



AGENDA FOR THE

YOUR WATER DONE WELL
DELIBERATIONS

TO BE HELD IN THE
COUNCIL CHAMBERS

SELWYN DISTRICT COUNCIL
ROLLESTON

WEDNESDAY 26 MARCH 2025

COMMENCING AT 10.30AM

Your Water Done Well Deliberations 26 March 2025

Attendees: Mayor Sam Broughton, Councillors, P M Dean, S N O H Epiha, L L Gliddon, D Hasson, M B Lyall, S G McInnes, G S F Miller, R H Mugford, E S Mundt & N C Reid & Ms M McKay

26 March 2025 10:30 AM

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Public portions of this meeting are audio-recorded and livestreamed via the Council's YouTube channel.

The Severe Weather Emergency Legislation Bill has, until October 2024, suspended the requirement for members to be physically present to count as 'present' for the purposes of a quorum. Members attending by means of audio link or audiovisual link are therefore able to be counted as present for the purposes of a quorum and able to vote. The recently enacted Local Government Electoral Legislation Act has made these emergency provisions permanent.

Opening Karakia

Whakataka te hau ki te uru	Cease the winds from the west
Whakataka te hau ki te tonga	Cease the winds from the south
Kia mākinakina ki uta	Let the breeze blow over the land
Kia mātaratara ki tai	Let the breeze blow over the sea
E hī ake ana te atakura	Let the red-tipped dawn come with a sharpened air
He tio, he huka, he hau hū	A touch of frost, a promise of a glorious day
Tīhei mauri ora!	

**MINUTES OF THE YOUR WATER DONE WELL HEARINGS
OF THE SELWYN DISTRICT COUNCIL
HELD IN THE COUNCIL CHAMBERS
ON THURSDAY 20 MARCH 2025 COMMENCING AT 1.00PM**

PRESENT

Mayor S T Broughton; Councillors P M Dean (online), S N O H Epiha, L L Gliddon, D Hasson, M B Lyall, S G McInnes, G S F Miller, R H Mugford, E S Mundt, N C Reid & Ms McKay

IN ATTENDANCE

Mrs S Mason (Chief Executive); Messrs. S Gibling (Executive Director People, Culture & Capability), M McGrath (Chief Digital Officer), C Lammers (Senior Communications Advisor); Mesdames A Sneddon (Chief Financial Officer), D Kidd (Executive Director Community Services & Facilities), J Hands (Head of Legal and Risk), R Phillips (Commercial Manager Property and Infrastructure), H Tate (Communications Advisor), S Carnoutsos (Communications Manager), J Gallop (Executive Assistant) and Ms T Davel (Senior Governance Advisor)

The meeting was livestreamed.

APOLOGIES

None.

OPENING COMMENTS

Mayor Broughton welcomed everyone in attendance to the Hearings for Your Local Water Done Well. He said that there will be five-minute presentations today.

RECEIPT OF SPEAKING SUBMISSIONERS

The following submitters spoke to their submissions in person at the Hearings. Main points noted are captured below (*the full hearing is available on council's YouTube channel*).

Submission No: 228 – Edward Parker

- Keep water services inhouse.
- Consultation process was too short at three weeks, the times were not advertised, and the drop-in sessions were held at 6pm in the evening when it was difficult for people to attend.

Submission No: 271 – Christine Parker

- Consultation documents were not readily available.
- Drop-in sessions format needed to include being able to hear from the residents.
- To a question as to how Ms Parker found out about the consultation, she responded that she attended a Residents Association meeting where it was mentioned.

Submission No: 352 – Gareth Payne

- Consultation timeframe was too short.
- Don't want borrowing against residents' homes.
- Dubious policy decisions that don't align with the requirements of the district.
- Malvern thinking of breaking away from SDC, as Council is not delivering.
- Concerns that rural on septic tanks doesn't come under council so why should they buy in and have CCO borrow against their homes.
- Mayor Broughton stated that LGNZ had a discussion yesterday regarding the rural sector.

Submission No: 267- Harvey Polglase, Darfield Residents Association

- No problem with consultation.
- Council last year agreed on LTP and is now proposing a WSCCO. Perhaps look at that in next 10 years.
- Consultation needs to be must less biased.

Submission No: 350 – Darryl Griffin

- Concern raised regarding the Local Government Official Information Management Act (LGOIMA), the WSCCO will not be subject to the act so the public will not have access to any of the information.

- In response to a question about water targeted rates that were mentioned in the submission, Mr Griffin responded that the WSCCO will set the water rates and SDC set the rest, so the rates bill will be larger.

Submission No: 283 – Samuel Wilshire

Submission No: 367 - Samuel Wilshire, West Melton Residents Association

- Noted that on pages 13 & 15 of the consultation document, people and health are not mentioned in the risks.
- Loan from the LGFA were 80% floating interest, not fixed as advised by staff.
- The cost of assets is unclear.
- The consultation process is flawed.
- Questioned how \$2m for the WSCCO establishment team of the WSCCO has been spent in the two months.
- Asked whether he thought there were alternative financing options that council should consider, Mr Wilshire responded that Council should stop legacy projects, fix roads that have been flooding for 30years and are still flooding - cut the spend, start the mend.

Submission No: 346 - Douglas Marshall

- Submission process was well done and provided additional material regarding alternative funding.
- Council needed to prioritise its work.
- Asked if Mr Marshall wanted the in-house model because of isolated decision making, he said Council needs to look at other priorities as water will take a bigger chunk in a WSCCO model.

Submission No: 226 – Basil and Trudi Meyer

- Consultation and decision-making process was too rushed; questioned whether the council thought about collaborating with other council.
- Mayor Broughton responded that all voices will be heard which is why council was having this consultation. Selwyn District Council proposed to work with other councils, but it was declined.

Submission No: 273 - Mark Alexander, Rolleston Residents Association

- Consultation process was poor, there wasn't enough time for proper consultation and residents' association didn't do well getting information out to the community either. The drop-in sessions were also poor.
- Asked to expand on why the resident's association was against setting up of a WSCCO, Mr Alexander responded that the extra cost of setting up is expensive when council already have staff with the expertise.

- Asked about his thoughts as to rising costs regardless of which model, Mr Alexander responded that the costs would increase in either model, the overheads are a lot less keeping it in-house and winding up a CCO will not be cheap.

Submission No: 297 – Denise Carrick, Lincoln Voice

- Ms Carrick thanked Councillors Mundt and McInnes for holding drop-in sessions.
- She noted several submissions that had good arguments for an amended inhouse model and quoted the LGNZ website regarding community and decision making.

Submission No: 336 Brian Lester

- Stated that a 'light touch' consultation would be acceptable if the intention was to retain the status quo but not for a new WSCCO.
- Asked whether Council would respond to submissions and asked what the \$2m was spent on.
- Mayor Broughton responded that these questions will be answered during the council's deliberation meeting on 2 April.

Submission No: 254 – Susan Farmer

- Mrs Farmer stated that this sounded like a Ponzi scheme and the public were conditioned to not notice.

Submission No: 345 – David Farmer

- Doesn't want council debt on his house, and with the cost-of-living crisis and increased rates already, with a WSCCO as a commodity, he don't want any more increased borrowing to add to the debt.

Submission No: 174 – Steve Garbett

- Believe there are people inhouse that could be utilised to deliver just as well as a WSCCO.
- Acknowledged that there is a need to co-opt some skill sets, although consultants are expensive and either don't have the skill set or are not fully invested.

Submission No: 298 – Kenneth May

- Mr May stated that asset management should come from Council.

Submission No: 364 – Graeme Young

- Suggested addressing the issues of language, instead of using spiritual terms use scientific rationale language.
- He noted the cost of staffing increases.
- He also pointed out that no provision has been made for wider road and electric trams that would provide Rolleston with a future.

Cr Reid and Cr Miller left at 4.05pm.

Submission No: 393 – Keith Taege

- Stated that there needs to be co-ordination between water and planners. He related to stories of when a separate entity did not work in the UK.

Submission No: 332 – Nikki Chippendale (Presented by Nadene Butcher)

- Does not support transition to WSCCO, keeping water services and costs inhouse along with any profit made should go to SDC rather than a corporate organisation.

Submission No: 142 – Nadene Butcher

- Lack of information and clarity; transparency was required.
- Questioned the Act but it was confirmed that there were already acts in place dictating the matter.

Submission No: 336 – Lieuwe Doubleday

- Noted that SDC have done things well so keep what we have got inhouse and set a rate for the future that will pay for itself in 100 years' time.

Submission No: 328 – Delwyn McKenzie

- Quoted the Christchurch City Council proposal for in-house water service and asked Councillors to act wisely and prudently, as she is paying rates on three different properties.

Cr Mugford left the Chamber between 4.47pm - 4.50pm

Submission No: 295 – Helen Stevenson

- Noted it was council's responsibility to manage water services, not residents.

Submission No: 259 – Gail Harkness

- WSCCO was unaffordable and unnecessary with the projection of costs and increase of rates.

Submission No: 275 – Lou Gourlie

- Ms Gourlie stated why the haste and thought Council was being deceitful.

Cr Dean arrived in person at 4.55pm

Submission No: 259 – Allison Rosanowski (online)

- Reaffirmed her submission.

Submission No: 344 – Calvin Payne

- Timeframe for the consultation was too short.
- Staff have done an amazing job answering all the questions in the short timeframe and thanked the staff involved.
- Stated that if it is not broken, don't fix it.
- Councillors noted that they were in this position because of a government decision giving council three choices, ring-fence, new CCO or community trust model.
- When asked which one would be best in his opinion to enable maintenance etc, Mr Payne replied that a ring-fenced in-house model, sharing resources between councils would be more efficient.

Submission No: 372 – John Verry (Malvern Community Board) – presented by Calvin Payne

- PowerPoint as per hand-outs.

Submission No: 385 – John Verry – Presented by Calvin Payne

- When asked whether it was more important to have a consistent governance structure or accountability via the vote for elected members, Mr Payne responded that it could be a valuable argument for a separate governance structure, but water was ongoing and not a project that is going to be stopped, so he trusts the staff to get the right structure. It's more about financial governance which doesn't sit in a separate entity.
- Mayor Broughton noted for clarity that privatisation is not within the scope of this consultation and there is no intention to privatise anything.

HEARINGS END

Mayor Broughton thanked all the submitters and everyone supporting the submitters. He asked Councillors to submit any questions to the Chief Executive by tomorrow (Friday) so answers can be pre-circulated before the decision making on Wednesday next week.

It was confirmed the deliberations have been advertised and was a public meeting.

Councillors requested clarification on information in the consultation document, especially around the Bill. The Mayor acknowledged that there was some confusion around the Bill but it does not undermine the current process which is based on previous Acts already in place.

The Chief Executive stated that more information will be included in the deliberation meeting pack.

Mayor Broughton stated that the decision next week will be made on the work that has been completed to date, submissions made today and external legal advice.

The hearings closed with karakia at 5.47pm.

COUNCIL PUBLIC REPORT

TO: Council

FOR: Local Water Done Well Deliberations – 26 March 2025

FROM: Executive Director Infrastructure and Property – Tim Mason

DATE: 22 March 2025

SUBJECT: **LOCAL WATER DONE WELL DELIBERATIONS**

RECOMMENDATION

‘That the Council

- a) Receives the report “Local Water Done Well Deliberations”*
- b) Receives 417 submissions to the Your Water Done Well consultation*
- c) Agrees to accept an additional six late submissions’*

1. PURPOSE

The purpose of this report is to support Council deliberations on the Local Water Done Well programme, and to outline the next steps for the Council decision in relation to the water delivery model, and Water Services Delivery Plan, as required by the Local Government (Water Services Preliminary Arrangements) Act 2024.

The report provides a substantial amount of information gathered over the previous six-seven months and includes a review of the current and signalled legislative context from central government, an outline of the various decisions Council has taken prior to reach this point, and an overview of the Your Water Done Well consultation process. It also provides a high-level and detailed assessment by staff of feedback received through 423 submissions from the community as part of the consultation. The full schedule of submissions received through the Your Water Done Well engagement is included in the deliberations pack, with submission analysis including officer comments provided as Appendix 4.

2. HISTORY/BACKGROUND

Water services across New Zealand have faced significant challenges in recent times, the most notable being issues with aging and poorly maintained infrastructure, underinvestment, and varying levels of service quality across different regions, with some leading to significant public health concerns such as the Havelock North Water contamination that led to a government inquiry.

Multiple governments have recognised the need for change and improvement by councils across the country. The intent to drive water reform across New Zealand has been a political feature of the past 5 years and it is clear that the last and current governments agree the status quo is not an option.

The Crown has initiated a comprehensive legislative reform agenda which is aimed at improving the management and delivery of water services nationwide. In December 2023, the Government announced a new direction for water services (drinking water, wastewater and stormwater services) policy and legislation, referred to as Local Water Done Well.

Key components of Local Water Done Well include:

- Fit-for-purpose service delivery models and financing tools;
- Ensuring water services are financially sustainable; and
- Introducing greater central government oversight, economic and quality regulation.

Legislative Reform – Local Water Done Well Framework

The Local Water Done Well (LWDW) framework drives an increased focus on the investment in and delivery of water services and their long-term financial sustainability, established through three stages of legislation:

1. Water Services Acts Repeal Act passed in February 2024, repealing the previous water services legislation (Water Services Entities Act 2022, Water Services Legislation Act 2023 and the Water Services Economic Efficiency and Consumer Protection Act 2023);
2. Local Government (Water Services Preliminary Arrangements) Act 2024 passed in September 2024, establishing the Local Water Done Well framework and the preliminary arrangements for the new water services system, including a requirement for councils to develop water services delivery plans (WSDP); and
3. Local Government Water Services Bill, introduced on 10 December, sets out provisions that enable the efficient and effective transfer of ownership, powers, assets, liabilities, and staff to new delivery models.

Local Government (Water Services Preliminary Arrangements) Act 2024 ("Preliminary Arrangement Act")

This was the first piece of substantive legislation the Government introduced in respect of Local Water Done Well.

As a key requirement of the Local Government (Water Services Preliminary Arrangements) Act, councils are required to develop a Water Services Delivery Plan (WP) by September 2025. The WSDP is intended to be the mechanism for Council to demonstrate its commitment to delivering water services that meet regulatory requirements, support growth and urban development, and the actions it will take to be financially sustainable by 30 June 2028. The WSDP must include an implementation plan that sets out how Council will deliver the new model or arrangements for delivering water services proposed in the plan.

The WSDP covers information across three key areas:

1. Financial and asset information, the investment required, and
2. Service delivery arrangements (including drinking water, wastewater and stormwater). Through the development of the WSDP, Council is required to provide an assessment of water infrastructure, the level of investment required, and plans for the financing and delivery through a preferred service delivery model. Ring-fencing of water services and revenue from other council activities is a key feature of the WSDP.
3. Each WSDP must include information about "*the anticipated or proposed model or arrangements for delivering water services*" (section 13(1)(k)) and be submitted to the Secretary for Local Government by 3 September 2025, unless an extension is granted.

The short time frame between the Preliminary Act coming into force (December 2024) and the date for submission of WSDPs (3 September 2025), requires Councils to make large and impactful decisions around the long-term future of some of its most critical infrastructure assets and operational activities.

To facilitate Councils meeting this compressed timeline, the Preliminary Arrangements Act also provided for councils to undertake streamlined consultation and decision-making processes. The key change was that the Preliminary Arrangements Act removed any requirement for a Special Consultative Procedure to be undertaken under the normal Local Government Act requirements, despite the proposals around water service delivery concerning strategic assets and significant activities that impact significantly on levels of services.

Councils were instead given a wide discretion to determine what effective consultation and engagement with their communities meant, while not imposing the requirements of a four-week consultation, public workshops, hearings and deliberations. SDC Councillors however chose to undertake a process which came much closer to the engagement level of a Special Consultative Process than the Bill strictly required.

The Local Government (Water Services Preliminary Arrangements) Act 2025 aims to facilitate efficient decision-making about future water delivery models (in-house, joint CCO, standalone CCO or consumer trust) enabling quicker responses to infrastructure needs.

Other key requirements of the Act include:

1. the introduction of a clear framework for accountability and economic regulation measures,
2. financial principles mandating that revenue from water services be reinvested in the sector.

The Act has also made provision for, the Local Government Funding Agency to provide access to improved financing options with higher borrowing limits to support critical infrastructure investments. This improved finance options will not be accessible to councils retaining an in-house delivery model.

Local Government Water Services Bill

The Bill (referred to as Bill #3), will require Councils to provide water services in a flexible, cost-effective, financially sustainable, and accountable manner. In addition to directing the development of the WSDPs, the Bill sets out minimum requirements for:

- Arrangements for the new water services delivery system including,
 - establishment, ownership, and governance of water organisations,
 - operational matters such as arrangements for charging, bylaws, and management of stormwater networks,
 - planning, reporting, and financial management provisions;
- A new economic regulation and consumer protection regime for water services
- Changes to the water quality regulatory framework and the water services regulator; and
- Singular environmental performance standards and infrastructure design solutions (developed by Taumata Arowai) which could substantially streamline consenting processes for wastewater and stormwater infrastructure.

The Bill intends to introduce a new regulation for water services delivery, providing a range of structural and financing tools, and by implementing a new economic regulation regime for water services providers.

From 1 July 2025, the Commerce Commission will oversee and implement new economic regulation and consumer protection regime for water services and will have a range of regulatory tools, including mandatory information disclosure, to promote transparency and ensure investments are made where they are needed most. Information disclosed in the WSDP, including capital and operating expenditure, financial projections, and asset information, will be shared with the Commerce Commission as it works towards implementing the enduring economic regulation regime.

The Local Government (Water Services) Bill provides for a full economic regulation regime to promote sufficient revenue recovery, and efficient investment and maintenance so that water services are delivered at a quality that communities expect. All regulated suppliers will be required to disclose information to promote transparency about their performance and inform the need for any further regulatory intervention.

The Bill also includes a regulation-making power that enables the Minister of Commerce and Consumer Affairs to give the Commerce Commission quality regulation, performance requirement regulation and price-quality regulation as additional tools, if needed for specific suppliers.

Informed by the investigative work progressed by Council, including the development of the proposal to establish a WSCCO, a submission on the Local Government Water Services Bill was made to the Finance and Expenditure Select Committee, with Mayor Sam Broughton speaking to the Select Committee supported by key staff. The submission raised several issues identified by Council, presenting various recommended amendments and clarifications. Key among these were:

1. Ensuring a stronger framework for the depoliticisation of water decisions under the legislation to ensure that future generations do not inherit degraded infrastructure;

2. Ensuring the governance and reporting frameworks are clear and right sized so as to not increase cost of compliance and burden for water consumers;
3. Clarifying the purpose of dividend to remove any suggestion the WSCCOs could be profit making which is at odds with the remainder of the legislation;
4. Ensuring a better regime to allow for fuller recovery of growth-related costs under the development contributions regime; and
5. Ensuring any WSCCO has equivalent powers such as powers of entry to enable effective operational management.

These proposed changes will, in the Councils view, ensure that the Bill provides a workable regime for councils and new water organisations established under the Local Government (Water Services Preliminary Arrangements) Act 2024 and operating under the Bill, Local Government Act 2002 and other relevant legislation.

