the money?



Full Name: Fred Bull

Organisation: Wish to speak to the submission: No

370

Ourfield library 11/3/25

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

to remain within the Council.

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First name*	D
Last name* BL	ILL.

Are you s	ubmitting on behalf of an organisation?*
Yes	X No
If yes, plea	ase state the name of the organisation*
	ish to attend a hearing to present your
submissi	on in person?*
	on in person?*

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### Questions

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

Yes No
Please add your comments
as a rate payer a separate entity,
as a rate payer a separate entity, but still bouncil controlled sounds
more like a useless' pensive double
dipping of portunity to me.
Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?
Yes No
Please add your comments
Read again answet
to Question 1.

Your Water Done Well | 23

Please ad your comments  READ ACAIN ANSWER  TO QUESTION ONE.  Dirophing it off with our Customer Service Teams at:  Council Rolleston Offices, 2 Norman Kirk Drive, 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 Spm, 12 March 2029. Please allow time for your submission to be delivered by this deadline.  Scanning and emailing it to yourwater@selwyn.govt.nz	3. Do you have any comments on the	Return this submission form by:
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yourwater@selwyn.govt.nz		by 5pm 12 March 2025. Please allow time for your
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Full Name: Graeme Dawson

Organisation: Wish to speak to the submission: No

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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* SLALME
Last name* DANSIN
***
,
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 VNo
162 1VU
If yes, someone will be in contact with you

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### Questions

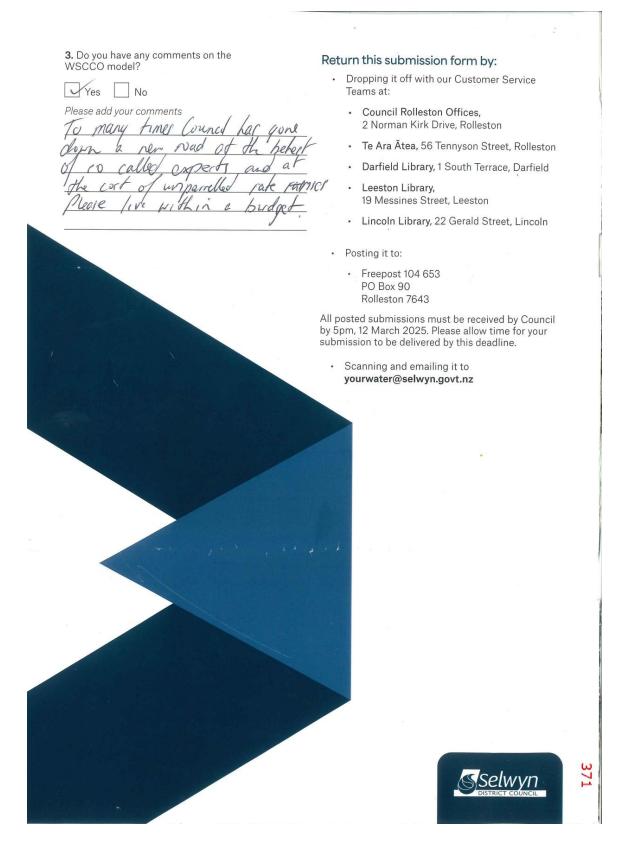
<ol> <li>Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services</li> </ol>
Council Controlled Organisation (WSCCO) with
stormwater services to remain within Council?
Yes No

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

Yes

Please add your commen

Your Water Done Well | 23



Full Name: John Verry

Organisation: Malvern Community Board Wish to speak to the submission: Yes

# 372-

## **Submission Form**

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#### **Submitter details**

X Yes No

submission in person?\*

to arrange the date and time.

X Yes

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?\*

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

Do you wish to attend a hearing to present your

Malvern Community Board

If yes, someone will be in contact with you

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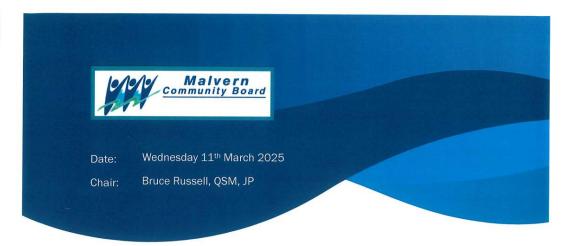
### Questions

Selwyn 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 X No	
Please add your comments  Refer attached	
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery mode	el?
X Yes No	
Please add your comments Refer attached	

X

Your Water Done Well | 23

372	3. Do you have any comments on the	Return this submission form by:
	WSCCO model?  X Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
	Please add your comments  Refer Attached	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
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		<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
		Mode of submisson
		Submission circulated to MCB and approved at MCB meeting held 11th March 2025.
		Selwyn



### 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 then 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, question 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
Clare.	_
Calvin Payne	

THIS 11th Day of March 2025.

Full Name: Janet Mathewson

Organisation:

Wish to speak to the submission: No

# **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

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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*	Jonet
Last name*	Mathewson

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### Questions

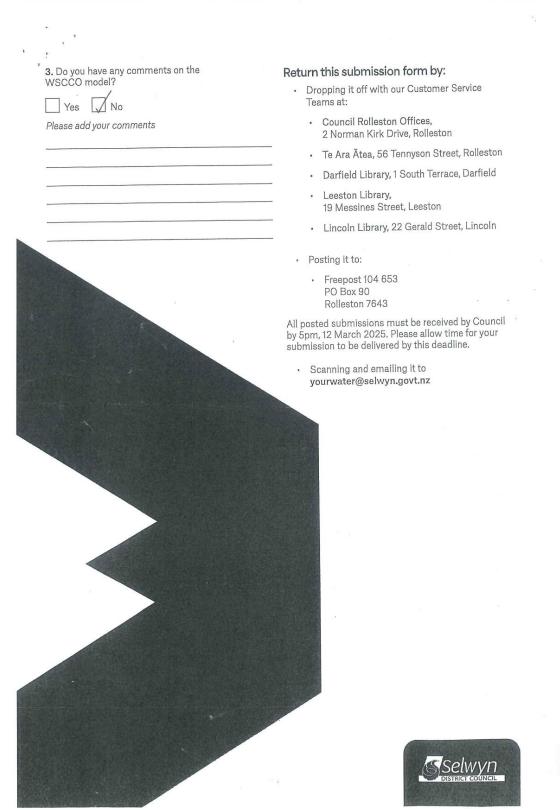
I. Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with	•
stormwater services to remain within Council?	

Please add your comments

Are you submitting on behalf of an organisation?*  Yes No  If yes, please state the name of the organisation*	2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?  Yes No
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.	Please add your comments

Your Water Done Well | 23

Y



Full Name: Patricia Clare

Organisation: Wish to speak to the submission: No

# Submission Form

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First name*	Patricia	
Last name*	Clare	
	•	
A	-: tting on habilf of an arganication?*	

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

X,

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Selwyn D	istrict Council drinking and wastewater
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Council C	Controlled Organisation (WSCCO) with
tormwat	er services to remain within Council?

Yes No	
ease add your comments	
Remain as it is	

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

Yes N

Please add your comments

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Your Water Done Well | 23

### Return this submission form by:

- Dropping it off with our Customer Service
  - 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
- - 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



Full Name: Alice Thorne



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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		<u> </u>	_	-
First name*	1	1	6	6

Last name\* Thorne

submission in person?\* V No

to arrange the date and time.