Delivery Options Identified by Council – change is needed

The LWDW reform programme acknowledges the historical underfunding of water infrastructure within councils across the country and aims to address this by enabling greater levels of direct borrowing for necessary inter-generational infrastructure improvements. While Selwyn has arguably invested heavily in its water assets, we believe that the incoming regulatory framework means Council needs to consider new delivery models to ensure that water services are managed effectively and sustainably with an intergenerational view.

Under our current delivery model, we continue to be limited by budget constraints and competing priorities under our current borrowing limits. One key advantage of a WSCCO is its ability to borrow up to 500% of its operating revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house. By providing better access to funding tools and financing mechanisms, we believe these models will allow us to invest more in our water infrastructure, supporting both current and future long-term needs.

A new water services delivery model is underpinned by Selwyn's new fit-for-future strategic approach, ensuring the region grows in a way that benefits everyone for generations to come.

Selwyn is the fastest-growing district in the country, with a 29% increase in population between 2018 and 2023, and projections indicate that the population could reach 140,000 by 2050¹. Our long-term strategic initiative, Future Selwyn aims to improve the social, environmental, economic, and cultural well-being of Selwyn, aiding in strategic planning and coordination of public and private investment.

While we have invested in water and invested more than many other councils, we need to continue to deliver more infrastructure investment to support continued growth and to keep pace changing regulatory standards. Our ability to continue to ring-fence water and the ability to access additional investment, enables us to invest with greater certainty in Selwyn's future which is at the core of this proposal.

¹ Stats NZ, 2023 Census

Change in our water delivery model is inevitable. We are proud to be a Council that considers the best long-term options for our communities. Being proactive in considering our water services delivery model is in line with our Future Selwyn strategy and our One Water Strategy. It will help set a clear direction for water services delivery, enable us to consider investment beyond our 30 Year Infrastructure Strategy, provide a sustainable intergenerational price path for water and provide certainty for our staff and communities who have experienced significant disruption following nearly 5-years of central government water reform policy development.

Range of Service Delivery models considered

To support councils in meeting the new requirements, the Department of Internal Affairs (DIA) outlined a range of water service delivery models designed to ensure that communities receive enhanced water services without placing undue financial pressure on ratepayers. They are intended to have the flexibility to be financially independent from Council's credit rating.

Table 1: Overview of illustrative service delivery models²

Service delivery model	
Internal business unit or division	· Status quo for many councils · Minimum requirements for water service providers will apply · New financial sustainability, ringfencing rules, and economic regulation will apply
Single council-owned water organisation	· New company established, 100% owned by the council · Financial sustainability rules will apply, but retains a financial link to the council · Councils with existing water council-controlled organisations will be required to meet minimum requirements
Multi-council owned water organisation	· New company established with multi-council ownership · Appointment of a Board through shareholder council (or similar body) is advisable but not a statutory requirement · Option to access LGFA finance with the provision of parent support or to create a more financially independent organisation
Mixed council/consumer trust owned	· Consumer trust established to own majority of shares · Mixed ownership, with one or more councils owning minority of shares · Structure enables financially independent organisation to be established while retaining minority council ownership
Consumer Trust owned	· Council transfers assets to consumer trust owned organisation · Consumers elect trustees to represent their interests in the organisation · Most financially independent of the available models

In response to the development of the Local Water Done Well programme, Council has undertaken substantial work, exploring and analysing the various delivery options provided for within the Local Government (Water Services Preliminary Arrangements) Act 2024 (Refer Appendix 1: Council Report 13 November 2024, Item 14).

² DIA, [Water service delivery models: Guidance for local authorities](#), August 2024

To aid the process of working through a solution for Selwyn, a series of workshops were held by PWC and their team of experts to guide the subcommittee and senior staff to discuss the requirements of the Act, and what the various options available could look like for water delivery and management in the Selwyn District.

Council explored all options put forward by government, including potential partnerships with other councils, both nearby and further afield. However, each came with challenges such as differing priorities, logistical complexities, and significant additional costs (Refer Table 5 Council – 13 November 2024, Item 5).

Partnering with other councils is not mandatory under the new legislation, however, we believe it is an inevitable step in the long-term

Collaborating with other councils can lead to greater efficiency, standardisation, knowledge sharing and ultimately lower costs for consumers. Council staff have engaged with several other South Island councils to explore opportunities to partner. Initially 5 councils (including Selwyn) explored working together through assessing the differing levels of investment by councils to date, the varying water prices for consumers, and various growth and level of service requirements exceeded the borrowing levels proposed by the reform.

Given the complexity in those initial discussions, we do not anticipate such partnerships will happen quickly, particularly given the proposed reform timelines. However, we believe that any water delivery model we adopt must be flexible and ready to adapt to future partnerships and regional collaboration to support future strategic planning and to optimise water delivery costs over time.

Following the workshop process there were two options identified for further detailed analysis and assessment:

- ***Option 1:*** Set up a WSCCO to deliver wastewater and drinking water and continue to deliver stormwater in house (this was Councils preferred option for consultation with the community)
- ***Option 2:*** Deliver water services through a future in house delivery model.

Option 1: Set up a WSCCO to deliver wastewater and drinking water. Continue to deliver stormwater in-house.

Our assessment is that a Selwyn water CCO would provide greater financial flexibility in the medium to long term, more effective management of economic and water quality regulations, and enhanced resilience in the face of rapid growth. This model enables us to respond to the legislative change immediately, while simultaneously positioning us to maximise partnering and efficiency opportunities as they arise.

Establishing a CCO ensures that water services are managed separately from other council operations, providing a focused and sustainable approach to managing water infrastructure. Given the complexities of our stormwater delivery and the interface of these with other core council assets, we propose initially the CCO will be established to provide services for drinking water and wastewater, with stormwater responsibility continuing to sit with the core Council in the short to medium term. This includes land drainage and water races.

The CCO model is one of the core options of the LWDW policy and is designed to be enduring and adaptable over time. This model offers numerous advantages for the Selwyn community, including:

- *Enhanced Funding and Investment:* Improved access to funding and financing tools ensures we can upgrade our water and wastewater systems to meet increasing demand without placing undue pressure on rates.
- *Improved Water Quality and Services:* Increased investment will directly translate into improved water quality and service reliability for our residents.
- *Enhanced Resilience:* A CCO will enhance resilience in the face of rapid population growth, ensuring our water infrastructure can handle increased demand.
- *Certainty and Stability:* Establishing a CCO provides immediate certainty for the Selwyn residents, allowing us to move past a period of reform uncertainty. The reforms have led to professional uncertainty across the local government sector for water engineers and staff associated with 3 Waters service provision.
- *Futureproofing:* The CCO model is designed to be adaptable, future-proofing our water services for regional collaboration and increased efficiency in the future.
- *Depoliticised Model for Water Services:* While Selwyn's rapid growth has meant water infrastructure is largely new and in a well-maintained state, this may not always be the case. As assets age and need more maintenance and repair, additional funding will be required. Nationally, water under direct control of elected officials who change every three years and come with different ideologies, presents a risk that spending is deferred in the interest of keeping rates low and to allow for funding of non-water related projects. This can ultimately create an intergenerational and infrastructure deficit. By supporting the move to a depoliticised model, with a focus solely on water delivery (removing the need for the balancing of competing priorities) now, Selwyn has the opportunity to protect its current position and remove the risk of this intergeneration, infrastructure deficit in its water and wastewater networks.

Table 2: WSCCO Benefits and Risks³

Benefits of WSCCO Model	Risks
• Enhanced Service Delivery: A WSCCO will have a sole focus on improving water quality and service reliability, which would deliver better customer service. • Dedicated Water Governance: A WSCCO streamlines operations and over time will improve costs through specialised drinking and wastewater governance and management, leading to better resource allocation and improved service delivery. It also offers a specific focus on water services.	• Initial Setup: Establishing a WSCCO requires significant initial effort and coordination, including legal, financial, and operational setup. This process can be complex and involves increased investment at setup. • Uncalled Capital: From Council's perspective, there would be some contingent risk that the uncalled capital could be called on in the event of WSCCO financial distress. However, it is expected that this would be a last resort, and that LGFA would work with the WSCCO to address any issues before seeking to have

³ Selwyn District Council Your Water Done Well Consultation Document

- Improved Access to Funding: A WSCCO has greater borrowing capacity and access to funding specific to water, supporting necessary infrastructure upgrades and expansions, ensuring long-term financial stability. Improved access to funding ensures that the WSCCO can upgrade water and wastewater systems to meet increasing levels of service. - Resilience and Adaptability: A WSCCO is adaptable and scalable, effectively responding to changing demands and future challenges specific to the delivery of water services, such as rapid population growth and evolving regulatory requirements. This would help ensure our water infrastructure can manage increased growth. - Community Benefits: A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.	recourse to Council. The uncalled capital structure is also expected to be a precondition for any WSCCO seeking to obtain financing from and gaining the benefits of LGFA financing.

Option 2: Deliver water services through a future in-house delivery model.

Our assessment is that a Selwyn water in-house delivery model would likely provide shorter term financial benefit through limited change internally to staff and operational structures. There is a challenge with this model in how it would manage and respond to the range of economic and water quality regulations, that are expected from the legislative reform programme. This model would likely require further amendments and consultation with the community should we wish to enter into a partnering arrangement in the future.

Retaining an in-house model ensures that water services are managed together with other council operations, providing a coordinated approach to managing water infrastructure. This would enable all infrastructure assets to be prioritised collectively and would remain a part of the whole and not a focus in and of its own right.

Table 3: In-house Delivery Benefits and Risks⁴

Benefits of In-house Delivery Model	Risks
- Political Influence and Control: Enables the Council to maintain full control over decision-making processes, ensuring decisions are made with an understanding of local needs and priorities. Residents can engage with their elected representatives about water service issues. - Familiarity and Continuity: The Council can continue using existing systems and processes, which staff and management are already familiar with, reducing the need for	Limited Funding Capacity: The Council may struggle to secure sufficient funding for necessary infrastructure upgrades and maintenance, leading to deferred projects and potential service degradation. Limited borrowing capacity can restrict the Council's ability to finance large-scale improvements, resulting in higher long-term costs. To date, Council has funded the required upgrades for water and wastewater. In the future, funding priorities may change with department capacity allocated to other activities like transportation or facilities, rather than

⁴ Selwyn District Council Your Water Done Well Consultation Document

extensive training and transition periods.	drinking water or wastewater. - Operational Costs: Any deferred investment in our assets to manage debt levels could increase operational costs. Unexpected repairs or emergencies can strain the Council's financial resources, leading to budget reallocations or increased rates. - Regulatory Compliance: Ensuring compliance with evolving regulatory standards can be challenging, but Council currently has a good level of compliance. Maintaining rigorous monitoring and reporting systems to meet regulatory requirements can be resource intensive and complex and is set to increase. - Infrastructure and Service Delivery: In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model may struggle to scale effectively to meet the ever-increasing demand on our district's assets, impacting service reliability and quality. - Political interference: The country has a \$200 billion deficit in water funding in the next 30 years. Much of this is because of political leaders delaying investment over the past 30 years. - Lack of clear strategy: Minor projects have time and resource allocated that would otherwise be spent on strategic investment. - Competing funding: Water is only one factor in the Council decision making and investment. Water priorities can lose out to other funding priorities.

Note: Maintaining current in-house delivery for delivering water services is not an option due to new legislation and increased compliance. A future in-house water delivery model would still require increased investment, but that model would have limited access to additional funding for vital infrastructure.

Councils preferred option for Consultation

At its meeting on 13 November 2024, Council resolved to:

- Progress with investigating the development of a CCO model.
- Approve \$2 million funding to support the establishment a water services programme office. This funding has been used to cover initial setup costs, including legal, financial, and operational preparations. It also includes the additional resources to develop the WSDP on behalf of Selwyn District Council.
- Delegate approval of key items to a Water Services subcommittee
- Consult with the community on a proposed CCO model as the preferred option and to also consult on an in-house model.

Consultation Overview

As required under the Local Government (Water Services Preliminary Arrangements Act) 2024, Council has undertaken consultation under the engagement programme of Your Water Done Well. As noted above under the provisions of the Preliminary Arrangements Act, Council is not required to run a Special Consultative Procedure. However, Council defaulted back to the principles of consultation, prescribed under section 82 of the Local Government Act 2002, with discretion to the length of consultation provided by the Preliminary Arrangements Act.

A consultation document, and engagement process was developed, whilst also still aiming to meet the intent of the Council's Significance and Engagement Policy. The Local Water Done Well Subcommittee recommended that Council adopt the consultation document and endorse the proposed engagement process (Refer Appendix 2: Local Water Done Well Subcommittee – 12 February 2025, Item 4).

At the subsequent Council meeting, the consultation document was adopted and the proposed process for public consultation was endorsed (Refer Appendix 3: Council – 19 February 2025, Item 10).

The consultation document, and supporting material identified Council's proposal to: *"transition Selwyn District Council drinking water and wastewater assets and services into a new publicly owned Water Services Council Controlled Organisation (WSCCO) with stormwater services to remain within the Council".*

The second option, included in the consultation was the continuation of an in-house water delivery model, noting that this would require increased investment to meet anticipated legislative and compliance requirements, but this model would have limited access to additional funding for vital infrastructure.

	Drinking Water	Wastewater	Stormwater	Water Race	Land Drainage
<i>Existing arrangements</i>	In-house, by Council	In-house, by Council	In-house, by Council	In-house, by Council	In-house, by Council
<i>Our Proposal</i>	Transfer to new WSCCO	Transfer to new WSCCO	No change, in-house by Council	No change, not subject to consultation	No change, not subject to consultation

Figure 1: Your Water Done Well Consultation Options

Public consultation on the proposal was undertaken from 9am Thursday 20th February and 5pm Wednesday 12th March, under Your Water Done Well. Council set a consultation timeframe that recognises the timing in connection with the tight delivery timeframes for the WSDP (by September 2025) and the expectations of the community.

Consultation activity included widespread distribution of information through digital and traditional media and face to face drop-in sessions across the district. Opportunities for residents to make submissions were provided both online, through the Council's

engagement website, and through printed information and submission forms available at Council facilities. Community feedback and questions were collated into Frequently Asked Questions throughout the consultation period and posted online. Videos were also created explaining the process, and the various components of the consultation.

Consult 24 was used for this consultation and managed in the same way the Representation Review and Long-Term Plan 2024-2034 submission processes were managed, with submissions being received online and in writing.

Your Water Done Well Consultation Response

A total of 423 submissions (including 6 late submissions) were received from across the district, via a combination of online and on paper submissions.

Late Submissions

Six submissions to the Your Water Done Well consultation were received late:

1. Charlotte Barraclough received by Council on 14 March 2025;
2. Clint Madden, received by Council 14 March 2025;
3. Bronwen Quigley, received on 14 March 2025;
4. Jeff Quigley, received on 14 March 2025;
5. Helen Madden, received on 14 March 2025; and
6. Vince Barry on behalf of National Public Health Service, Te Waipounamu Region, Health New Zealand – Te Whatu Ora, received on 18 March 2025.

All six of the late submissions identified have been incorporated into the analysis in support of the deliberations process. It is recommended that these submissions are formally accepted.

Consultation Analysis

- 11.5% support the transition to a Water Services Council Controlled Organisation (WSCCO)
- 87.3% oppose the transition, and support retaining water services in house
- 49.9% of people left additional comments on the WSCCO model (Q3)

Those in support of the WSCCO can be grouped into the below general themes:

- Long-Term Benefits: Potential for improved infrastructure and service delivery.
- Funding and Investment: Better access to funding for infrastructure projects.
- Expert Management: Belief in operational efficiencies from specialised management.

Those in support of the future in house delivery model can be grouped into the following feedback themes:

- Increased Costs and Bureaucracy: Concerns about higher costs (particularly rates), financial burden and additional bureaucracy.
- Debt Concerns: Worries about increased borrowing and long-term debt for ratepayers.

- **Efficiency Doubts:** Scepticism about the new entity's efficiency compared to the current system. Believe the current system is cost-efficient and effective.
- **Local Control:** Importance of maintaining local council control for accountability, transparency, and responsiveness.
- **Privatisation Concerns:** Fear of higher costs and reduced control potential privatisation with a WSCCO.

There were also mixed responses from some submitters which included the flowing themes:

- **Conditional Support:** Support contingent on further details about governance and cost management.
- **Request for More Information:** Desire for more detailed information and a longer consultation period.
- **Consultation Process:** Criticism of the consultation process for being rushed and lacking information.

Key responses and feedback are further summarised below:

Question 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?					
11.5% (49)	Support	87.3% (371)	Do not support	1.2% (5)	No preference stated
Theme Analysis					
Support for the proposed WSCCO: • Long-Term Benefits: Some submissions highlight potential long-term benefits, such as improved infrastructure and service delivery. • Funding and Investment: Supporters believe that a WSCCO could provide better access to funding and investment for necessary infrastructure projects. • Expert Management: There is a belief that a specialised entity could bring in expert management and operational efficiencies.					
Opposed to the proposed WSCCO: • Increased Costs and Bureaucracy: Many submissions express concern about the potential for increased costs and rates associated with setting up a new entity. There is a desire from respondent not to add another layer of bureaucracy which is seen to lead to increased cost. • Debt Concerns: Concerns about the increased borrowing capacity and the long-term debt implications for ratepayers are frequently mentioned. • Efficiency Doubts: Doubts about the efficiency and effectiveness of a new entity compared to the current council-managed system are common. • Concern about loss of Local Control: A significant number of submissions emphasise the importance of keeping water services under local council control to ensure accountability and responsiveness to the community.					
Neutral/Mixed Responses to the Proposed WSCCO • Conditional Support: Some submissions express conditional support, depending on further details and assurances about governance, cost management, and accountability. • Request for More Information: Several submissions request more detailed information and a longer consultation period to make an informed decision.					

Question 2: Do you prefer that the Selwyn District Council continues with a future in-house water delivery model?					
86.1% (365)	Support	13.5% (57)	Do not support	0.4% (2)	Unsure
Theme Analysis					
Support for in-house delivery: - Continuation of Current Operations: Submitters cited reasons such as better local control, accountability, and cost efficiency. Comments highlight that the current system is working well and there is no need to change it. - Concerns About Costs and Bureaucracy: A significant number of submissions express concerns about the potential increase in costs associated with establishing a new entity (WSCCO). Respondents are worried about the financial burden on ratepayers and prefer to keep costs low by maintaining the current in-house model. - Accountability and Transparency: Several submissions emphasise the importance of accountability and transparency in managing water services. Respondents believe that keeping the services in-house ensures that the council remains directly accountable to the community. Some respondents are concerned that a WSCCO might lead to increased bureaucracy and less direct control over water services. - Local Expertise and Control: Many submissions highlight the value of local expertise and control in managing water services. Respondents believe that local management is better suited to address the specific needs and challenges of the community. - Concerns About Privatisation: Some respondents express concerns that establishing a WSCCO could lead to the privatisation of water services in the future. They prefer to keep water services under public control to avoid potential negative impacts of privatisation.					

Question 3: Do you have any comments on the WSCCO model?			
<i>This section did not contain a yes or no questions but allowed people to reinforce their main points and add any additional free text they wanted to.</i>			
49.9% (210)	Provided further comment	50.1% (211)	Did not provide further comment
Theme Analysis			
- Concerns about Privatisation: Many respondents expressed concerns about the potential privatisation of water services. They fear that privatisation could lead to higher costs and reduced control over water resources. - Financial Implications: There is concern about the financial burden on ratepayers. Many comments highlight concerns about increased rates and the long-term debt implications of the proposed changes. - Governance and Accountability: Respondents are concerned about the governance structure of the proposed Water Services Council Controlled Organisation (WSCCO). They fear that it may reduce transparency and accountability to the local community. - Quality and Efficiency of Services: Some comments question the efficiency and quality of services under the new model. There are concerns that the WSCCO may not deliver better services compared to the current in-house model. - Consultation Process: Several respondents criticised the consultation process, stating that it was rushed and lacked sufficient information. They feel that more time and detailed information are needed for the community to make an informed decision.			

Hearings

A total of 44 people asked to be heard by Council. Of those, 14 withdrew citing other commitments, unable to leave work (covering for a colleague), illness, out of town etc.

In total, 28 people spoke across 30 speaking slots to their (or on behalf of others) submissions for 5 minutes, including the opportunity for councillors to ask clarifying questions, on 20 March 2025 (Refer Council 'Your Water Done Well Hearings' – 20 March).

Following the hearing, additional feedback was received, which indicated there was a degree of misunderstanding about several key matters outlined in the following points:

- There *not being a need to respond because the Act hasn't been finalised*. This may be a combination of the name of the act including the term *preliminary* and that Bill #3 has not yet been adopted.
- *Concerns around privatisation*. This is addressed in the detail in section 2 around guidelines from DIA.
- *Concerns around the consultation timeframe and process*. Timing for this consultation has previously been discussed and responded to within this paper and historically, including in the November 2024 Council meeting. The consultation process was consistent with the LTP and Representation Review consultation processes and contained similar elements including drop ins, digital and traditional advertising, and the ability to submit online or on paper. The response of 423 submissions was good suggesting the level of promotion and advertising was appropriate.

2. DISCUSSION

Considerations for Deliberations

Relevant legal decision-making criteria

The Council is required to decide which of the models consulted on for the future delivery of its wastewater, stormwater and drinking water services will be adopted, and in turn included in its Water Service Delivery Plan (WSDP). The Council's WSDP must be prepared, certified by the Chief Executive, and then submitted to the Secretary for Local Government by 3 September 2025.

The Secretary for Local Government has an approval role in relation to WSDPs, as well as intervention powers, which can be used in certain circumstances. This report outlines those powers at a high level below.

For the mandatory consultation on the water service delivery model options, the Council is required to use and comply with the alternative requirements for decision-making under the Local Government (Water Services Preliminary Arrangements) Act 2024 (PA Act). These alternative requirements assist to streamline decision-making and prescribe the content of the information that must be presented as part of public consultation.

The effect of the PA Act is that it displaces some, but not all, of the decision-making requirements under the Local Government Act 2002 (LGA). Where a requirement of the LGA is not displaced, the Council still needs to comply with that requirement.

One example is the PA Act displaces the requirements in section 77(1)(a) and (b) of the LGA. As a result, the Council was not required to identify, assess and consider "*all reasonably practicable options*". Instead, it was required to consult on a baseline of two "*reasonably practicable options*", one of which was its existing delivery model, and the

other, either a joint arrangement or water services CCO. In this case, the Council has consulted on the water services CCO and its existing model, with the advantages and disadvantages of those options outlined in the consultation information.

The Council is not required to consider any other option that may have been raised through submissions received as part of consultation.

As the usual provisions of the LGA continue to apply to decision-making, unless expressly displaced, in addition to the requirements above, the Council will need to comply with the following (which are related by also separate requirements):

- If any of the options involve a significant decision in relation to land or a body of water, it will need to take into account the relation of Maori and their culture and traditions with their ancestral land, water, sites, waahi, tapu, valued flora and fauna, and other taonga (section 77(1)(c));
- consider the views and preferences of persons likely to be affected by, or to have an interest in, the matter (section 78(1));
- consider the views presented during consultation with an open mind (section 82(1)(e)); and
- provide clear reasons for its decisions (section 82(1)(f)).

It should be noted that the requirement to consider the views of those affected or interested in the decision, and to consider the view during consultation are related but separate matters. This recognises that there are valid community perspectives that can be elicited outside consultation and where Council or Councillors themselves have knowledge of these views they can and should also be considered. Examples include, views expressed during other consultations such as LTP or through Councillors own engagements with their communities (which may have occurred outside consultation or when discussing distinct but related issues). The key point being, all views of all parties must be considered, consultation outcome is only one consideration.

The Council, as the substantive decision-makers, are being provided with all submissions as part of this deliberations report, as well as a summary prepared by Council staff. The Council should read and consider the information in the consultation material, and the submissions, so they are fully informed when considering oral submissions and when making their final decisions.

There are two other points worth noting ahead of decision-making:

- Firstly, that the Council will need to make decisions in a way that aligns with its statutory role in section 12 of the LGA, and the principles in section 14 of the LGA; and
- Secondly, that the PA Act requirements for a WSDP, of which the delivery model decision is a required input, requires the WSDP to demonstrate that water services will be delivered in a way that:
 - will meet all relevant regulatory quality standards for its water services; and
 - is financially sustainable for the territorial authority; and
 - ensures that the territorial authority will meet all drinking water quality standards; and
 - supports the territorial authority's housing growth and urban development, as specified in the territorial authority's long-term plan.

These matters will need to be considered by the Council when making its decisions on both the delivery model and adoption of the WSDP.

Regulation

Bill #3, together with earlier regulatory reform including the Water Services Act 2021 have indicated that there is going to be a large volume of regulation imposed on water service delivery. Regulation will relate to quality and environmental performance for water delivery networks, as well economic regulation. While the final shape of this regulation continues to develop, it will substantially increase regulatory burden for either model. We are aware of the following in this space:

- Quality and performance regulation*
- Economic regulation

Given the substantial reform coming which will direct both options equally, *Alan Pragnell, CEO of Taumata Arowai will provide a verbal briefing on the future state of regulation for quality and performance to the meeting during deliberations.

The Commerce Commission is responsible for economic regulation and is already the regulator for several important infrastructure sectors. Under the Local Government (Water Services) Bill (Bill #3), the Commission will oversee the new economic regulation and consumer protection regime for water services. This regime will apply to councils and water organisations who are responsible for deciding capital and operating expenditure, revenue recovery, and charging levels for local government water services.

The Commerce Commission has stated that *“information and transparency are at the heart of the economic regulation of water”*.

The Local Government (Water Services) Bill will enable the Commerce Commission to:

1. Require local government water services providers to disclose performance information to promote transparency and inform regulatory needs.
2. Set revenue thresholds to ensure sufficient funding for maintaining and developing water infrastructure.
3. Ensure that revenue collected for water services is spent solely on water services.
4. Set and enforce quality standards for water services to ensure reliable and safe water supply.
5. Regulate the maximum or minimum revenue levels that providers can collect.

Bill #3 also includes provisions to protect consumers' rights including access to necessary information, a complaint framework, and a dispute resolution process.

Financial implications

Rates

Rates are expected to be impacted regardless of the model that is chosen due to baseline costs changing and moving to a more highly regulated environment.

The table below illustrates the 10-year projection of what the rates are modelled to be under a future in-house model or under the WSCCO model. Four scenarios are illustrated to demonstrate impact on an urban residential property with or without sewerage and a property on restricted water supply with or without sewerage.

While the modelling does show an initial increase in the cost under a WSCCO model the modelling illustrates that from year 10 onwards the WSCCO charges will be reduced.

Summary Rates	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034
Example: Urban Residential Property With Sewerage									
LTP Water Bill Under future in-house model	\$ 1,552	\$ 1,769	\$ 1,948	\$ 2,070	\$ 2,195	\$ 2,324	\$ 2,465	\$ 2,614	\$ 2,730
WSCCO Water Bill	\$ 1,700	\$ 2,018	\$ 2,635	\$ 2,635	\$ 2,668	\$ 2,668	\$ 2,668	\$ 2,668	\$ 2,668
Comparison	\$ 148	\$ 248	\$ 687	\$ 565	\$ 473	\$ 343	\$ 203	\$ 54	-\$ 62
% Increase LTP to WSCCO	10%	14%	35%	27%	22%	15%	8%	2%	-2%
Example: Urban Residential Property Without Sewerage									
LTP Water Bill Under future in-house model	\$ 745	\$ 841	\$ 955	\$ 1,022	\$ 1,095	\$ 1,169	\$ 1,252	\$ 1,340	\$ 1,392
WSCCO Water Bill	\$ 808	\$ 965	\$ 1,287	\$ 1,287	\$ 1,307	\$ 1,307	\$ 1,307	\$ 1,307	\$ 1,307
Comparison	\$ 63	\$ 123	\$ 332	\$ 265	\$ 212	\$ 137	\$ 55	-\$ 33	-\$ 85
% Increase LTP to WSCCO	9%	15%	35%	26%	19%	12%	4%	-2%	-6%
Example: A Property on Restricted Water Supply with Sewerage									
LTP Water Bill Under future in-house model	\$ 1,579	\$ 1,805	\$ 1,993	\$ 2,120	\$ 2,251	\$ 2,387	\$ 2,532	\$ 2,689	\$ 2,808
WSCCO Water Bill	\$ 1,729	\$ 2,056	\$ 2,689	\$ 2,689	\$ 2,722	\$ 2,722	\$ 2,722	\$ 2,722	\$ 2,722
Comparison	\$ 150	\$ 251	\$ 696	\$ 569	\$ 471	\$ 335	\$ 190	\$ 33	-\$ 86
% Increase LTP to WSCCO	9%	14%	35%	27%	21%	14%	8%	1%	-3%
Example: A Property on Restricted Water Supply without Sewerage									
LTP Water Bill Under future in-house model	\$ 772	\$ 877	\$ 1,000	\$ 1,072	\$ 1,151	\$ 1,232	\$ 1,319	\$ 1,415	\$ 1,470
WSCCO Water Bill	\$ 837	\$ 1,003	\$ 1,341	\$ 1,341	\$ 1,361	\$ 1,361	\$ 1,361	\$ 1,361	\$ 1,361
Comparison	\$ 65	\$ 126	\$ 341	\$ 269	\$ 210	\$ 129	\$ 42	-\$ 54	-\$ 109
% Increase LTP to WSCCO	8%	14%	34%	25%	18%	10%	3%	-4%	-7%

Figure 2: Summary Rates and Water Charges⁵

It is noted that in the current WSCCO modelling the charges flatline after year 5 (FY2029/2030) as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

Debt

Under Local Government Funding Agency (LGFA) guidelines, Councils are currently constrained and can only borrow up to 280% of their operating revenue. The SDC's Treasury Policy restricts this to 220% of operating revenue. This constraint limits the Councils investment options. Restricting the Council's ability to finance large-scale improvements, potentially resulting in higher long-term costs.

To date the Council has prioritised borrowing to fund Water Supply and Wastewater projects. However, if waste and drinking water activities were moved to a WSCCO this would allow Council to better prioritise funding toward other activities of the Council like transportation or facilities. In an in-house model, drinking water and wastewater by contrast would likely continue to demand more than its proportional share of funding which would in turn restrain investment in other activities.

Under the proposed WSCCO model, the LGFA have extended their financing support to allow Water CCOs to borrow up to 500% of their operating revenue. Whilst this debt limit will be based on a reduced level of revenue (only Drinking Water and Wastewater revenue), the increased facility limit will enable the WSCCO to continue to fund the existing capital projects that were included in the LTP. Because the WSCCO's revenue

⁵ Selwyn District Council Your Water Done Well Consultation Document

will only consist of income from these core water services, even though the borrowing limit is a higher percentage, the actual amount of additional borrowing capacity needs to be considered in this context.

Nevertheless, the establishment of a WSCCO is considered a positive move from a financial and asset management perspective due to several key factors identified in the report, including: improved and dedicated access to funding for water infrastructure, ensuring ring-fenced investment in essential water services, the benefit of specialised governance and management focused on water assets, enhanced resilience and adaptability to meet future demands, the aim for long-term financial sustainability, and the potential for the depoliticisation of critical water service investments.

Under the WSCCO model the financing will be available exclusively for the growth and level of service projects of drinking water and wastewater and will not be at risk of changing priorities moving financing to other activities of the Council. Recognising all water services debt with a WSCCO would increase Council's headroom, within its current Financial Strategy limits. This would improve Council's financial resilience through increasing debt availability for response to significant or emergency events, such as AF8.

Establishment costs

On 13th November 2024, Councilors passed that SDC would fund the development of the Water Services Delivery Plan and proposed establishment of the CCO up to \$2m (Refer Council 13 November 2024, Item 14). To date, actual spend has been \$578,048, consisting of:

Advisory costs	\$ 262,332
Internal staff secondments	\$ 155,622
Contractor costs	\$ 113,846
Office costs (including allocation of rent)	\$ 46,248

Transitional arrangements

The process for implementation and transition varies for each option.

Should Selwyn Council decide to retain in-house delivery, initially there is unlikely to be any change and status quo will be maintained. As new water delivery and economic regulation is imposed Council will need to rescope its water function. Additional capability will be required as will new procurement and commercial contract management functions. This will incur further cost.

In turn, overall operational cost will increase the cost base in determining Council rates. If an in-house model were chosen, it is expected that the timeline for implementation would need to be rescope. Rescoping of the function would come after Council have had their WSDP accepted in September to avoid unnecessary changes.

For the WSCCO, implementation would occur on 1 July and there would be a full transfer of assets, functions and staff related to the new entity. The new entity will design its own fit for purpose corporate structure, however it is expected that all current dedicated Water Services roles will transfer to the new entity. The WSCCO would ensure a careful transition plan to ensure there is no interruption or change in the level of service.

A transitional service agreement will be put in place where Council will continue to provide some services on behalf of the WSCCO on an interim basis and that services would progressively transfer to the WSCCO. While any shared services would be more clearly defined closer to implementation, these could include functions such as payroll, billing and digital support. Services would be charged to the CCO at a rate that covers the costs of delivery.

This staged process would be programmed to reduce risk during transition and prevent any interruption to day-to-day water services. The capital programme would continue to be delivered, mitigating any immediate risk to service delivery and the ongoing project works.

Impact on Levels of Service

Performance requirements are set by national regulations. The Council does not foresee an immediate difference in service delivery between the two models. Impacts on service delivery when comparing the two models come down to the focus of having a dedicated WSCCO and associated water specific governance, asset management, long-term investment policy and implementation. This would replace the priorities being set by elected members across a broader scope of activity.

Regardless of the delivery model, it is critical that water infrastructure investment and management practices are sustainable and resilient, benefiting not only current residents but also future generations.

Transitioning water services to a WSCCO, along with the associated existing debt, enables a larger debt facility to invest in Councils remaining infrastructure services.

Impact on asset investment and ability to respond to growth

As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations. One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house.

Governance and control

WSCCO delivery model

The WSCCO would be governed by a commercial board appointed under its own constitution and in compliance with the legislation. This Board must consist of independent members, with Councillors and staff not eligible for appointment under the Local Water (Water Services) Bill.

It is anticipated that the decision on who board members would be would occur via an appointments panel, in the same manner as currently occurs with CORDE. This appointment process would be phased. It is also anticipated that a rotation schedule will be embedded in order to provide continuity and retirement to allow for renewal as the organisation matures. On retiring the board appointments panel could choose to reappoint a retiring board member or appoint a new board member in their place.

In addition, the Constitution will outline the process for the removal of a Director (or the Board) should they fail to meet standards met in the constitution or a material breach of

the appropriate legislation or regulations, failure to fulfil the statement of expectations; and/or a breach of the Companies Act 1993.

Key performance and accountability frameworks will be developed and implemented. Under this option the Council and the community would agree the high-level expectations on strategy and performance of the new organisation through a Statement of Expectations. These expectations would include the Council's commitment to the ongoing partnership with mana whenua in the delivery of water and wastewater services. When setting up the WSCCO, the Council would develop accountability standards and monitoring arrangements for performance of the assets it transfers to the WSCCO. These will be set out across the Statement of Expectations, the Constitution and Water Strategy.

The WSCCO's Annual Report will be a key document for monitoring performance. If adopted, the WSCCO would be established and included in the Council's WSDP, which is due to be adopted in early September 2025.

In-house delivery model

Under an in-house model governance would continue unchanged from the existing delivery model. Councillors would have primary governance. There is a greater potential under this model, where governors are not solely focused on water to make trade-offs on water investment that have wider impacts across Council services. These include:

- Reducing investment in repair and maintenance to keep rate rises low;
- Reducing investment in non-water related activities such as roading or community facilities to fund water.
- Rate-smoothing to defer or reduce rate costs

There is a greater risk of politicisation of governance of water under the in-house model than a WSCCO.

Community views and preferences

In addition to the feedback received through the Your Water Done Well engagement, including submissions summarised in this report, other feedback on water services has been heard by council through recent engagements as outlined below.

Long Term Plan

Through the recent Long-Term Plan 2024-2034 process research was conducted by an Independent Research company, Research First, into what residents valued about living in Selwyn.

The primary vision for Selwyn residents over the next decade is a sustainable future. Residents welcome the projected population growth and diversity but prioritise retaining the core values and charm of the region. Key aspects of this sustainable vision include:

- Self-sufficiency: Enabling residents to live, work, and play within Selwyn.
- Infrastructure & Amenities: Emphasising services, healthcare, and community spaces.
- Environmental and Developmental Sustainability: Managing land use, housing, and green spaces effectively.

Water is the priority: 97% of residents consider the protection of local water sources as very high or high importance. There is a heightened sensitivity and protectiveness of local water sources throughout the Selwyn region. Residents recognised Wai as essential to life, and protecting those local water sources was an important priority for the region's ongoing sustainability. This was a sentiment shared, and responsibility felt by farmers and non-farmers alike and was supported in the quantitative data, with 97% of residents stating the protection of local water sources was of 'very high importance' or 'high importance'.

Further to this on the topic of infrastructure residents strongly suggest future planning for infrastructure that looks beyond a Rolleston-centric view. They want a proactive, not reactive, strategy to infrastructure that ensures what we are building now, will be suitable to support the needs of the forecasted population growth.

Your Water Done Well

Overall response from the Local Water consultation was consistent with this feedback particularly with maintaining local control, and support for a long-term view on water services delivery.

Specific themes for discussion from this consultation and further discussed below, with most feedback able to be summarised and grouped by the benefits and risks of a WSCCO and in-house delivery model, as outlined in the consultation document.