Do you wish to attend a hearing to present your

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#### Questions

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Are you s	ubmitting on behalf of an organisation?*	
Yes	No	
If ves. plea	ase state the name of the organisation*	

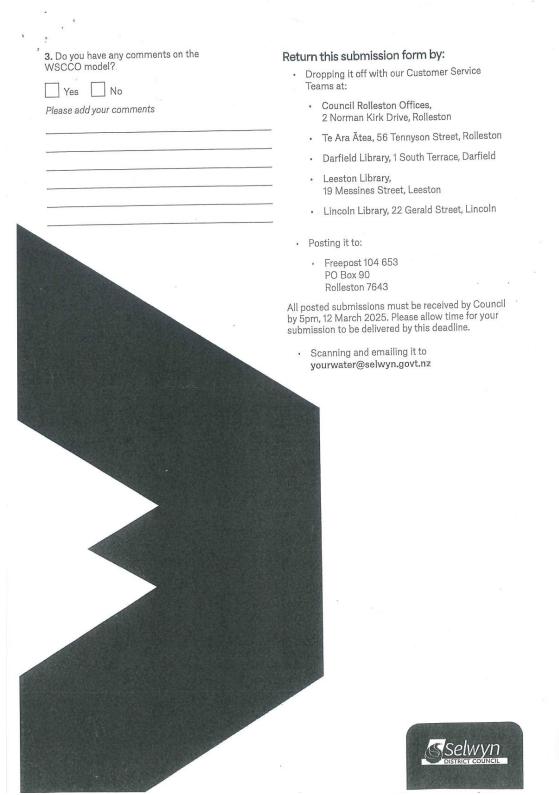
Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

	_	
V	Yes	N

Yes No Please add your comments

Please add your comments





Full Name: Margaret Lang-dale Hunt

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Last name\*

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Are you	Submitting	011	benan	or an	organisation?*

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

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Yes

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Please add your comments

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

1/ Yes No

Please add your comments





Full Name: Walker Brian

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Do you wish to attend a hearing to present your

If yes, someone will be in contact with you

submission in person?\*

to arrange the date and time.

First name\*

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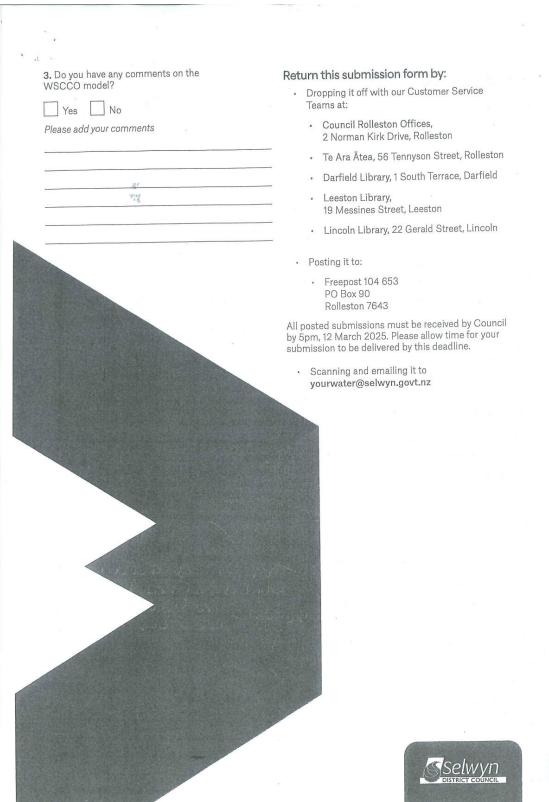
Please add your comments
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What is rerognised to be the
Worst council in

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

Yes No
Please add your comments

Your Water Done Well | 23

X



Full Name: Patrick Van dePol

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

Do you wish to attend a hearing to present your

If yes, someone will be in contact with you

First name\* Podricu

Yes No

submission in person?\*

to arrange the date and time.

Last name\* Van de Pol

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Yes No

Please add your comments

Are you submitting on behalf of an organisation?

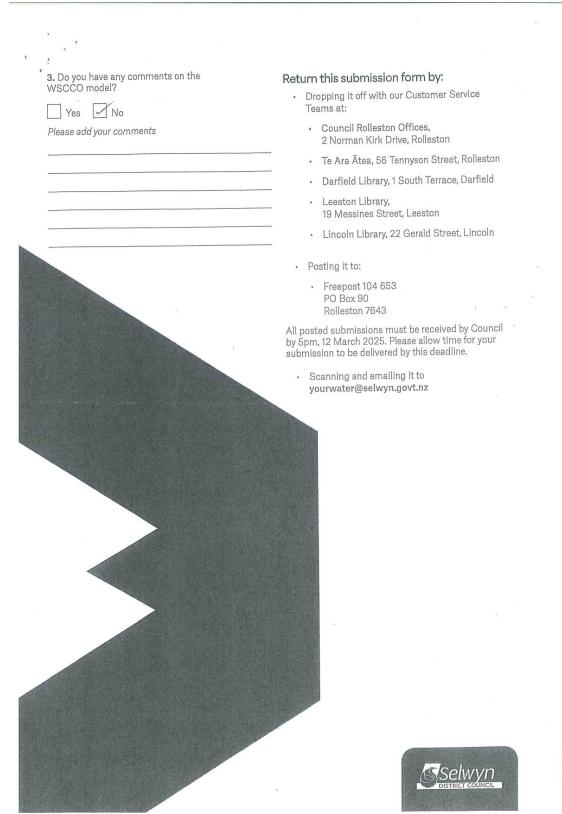
Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes No

Please add your comments

Your Water Done Well | 23

X



Full Name: Stephen Ray

Organisation: Suburb: Annat

Wish to speak to the submission: No

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First name*	Stepher	`
Last name*	Raj	
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Lucerianio		- 0 2

Are you submitting on behalf of an organisation?\*

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Do you wish to attend a hearing to present your

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#### Questions

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lease add your comments

'a	
. Do you prefer that the Selwyn Distri ontinues with a future in-house water	ct Council delivery model?
Yes No	
lease add your comments	
	-

Your Water Done Well | 23

X

Full Name: Steve Pudney

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First name\* Steve

last name\*

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Yes

/ No

lease add your comments

Are you submitting on behalf of an organisation?\*

Yes V

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.

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

Yes N

Please add your comments

Leave as is

Your Water Done Well | 23

380



380

Full Name: Andrew Howard

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First name*	Indrew		
. 4	1 boward		

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Yes No

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

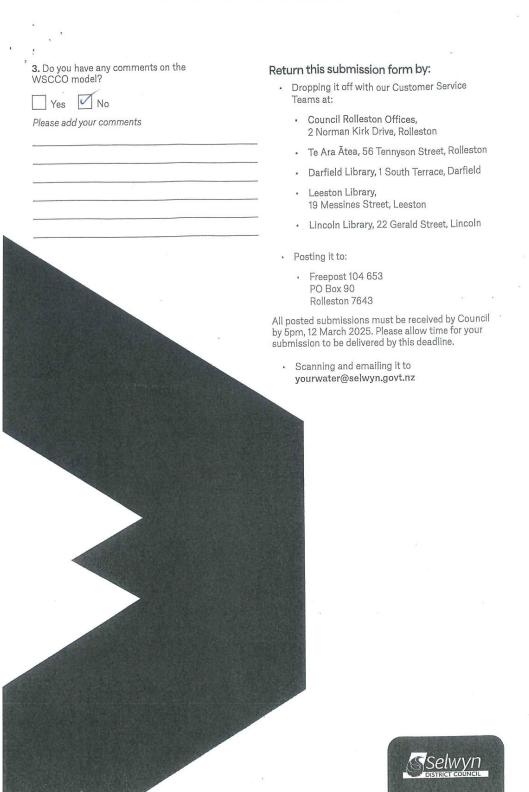
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes No

Please add your comments

Your Water Done Well | 23

381



Full Name: Lesley Palmer

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

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First name\* LESIEY

Are you submitting on behalf of an organisation?\*

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

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

If yes, someone will be in contact with you

to arrange the date and time.

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#### **Ouestions**

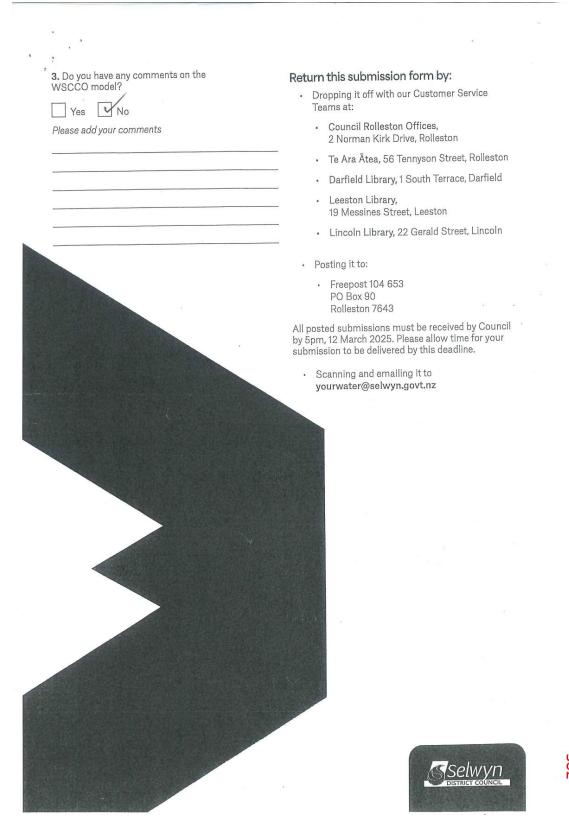
1. Do you support the proposed transition of the Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with rmwater services to remain within Council?

Do you prefer that the Selwyn Dis ntinues with a future in-house wa	strict Council ater delivery model?
Yes No	
ease add your comments	

ease add your comments

Your Water Done Well | 23

382



Full Name: Sonya Strahan
Organisation:
Wish to speak to the submission: No

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#### Submitter details

)

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First name* SONYA
Last name*STRAHAN
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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#### Ouestions

Selwyn District Council drinking and wastewater assets and services into a new Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within Council?
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ncil fun water Selvices are well in . S manageable. Your Water Done Well | 23

Full Name: Eric Freeman

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Last name	* FR	EEM	AN		
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Do vou wie	sh to attend a hearing to present your	
	n in person?*	
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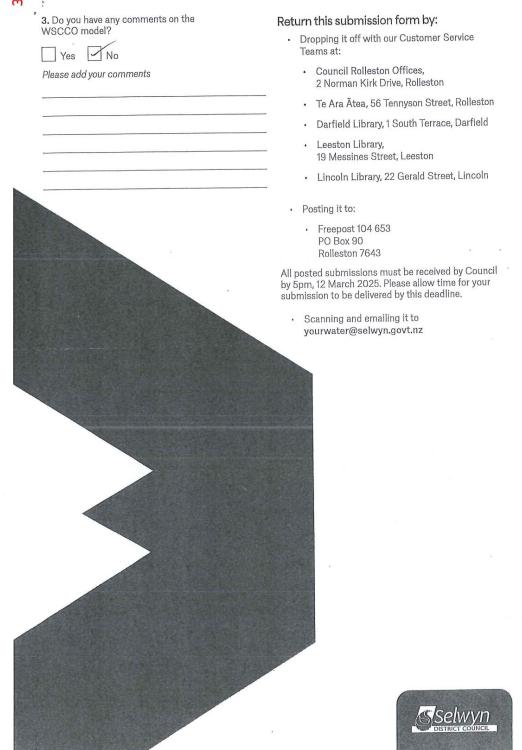
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#### Questions

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Din	* *
Do you prefer that the Selw continues with a future in-hou  Yes No	yn District Council ise water delivery model?



Full Name: John Verry

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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* John
Last name* VERRY
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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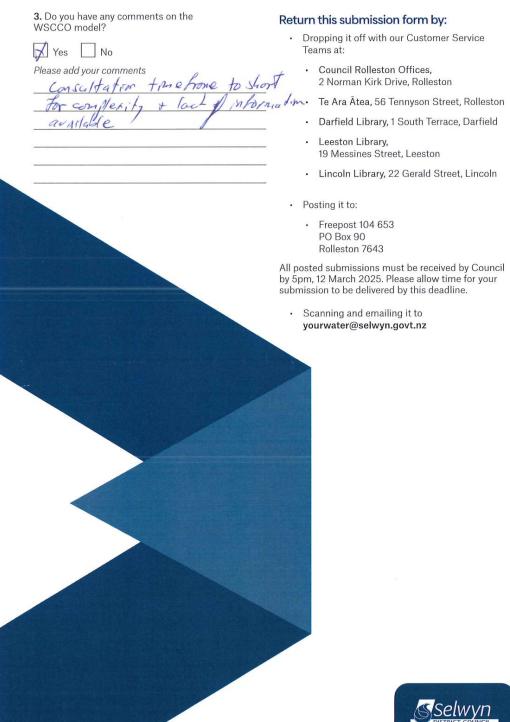
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Selwyn District Council drinking and wastewater
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Council Controlled Organisation (WSCCO) with
stormwater services to remain within Council?
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2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

continues with a future in-house water delivery model?
Yes No
Please add your comments
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Full Name: Christopher Norton
Organisation:
Wish to speak to the submission: No

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First name* Christopher
Last name* Norton
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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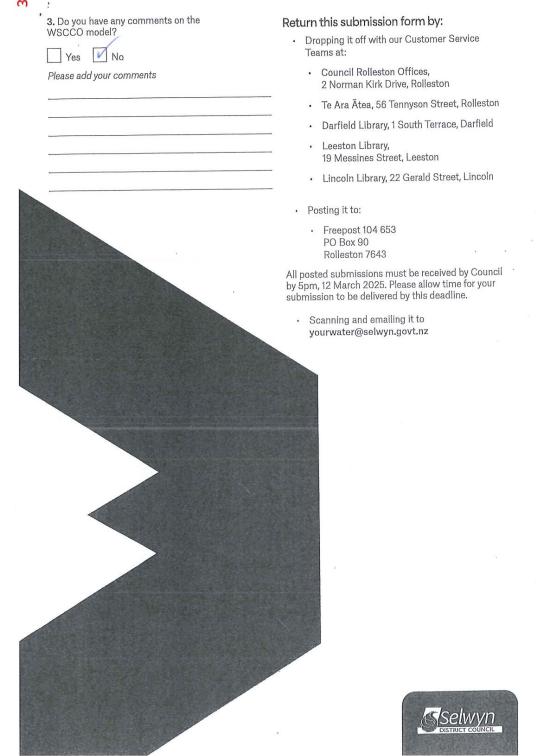
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1. Do you support the proposed transition of the Selwyn District Council drinking and wastewater

#### Questions

assets and services into a new W Council Controlled Organisation stormwater services to remain w	(WSCCO) with
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Please add your comments	
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2. Do you prefer that the Selwyn continues with a future in-house	
Yes No	
Please add your comments	



Full Name: William Gye

Organisation:
Wish to speak to the submission: Yes

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

Do you wish to attend a hearing to present your

If yes, someone will be in contact with you

submission in person?\*

to arrange the date and time.