OPTION 1: WSCCO

Benefit: ENHANCED SERVICE DELIVERY Consultation document: <i>A WSCCO will have a sole focus on improving water quality and service reliability, which would deliver better customer service.</i>	
Supporting feedback themes	Opposing feedback themes
○ Access to specialist expertise ○ Access to appropriate funding ○ Potential to be more efficient ○ Future collaboration opportunities ○ Support a new water services body but concerned by the additional cost to consumers ○ Long term benefits outweigh short term costs and vocal minority opposition ○ Support simplified billing ○ In-house model is not sustainable long-term ○ Increased transparency and performance monitoring	○ No need for additional organisation - SDC responsibility ○ Organisation separation creates relationship, IT, data and strategy alignment risks ○ Better management by SDC: good current delivery and answerable to the ratepayers ○ Concerned by loss of operational control by Council ○ Council should focus on efficient and effective water services in-house ○ Inhouse can achieve the same benefit without the new organisation costs / Inhouse can be resourced to be just as effective as a WSCCO and meet additional government requirements ○ In-house reduces risk associated with the establishment of the WSCCO ○ Should utilise capabilities of SDC within existing budget ○ Separation of Council and CCO infrastructure programmes will result in inefficiency and additional cost ○ For now, SDC has the ability to retain these services in-house using existing staff who have the best understanding of the community and water services ○ Oppose separation of water services due to co-location of infrastructure, inefficiencies and risk

	○ Retaining and building skills within the Council avoids reliance on expensive private contractors, ensuring efficient and effective water services directly managed by the Council. ○ Lack of evidence-based information on the benefits of a WSCCO and no detailed business case ○ Costs of establishment not justified / not justified in current economic climate ○ Concern that costs will increase over time ○ Support use of CORDE
Officer comments	
○ It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services. ○ A WSCCO would ensure specialist focus and funding on water infrastructure. ○ A WSCCO is designed to improve efficiency, not add unnecessary bureaucracy or duplicate roles. ○ A WSCCO would still be fully owned by the Council, meaning there's no loss of local control, ownership or accountability. Council would continue to set strategic objectives, oversee operations, and hold the WSCCO accountable for performance, safety, and affordability. ○ There is the future potential for a WSCCO to partner or merge with other WSCCOs. ○ We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly to ratepayers in the in-house model. ○ Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.	

Benefit: DEDICATED WATER GOVERNANCE <i>Consultation document: A WSCCO streamlines operations and over time will improve costs through specialised drinking water and wastewater governance and management, leading to better resource allocation and improved service delivery. It also offers a specific focus on water services.</i>	
Supporting feedback themes	Opposing feedback themes
○ Support change to governance focus on water ○ Support purpose-built organisation to meet future demands and political separation ○ Access to specialist expertise and governance ○ Support of WSCCO with mana whenua co-governance and partnerships ○ Support of WSCCO for innovative thinking and leadership ○ Support depoliticising water services ○ Support condition on complete separation of decision making from Council ○ Support subject to removing 3-yearly priorities of election cycles to enable long term deliveries ○ Expertise should include good governance skills not just waters expertise	○ Good current state of infrastructure a credit to existing staff and Council decisions. Raises the question of why additional specialised governance and management is required ○ Should utilise existing governance and capabilities of SDC ○ Limited number of water services experts available in NZ (governance and staff) ○ Concerned by loss of democratic accountability and community influence ○ Other CCO and regional water delivery entities performance highlight perceived responsiveness, added complexity and potential inefficiencies of coordinating across different priorities ○ Local representatives understand local needs / localised services and decision making must be retained
Officer comments	
○ Positive endorsement of current SDC Management and Council is acknowledged. The WSCCO would have the additional benefit of a professional board.	

- A WSCCO would be managed by specialists in water delivery, infrastructure funding, and long-term debt management. This dedicated expertise allows for more efficient operations, better long-term planning, and a stronger focus on water services without competing priorities within Council.
- A skill matrix would be developed that sets out the required mix of skills of the Board, which will include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO, mana whenua and independent expertise
- Staff recognise the importance of supporting iwi participation – SDC is committed to ensuring inclusivity and that ensuring everyone has an opportunity to benefit. Council considers this can lead to better outcomes for the whole community. For example, iwi knowledge about local environments including water can be invaluable in planning and resource management projects. Ensuring iwi perspective and partnerships reflects our commitment to the Te Tiriti o Waitangi, and our shared responsibility to create a more equitable and respectful society.
- An independent board would undertake the governance and assurance function, reducing the risk of political decision-making and interference that could delay necessary investment.
- One of the government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which in some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motives.
- SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable to through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.

Benefit: IMPROVED ACCESS TO FUNDING

Consultation document: *A WSCCO has greater borrowing capacity and access to funding specific to water, supporting necessary infrastructure upgrades and expansions, ensuring long-term financial stability. Improved access to funding ensures that the WSCCO can upgrade water and wastewater systems to meet increasing levels of service.*

Supporting feedback themes	Opposing feedback themes
○ Support to enable access to funding necessary to upgrade waters infrastructure ○ Support prioritising water funding ○ Need increased investment required to meet growth and build resilience to climate change impacts ○ Need to ensure capability and build capacity to service growth ○ Ongoing maintenance and further investment in water infrastructure are crucial to manage the growing population.	○ Selwyn has already invested large sums into water infrastructure ○ LTP should already provide for appropriate funding depreciation and development levies ○ Can see no clear need for SDC to need the ability to raise capital more easily through a WSCCO as it already has a high credit rating ○ Benefit of increasing debt not required for the age of SDC's assets ○ Query whether ability to increase debt is required given high growth and capital contributions ○ Concerned planned debt is unsustainable and not financially prudent ○ Higher borrowing capacity would come at the cost of democratic decision making and accountability ○ Requirement for increased debt not clear beyond projects planned in LTP
Officer comments	
○ Under the new legislation, councils must fund water infrastructure upgrades without additional government funding. One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house. ○ Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the region's growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.	

- This increased borrowing capacity allows for critical renewals and upgrades to be financed over a longer period, avoiding sharp rate increases for residents
- Borrowing enables council to continue to provide the required future infrastructure required for the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users.
- As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.

Benefit: RESILIENCE & ADAPTABILITY

Consultation document: *A WSCCO is adaptable and scalable, effectively responding to changing demands and future challenges specific to the delivery of water services, such as rapid growth and evolving regulatory requirements. This would help ensure our water infrastructure can manage increased growth.*

Supporting feedback themes

- Need increased investment required to meet growth and build resilience to climate change impacts
- Support of WSCCO for future proofing climate resilience
- Need to ensure capability and build capacity to service growth
- Support of WSCCO on basis of water quality improvements - indicating preference for chlorine reduction
- Support WSCCO to enable access to funding necessary to upgrade waters infrastructure
- Ongoing maintenance and further investment in water infrastructure are crucial to manage the growing population
- Stormwater should be considered in WSCCO

Opposing feedback themes

- Good current state of infrastructure a credit to existing staff and Council decisions
- Council should be able to manage compliance risk in-house with qualified staff and performance systems / requirements of the Bill should be able to be met by Council within in-house delivery model: Objectives for water services should already be in place. Financial principles, like matching revenue to expenditure, should be in place. Operating within a planning and financial framework is not new
- Oppose enabling further growth beyond the environmental capacity of the district
- Recommend restructuring the existing water/wastewater teams to accommodate the growth, continue to share expertise through consultancy and aligned services contracts, but retain ownership and hands on leadership (and accountability) within the Selwyn Council
- Water services should not exclude stormwater as SDC has identified several flood prone areas

Officer comments

- As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
- An in-house model would limit Council's ability to borrow for the large-scale infrastructure projects needed to support Selwyn's rapid growth.
- Renewals and new investment would stall once the 280% limit is reached.
- A WSCCO provides a more adaptable and financially sustainable solution, ensuring Selwyn's water infrastructure remains resilient, future-proofed, and capable of meeting the needs of generations to come.
- Stormwater systems interact with other surface waters and transport and open spaces assets - splitting out stormwater from the other surface waters (water races, and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains in Council.

Benefit: COMMUNITY BENEFITS

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

Supporting feedback themes**Opposing feedback themes**

○ Support for WSCCO with increased transparency and performance monitoring ○ Long term benefits outweigh short term costs and vocal minority opposition ○ Support purpose-built organisation to meet future demands and political separation ○ Support of WSCCO for long-term investment and operational efficiency	○ Planning and water infrastructure should remain in-house, with accountability to ratepayers ○ Don't perceive a CCO would be well managed by Council ○ 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. ○ Silo working is bad for Council and the community - especially in the case of essential services ○ Concerned by loss of operational control by Council ○ Concerned about potential application of commercial frameworks without community safeguards ○ Concerned that Council is responding to government direction over community need and interest ○ Draft SOI lacks necessary detail to assure the community of long-term safeguards
Officer comments	
○ A key benefit of a WSCCO is its sole focus on water services, rather than competing with other Council priorities. This allows for better long-term planning and investment while keeping costs in check. ○ The WSCCO will remain accountable to Council. A statement of expectation will be put in place between the Council and the CCO. The Council also remains accountable to the community. ○ The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. ○ Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.	

Risk: INITIAL SETUP

Consultation document: *Establishing a WSCCO requires significant initial effort and coordination, including legal, financial, and operational setup. This process can be complex and involves increased investment at setup.*

Supporting feedback themes	Opposing feedback themes
○ Support a new water services body but concerned by the additional cost to consumers ○ A WSCCO should be considered on a regional basis ○ Long term benefits outweigh short term costs	○ No clear rationale on why SDC should lead ahead of other councils in setting up a WSCCO. ○ Short term costs not justified / do not outweigh the cost burden ○ Establishment costs will outweigh any benefit ○ Given the significant information gaps on WSCCO and its higher costs to ratepayers in 8 of the next 9 years, there is no clear evidence-based rationale for splitting ○ Not enough transparency and detail of costs for the establishment and operating model ○ Oppose the high costs with establishment if legislation drives more change ○ Concerned that risk of transition have not been sufficiently identified
Officer comments	

- Rising costs are acknowledged as a major concern and are unavoidable. While the modelling of the proposed WSCCO shows a short-term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers.
- At this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be actively considered.
- A WSCCO is designed to improve efficiency, not add unnecessary bureaucracy or duplicate roles. While there are initial setup costs, these are balanced by the long-term financial and operational benefits of having a dedicated water entity.
- Council is required to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. The new model, whether an in-house model or a WSCCO, will be progress by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Risk: UNCALLED CAPITAL

Consultation document: *From Council's perspective, there would be some contingent risk that the uncalled capital could be called on in the event of WSCCO financial distress. However, it is expected that this would be a last resort, and that LGFA would work with the WSCCO to address any issues before seeking to have recourse to Council. The uncalled capital structure is also expected to be a precondition for any WSCCO seeking.*

Supporting feedback themes

- Support WSCCO to enable access to appropriate funding
- Risk of guarantees must be carefully monitored as WSCCOs increase borrowings for the sector, secured against member councils

Opposing feedback themes

- Concerned by uncalled capital arrangement as it could place assets at risk if a call is made on the outstanding capital
- Concerned about the risk if the WSCCO encounters financial distress

Officer comments

- To help manage and control the costs of the WSCCO over time, it is expected that the WSCCO will be able to secure financing through the Local Government Funding Agency (LGFA) under the Local Water Done Well policy. LGFA provides financial support to the local government sector, including CCOs, and as part of this, requires credit support from the shareholding councils. This support comes in the form of uncalled capital security, which means the Council will act as guarantor for the WSCCO, but the capital remains unused unless there's a default on the financing arrangements. In practice, the Council would subscribe for uncalled capital of at least \$450 million, which is anticipated to cover both the initial and future borrowings of the WSCCO for the next five years, ensuring financial stability and cost control.
- As part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO,. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.

OPTION 2: IN-HOUSE DELIVERY MODEL

Benefit: POLITICAL INFLUENCE AND CONTROL Consultation document: <i>Maintaining water services in-house enables the Council to maintain full control over decision-making processes, ensuring decisions are made with an understanding of local needs and priorities. Residents can engage with their elected representatives about water service issues.</i>	
Supporting feedback themes	Opposing feedback themes
○ In-house retains accountability, transparency and responsiveness to ratepayers ○ Requires appropriate governance and accountability ○ Localised services and decision making must be retained ○ Concerned by loss of operational control by Council under WSCCO model ○ Don't perceive a CCO would be well managed by Council ○ Recommend restructuring the existing water/wastewater teams to accommodate the growth, continue to share expertise through consultancy and aligned services contracts, but retain ownership and hands on leadership (and accountability) within the Selwyn Council.	○ Support change to governance to meet future demands and political separation and access to specialist expertise and governance ○ Support depoliticising water services ○ Support for WSCCO only if depoliticised / political separation
Officer comments	
○ A WSCCO would remain accountable to Council. A statement of expectation would be put in place between the Council and the CCO. The Council also remains accountable to the community. ○ One of the government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which in some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motive. ○ An independent board would undertake the governance and assurance function, reducing the risk of political decision-making and interference that could delay necessary investment.	

Benefit: FAMILIARITY AND CONTINUITY Consultation document: <i>The Council can continue using existing systems and processes which staff and management are already familiar with, reducing the need for extensive training and transition periods.</i>	
Supporting feedback themes	Opposing feedback themes
○ Retaining and building skills within the Council avoids reliance on expensive private contractors, ensuring efficient and effective water services directly managed by the Council. ○ Silo working is bad for Council and the community - especially in the case of essential services ○ Separation of Council and CCO infrastructure programmes will result in inefficiency and additional cost ○ Organisation separation creates relationship, IT, data and strategy alignment risks	○ Potential of a CCO to be more efficient
Officer comments	
○ Shared service agreements could be established to ensure organisational relationship, strategies and systems are aligned. ○ We recognise that our water team are a highly skilled and knowledgeable group of people who are passionate about delivering water services to our community.	

Risk: LIMITED FUNDING CAPACITY Consultation document: <i>The Council may struggle to secure sufficient funding for necessary infrastructure upgrades and maintenance, leading to deferred projects and potential service degradation. Limited borrowing capacity can restrict the Council's ability to finance large-scale improvements, resulting in higher long-term costs. To date, Council has funded the required upgrades for water and wastewater. In the future, funding priorities may change with department capacity allocated to other activities like transportation or facilities, rather than drinking water or wastewater.</i>	
Relevant feedback themes	
- Can see no clear need for SDC to need the ability to raise capital more easily through a WSCCO as it already has a high credit rating - Improvements to in-house should be made within existing budget - LTP should already provide for appropriate funding depreciation and development levies	- Support CCO access to improved funding and borrowing capacity - Support prioritising water funding - Ongoing maintenance and further investment in water infrastructure are crucial to manage the growing population.
Officer comments	
- Under the new legislation, councils must fund water infrastructure upgrades without additional government funding. One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house. - This increased borrowing capacity allows for critical upgrades to be financed over a longer period, avoiding sharp rate increases for residents - Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users	

Risk: OPERATIONAL COSTS Consultation document: <i>Any deferred investment in our assets to manage debt levels could increase operational costs. Unexpected repairs or emergencies can strain the Council's financial resources, leading to budget reallocations or increased rates.</i>	
Relevant feedback themes	
- Rates should fund the services the council is responsible for—ensure they're delivered effectively without waste - Require development contributions / increase development contributions rather than placing more financial pressure on ratepayers	
Officer comments	
<u>We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.</u> - Increased borrowing capacity of a WSCCO would allow for critical upgrades to be financed over a longer period, avoiding sharp rate increases for residents - A WSCCO would provide flexibility to look at larger projects that would be difficult to fund with the in-house model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period (an example is a Trade Waste facility). - Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.	

○ Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades. This could lead to: · Higher costs over time – As compliance costs increase, they would need to be covered directly by ratepayers. · Financial restrictions – Limited borrowing capacity could delay necessary infrastructure projects. · Potential risks – An in-house model may struggle to keep up with regulatory changes, population growth, and future service demands.

Risk: REGULATORY COMPLIANCE Consultation document: <i>Ensuring compliance with evolving regulatory standards can be challenging, but Council currently has a good level of compliance. Maintaining rigorous monitoring and reporting systems to meet regulatory requirements can be resource intensive and complex and is set to increase.</i>	
Relevant feedback themes	
○ Council should be able to manage compliance risk inhouse with qualified staff and performance systems	○ Support purpose-built organisation to meet future demands and political separation ○ Support on basis of water quality improvements - indicating preference for chlorine reduction
Officer comments	
○ Both options will require ongoing review of capacity and delivery reviews to ensure they are appropriately resourced. ○ Maintaining current in-house delivery is not an option due to the new legislation and compliance requirements. ○ Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.	

Risk: INFRASTRUCTURE AND SERVICE DELIVERY Consultation document: <i>In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model may struggle to scale effectively to meet the ever-increasing demand on our district's assets, impacting service reliability and quality.</i>	
Relevant feedback themes	
○ Council should focus on efficient and effective water services in-house ○ Current operations satisfactory and no change to delivery model required	○ Need increased investment required to meet growth and build resilience to climate change impacts ○ In-house model has not delivered sustainable level of service ○ Support of WSCCO for long-term investment and operational efficiency ○ Support of WSCCO for a separate entity with ring-fenced funding to maintain, upgrade, and expand 3 Waters services ○ Ongoing maintenance and further investment in water infrastructure are crucial to manage the growing population
Officer comments	
○ A WSCCO would be managed by specialists in water delivery, infrastructure funding, and long-term debt management. This dedicated expertise allows for more efficient operations, better long-term planning, and a stronger focus on water services without competing priorities within Council.	

Risk: POTENTIAL INTERFERENCE LEADING TO LEAKY PIPES Consultation document: <i>The country has a \$200 billion deficit in water funding in the next 30 years. Much of this is because of political leaders delaying investment over the past 30 years.</i>	
Relevant feedback themes	
○ Better management by SDC ○ Concerned by loss of operational control by Council ○ There is no indication of how future-proofing Selwyn's water infrastructure would happen better with a WSCCO than in-house	○ Support for WSCCO only if depoliticized ○ Support prioritising water funding
Officer comments	
○ A key benefit of a WSCCO is its sole focus on water services, rather than competing with other Council priorities. This allows for better long-term planning and investment while keeping costs in check.	

Risk: LACK OF CLEAR STRATEGY Consultation document: <i>Minor projects have time and resource allocated that would otherwise be spent on strategic investment.</i>	
Relevant feedback themes	
○ Council should have long-term development and asset management plans ○ Current operations satisfactory and no change to delivery model required	○ Need increased investment required to meet growth and build resilience to climate change impacts ○ Ongoing maintenance and further investment in water infrastructure are crucial to manage the growing population. ○ Support of WSCCO for long-term investment and operational efficiency
Officer comments	
○ Council has a 10 Year Asset Management Plan along with 30 Year Infrastructure Strategy for water services and other asset types. ○ A WSCCO would still be fully owned by the Council, meaning there's no loss of local control or accountability. Council would continue to set strategic objectives, oversee operations, and hold the WSCCO accountable for performance, safety, and affordability.	

Risk: COMPETING FUNDING Consultation document: <i>Water is only one factor in the Council decision making and investment. Water priorities can lose out to transport or solid waste investment.</i>	
Relevant feedback themes	
○ Need to focus on essential expenditure and defer other programmes until they are affordable	○ Support prioritising water funding ○ Support of WSCCO for a separate entity with ring-fenced funding to maintain, upgrade, and expand 3 Waters services
Officer comments	
○ A WSCCO would focus on the essential work of water and wastewater services ○ A WSCCO would be managed by specialists in water delivery, infrastructure funding, and long-term debt management. This dedicated expertise allows for more efficient operations, better long-term planning, and a stronger focus on water services without competing priorities within Council.	