First name\* William

Last name\*

aye

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### Questions

Do you support the proposed trans Selwyn District Council drinking and assets and services into a new Water	l wastewater r Services
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Yes No	
Please add your comments	

Your Water Done Well | 23

0



Full Name: Sharon Howard

Organisation: Wish to speak to the submission: No

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#### Submitter details

First name\* Last name\*

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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 1 No

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. Do you	support the proposed transition of the
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	d services into a new Water Services
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	er services to remain within Council?

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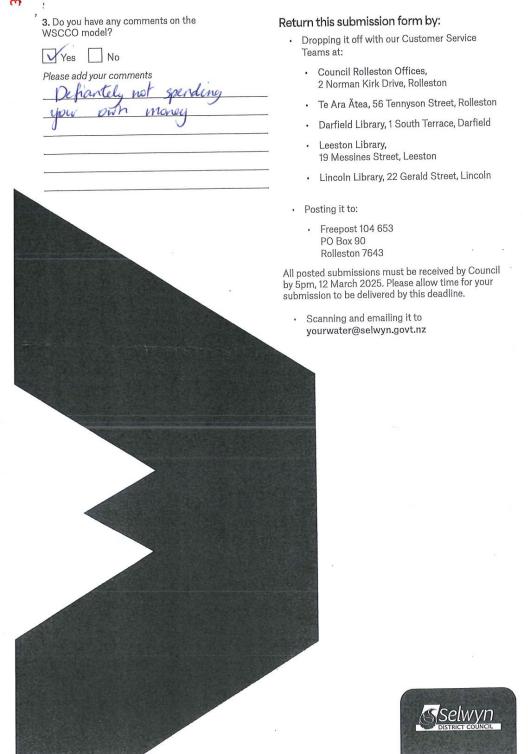
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

V Yes No

Please add your comments

Work within a budget we aren't





Full Name: Ian Tennant

Organisation: Wish to speak to the submission: Yes

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### Submitter details

Yes No

submission in person?\*

Yes No

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	First name*	lan
Last name*   lnnant	Last name*	Ternant

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

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2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model	l?
Yes No	
Please add your comments	
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3. Do you have any comments on the Return this submission form by: WSCCO model? · Dropping it off with our Customer Service Yes No Teams at: Council Rolleston Offices, Please add your comments 2 Norman Kirk Drive, Rolleston See attached 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

#### SUBMISSION ON WSCCO PROPOSAL

The following submission relates to the above proposal and my objections to it.

Preamble: The council put out a 'Funding and Financing' policy, adopted in 2024, which states, relating to water services, on page 18: "Council is in the best position to respond to the expectation of communities it serves and to translate these needs into levels of service" and further on: "The council is well positioned to take a major leadership role in planning and managing assets and networks that deliver these essential services..." and "...that failure of these services has a devastating and far-reaching effect on the district".

This admirable statement is the base of my objection, which shall be elaborated on below. What has suddenly changed? I'm not aware of anything that necessitates such a dramatic shift. Council has a direct and inalienable responsibility to deliver the services it is trying to offload onto a WSCCO.

The costs concern me too, as I shall address below. I note with interest the statement in the 'Development Contributions' policy that there is a table on page 37, which sets out who pays capital development and their projected costs. It shows that all Lincoln water extension of service is to be funded from Development Contributions. Page 41 observes that the capital expenditure "brings little or no benefit to the existing communities"

Recent central government decisions may make it easier for Council to pass on capital works costs to the Developers. These decisions should certainly make it easier for Council to pass on costs and reduce the ratepayer burden.

The FAQs and Council's response make for interesting reading and form a useful framework to outline my concerns. The FAQ is followed by excerpts of council response, followed by my queries/objections.

FAQ: Why is the preferred model a WSCCO? "..... future-proof Selwyn's water infrastructure..." There is no indication of how this would happen better with a WSCCO that in -house. Especially given that, in the council's own words, that is well positioned to do this, as I quoted above.

Surely the council, as part of its core business responsibilities already has the expertise for safe water delivery? If that is not the case, then who has been delivering these services so far? If it is the case, then why is there a need to develop a whole new level of bureaucracy and associated cost to deliver the same result?

An observation: If about 30% of Council's income from rates is water-related, then I assume that the relevant costs in Council will be reduced by an equivalent amount. As the Council's CEO will be responsible for 30% less, then will the salary be reduced by a similar amount. Almost certainly not. Will the Council require staff currently involved in safe water provision be required to take positions in the new WSCCO?

If water services are no longer going to be a Council activity, then I'd like to assume the rates would be lowered by a commensurate amount. I strongly suspect this will not be the case. Why?

Assuming this proposal was adopted, what will be the explicit anticipated costs. I see some very concerning figures about increases over the next few years. Council has a requirement to act responsibly.

These costs of implementing the setting up and operation of a WSCCO over the next few years amount to a huge extra charge to existing ratepayers. These costs would be on top of the already extremely large 70.8% increases in rates, above current levels, already signaled in the latest LTP.

FAQ: Why has the Council decided the preferred model is a WSCCO? "... A WSCCO would be managed by specialists in water delivery infrastructure financing long term debt management..."

Surely ALL these functions should already be carried out by existing staff. If that is not the case, who is making these decisions at the moment?

As a side note. Management is a separate skill from the nuts and bolts of delivery. I suspect this will lead to a whole new, and expensive to ratepayers, bureaucracy. This fear is well founded as further on it states the intention to set up a separate board to run the WSCCO.

I have other points I wish to make, but the exceptionally short time-frame means I have no time to include them in these comments but I do reserve the right to mention them when being heard on this submission.

Thank You for the opportunity to submit this

lan Tennant.

Full Name: Sharon Ray

Organisation:
Wish to speak to the submission: No

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First name* Shavon Last name* Ray	<ul> <li>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</li> </ul>
	stormwater services to remain within Council?
	Yes No
	Please add your comments
	ailco
Are you submitting on behalf of an organisation?*  Yes No	Do you prefer that the Selwyn District Council continues with a future in-house water delivery management.
If yes, please state the name of the organisation $\!\!\!\!\!\!^*$	Yes No
	Please add your comments
Do you wish to attend a hearing to present your submission in person?*	
Yes No	
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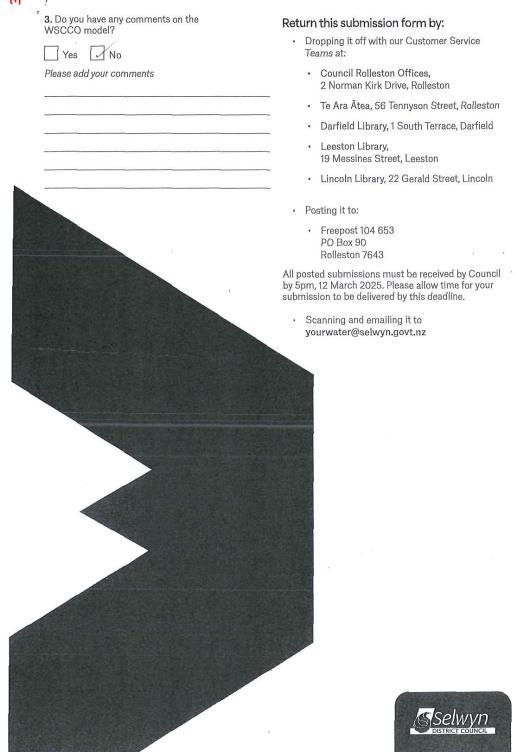
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## Questions

stormwate	er services to remain within Council?
Yes	No
Please add	d your comments
silco-	· ,
	prefer that the Selwyn District Council with a future in-house water delivery model?
Please add	d your comments



Full Name: Connor van dePol

Organisation: Wish to speak to the submission: No

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First name*	Connov	Varade Pol.
I +	110 - 01	- 001

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

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

Yes No

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	1	No
_	100		110

Please add your comments

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

No

Please add your comments

3. Do you have any comments on the	Return this submission form by:
WSCCO model?	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>Norman Kirk Drive, Rolleston</li> </ul>
	Te Ara Ătea, 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.
	<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
	SISELWYN DISTRICT COUNCIL

Full Name: Bronwyn van dePol Organisation: Wish to speak to the submission: No

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

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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

First name\* Bronwyn

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

Last name\* Van de Pol

Are you submitting on behalf of an organisation?\*

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

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

Yes No

X

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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 ac	dd your comments			
-	*			
	u prefer that the Selwyn District Council s with a future in-house water delivery model?			
Yes	No			
Please ac	dd your comments			
-				

3. Do you have any comments on the WSCCO model?	Return this submission form by:
Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
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	Selwyn

Full Name: Keith Taege
Organisation:
Wish to speak to the submission: Yes

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

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First name*	Keith		
Last name*	Taege		0
	( ,	. /	Λ

Are you submitting	on behalf	of an	organisation?
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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?

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

continues	with a future in-nous	se water den	very
Yes	☐ No		

)		



WSCCO model?	Return this submission form by.
Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
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	Scanning and emailing it to yourwater@selwyn.govt.nz
	(Sselwyn

Full Name: Helen Taege

Organisation:
Wish to speak to the submission: No

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

First name\*

Last name\*

Yes No

submission in person?\*

to arrange the date and time.

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

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

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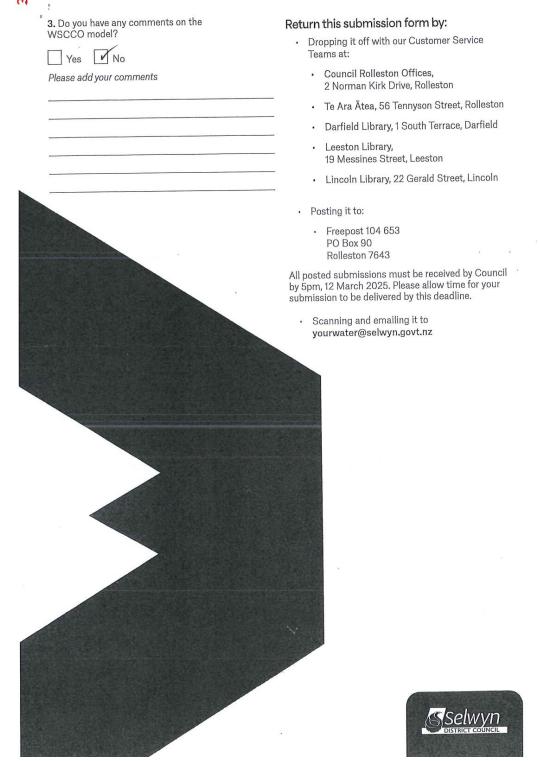
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1. Do you support the proposed transition of the

0	 -	-4	-	-	-

Selwyn 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 X No			
Please add	d your comments		
	•		
	prefer that the Selwyn District Council with a future in-house water delivery model?		
✓ Yes	No		
Please add	d your comments		





Full Name: Alan Hogg Organisation: Wish to speak to the submission: No

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

First name\* ALLAN

submission in person?\*

Yes No

to arrange the date and time.

If yes, someone will be in contact with you

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Last name*	Hoas
Are you subm	itting on behalf of an organisation?*
Yes	No
If yes, please s	tate the name of the organisation*
Do you wish to	attend a hearing to present your

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1 Do you support the proposed transition of the

### Questions

Selwyn District Council drinking assets and services into a new \ Council Controlled Organisation	g and wastewater Water Services
stormwater services to remain v	
Yes No	
Please add your comments	
.com	
2. Do you prefer that the Selwyr continues with a future in-house	
Yes No	
Please add your comments	= 192
Keep services	s in house
Keep services	fall service

No priviliagion of sarvice

3. Do you have any comments on the WSCCO model? Return this submission form by: · Dropping it off with our Customer Service Teams at: Yes Council Rolleston Offices, Please add your comments 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

Full Name: Bruce Russell

Organisation: Wish to speak to the submission: Yes

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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Last name\*

Kussel1

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### Questions

1. Do you support the pro	posed transition of the
Selwyn District Council of	frinking and wastewater
assets and services into a	a new Water Services
Council Controlled Organ	nisation (WSCCO) with
stormwater services to re	emain within Council?

Yes	V	1
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Please add your comments

Are you submitting on behalf of an organisation?\*

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

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

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

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

No

Please add your comments



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Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
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	<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
	Selwyn

Full Name: Vanessa Murray

Organisation: Wish to speak to the submission: Yes

o Know

Well

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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First name\* Vouces>a

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 N

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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

SDC needs to

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? Return this submission form by: · Dropping it off with our Customer Service Teams at: Yes No Council Rolleston Offices, Please add your comments 2 Norman Kirk Drive, Rolleston Te Ara Ätea, 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

Full Name: Philip Anderson

Organisation:
Wish to speak to the submission: No

### 398

## **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*	Milip.	
Last name*	Anderson	

Are you s	submitting on behalf of an organisation
Yes	No
If yes, plea	ase state the name of the organisation*

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 Selwyn District Council drinking and wastev	
assets and services into a new Water Service	
Council Controlled Organisation (WSCCO) v	
stormwater services to remain within Counc	

Yes	No					
	ld your col			the	3 wa	ler
	ervice	et	He	mone	st and	He
	why th	people ext	ple el	or to	rote pre	Hem

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

Yes	No				
Please ad	d your cor	nments			
AS	above	tour	another	cost	to
-		0			4

satepayer which is an attime high.





Full Name: M Smithies

Organisation: Suburb: Halswell

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Ratepayers can't afford this shiny new entity with it's need to borrow huge amounts with no accountability.

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

Yes

Please add your comments

Elected representative oversight present when in-house.

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

Yes

Please add your comments

Despite S Broughton's comments to the contrary, it's not working in Wellington - contractor rip offs. No accountability or oversight apparently.

Full Name: J Gourlie

Organisation: Parkdale Farm

Suburb: Halswell

Wish to speak to the submission: No

Do you support the proposed transition of the Selwyn District 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

Loss of direct accountability through elected councilors. No consultation. Borrowing and spending ratepayer funds with no accountability.