OTHER MATTERS RAISED

Relevant feedback themes	Officer comments
Timing of process	
- Government's legislation and information on this matter has not been finalised - should wait before deciding - Retaining services in-house allows more time for thorough investigation to understand the true impacts of having a WSCCO - Defer a decision until more detail is known	The Local Government (Water Services Preliminary Arrangements) Act 2025 requires Council to make a decision on model by September 2025
Stick with the working in-house model, with provision to review around 2033/34 if legislative requirements and finances then show a real need for change.	
- Concerned decision has already been made and money is being spent to advance - Concerned that appointment of Establishment Team is premature and indicates undemocratic predetermination	- A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025 - Any budget allocated to the programme team is there to support water services delivery plan development regardless of the delivery model chosen
Consultation and decision timeframes too short for the significance	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
Concerns about privatisation	
- Must prevent future possibility of privatisation - Concern about shareholdings and potential for private equity partners	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Relevant feedback themes	Officer comments
Role of mana whenua	
○ Seek confirmation of governance role for mana whenua - recognition of their rights under Te Tiriti ○ Concern over iwi or mana whenua partnerships in association with ratepayer funded services ○ Concerns over Wairoa One Water Strategy and what this means for WSCCO ○ Seek delay of decision under implications of Ngāi Tahu claim are understood	○ Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy). ○ Council's goal is to ensure that all parties involved in managing water resources work towards protecting and enhancing the mana (spiritual authority) and mauri (life force) of all water bodies, regardless of any future changes in how water is managed or governed. ○ Our Wairoa One Water Strategy has agreed to uphold the mana and mauri of all water in its decision making and to work in partnership to sustainably manage water now and into the future. This partnership approach will remain in both delivery options being considered. ○ Council will continue to monitor the progress of Ngāi Tahu's statement of claim seeking recognition of rangatiratanga over its awa (rivers) and moana (sea)

Long Term Plan amendment requirement

If a CCO is established a Long-Term Plan Amendment will be required to give effect. If the in-house model is chosen, consideration will need to be given to if a Long-Term Plan Amendment is required on the basis it may fundamentally change our investment in water under a new in-house delivery model, particularly once forthcoming regulation takes effect.

Any other matters

The Secretary for Local Government can only accept a Water Services Delivery Plan if it complies with the Act. Once the WSDP is submitted to DIA for approval, amendments to the WSDP may be required should DIA propose changes to ensure the WSDP aligns with the Act.

Where a Plan is not submitted in accordance with the Act, or a resubmitted Plan does not meet the requirements of the Act, the Minister of Local Government may appoint a Crown Water Services Specialist (at the council's expense).

A Crown Water Services Specialist can prepare a Plan for the council(s), direct the council(s) to adopt a specified Plan (which may be a Plan that the Crown Water Services Specialist has prepared), or direct the council(s) to submit a specified Plan to the Secretary.

3. ALIGNMENT WITH COUNCIL PLANS, STRATEGY, POLICY AND REGULATORY/COMPLIANCE OBLIGATIONS

Waikirikiri Ki Tua/Future Selwyn

The following aspects of [Waikirikiri Ki Tua/Future Selwyn](#) have been identified as relevant to this issue, proposal/decision/activity/project, and inform both the outcomes of the project as well as the way the project develops:

Outcome and/or Direction	Relevance
Inclusive Communities IC1 Honour Te Tiriti and strengthen our partnership with Mana Whenua	High relevance: new delivery models for water services depend on partnership with mana whenua to sustainably manage water now and into the future.
Healthy Water HW1 Prioritise the health and wellbeing of water	High relevance: Our Waiora One Water Strategy states that 'the health and wellbeing of water is prioritised and all water systems are protected and enhanced'. The Supporting outcome of 'Healthy Water' aligns with our Waiora One Water Strategy.
Healthy Water HW2 Protect and restore the mana and mauri of water	High relevance: Our Waiora One Water Strategy vision states 'Hei Wakamana kā wai tūpuna, Hei whakahaumanu kā wai oraka – upholding the mana of our ancestral waters, restoring the mauri of our lift giving waters'
Healthy Water HW4 Protect sources of water and human health	High relevance: The water services delivery options would support improving water quality and service reliability
Living within Environmental Limits LWEL2 Conserve and manage finite resources	Moderate relevance: Water services provision intends to provide sustainable and efficient water service delivery, recognising water is a precious taoka.
Quality Infrastructure QI1 Strategically plan and coordinate Infrastructure	High Relevance: the future delivery of water services requires strategic planning and coordination, with water services responsible for planning, funding, building and maintaining drinking and wastewater infrastructure.
Quality Infrastructure QI2 Strengthen the resilience of infrastructure to shocks and stresses	Medium Relevance: Resilience of water services infrastructure is a key component of the activity.
Quality Infrastructure QI3 Deliver timely and intergenerational infrastructure	High Relevance: We are committed to ensuring water services are delivering benefit to long-term communities and infrastructure needs.
Quality Infrastructure QI4 Make efficient use of existing infrastructure	High Relevance: water services are reliant on the efficient use of existing infrastructure.
Quality Infrastructure QI5 Maintain and operate infrastructure efficiently and affordably	High Relevance: the Local Water Done Well programme highlights financial sustainability is a key priority.
Quality Infrastructure QI6 Prioritise investments in infrastructure that deliver on multiple outcomes over generations	High Relevance: We are committed to making cost-effective decisions that balance affordability for communities with long-term infrastructure needs.

Other Council Plans, strategy policy and regulatory/compliance obligations

The following strategies have been identified as relevant to this issue.

SDC Strategic context	How the document relates
Waiora One Water Strategy	The Waiora One Water Strategy expresses a collective desire that, rūnanga and the Council have an agreed strategic framework and roadmap for those involved in

	water management to upholding the mana and mauri of all water, (irrespective of the future management structures for water)
<u>Rautaki Tūāhaka Infrastructure Strategy 2024-2054 (includes our approach to sustainability)</u>	Our Infrastructure Strategy highlights the significant infrastructure issues and challenges we think we're going to face in managing our infrastructure over the next 30 years. It identifies options of how we might address these, and the implications of those options
<u>Kai Aku Rika Economic Development Strategy</u>	The Kai Aku Rika Economic Development Strategy serves as both a blueprint and a call to action for our community to participate in shaping an economy that fits with the future aspirations of Waikirikiri Selwyn.
<u>Piki Amokura (Selwyn Youth Strategy)</u>	Piki Amokura aims to enhance Selwyn as an exceptional place for young individuals (ages 12 - 24) to thrive. Water services plays a critical role in supporting the health and wellbeing of our young people.
<u>Te Paepae (Ageing Well Strategy)</u>	Te Paepae Ageing Well is a strategy for Waikirikiri Selwyn. It identifies what residents aged 65 and over need so they can age in place well, supported by comprehensive and equitable services within a vibrant, connected, and inclusive community. Water services plays a critical role in supporting the health and wellbeing of our young people.
Te Rautaki Tikaka Rua (Bicultural Strategy)	Te Tiriti represents a foundational and ongoing relationship between Māori and the Crown. SDC strives to honour this relationship, and this is exemplified through our Bicultural Strategy – Te Rautaki Tikaka Rua, which provides a framework for strengthening partnerships with mana whenua and enhancing our bicultural competence.
Operational Policy	
	All existing drinking water and wastewater related Operational Policies will transfer to the WSCCO should this option be preferred. The WSCCO would then review, update and maintain these policies.
Regulatory/Compliance requirements or obligations	
- Local Government (Water Services Preliminary Arrangements) Act 2024 - Regulatory Oversight by Taumata Arowai including Drinking Water Quality Assurance Rules	Water service providers must adhere to several regulatory and compliance requirements to ensure safe and effective water service delivery.

4. SIGNIFICANCE ASSESSMENT/COMPLIANCE STATEMENT

“The decisions and matters of this report are assessed as being of High significance, in accordance with the Council's Significance and Engagement Policy.”

A consultation process has been undertaken in accordance with the requirements of the Local Government (Water Services Preliminary Arrangements) Act 2024.

5. VIEWS OF THOSE AFFECTED / CONSULTATION

In making a decision Council needs to know enough about and consider the views and preferences of affected and interested parties. The degree to which Council seeks views of affected and interested parties will be proportionate to the significance of the decision or issue being considered.

(a) Views of those affected and Consultation

Public consultation has been undertaken between 20 February and 12 March 2025, in accordance with the requirements of the Local Government (Water Services Preliminary Arrangements) Act 2024, with the views presented in this report, the Hearing minutes, and the Your Water Done Well submission booklets.

(b) Māori and Treaty implications

The decision whether to establish a CCO is a significant decision in relation to bodies of water, and therefore the Council must consider the relationship of Māori and their culture and traditions with water.

The Waioira One Water Strategy has agreed to uphold the mana and mauri of all water in its decision making and to work in partnership to sustainably manage water now and into the future. This partnership approach will remain in any delivery option chosen.

Te Taumutu Rūnanga representative McKay has actively participated in Council workshops to determine an appropriate response to the Government's Local Water Done Well legislation. She has also been appointed as a member of the newly established Local Water Done Well committee, which has the authority to oversee the establishment of a WSCCO.

Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga have verbally indicated their support for the establishment of a WCCO and SDC remains committed to high levels of engagement on this kaupapa moving forward.

(c) Resiliency and Sustainability considerations

The Local Water Done Well programme has placed an emphasis on achieving financial and environmental sustainability in the delivery of water services by 2028.

Both models have the potential to align with Selwyn's sustainability goals, but the choice depends on the council's priorities for control, flexibility, specialisation, and efficiency.

An in-house model would allow the council to retain direct control over water services, ensuring seamless integration with the sustainability strategy, greater flexibility in aligning projects with sustainability goals, and clear accountability within the council for meeting these targets. This model would also enable the council to directly implement and monitor environmental sustainability initiatives, such as reducing water wastage, enhancing water quality, and protecting local ecosystems.

The WSCCO would need to adhere to strict environmental regulations and sustainability goals set by the council to be managed through the Statement of

Expectations, ensuring that water services are managed in an environmentally responsible manner. This could include initiatives like advanced water treatment technologies, sustainable water sourcing, and comprehensive environmental impact assessments.

6. FUNDING IMPLICATIONS

Funding implications of the matters under deliberation by Council are outlined in Part 3: DISCUSSION - Considerations for Deliberations: *Financial implications*.

7. LEGAL/POLICY IMPLICATIONS

Relevant legislation has been identified in the body of this report, including:

- Water Services Acts Repeal Act
- Local Government (Water Services Preliminary Arrangements) Act 2024
- Local Government Act 2002

8. NEXT STEPS

The following steps are required to ensure the successful development and implementation of the Local Water Done Well programme:

1. Direction to be given to Council staff
2. Council decision to be made on delivery model at its meeting of 2 April 2025
3. Officers then directed to develop WSDP: Following the Council's decision, officers will be tasked with developing the Water Services Delivery Plan (WSDP).
4. Council will consider and adopt WSDP, with the Chief Executive required to certify it before submission to the Secretary for Local Government for approval.



Tim Mason
EXECUTIVE DIRECTOR INFRASTRUCTURE AND PROPERTY

Endorsed For Agenda

REPORT

TO: Chief Executive Officer
FOR: Council Meeting – 13 November 2024
FROM: Executive Director Infrastructure and Property – Tim Mason
DATE: 8 November 2024
SUBJECT: **CCO IMPLEMENTATION**

RECOMMENDATION

‘That Council:

- (a) agrees to progress with and fund preliminary investigations and steps toward the establishment of a Council Controlled Organisation for water services with an expectation that the model is consulted on next year and decision paper brought to Council post consultation.*
- (b) notes the requirements for Selwyn District Council from Local Water Done Well legislation, including delivery of a Water Services Delivery Plan and changes to requirements for water services delivery*
- (c) agrees to fund the development of the Water Services Delivery Plan and proposed establishment of the CCO up to \$2 million in line with this paper, as required by legislation;*
- (d) agrees to delegate oversight of the activities referred to in (a) and (b) to the Local Water Done Well subcommittee; and*
- (e) agrees that Council can hire a CCO establishment Board chair.*

1. SIGNIFICANCE ASSESSMENT/COMPLIANCE STATEMENT

The decision before the Council is whether to establish a water services CCO in accordance with section 58(a)(i)(A) of the Local Government (Water Services Preliminary Arrangements) Act 2024 (WSPAA) and section 56 of the Local Government Act 2002 (LGA).

The issue and decision that is the subject of this report has been assessed against the Significance and Engagement Policy (Policy) and consideration has been given to criteria set out in the Policy including:

- the extent to which matters impact on the people of Selwyn now and in the future (assessed as higher degree of impact);
- the extent to which individuals, organisations, businesses, groups, communities, and sectors within the community are particularly affected by, or are interested in, the matter (assessed as higher degree of impact);
- the extent to which decisions relate to mana whenua and the impact on mana whenua relationship with land (including tapatapa and development on Māori

land), water, culture and traditions with ancestral sites, wāhi tapu (and wāhi taoka), valued flora and fauna, and other taoka (assessed as higher degree of impact);

- the extent to which the matter is consistent with the Council's community outcomes, existing strategies, and policies (assessed as lower degree of impact);
- the impact of the decision on the ability to achieve the objectives set out in the Council's 2024-2034 Long-Term Plan (LTP) and Financial Strategy (assessed as higher degree of impact); and
- the extent to which a decision, proposal, matter, impacts on climate mitigation and adaption initiatives (assessed as lower degree of impact).

In summary, the overall significance of the issue and decision that is the subject of this report is considered to be of **high significance**. For the purposes of decision making and consultation on this issue and decision:

- the Council will be able to rely on the alternative requirements specified in sections 61 to 64 of the WSPAA; and
- for the avoidance of doubt, pursuant to section 60(2) of the WSPAA, all other relevant requirements in the LGA will continue to apply (including the requirements in sections 77(1)(c), 81 and 82).

2. PURPOSE

This paper seeks Council approval to progress with the establishment of a Council Controlled Organisation (CCO) to enhance the delivery and financial sustainability of water services in the Selwyn District. This approach is aligned with the "Local Water Done Well" (LWDW) legislation.

The Water Services Delivery Plan (WSDP) is a legislative requirement under LWDW that requires Councils to submit a WSDP by September 2025.

To support establishment of a CCO and submission of the WSDP, this paper is seeking from Council:

- **Approval to progress with the development of a CCO model:** As outlined in this paper, we seek approval to move forward with the development of a water services CCO.
- **Approval of funding:** Secure Council approval for up to \$2M in funding to support the proposed establishment of the CCO and development of WSDP. This funding will cover initial setup costs, including legal, financial, and operational preparations. It also includes the additional resources to develop the WSDP on behalf of Selwyn District Council.
- **Delegation of approval of key items to a Water Services subcommittee:** Per legislation, a CCO will require a constitution, a statement of expectations from the Selwyn District Council and a water services strategy from the CCO. There will be a range of other approvals needed during the establishment, which will require an agile delegation approach. We seek approval for the Water Services subcommittee to provide guidance and oversight in line with this paper regarding preliminary steps towards establishment of CCO, and WSDP development and consultation. A final decision regarding adoption of WSDP and

establishment of the CCO will be referred to Council following consultation, subject to endorsement via this subcommittee.

- **Consultation of the CCO model:** Engage in a public consultation process (early 2025) on establishment of a water services CCO via the alternative streamlined consultation requirements specified in sections 61 to 64 of the WSPAA. This will ensure community input and support for the proposed changes.

3. HISTORY/BACKGROUND

Historically, water services in New Zealand have faced significant challenges, including aging infrastructure, underinvestment, and varying levels of service quality across different regions. These challenges led the Crown to initiate comprehensive reforms aimed at improving the management and delivery of water services nationwide.

The Local Water Done Well (LWDW) legislation drives an increased focus on the investment in and delivery of water services and their long-term water financial sustainability

LWDW is being implemented in three stages, each with its own piece of legislation. The first Bill (enacted February 2024) repealed the previous water services legislation.

The second Bill (enacted September 2024) outlines the LWDW framework including requirements for councils to develop WSDPs. As per the second Bill, councils must develop WSDPs by September 2024. The act requires that:

- WSDPs outline future water services delivery arrangements, and that councils commit to an implementation plan.
- WSDPs include baseline information from councils about their water services operations, assets, revenue, expenditure, pricing, and projected capital expenditure, as well as necessary financing arrangements, as a first step towards future economic regulation.

The Bill also streamlines consultation and decision-making processes for establishing CCOs.

The third Bill (to be introduced December 2024) will provide the enduring settings for water services.

While not yet finalised, the guidance released by the Department of Internal Affairs (DIA) outlines new delivery models for water service delivery that councils can choose to adopt and outlines the minimum requirements that will apply for water services. Requirements are likely to state that water service providers:

- Will be subject to economic, environmental and water quality regulation
- Will be subject to a new planning and accountability framework for water services, including the need to produce stand-alone financial statements for water supply, wastewater, and stormwater
- Must be financially sustainable
- Must act consistently with statutory objectives
- Will be subject to restrictions against privatisation.

The reform will also include the new economic regulatory regime administered by the Commerce Commission, as well as new financing options available through the New Zealand Local Government Funding Agency (LGFA) to support water services.

The Government is developing models to enable increased investment which should support councils to deliver more for our communities

To support councils in meeting these new requirements, DIA has outlined a range of illustrative water service delivery models designed to ensure that communities receive enhanced water services without placing undue financial pressure on ratepayers. They are intended to have the flexibility to be financially independent from Council's credit rating.

Table 1: Overview of illustrative service delivery models¹:

Service delivery model	
Internal business unit or division	• Status quo for many councils • Minimum requirements for water service providers will apply • New financial sustainability, ringfencing rules, and economic regulation will apply
Single council-owned water organisation	• New company established, 100% owned by the council • Financial sustainability rules will apply, but retains a financial link to the council • Councils with existing water council-controlled organisations will be required to meet minimum requirements
Multi-council owned water organisation	• New company established with multi-council ownership • Appointment of a Board through shareholder council (or similar body) is advisable but not a statutory requirement • Option to access LGFA finance with the provision of parent support or to create a more financially independent organisation
Mixed council/consumer trust owned	• Consumer trust established to own majority of shares • Mixed ownership, with one or more councils owning minority of shares • Structure enables financially independent organisation to be established while retaining minority council ownership
Consumer Trust owned	• Council transfers assets to consumer trust owned organisation • Consumers elect trustees to represent their interests in the organisation • Most financially independent of the available models

DIA have also released requirements for establishing a CCO, including:

- Current council staff and elected members cannot be appointed to boards
- Water organisations must be companies
- Activities of water organisations will be limited to the provision of water services and directly-related activities
- Only councils or consumer trusts can be shareholders
- Board appointments must be competency-based and have the appropriate mix of skills, knowledge, and experience
- There will be a range of protections against privatisation

¹ DIA, [Water service delivery models: Guidance for local authorities](#), August 2024

The policy landscape is continuing to evolve, including in regards to economic regulation, and there may be significant changes to the LWDW landscape that arise in the upcoming months. However, in order to meet the proposed legislative timelines we are progressing with a 'no regrets' proposal.