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

Yes

Please add your comments

Cheaper overall - can't borrow as much as the WSCCO so have to spend more carefully, wisely and in a planned fashion. No middle management.

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

Yes

Please add your comments

Selwyn has new infrastructure, no need for large scale rebuilding or repairs. Make developers pay their share.

Full Name: Shanelle Carroll Pudney

Organisation: Wish to speak to the submission: No

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#### Submitter details

submission in person?\*

V No

to arrange the date and time.

If yes, someone will be in contact with you

Yes

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\* Small (C)

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Last name* (CM) (PUCINCIA
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

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Selwyn District Council drinking and wastewater	
assets and services into a new Water Services	
Council Controlled Organisation (WSCCO) with	
stormwater services to remain within Council?	
Von ANo	

Please add your comments	
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rate increases

3. Do you have any comments on the	Return this submission form by:
WSCCO model?	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Yes Mo	
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>Norman Kirk Drive, Rolleston</li> </ul>
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	<ul> <li>Scanning and emailing it to</li> </ul>
	yourwater@selwyn.govt.nz
	Selwyn DISTRICT COUNCIL

Full Name: Graham Gough

Organisation: Wish to speak to the submission: No

### 102

## **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

submission in person?\*

Yes No

to arrange the date and time.

If yes, someone will be in contact with you

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* Graham
Last name* ( ough
,
Are you submitting on behalf of an organisation?*
Yes V No
If yes, please state the name of the organisation*
Do you wish to attend a hearing to present your

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1. Do you support the proposed transition of the

#### Questions

assets and se Council Contr	ct Council drinking and wastewater rvices into a new Water Services olled Organisation (WSCCO) with ervices to remain within Council?
Yes 🗸	No
Please add ypi Get ri u	of the ideas like
"got t	odo something because
"Some 11	who ideas like who something "because hung Might happen"
	er that the Selwyn District Council n a future in-house water delivery model?
✓ Yes	No
Please add you	ur comments

X



Full Name: Gary Brown
Organisation:
Wish to speak to the submission: No

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

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to remain within the Council.

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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*	Gary
Last name*	BROWN
Are you subm	itting on behalf of an organisation?*
Yes /	No
If yes, please s	state the name of the organisation*
	N .
Do you wish t submission in	o attend a hearing to present your person?*
Yes 🗸	No
	e will be in contact with you date and time.

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#### Questions

Selwyn D assets an Council C	support the proposed transition of the istrict Council drinking and wastewater d services into a new Water Services ontrolled Organisation (WSCCO) with er services to remain within Council?
Yes	✓ No
Please add	d your comments
-	
	*
	prefer that the Selwyn District Council with a future in-house water delivery model?  No
Please add	d your comments

3. Do you have any comments on the	Return this submission form by:
WSCCO model?	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
	· Te Ara Ătea, 56 Tennyson Street, Rolleston
	Darfield Library, 1 South Terrace, Darfield
	· Leeston Library, 19 Messines Street, Leeston
	Lincoln Library, 22 Gerald Street, Lincoln
	<ul> <li>Posting it to:</li> </ul>
	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.
	<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
	SSelwyn DISTRICT COUNCIL

Full Name: Scott Halkett

Organisation: Wish to speak to the submission: No

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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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#### Questions

Do you support the proposed transition of the Selwyn 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
	x *
	orefer that the Selwyn District Council with a future in-house water delivery model?
Yes	
Please add	your comments

3. Do you have any comments on the WSCCO model?	Return this submission form by:
Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
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	Selwyn DISTRICT COUNCIL

Full Name: Pietro Scalia

Organisation: Wish to speak to the submission: No

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#### Submitter details

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First name\* Scalia

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 Y No

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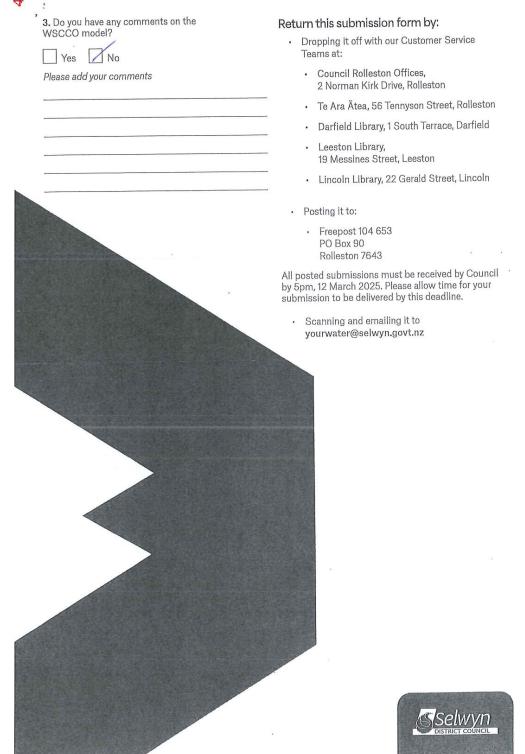
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1. Do you support the proposed transition of the

#### Questions

assets an Council C stormwat	olstrict Council drinking and wastewater d services into a new Water Services Controlled Organisation (WSCCO) with teer services to remain within Council?
Please ad	d your comments
con	
Yes	prefer that the Selwyn District Council s with a future in-house water delivery model?
Please ad	d your comments



Full Name: Alan Mathewson

Organisation: Wish to speak to the submission: No

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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* ALAN
Last name* MATHEN SON
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 Vo
If yes, someone will be in contact with you
to arrange the date and time.

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1. Do you support the proposed transition of the

#### Questions

Selwyn 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 V No
Please add your comments
Adds another layer of bureaucracy
and layer of top end high cost
personal duplicating what
can be done by present system
Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?
Yes No
Please add your comments
More cost effective currently

3. Do you have any comments on the WSCCO model? Return this submission form by: · Dropping it off with our Customer Service Teams at: Yes No Council Rolleston Offices, Please add your comments 2 Norman Kirk Drive, Rolleston Juother • 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



Full Name: Christine Montrose Hogg

Organisation: Wish to speak to the submission: No

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#### Submitter details

Yes No

submission in person?\*

to arrange the date and time.

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*	Christine	Montrose
Last name*	Hoag	
Eddellania	14	

Are you submitting on behalf of an organisation?\*

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

Do you wish to attend a hearing to present your

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Selwyn D	istrict Council drinking and wastewater
assets an	d services into a new Water Services
Council C	Controlled Organisation (WSCCO) with
stormwa	ter services to remain within Council?

Onn			
continue: Yes	with a future in	Selwyn District Co n-house water deliv	uncil very model?
Please ac	d your comment	S	

Y.

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Full Name: Pauline Scalia

Organisation: Wish to speak to the submission: No

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First name\* Jaw Ne
Last name\* Scalig

Are you submitting on behalf of an organisation?\*

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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#### Questions

Yes

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?