4. PROPOSAL

The LWDW legislation acknowledges the historical underfunding of water infrastructure within councils and aims to address this by enabling greater levels of direct borrowing for necessary infrastructure improvements. While Selwyn has invested heavily in its water assets, we believe that the incoming regulation will mean we will still need to consider new delivery models to ensure that water services are managed effectively and sustainably.

Under our current delivery model, we continue to be limited by budget constraints and competing priorities under our current borrowing limits. By providing better access to funding tools and financing mechanisms, we believe these models will allow us to invest more in our water infrastructure, supporting both current and future long term needs. Our models show a short term debt limitation for the CCO model.

Partnering with other councils is not mandatory under the new legislation, however, we believe it is an inevitable step in the long-term

Collaborating with other councils can lead to greater efficiency, standardisation, knowledge sharing and ultimately lower costs for consumers. We have worked with other South Island councils to explore opportunities to partner. Given the differing levels of investment by councils to date, the varying water prices for consumers, and various growth and level of service requirements, we do not anticipate such partnerships will happen quickly, particularly given the proposed reform timelines. However, we believe that any water delivery model we adopt must be flexible and ready to adapt to future partnerships and regional collaboration to support future strategic planning and to optimise water delivery costs over time.

A new water services delivery model is underpinned by Selwyn's new fit-for-future strategic approach, ensuring the region grows in a way that benefits everyone for generations to come

Selwyn is the fastest-growing district in the country, with a 29% increase in population between 2018 and 2023, and projections indicate that the population could reach 140,000 by 2050². Our long-term strategic initiative, Future Selwyn aims to improve the social, environmental, economic, and cultural well-being of Selwyn, aiding in strategic planning and coordination of public and private investment.

While we have invested in water and invested more than many other councils, we need to deliver more investment to support this continued growth and changing regulation. Continuing to ring-fence water and being able to access additional investment through a new model enables us to invest with greater certainty in Selwyn's future communities.

We believe that change in our water delivery model is inevitable. We are proud to be a Council that considers the best long term options for our communities. Being proactive

² Stats NZ, 2023 Census

in considering our water services delivery model is in line with our Future Selwyn strategy. It will help set a clear direction for water services delivery, enable us to consider investment beyond that in our 30 Year Infrastructure Strategy, provide a sustainable intergenerational price path for water and provide certainty for our staff and communities who have experienced significant disruption following nearly 5-years of central government water reform policy development.

To meet our immediate needs, new regulation and our long-term strategy, we are proposing establishment of a Selwyn water CCO

We have considered the range of options available to Selwyn to deliver water. Our assessment is that a Selwyn water CCO would provide greater financial flexibility in the medium to long term, more effective management of economic and water quality regulations, and enhanced resilience in the face of rapid growth. This model enables us to be able to respond to the legislative change immediately, while simultaneously positioning us to maximise partnering and efficiency opportunities as they arise.

Establishing a CCO ensures that water services are managed separately from other council operations, providing a focused and sustainable approach to managing water infrastructure. Given the complexities of our stormwater delivery and the interface of these with other core council assets, we propose that initially the CCO will be established to provide services for drinking water and wastewater, with stormwater responsibility continuing to sit with the core Council in the short to medium term. This includes land drainage and water races.

The CCO model is one of the core options of the LWDW policy and is designed to be enduring and adaptable over time. This model offers numerous benefits for the Selwyn community, including:

- **Enhanced Funding and Investment:** Improved access to funding and financing tools ensures we can upgrade our water and wastewater systems to meet increasing demand without placing undue pressure on rates.
- **Improved Water Quality and Services:** Increased investment will directly translate into improved water quality and service reliability for our residents.
- **Enhanced Resilience:** A CCO will enhance our resilience in the face of rapid population growth, ensuring our water infrastructure can handle increased demand.
- **Certainty and Stability:** Establishing a CCO provides immediate certainty for our Council staff and Selwyn residents, allowing us to move past the period of uncertainty that has surrounded water services.
- **Futureproofing:** The CCO model is designed to be adaptable, future-proofing our water services for regional collaboration and increased efficiency in the future.

Next steps to progress with establishing a CCO

There is no prescribed timeline for Selwyn to establish a CCO for water services delivery. However, there are several factors that mean we would like to progress this option in the current financial year with a target establishment date for 'minimal viable product' structure of 1 July 2025 (subject to consultation):

- Under the legislation, Selwyn will need to deliver a Water Services Delivery Plan by September 2025. It is important that the CCO, who will ultimately deliver this

WSDP is able to input into and endorse the approach that is proposed in this plan.

- A new Water Services CCO can access the different borrowing levels via LGFA. We would like to ensure we have this option available to us as soon as possible, so we can look to smooth our funding costs over time with this finance. This may also provide borrowing headroom for Selwyn to invest further in other services.
- Our staff have faced significant disruption and uncertainty. Providing a clear pathway forward is important.

As there are several areas of detail needed in the WSDP's that will determine how the CCO needs to operate in the medium-long term, we propose to set the CCO up to mirror the current service and operational structures. This means that initially the CCO may have agreements in place with Council to provide services and systems. This approach minimises the level of risk, effort and cost to establish the CCO and means the CCO can make operating decisions in a timely manner.

Our focus over the period to entity establishment will be to ensure the right service agreements are in place and that there is no disruption to service levels. We will also focus on the governance arrangements for the entity to ensure the structure is fit for the future and delivers to the needs of our Selwyn community.

Development of the WSDP: The WSDP documents are substantive and require us to consider not only how we deliver water services now, but how we will look to deliver, fund and finance these in the future. To complete these plans, we will need to allocate resources which will require additional contractor/consultant support to ensure we have no loss of service during this process.

In the event there is a policy shift before consultation early next year, we will incorporate implications and any revised analysis into the consultation material. We are progressing with the CCO establishment on a 'no regrets' basis with the expectation that work will underpin future water services delivery and submission of the WSDP.

5. OPTIONS

Determining the best option for Selwyn is not straightforward, particularly given uncertainty around economic regulation, water financing prudential requirements, and where partnering arrangements between councils will ultimately land.

The analysis of options that was completed in advance of this paper, was based on LWDW legislation and policy guidance available as of 1 September 2024. Recent policy announcements that have been factored into the analysis include:

- Water Services Preliminary Arrangements Bill
- Guidance on Water Service Delivery Plans and financial sustainability metrics
- Policy announcement for water organisation financing mechanisms, including potential for LGFA lending to water organisations.

In addition, Selwyn explored the potential for joint water services delivery arrangements with other South Island councils. At the time of preparing this paper information has been received from Buller, Clutha, Central Otago, and Waitaki district councils, in addition to Selwyn's own Long-term Plan forecasts.

Longlist options

Five long list options were identified for Selwyn water services delivery under the LWDW legislation. These are outlined in the table below.

Table 2: Longlist options overview

Longlist options	
Option 1 - Council delivered services (baseline)	Water service delivery remains integrated into SDC operations, but water revenue and expenditure will be ring-fenced internally to comply with financial sustainability requirements and economic regulation.
Option 2 - Selwyn CCO	A Selwyn-only (100% owned) CCO is established, with ownership of two water assets transferred with stormwater being delivered internally by Council.
Option 3 - Joint CCO	Selwyn establishes / joins a joint CCO arrangement with multiple councils, and owns a portion of the CCOs on an agreed basis (e.g. value of assets or revenues contributed).
Option 4 - Consumer trust	Establish a trust to deliver water services. This includes both a 100% consumer trust owned entity or majority owned consumer trust (minority Council ownership).
Option 5 - Shared delivery model	Regional shared delivery model established.

Longlist options assessment

An initial analysis was completed on the longlist options and two options were discounted and not progressed for additional analysis:

Consumer Trust: this was discounted because, while operationally similar to establishing a new CCO (from a governance perspective), the financial structure would differ significantly. A trust would have to borrow independently from the Council(s), unlike a CCO where the Council provides financial support or guarantees. Consequently:

- A trust would not have access to the LWDW financing tools, including the ability to borrow from the LGFA at higher gearing than other council assets, which is crucial for funding the entity's required investment pathway.
- A trust would need to secure financing from alternative sources, such as banks and capital markets, which is typically more expensive and would likely necessitate an investment-grade credit rating.
- A trust model is more complex and costly to administer.

Shared Service Delivery Model: Akin to Wellington Water, this model assumes a shared services delivery model with assets retained by the Council. Given the lack of partnering opportunities in the region and the uncertainty of how this could achieve efficiencies, this model was discounted, noting it does not preclude shared services being part of an operating model within a CCO.

Shortlist options

Following the initial analysis, the shortlist options were further defined to allow for a more granular analysis.

Table 3: Shortlist option descriptions

Shortlist options	Description
Option 1 - Council delivered services (baseline)	Selwyn continues to deliver all water services for the district. Water service delivery remains integrated into council operations, but water revenue and expenditure will be ring-fenced internally to comply with financial sustainability requirements and economic regulation. Borrowing will be undertaken by the council (e.g. via LGFA in most cases) and allocated specifically to the relevant water service.
Option 2 - Selwyn CCO	A Selwyn-only (100% owned) CCO is established, with ownership of two water assets transferred with stormwater being delivered internally by Council. The entity's governance framework will set the parameters under which the CCO will operate, with direction from Council coming via the Statement of Expectations. The CCO would borrow directly from the LGFA, up to an indicative 500% debt-revenue limit. Selwyn would provide a financial guarantee to enable the CCO to borrow.
Option 3 - Joint CCO	Selwyn establishes / joins a joint CCO arrangement with multiple councils, and owns a portion of the CCOs on an agreed basis (e.g. value of assets or revenues contributed). The option progressed for analysis involves councils that have collaborated with Selwyn on a joint scenario so far, including Central Otago, Buller, Waitaki and Clutha.

Shortlist options assessment

The shortlist options were assessed based on governance, shareholding and financial sustainability objectives. Key evaluation criteria are included in the table below.

Table 4: Evaluation approach and criteria

Element	Key criteria	How to evaluate
Governance arrangements	- Selwyn can continue to influence water outcomes for the district (but not necessarily have full control). - Enable effective community and iwi participation and be highly responsive to local needs. - Enable Selwyn to have influence on any future changes to arrangements.	✓ or ✗
Shareholding structure	Ensure Selwyn's historical and planned investment in water infrastructure & services is fairly reflected in shareholding arrangements (economic shareholding).	

	Model provides structural longevity and adaptability.	
Risk	Understand and minimise implementation risk as part of any change in water service delivery arrangements.	Implementation risk and long-term risk. 
	Understand and minimise long-term risk associated with water delivery arrangements (e.g. disparity in pricing / service levels between districts, asset data quality of partner districts).	
Financial sustainability and affordability	- To deliver water services that are as financially affordable as possible for the Selwyn community. - Meets all financial sustainability requirements under LWDW legislation: Revenue sufficiency - is there sufficient revenue to cover costs (including servicing debt) of water services delivery? Investment sufficiency - is the projected level of investment sufficient to meet regulatory requirements and provide for growth? Financing sufficiency - are funding and financing arrangements sufficient to meet investment requirements?	- Commentary on likely water pricing impact. - Assessment of ability to meet financial sustainability requirements.

A summary of the shortlist options assessment is included in Table 5 below. Detailed option scoring and rationale is included in Appendix 2.

Table 5: Shortlist options assessment summary

		Option 1 - Council delivered services	Option 2 - Selwyn CCO	Option 3 - Joint CCO
Meets governance objectives		✓	✓	✓ Yes, but reduced influence
Meets shareholding requirements		May not provide longevity and adaptability.	✓	✓
Implementation risk profile				
Long-term risk profile				
Financial sustainability requirements	Revenue sufficiency	✓	✓	? Marginal at baseline price path, may require more revenue or efficiencies.
	Investment sufficiency	✓	✓	? Some uncertainty around partner council investment sufficiency.
	Financing sufficiency	? Will depend on the economic regulatory approach. Initial financial sustainability metrics show the model may require more revenue to be sustainable.	? Will depend on the economic regulatory approach. Initial financial sustainability metrics show it may have a price benefit in the medium term from financing and assuming operating model efficiency.	✗ Insufficient revenue at baseline price path, likely to require more revenue.
Pricing impact (vs current proposed price path)		Unlikely to lower the cost of water services over the long-term.	May provide lower pricing over the medium-long term with commercial focus on water services and long term financing.	The high level analysis showed financial sustainability was challenging in the absence of significant efficiencies or operating model changes. Other partnering combinations could result in a different outcome. Detailed operating model work would be required to validate this.
Credit rating considerations		Water services continue to be 'on balance sheet' for Selwyn.	Water services continue to be 'on balance sheet' for Selwyn.	Water services are likely to be a contingent liability for Selwyn. Potentially improves Council's credit position / headroom for other investments over time.

Recommended option: Selwyn CCO

We recommend a Selwyn owned CCO as the preferred water services delivery option. While there is the option of services remaining within core council as currently delivered, we feel the CCO offers the following benefits that cannot be obtained via the status quo delivery model:

- *Better access to funding tools and financing to support growth without undue rate hikes*
- *Improved water quality and services (in line with dedicated water CCO Board)*
- *Resilience in the face of growth (in line with dedicated water CCO Board)*
- *Greater certainty for our people and our community*
- *Futureproofing for regional collaboration*
- *Water assets and services are retained within the council family*

6. VIEWS OF THOSE AFFECTED / CONSULTATION

Views of those affected

Consultation on the proposed model expected early 2025 at which point the views of those affected / consulted will be understood. Alternative streamlined consultation requirements are specified in sections 61 to 64 of the WSPAA.

Māori implications

Te Taumutu Rūnanga representative McKay has actively participated in Council workshops to determine an appropriate response to the Government's Local Water Done Well legislation. She has also been appointed as a member of the newly established Local Water Done Well committee, which has the authority to oversee the establishment of the Council-Controlled Organisation (CCO). However, that does not negate the need to engage with mana whenua directly. We intend to engage with Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga to determine levels of engagement on this kaupapa moving forward.

7. FUNDING IMPLICATIONS

Estimated costs to establish the CCO, and submit the WSDP per legislation, up to \$2M. Level of costs in the following indicative estimate are variable depending on the level of activities that can be completed by the CCO, at their own costs, after establishment.

Cost breakdown	Estimate
Costs for to develop the WSDP, CCO principles and preliminary operating model, establishment programme management (including temporary programme director)	\$900k - \$1.3M
Direct legal, tax and compliance costs for establishment	\$200k - \$500k
New CCO costs including the CCO Board and Chief Executive costs, any legal or wider advice	\$100k - \$200k

These costs would be treated as a long-term internal loan between SDC and the CCO.

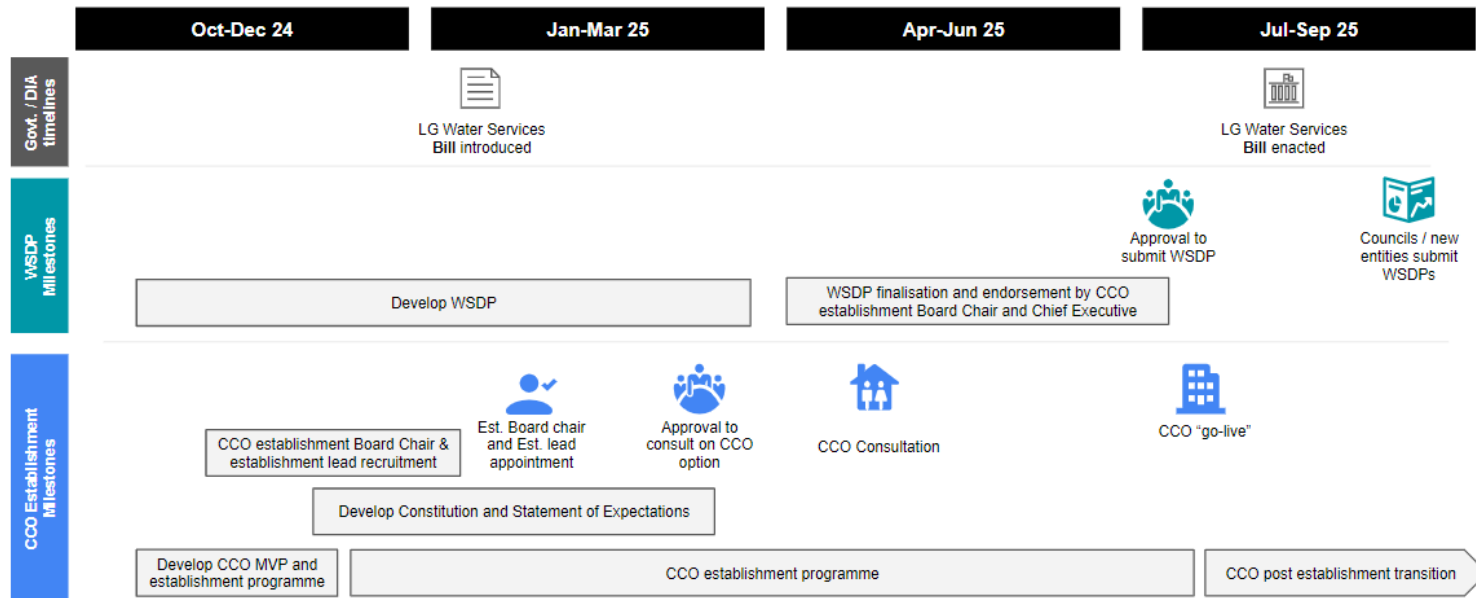
A handwritten signature in blue ink, appearing to be 'Tim Mason', with a long, sweeping horizontal stroke at the end.

Tim Mason
EXECUTIVE DIRECTOR INFRASTRUCTURE AND PROPERTY

A handwritten signature in black ink, appearing to be 'Allison Sneddon', with a stylized, cursive script.

Allison Sneddon
CHIEF FINANCIAL OFFICER

APPENDIX 1: LWDW AND SELWYN CCO ESTABLISHMENT INDICATIVE TIMELINE



APPENDIX 2: SHORTLIST OPTIONS ASSESSMENT AND RATIONALE**Option 1 - Council delivered services (baseline)**

Objective		Rationale
Governance 		- Water services are delivered by an internal business unit / division which is directly accountable to elected members, and subject to Council's governance oversight and monitoring processes. - Selwyn prepares the district's water services strategy, and continues to have control of water decision making within regulatory parameters and economic regulation requirements (reduced flexibility relative to the status quo). - Selwyn has autonomy around future changes to the district's water services arrangements such as forming or joining a CCO.
Shareholding 		- Selwyn continues to directly own the district's water assets, reflecting the communities historical investment in infrastructure. - Structure provides limited adaptability and does not easily enable Selwyn to enter a joint water services arrangements in the future, or have full control of shareholding terms if joining a CCO in the future.
Implementation risk profile 		- Low risk associated with implementation as there is no requirement to integrate with other districts or make organisational changes. - However, this option may require changes to internal operations and processes to support economic regulation, and demonstrate that water related costs and revenues are ring-fenced.
Long term risk profile 		- Water services would not specifically be set up to enable integration with other districts in the future. - Low flexibility to provide for future investment and less opportunity to deliver more efficient water services in the future (relative to a CCO). - Selwyn would need to implement any future changes to regulatory standards rather than sharing compliance requirements across a wider service area, and respond to potential events using its balance sheet (e.g. severe weather / climate change related).
Financial sustainability requirements	Revenue sufficiency 	Council has sufficient operating cash relative to operating costs; therefore, we expect it is likely to meet the revenue sufficiency test.
	Investment sufficiency 	Over the 10-year LTP period Selwyn is planning significantly more investment than the current rate of asset depreciation, reflecting the significant growth and improvements to level of service planned over the period. This results in an asset investment ratio of well over 100%.