Please add your comments

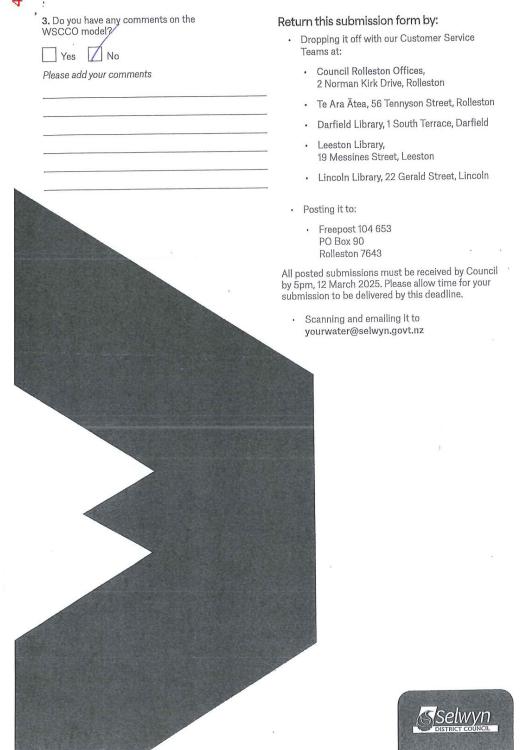
Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?

Yes

No

Please add your comments

.



Full Name: Tara Norton

Organisation: Wish to speak to the submission: No

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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* Tara	
Last name* Norton	
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	

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#### Questions

Do you support the proposed transition of the Selwyn 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
p.n.
2. Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?  Yes No
Please add your comments
Your Water Done Well   23

to arrange the date and time.

409	3. Do you have any comments on the WSCCO model?  Yes No  Please add your comments	Return • Dr Tea
		• Poster All poster by 5pm, submiss
		· Sca you

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



Full Name: George Thorne
Organisation:
Wish to speak to the submission: No

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#### Submitter details

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Gregoria Perae
Last name* Thorne
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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#### Questions

Do you support the proposed transition of the Selwyn 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 ad	d your comments		
	prefer that the Selwyn District Council s with a future in-house water delivery model?		
V Yes	No		
Please ad	d your comments		
,			

Full Name: Owen Murray

Organisation: Wish to speak to the submission: No

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be used for the purpose of this consultation process. All submissions will be considered by Council before

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submissions will not be accepted. Submissions

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Your Water Done Well | 23

process and are a public record. Anonymous

you would prefer to be kept private.

official documentation.

making a decision.

Privacy statement

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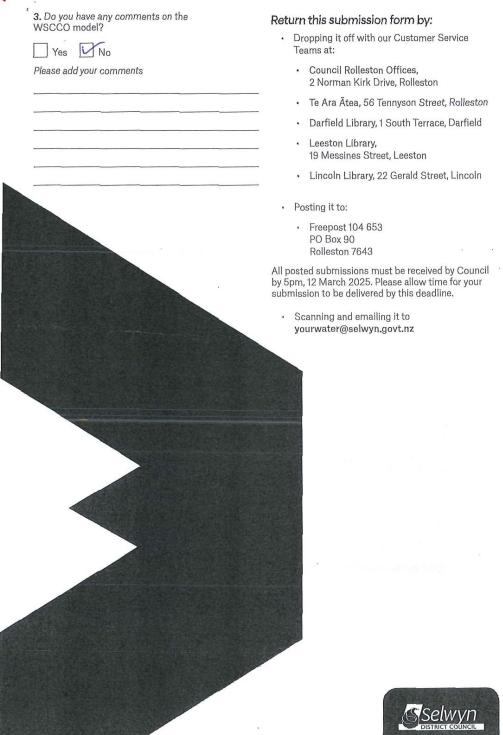
#### Submitter details

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P	Questions
First name* Owen  Last name* Mussay	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 UNo
	Please add your comments
	P/M
Are you submitting on behalf of an organisation?*	
Yes No	<ol><li>Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?</li></ol>
If yes, please state the name of the organisation*	Ves No
Do you wish to attend a hearing to present your submission in person?*	Please add your comments
	*
Yes No	
If yes, someone will be in contact with you to arrange the date and time.	







Full Name: Carly Norton
Organisation:
Wish to speak to the submission: No

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### Submitter details

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First name*	Carlu
Last name*	norton
Are you sub	mitting on behalf of an organisation?*
Yes	No
If yes, pleas	e state the name of the organisation*
Do you wish	h to attend a hearing to present your in person?*
Yes	No
	one will be in contact with you he date and time.

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### Questions

1. Do you support the pro Selwyn District Council c assets and services into a Council Controlled Organ stormwater services to re	drinking and wastewater a new Water Services hisation (WSCCO) with
Yes No	
Please add your commen	ts
	-
2. Do you prefer that the continues with a future i	Selwyn District Council n-house water delivery model?
Yes No	
Please add your commen	ts
	Your Water Done Well   23

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3. Do you have any comments on the WSCCO model?	Return this submission form by:
Yes No	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>Norman Kirk Drive, Rolleston</li> </ul>
	Te Ara Ătea, 56 Tennyson Street, Rolleston
	<ul> <li>Darfield Library, 1 South Terrace, Darfield</li> </ul>
	<ul> <li>Leeston Library,</li> <li>19 Messines Street, Leeston</li> </ul>
	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.
	<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
	Selwyn

Full Name: Stuart Murray

Organisation: Wish to speak to the submission: No

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### Submitter details

Please note: all fields marked with an asterisk (\*)

Do you wish to attend a hearing to present your

If yes, someone will be in contact with you

submission in person?\* No

to arrange the date and time.

are compulsory. These details will be used for the	
ourpose of contacting you about this consultation.	Questions
First name* STUART	1. Do you support the proposed transition of the
ast name* Murry.	Selwyn District Council drinking and wastewate 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
Are you submitting on behalf of an organisation?	th.
Yes No	<ol><li>Do you prefer that the Selwyn District Counci continues with a future in-house water delivery in the self-water forms.</li></ol>
fyes, please state the name of the organisation*	Ves No

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	he Selwyn District Council e in-house water delivery model?
Yes No	
Please add your comm	ents
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3. Do you have any comments on the	Return this submission form by:
WSCCO model?	Dropping it off with our Customer Service
Yes No	Teams at:
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>Norman Kirk Drive, Rolleston</li> </ul>
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	<ul> <li>Scanning and emailing it to yourwater@selwyn.govt.nz</li> </ul>
15 242 89 10 23 0000	
	Selwyn

Full Name: Francine Murray

Organisation: Wish to speak to the submission: No

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First name*	M	ancir

Last name\*

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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 tormwater services to remain within Council?

Yes	V	No

lease add your comments

e you submitting on behalf of an organisation?

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

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

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

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

Yes No

Please add your comments

Your Water Done Well | 23





3. Do you have any comments on the WSCCO model?	Return this submission form by:
WSCCO model?	<ul> <li>Dropping it off with our Customer Service Teams at:</li> </ul>
Please add your comments	<ul> <li>Council Rolleston Offices,</li> <li>2 Norman Kirk Drive, Rolleston</li> </ul>
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	Scanning and emailing it to yourwater@selwyn.govt.nz
	SSELWYN DISTRICT COUNCIL

Full Name: Pauline Sewell

Organisation: Wish to speak to the submission: No

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### Submitter details

First name\*

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

Last name* SEWELL
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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1. Do you support the proposed transition of the

### Questions

assets and Council C	istrict Council drinking and wastewater d services into a new Water Services controlled Organisation (WSCCO) with er services to remain within Council?
Yes	No
Please add	d your comments
om,	
	prefer that the Selwyn District Council with a future in-house water delivery model?
	U No d your comments



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

Yes No

Please add your comments

Very difficult to understand both options.

### Return this submission form by:

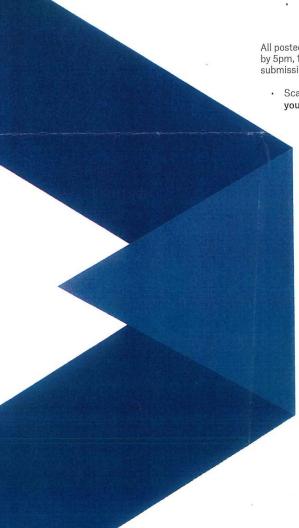
- Dropping it off with our Customer Service Teams at:
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Full Name: Kelvin Sewell

Organisation: Wish to speak to the submission: No



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### Submitter details

First name\* KELVIN

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Last name* SEWELL
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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Selwyn D assets an Council C	support the proposed transition of the listrict Council drinking and wastewater id services into a new Water Services Controlled Organisation (WSCCO) with ter services to remain within Council?
Yes	No
Please ad	d your comments
V2.	
	prefer that the Selwyn District Council s with a future in-house water delivery model?
Yes	No
Please ad	d your comments
-	
-	

Your Water Done Well | 23

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	Selwyn

Full Name: Heather Stanley

Organisation: Suburb: Annat

Wish to speak to the submission: No

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First name\*

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Are you submitting on behalf of an organisation?\*

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

Do you wish to attend a hearing to present your

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### Questions

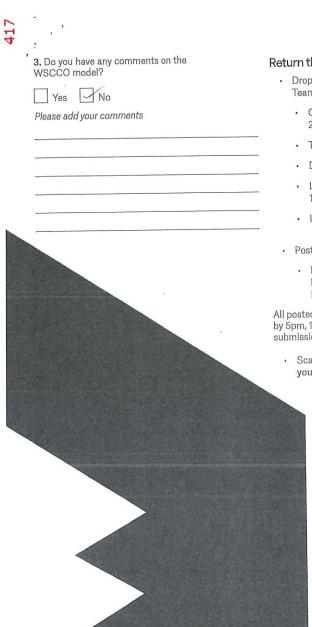
Selwyn District Council drinking and wastewater
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Yes No
Please add your comments
*
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Yes No
lease add your comments

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

submission in person?\*

Yes No

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     Rolleston 7643

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



Full Name: Rachel Inch

Organisation: Wish to speak to the submission: No

#### Rachael Inch



Date: March 13th 2025

To:

Selwyn District Council

yourwater@selwyn.govt.nz

### Submission on Proposed Service Delivery Model for Water Services

Dear Councillors,

I am writing to submit my feedback on the Council's proposal to establish a separate service delivery entity for local water services. First, I wish to sincerely thank the Council for accepting this submission a day after the formal deadline. I appreciate your willingness to consider my input. I needed time to research this matter properly.

### **Concerns with Consultation Process**

I am making this submission under significant time pressure due to the limited consultation timeframe provided. I am extremely disappointed in the Council's engagement approach. This process is not only unjust — it falls short of your obligations to the community you represent.

While I acknowledge that central government has imposed time constraints, I urge the Council to ensure that future decisions of this magnitude are subject to **robust, meaningful, and well-publicised community consultation**. Should this level of consultation continue, I will seek to address this directly in person with Council.

I speak from experience — I authored the Social Impact Report on the Freshwater Regulations in the Ashburton District. That work clearly showed the significant consequences of poor consultation processes, particularly on social cohesion and community trust.

### Assessment of the Council-Owned Organisation (COO) Model

In considering this proposal, I focused my research on existing water entities in New Zealand:

- Watercare Services Limited (Auckland): While often cited as a successful model for centralised and efficient water delivery, it has faced criticism for its limited responsiveness to local community needs.
- Wellington Water Limited: A shared governance model between multiple councils, which highlights the complexity and potential inefficiencies of coordinating across different priorities.

### **Key Concerns**

Based on this review and my own understanding of our district's needs, I have serious reservations about the proposed COO model:

- · Loss of democratic oversight and transparency
- · Reduced community accountability and voice
- High setup and administrative costs
- · Potential inequity through cost-recovery pricing models
- Council remains publicly accountable but loses total operational control

While I acknowledge the Council has proposed a 'Council-Owned Organisation' rather than a privatised entity, the same concerns around governance, democratic oversight, and community accountability still apply if safeguards are not in place.

We have seen in Selwyn how quickly decision-making can shift when a small, organised group gains influence. This model may increase that risk, while disempowering the broader community. The costs of establishing a new entity are also substantial, and the return on investment is uncertain — particularly if commercial frameworks are applied without community safeguards.

### **Acknowledged Potential Benefits**

I acknowledge there are potential benefits, including:

- · Access to specialist expertise
- Improved funding and borrowing capacity
- · Opportunity for future collaboration with other councils

These factors may contribute positively to the long-term sustainability of water infrastructure — but only if the right governance and accountability mechanisms are in place.

### **Unanswered Questions**

Significant gaps in the proposal remain, including:

- What level of control will the Selwyn community retain over its water assets?
- How will community engagement and oversight be maintained in the new structure?
- What is the primary objective cost efficiency, compliance, specialisation, or all the above?

These uncertainties make it extremely difficult to support the proposal with confidence.

Ownership and Governance: While Council has indicated it will retain 100% ownership and appoint all directors; the proposed governance structure remains vague. Local control **must not** be reduced to mere technical ownership. The model must include formal mechanisms for genuine community representation and accountability.

**Protection Against Future Regionalisation:** I also note that Council has explicitly stated this is not a step toward joining a regional water entity or reverting to the former Three Waters structure. I agree that this entity must not become a backdoor pathway to regionalisation or future amalgamation **without explicit and renewed community consultation.** 

Statement of Intent (SOI): The current draft SOI lacks the necessary detail to assure the community of long-term safeguards. It does not sufficiently address how community engagement will be preserved or provide transparent cost modelling. This further reinforces my call for a binding Memorandum of Understanding (MoU) and transparent cost implications.

**Efficiency vs Bureaucracy:** While the potential for operational efficiency is acknowledged, this outcome is not guaranteed. Without clear delivery benchmarks and accountability structures, there is a risk that the entity becomes an additional bureaucratic layer — detached from community needs and expectations.

### **Conditions for Support**

I want to be clear that I am **open to supporting the Council's proposal** — but only if the following conditions are met in full. In my mind, these are not minor considerations; they are essential protections for the integrity and sustainability of this model:

- A binding, long-term Memorandum of Understanding (MoU) that protects community ownership, engagement, and accountability.
- A balanced governance structure, including a board made up of shareholders and
  experts, with at least two dedicated community representatives. A structure like the
  Alliance Group model, which includes both appointed and elected directors, may be
  appropriate.
- Full and transparent cost implications for the community, with clear modelling of potential financial impacts.
- A formal commitment to equity and affordability, not just cost recovery.

These conditions are not optional in my mind — they are essential safeguards. Without them, I cannot in good faith support this proposal.

#### **Final Statement**

This is a **generational decision** that will shape the future of water services in our district. If Council is committed to earning and keeping the community's trust, it must prioritise democratic protections, financial transparency, and equitable outcomes.

"When leaders stop listening, the people stop believing. And when belief fades, so does legitimacy — until power becomes a shadow, and governance a shell."

Please listen now — before that belief is lost.

Yours sincerely,

Rachael Inch