	Financing sufficiency ?	- The Council (including water services) meets the financing sufficiency test under the current and new LGFA covenant threshold, indicating Selwyn is generating sufficient revenue from its assets to cover debt obligations during the LTP. - The preliminary cash flow / leverage assessment indicates that water services are operating at a "highly leveraged" risk profile until it stabilises in FY34. We are uncertain whether this will meet financial sufficiency requirements; despite the Council's overall financial position being sufficient, there may be an immediate need to increase revenue to reduce leverage and achieve a lower-risk position by 2028 when financial sustainability must be met.
Pricing impact		Unlikely to lower the cost of water services over the long-term.
Credit rating considerations		- Given water services will be delivered within Council, the debt will be treated as part of council's tax-supported debt by S&P ("on balance sheet"). - We expect S&P will continue to assess water services using the Local Government Methodology.

Option 2 - Selwyn CCO

Objective	Rationale
Governance 	- Board appointments will be competency-based. Current council staff and elected members cannot be appointed to boards. - The board and management has autonomy for operational and financial decision-making, including setting the price path. - The development of a governance framework will support Board approval of key documents (SoE, Asset Management Plan, Funding Plan). - CCO will act consistently with local authority land use, growth and development plans and strategies. - The CCO will have a direct relationship with customers. Provisions will be in place to ensure that consumer voice is heard through consumer panel and/or advocacy council, disputes resolution process, consultation requirements.
Shareholding 	- The Council will own 100% of shares in CCO, with the CCO owning the water assets. Stormwater will continue to be delivered by Selwyn, with the option to transfer to the CCO at a future date. - Local authorities will hold shares in the CCO, but these shares will have limited voting rights, primarily restricted to decisions on privatisation and merger proposals. - Council's influence in the governance of the CCO is via the Statement of Expectations and the LTP requirements.

Implementation risk profile 		• We estimate the initial legal and establishment costs of this option to be between \$500k and \$1m. • The CCO can utilise and build upon existing Council processes. However, forming a new company will require additional resourcing, time, and costs to determine staffing changes, establish new resourcing models, and execute setup tasks (e.g. SLAs for the initial period).
Long term risk profile 		• Flexibility to provide for future investment and / or commercial opportunities. • Ringfenced and separate operations from a regulatory and risk perspective. • The structure and governance enables more districts to join the CCO in the future (subject to council approvals).
Financial sustainability requirements	Revenue sufficiency 	• Similar to the baseline Council delivered services scenario, both the Council and the CCO present a positive operating cash ratio, which grows over the LTP period. • The CCO has forecast sufficient cash generated from operations to cover its operating cash expenses.
	Investment sufficiency 	• Over the 10-year LTP period Selwyn is planning significantly more investment than the current rate of asset depreciation, reflecting the significant growth and improvements to level of service planned over the period. This results in an asset investment ratio of well over 100%.
	Financing sufficiency 	• The impact of forming a separate CCO is that water and wastewater services need to borrow within the LGFA covenant threshold for water organisations and be financially sustainable. These two waters are the most highly geared of the water services. As a result of this higher leverage, our analysis suggests this option will likely require a price increase for the CCO to be covenant compliant and continue to borrow from the LGFA.
Pricing impact		• May provide lower pricing over the medium-long term with commercial focus on water services and long term financing.
Credit rating considerations		• Selwyn will be 100% shareholder of the CCO, therefore credit rating agencies will view the Council as having a high level of control over the CCO as well as a moral obligation to intervene should the CCO need financial support. • The Selwyn CCO will be treated as part of council's tax-supported debt or "on balance sheet" by credit rating agencies.

Option 3 - Joint CCO

Objective	Rationale

Governance 		- Selwyn appoints one position on the CCO board, and has [20%] of voting rights. - Selwyn is able to continue to plan and consult publicly through the LTP process, noting that an iterative planning approach is likely to be needed between councils and the CCO to ensure LTPs reflect the balance of strategic / investment priorities. - The Council continues to set strategic priorities for the district. - Selwyn can influence pricing through its planning processes; however, pricing would ultimately be driven by investment requirements for the district as well as measures set out by the economic regulator. - Levels of service could potentially be influenced by the Council; however, there may be benefits or requirements for the CCO to standardise levels of service between districts over time.
Shareholding (if optimised) 		- Council's water assets would be transferred to, and owned by, the CCO, with each council holding economic shares. Each Council's shareholding would be based on an agreed shareholding basis, such as net assets contributed, population, or equal shareholding.. - The shareholding structure will enable additional districts to join the CCO in the future (subject to council approvals). - Stormwater continues to be delivered by Selwyn, with the option to transfer to the CCO at a future date.
Implementation risk profile 		- We estimate the initial legal and establishment costs of this option to be between \$500k and \$1m. - The CCO can utilise and build upon existing processes. However, forming a new company will require additional resourcing, time, and costs to determine staffing changes, establish new resourcing models, and execute setup tasks (e.g. SLAs for the initial period). Additionally, a joint company will bring higher risks in aligning resourcing and processes across multiple districts.
Long term risk profile 		- The structure and governance of the CCO can be set up to enable more districts to join the CCO in the future, subject to council approvals. Geographic expansion of the service area has the potential to enhance future investment and commercial opportunities. - However, the benefits of partnering depend heavily on the assets and performance of the shareholding councils. Non-contiguous arrangements carry higher risks due to the added complexity of cost-sharing between communities. This can influence the extent to which economic efficiencies can be realised and affect the ability to achieve price harmonisation and cross-subsidisation.
Financial sustainability requirements	Revenue sufficiency ?	- The outcome for the Council is the same as the Selwyn CCO, with a small deterioration in the operating cash ratio when excluding two waters from Council. - The joint CCO's operating balance deteriorates over the forecast period compared to the Selwyn CCO. However the entity's forecast operating cash ratio position remains positive and steadily improves to FY34.
	Investment sufficiency ?	There is uncertainty around partner council investment sufficiency.
	Financing X	Based on a grouping of councils that have provided data so far (Selwyn, Central Otago, Buller, Waitaki and

	sufficiency	Clutha), excluding Selwyn stormwater, the joint CCO will not meet financial sustainability requirements under baseline assumptions.
Pricing impact		The high level analysis showed financial sustainability was challenging in the absence of significant efficiencies or operating model changes. Other partnering combinations could result in a different outcome. Detailed operating model work would be required to validate this.
Credit rating considerations		CCO debt would likely be treated as a contingent liability of councils by S&P, but not impinge on councils' credit quality until it becomes significant. Policy, commercial and financial structuring decisions will be considered holistically, as collectively they will affect how control is viewed and balance sheet impacts recognised.

PUBLIC REPORT

TO: Chief Executive Officer
FOR: Local Water Done Well Subcommittee
FROM: Tim Harris, Executive Director Strategy and Engagement
DATE: 7 February 2025
SUBJECT: CCO CONSULTATION

RECOMMENDATION

‘That the Local Water Done Well Subcommittee recommend that Council:

- *Adopt the draft Consultation Document (**Appendix 1**).*
- *Authorise the Chief Executive Officer to make any necessary minor changes to the Consultation Document prior to its release for consultation.*
- *Endorse the proposed process for public consultation to take place between 20 February 2025 and 12 March 2025, with hearing of submissions on 20 March 2025.*

1. PURPOSE

The purpose of this report is to enable the Subcommittee to recommend that the Council adopt a Consultation Document for the consultation process for establishment of a water services Council Controlled Organisation (CCO) in the Selwyn District.

2. HISTORY/BACKGROUND

Refer [Council Agenda – 13 November 2024](#), Item 14. On 13 November 2024 the Council resolved to:¹

- progress preliminary steps toward establishment of a Council Controlled Organisation for water services with an expectation to consult on this model in 2025; and
- delegate oversight of the consultation process to this Committee.

The recommendations in this report form part of this Subcommittee’s terms of reference:

- to understand and distil legislation – for the purposes of this report, the legislative requirements for consultation on the proposed model;
- to ensure communities, iwi/hapū, and businesses affected by the change in the way water services are managed, are fully involved in the process; and
- to keep the governing body fully informed about service delivery and management options being considered.

¹ Resolution ID 20241211_011.

The Council retains the authority for final approval of the Consultation Document and consultation process.

Legislative context

The Local Government (Water Services Preliminary Arrangements) Act 2024 (**Act**) provides for streamlined consultation processes for the consultation on whether or not to establish a water services council-controlled organisation (**CCO**).²

The streamlined consultation process includes that:³

- a decision need only be consulted on once;
- if consultation occurs on whether or not to establish a CCO, the Council may (but is not required to) consult further before adopting its water services delivery plan;
- additional consultation is not required for long-term plan amendments that may be necessary to give effect to a decision on whether or not to establish a CCO.

The Consultation Document must contain:⁴

- the proposal, an explanation of the proposal, and the reasons for the proposal;
- an analysis of the reasonable options for the Council, in this case being the status quo or establishing a CCO;
- the effect of the proposal and the status quo on the Council's rates, debt, and levels of service, and charges for water services;
- the accounting and monitoring arrangements by the Council over the assets transferred to the CCO;
- any other relevant implications of the proposal that the Council considers will be of interest to the public.

Consultation Document

The draft Consultation Document is **Appendix 1**.

A summary of the proposal in table form is set out at page 5 of the Consultation Document – this compares the status quo with the proposal. The detail of the options, including all information required by the Act is set out in pages 8 to 14.

Consultation Process

The high-level timeframes for the consultation process are:

- 20 February 2025 – Public consultation period starts
- 12 March 2025 – Consultation closes
- 20 March 2025 – Council hearing of submissions
- 26 March 2025 – Deliberations to amend proposal based on feedback
- 2 April 2025 – Council meeting to make final decision

² Act, section 64(1)(a)(i).

³ Act, sections 62 and 63.

⁴ Act, section 64(2).

Staff will ensure that consultation requirements are met, and external and internal engagement is achieved in this process.

3. OPTIONS/RECOMMENDATIONS

Option 1 (Recommended)	Recommend that the Council approve the proposed Consultation Document in Appendix 1 and endorses the proposed consultation process in Appendix 2.
Option 2	Recommend amendments to the Consultation Document and/or consultation process for consideration by the Council. Staff are available to advise on any proposed amendments to the draft documents.
Option 3	This Subcommittee could delay adoption of a Consultation Document and endorsement of a consultation process to obtain further information from staff. This is not recommended due to the tight timeframes for the decision whether or not to establish a CCO.

4. SIGNIFICANCE ASSESSMENT/COMPLIANCE STATEMENT

The decisions and matters of this specific report are assessed as of low significance in accordance with the Council's Significance and Engagement Policy. However, this report is part of a broader process that is assessed as of high significance.

5. VIEWS OF THOSE AFFECTED / CONSULTATION

(a) Views of those affected and Consultation

Views of those affected to be obtained through the proposed consultation process.

(b) Māori and Treaty implications

The decision whether to establish a CCO is a significant decision in relation to bodies of water, and therefore the Council must take into account the relationship of Māori and their culture and traditions with water.

The proposed consultation process includes direct engagement with takata whenua through Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga.

(c) Resiliency and Sustainability considerations

Substantive consideration of resilience and sustainability consideration will occur as part of the Council's decision whether to establish a CCO.

6. FUNDING IMPLICATIONS

Funding of the consultation process is being coded to the project and managed internally.

Funding implications of the decision whether to establish a CCO are set out in the Consultation Document.

7. LEGAL/POLICY IMPLICATIONS

This Report and the draft Consultation Document have been reviewed for legal and policy compliance.



Tim Harris
EXECUTIVE DIRECTOR STRATEGY AND ENGAGEMENT

Endorsed For Agenda



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Setting the Scene

In September 2024, the first substantive piece of legislation supporting the Government's Local Water Done Well policy was enacted. The Local Water Done Well policy is aimed at addressing New Zealand's water infrastructure challenges and places emphasis on achieving financial sustainability, appropriate regulation of water services, and ensuring flexibility for communities and councils in determining how their water services will be delivered.

The **Local Government (Water Services Preliminary Arrangements) Act 2024 (the Act)** sets out several transitional provisions, including a requirement for Selwyn District Council (Council) and all other territorial authorities to prepare and submit a Water Services Delivery Plan (WSDP) to the Government.

A WSDP is required to describe the current state of Council's water assets and services, and also describe the future arrangements for delivery of water services. A further piece of legislation, the Local Government (Water Services) Bill is currently before parliament, and will (once enacted) provide a structured framework for managing and delivering water services in New Zealand.

The Bill is progressing on a separate timeline and will apply to Council's future water arrangements in time.

The Act requires all councils to consider the arrangements for the future delivery of three of the water services that Council currently manages.

These are:



1. **Drinking Water:** Ensuring the provision of safe and reliable drinking water to communities.

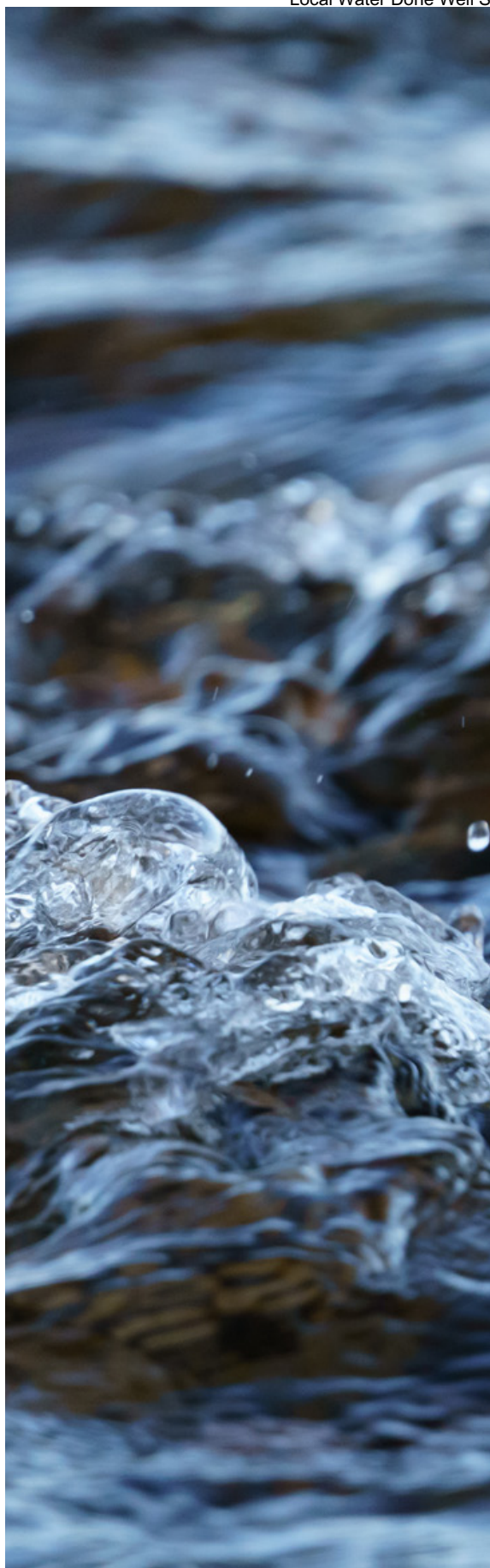


2. **Wastewater:** Managing the collection, treatment, and disposal of wastewater to protect public health and the environment.



3. **Stormwater:** Handling stormwater drainage to reduce flood risk and manage runoff in urban areas.





Following the introduction of the Act, and the requirement to consult on future delivery arrangements, Councillors decided, in November 2024, to start investigations into setting up a new Water Services Council Controlled Organisation (WSCCO).

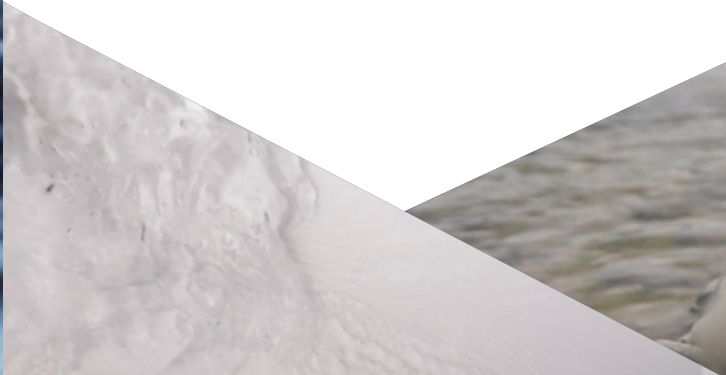
This document addresses the arrangements for stormwater, drinking water, and wastewater services within the Selwyn District Council.

By requiring WSDPs, and consultation on water service delivery arrangements, the Act provides an opportunity to revisit Council's current arrangements and provides an opportunity to consider whether a WSCCO will be preferable means of providing sustainable and efficient water service delivery, addressing challenges and laying the foundation for future improvement.

Stormwater, which is the Act for consideration, however, Council has decided not to consult on changes to its delivery. Many stormwater assets deliver multiple outcomes for the community including water quality and quantity, recreation amenity, ecology and cultural values, keeping an ability to take a multi values approach is critical. Further to this there are a lot of benefits of interconnections of stormwater management with other Council activities including roading, meaning we can take a catchment based approach to managing surface water. For these reasons the Council's proposal is that stormwater management and delivery is kept in house.

The Act and this proposal do not discuss arrangements for water races or land drainage. These services will continue to be delivered by Council, but could be reconsidered in the future.

DRAFT



The Act requires us to consult the community on maintaining services in-house, and at least one other model including a CCO, or a joint local government arrangement.

Council is asking you to give your thoughts on whether you support this proposal to establish a WSCCO for the management and delivery of drinking and wastewater, and to keep stormwater in house.

If the decision is made by Council to set up a WSCCO then information will be worked through to establish an operating model to support operations from 1 July 2025.

The Council believes this proposal will build on the great work already done by the Selwyn District Council to create strong, resilient, sustainable and reliable water services and provide certainty for our communities on the provision of water services. The proposal also creates an inter-generational framework in line with **Waikirikiri Ki Tua Future Selwyn**.

	Drinking Water	Wastewater	Stormwater	Water Race	Land Drainage
Existing arrangements	In-house, by Council	In-house, by Council	In-house, by Council	In-house, by Council	In-house, by Council
Our Proposal	Transfer to new WSCCO	Transfer to new WSCCO	No change, in-house by Council	No change, not subject to consultation	No change, not subject to consultation



Water in Waikirikiri Selwyn

In the year to 30 June 2024, Selwyn District Council:



Provided drinking water to

81%

of residential properties

Supplied **9.31**
million cubic metres of
water to households

..... THAT'S



3,124
Olympic size
pools

Provided wastewater to

68%

of residential properties



Treated **4.34**
million cubic metres of wastewater

..... THAT'S



1,736
Olympic size pools

The Council also
maintained...

1,549 km
of water network

693 km
of wastewater network

128 km
of stormwater pipes

1,572 km
of water race channels

372 km
of land drainage drains

Drinking Water Infrastructure



26

Drinking water schemes

- 36 Treatment plants
- 93 Reservoirs
- 17 Groundwater Supplies
- 9 Surface Water Supplies
- 27 Years (average age of asset)

Wastewater Infrastructure



16

Wastewater Schemes

- 7 Treatment Plants
- 63 Pump Stations
- 14 Years (average age of asset)

The Council currently manages water services through a combination of house calls and external contractors. It is responsible for delivering safe, reliable, and sustainable infrastructure and services for our communities.

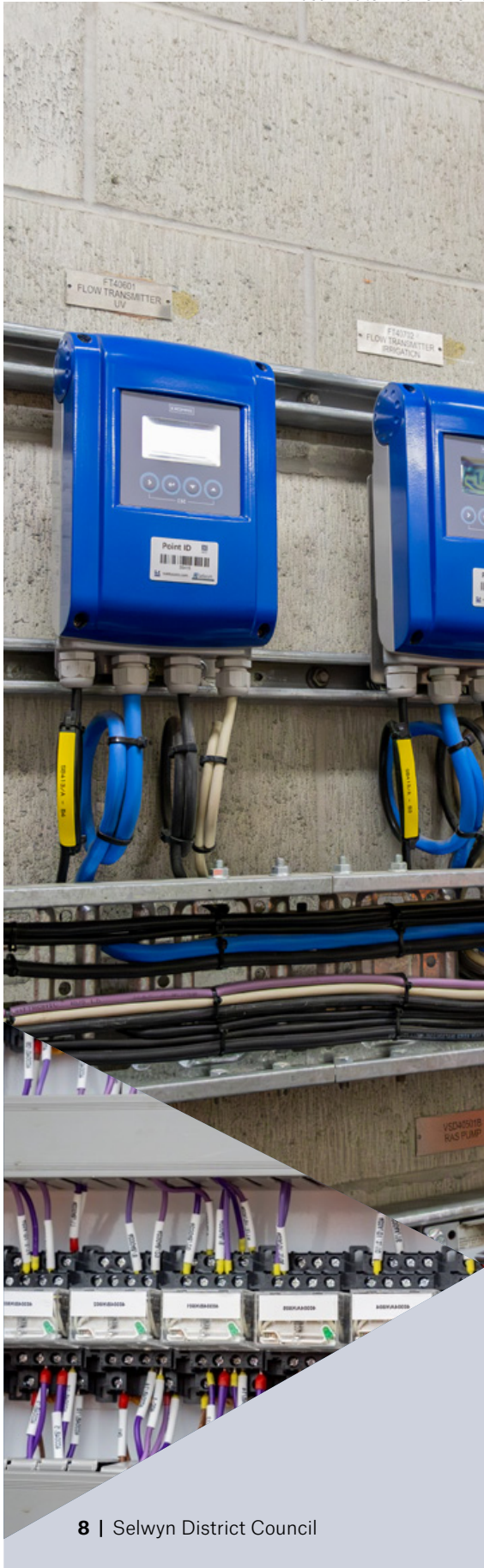
81% of residential properties in Waikirikiri Selwyn are serviced with water across 26 water supply schemes, and 68% of residential properties are serviced by the Council's wastewater systems. Selwyn residents are high users of water, using an average of 335 litres of water per person a day in the 2023/24 year.

The Council spends approximately \$95 million annually on water services.

All Council supplies are metered and properties pay by use. This is funded through charging a targeted rate for water services, depending on the type of property and its need. Residential, commercial, rural and urban properties are charged differently.

Wastewater carries an annual charge for residential users, and industry users have a separate rate. High users operate under individual trade waste agreements. Drinking water is charged at a base rate, with a volumetric metered charge for urban supply and a per unit rate for rural properties. Stormwater is charged at an annual rate for properties within Waikirikiri Selwyn townships.

The projected costs for maintaining the current water services model for drinking and wastewater are \$857 million over years 2-10 of the Long-Term Plan 2024-2034. The existing local government rating system and financial/lending constraints applying to Council means that there is limited ability to access borrowing to invest in new infrastructure. In particular, the Council is limited to borrowing up to 280% of its revenue.



Delivery Model Options

The Local Government (Water Services Preliminary Arrangements) Act 2024 (the Act) allows Territorial Authorities (TAs) to explore and establish new delivery models. The options for this include:

- Joint Local Government arrangements
- A Water Services Council Controlled Organisation (WSCCO)
- Consumer Trusts
- Continue to deliver water services in-house.

Our **Waiora One Water Strategy** has agreed to uphold the management of all water in decision making and to work in partnership to sustainably manage water now and into the future.

The partnership approach will remain with both delivery options being considered.

Council is consulting on the following two options:

1. Set up a WSCCO to deliver wastewater and drinking water. Continue to deliver stormwater in-house.

2. Deliver water services in-house.

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

A New Council Controlled Organisation - Proposal Model

After careful consideration, Council is proposing a new Water Services Council Controlled Organisation (WSCCO) as our delivery model for drinking water and wastewater services, with stormwater services to be delivered by an internal business unit of Council.

A WSCCO is a Council-controlled organisation specifically established to manage and deliver water services. This model will allow Council to leverage more specialised governance, enhancing the efficiency and effectiveness of water service delivery.

The WSCCO would be owned locally but would operate independently from Council with its own specialist board structure and management. Council would be the only shareholder, and its board would include members appointed based on competencies consistent with the needs of the new organisation, and specific to water governance.

The WSCCO would be responsible for planning, funding, building and maintaining drinking and wastewater infrastructure, as well as running the day-to-day customer-facing services for those water services. Ownership of drinking water and wastewater assets (and all associated debt and liabilities) would transfer to the WSCCO. As these assets are strategic assets of Council, the transfer will need to be provided for in the Council's Long-Term Plan. The transfer of these strategic water assets would be provided for in a Long-Term Plan amendment. In accordance with The Act, this consultation will cover this requirement.

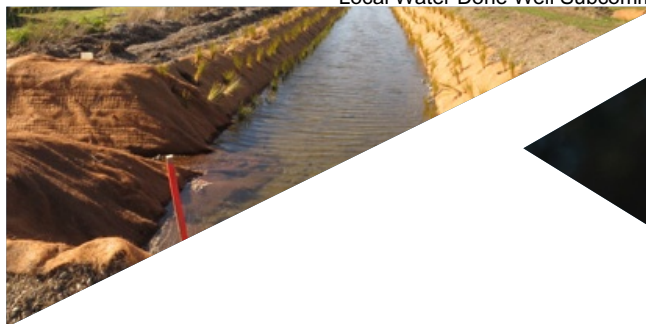
The WSCCO would start from a strong platform to enhance the comprehensive investment, construction and future planning by Council's water services team over recent years for strong, resilient, sustainable and reliable infrastructure and water service delivery. If this option is chosen then information will be worked through to establish an operating model to support operations from 1 July 2025.

The Council believes that the proposal will provide certainty for our communities as well as create an inter-generational framework in line with **Waikirikiri Ki Tua Future Selwyn**.

Benefits

A WSCCO offers benefits such as:

- **Enhanced Service Delivery:**
A WSCCO will have a sole focus on improving water quality and service reliability, which would deliver better customer service.
- **Dedicated Water Governance:**
A WSCCO streamlines operations and over time will improve costs through specialised drinking and wastewater governance and management, leading to better resource allocation and improved service delivery. It also offers a specific focus on water services.
- **Improved Access to Funding:**
A WSCCO has greater borrowing capacity and access to funding specific to water, supporting necessary infrastructure upgrades and expansions, ensuring long-term financial stability. Improved access to funding ensures that the WSCCO can upgrade water and wastewater systems to meet increasing levels of service.
- **Resilience and Adaptability:**
A WSCCO is adaptable and scalable, effectively responding to changing demands and future challenges specific to the delivery of water services, such as rapid population growth and evolving regulatory requirements. This would help ensure our water infrastructure can manage increased growth.
- **Community Benefits:** A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.



Risks

As well as the benefits noted, there are several risks associated with this model, including:

- **Initial Setup:** Establishing a WSCCO requires significant initial effort and coordination, including legal, financial, and operational setup. This process can be complex and involves increased investment at setup.

Setup considerations

In setting up a WSCCO there are some requirements outlined by the Act, which include ensuring the following requirements are met:

- **Governance Structure:** Under this option the Council and the community would agree the high-level expectations on the way and performance of the WSCCO, set out through a Statement of Expectations. These expectations should include the Council's commitment to ongoing partnership with the community when it comes to water and wastewater services.
- **Accountability Mechanisms:** When setting up the WSCCO, the Council would develop accountability measures and monitoring arrangements for performance of the assets it transfers to the WSCCO. These will be set out across the Statement of Expectations, the Constitution and Water Strategy. The WSCCO's Annual Report will be a key document for monitoring performance. If adopted, the WSCCO would be established and included in the Council's WSDP, which is due to be adopted in early September 2025.

What is the impact on rates and council debt?

You would no longer pay for drinking water and wastewater through your rates. Those connected to services would pay these charges directly to the WSCCO.

Water infrastructure can last 50 years or more so it makes sense to use debt to share this cost over the lives of those who are here now and those still to come. Councils are currently constrained and can only borrow up to 280% of their revenue. This limits investment options.

The new Local Water Done Well policy allows Council to borrow up to 500% of their total revenue, excluding development contributions and vested assets, to fund their water infrastructure investment.

Borrowing up to 500% of the WSCCO's revenue including the additional operating cost is modelled to have an approximate increase of 12% on top of the 2024/2034 Long-Term Plan. There will be a partial offset saving, in general rates charges.

You will still have to pay to receive water services through a water charge as you currently do, but this would be determined by the WSCCO.

**These projected costs are based on the information available at the current time. Future costs may change as the rate of population growth, actual contract rates and other costs are known.*

Council Delivered Services

Under the Act, Territorial Authorities (TAs) can continue managing and delivering water services directly. This involves preparing and adopting a Water Services Delivery Plan (WSDP) that outlines how they will sustain their existing water services infrastructure and operations.

Under the Council delivered model, Council would continue to partner with mana whenua on the direction and delivery of water services on behalf of the community.

Benefits

Maintaining water services in-house offers benefits such as:

- **Political Influence and Control:** Enables the Council to maintain full control over decision-making processes, ensuring decisions are made with an understanding of local needs and priorities. Residents can engage with their elected representatives about water service issues.
- **Familiarity and Continuity:** The Council can continue using existing systems and processes, which staff and management are already familiar with, reducing the need for extensive training and transition periods.

Risks

In addition to the benefits noted above, there are several risks associated with this model, including:

- **Limited Funding Capacity:** The Council may struggle to secure sufficient funding for necessary infrastructure upgrades and maintenance, leading to deferred projects and potential service degradation. Limited borrowing capacity can restrict the Council's ability to finance large-scale improvements, resulting in higher long-term costs. To date, Council has funded the required upgrades for water and wastewater. In the future, funding priorities may change with department capacity allocated to other activities like transportation or facilities, rather than drinking water or wastewater.

- **Operational Costs:** Any deferred investment in our assets to manage debt levels could increase operational costs. Unexpected repairs or emergencies can strain the Council's financial resources, leading to budget reallocations or increased rates.
- **Regulatory Compliance:** Ensuring compliance with evolving regulatory standards can be challenging, but Council currently has a good level of compliance. Maintaining rigorous monitoring and reporting systems to meet regulatory requirements can be resource-intensive and complex and is set to increase.
- **Infrastructure and Service Delivery:** In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model may struggle to scale effectively to meet the ever-increasing demand on our district's assets, impacting service reliability and quality.
- **Political interference leading to leaky pipes:** The country has a \$200 billion deficit in water funding in the next 30 years. Much of this is because of political leaders delaying investment over the past 30 years.
- **Lack of clear strategy:** Minor projects have time and resource allocated that would otherwise be spent on strategic investment.
- **Competing funding:** Water is only one factor in the Council decision making and investment. Water priorities can lose out to transport or solid waste investment.

Comparing the Two Options

Impacts on Services

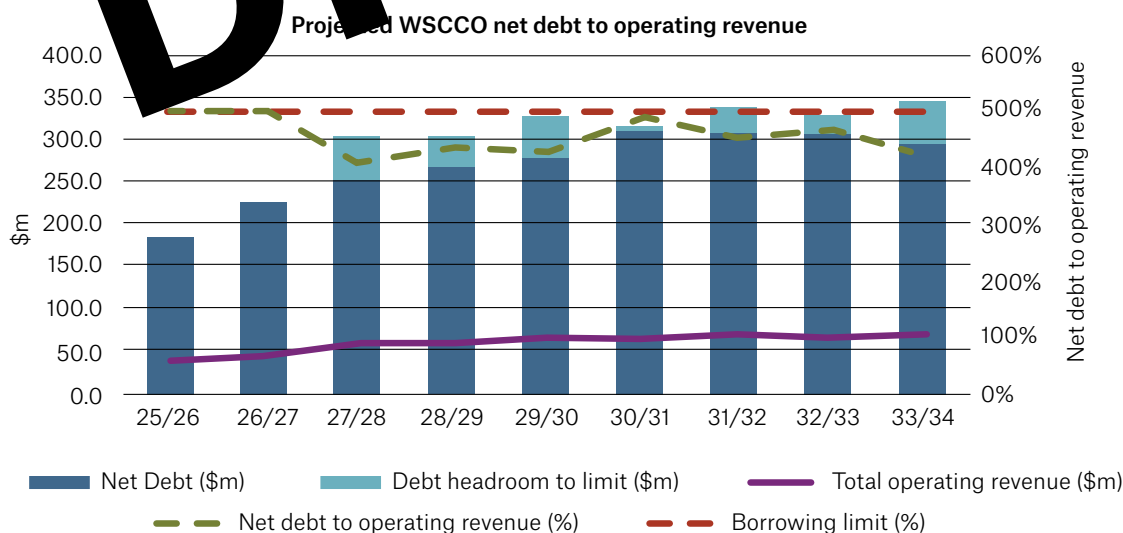
Performance requirements are set by national regulations. The Council does not foresee an immediate difference in service delivery between the two models. Impacts on service delivery when comparing the two models come down to the expertise and focus of having a dedicated WSCCO and associated water specific governance, compared to priorities being set by elected members across a broader scope of activity.

Impacts on Charges

If water services were to remain within the Council, there is no guarantee that the costs or service would not change. Whatever model is considered there will be baseline costs changes related to a more highly regulated environment. This will impact both models, meaning the current delivery costs are unlikely to remain as stated in the Long-Term Plan 2024-2034: The operating model for the WSCCO will be developed within the establishment process, and this will change the level of costs associated as we learn more. While there would be additional cost due to establishment setup, the WSCCO would have access to higher debt limits (500%) under the Act, which would be scalable over time. This isn't an option for the in-house model.

The average increase in Targeted Rates in the current Long-Term Plan 2024-2034 over the 10-year period is 11%, moving to a Council Controlled Organisation would mean you no longer pay anything to Council for drinking or wastewater. Your rates bill will reduce by those water charges. We estimate that the new WSCCO will charge you the same costs as today and rise 23% over the next 10 years. The General Rate will be lower than predicted in the Long-Term Plan, due to the Council receiving overhead revenue from the proposed changes in the WSCCO.

The chart below shows our net debt to operating revenue over the lifespan of the Long-Term Plan.



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.

Impact on Rates and Council Debt?

A WSCCO would have a dedicated board made up of members who have specific expertise in water, focused on the delivery of drinking and wastewater services for Waikirikiri Selwyn, which should result in better service delivery and resource allocation.

The following information demonstrates potential rating impacts across different scenarios in Waikirikiri Selwyn. This modelling only considers drinking and wastewater, as stormwater delivery will be maintained by Council for both options.

The increase shown is the difference between the current Long-Term Plan modelling, and the preliminary

WSCCO calculations. The in-house model would likely see increased rating compared to the Long-Term Plan modelling given the Local Government Water Services Bill is expected to increase regulation and therefore compliance cost.

This modelling shows that there is a rates increase with moving to the proposed WSCCO in the first three years. From year 10 the drinking and wastewater rates are predicted to be lower than what is in the published Long-Term Plan 2024-2034.

This is broken down into the following funding impact statement below.

Stormwater Funding Impact Statement (Excluding Water supply and Sewerage)*

	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	3,437	3,960	4,438	6,864
Total application of operating funding (B)	3,268	3,511	3,655	5,076
Surplus / (deficit) of operating funding (A-B)	169	446	783	1,788
Total sources of capital funding (C)	1,401	3,343	2,483	1,878
Total applications of capital funding (D)	1,570	3,791	3,266	3,666
Surplus / (deficit) of capital funding (C-D)	(169)	(446)	(783)	(1,788)

*Retained by Council

This table reflects our current Long-Term Plan position for service costs noted. Based on the changes in legislation and the intention of the council to change how water is delivered to the community.

Drinking Water and Sewerage Funding Impact Statement (excluding Stormwater)

	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	34,010	40,007	45,577	74,929
Total application of operating funding (B)	29,203	31,588	34,007	47,355
Surplus / (deficit) of operating funding (A-B)	4,807	8,419	11,570	27,574
Total sources of capital funding (C)	65,510	57,399	51,726	(3,612)
Total applications of capital funding (D)	70,317	65,818	63,296	23,962
Surplus / (deficit) of capital funding (C-D)	(4,807)	(8,419)	(11,570)	(27,574)

This table outlines the projected costs for the delivery of water through a WSCCO. Years 1-3 show an increase in charging, over time this cost reduces as we reflect the efficiencies in service.

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

	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	37,233	45,452	61,286	69,060
Total application of operating funding (B)	33,355	36,581	39,309	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	65,872	63,591	24,017
Surplus / (deficit) of capital funding (C-D)	(3,878)	(8,871)	(21,977)	(19,923)

Based on the anticipated changes in legislation.

Rating Examples

Summary Rates	2025/2026	2026/2027	2027/2028	2033/2034
Example: Urban Residential Property with Sewerage				
LTP Water Bill ¹	\$1,552	\$1,769	\$1,948	\$2,730
WSCCO Water Bill ²	\$1,700	\$2,018	\$2,635	\$2,668
Comparison	\$148	\$248	\$687	-\$62
% Increase LTP to WSCCO	10%	14%	35%	-2%
Example: Urban Residential Property without Sewerage				
LTP Water Bill	\$745	\$841	\$955	\$1,392
WSCCO Water Bill	\$808	\$965	\$1,287	\$1,307
Comparison	\$63	\$124	\$332	-\$85
% Increase LTP to WSCCO	9%	15%	35%	-6%
Example: A Property on Restricted Water Supply with Sewerage				
LTP Water Bill	\$1,579	\$1,805	\$1,993	\$2,808
WSCCO Water Bill	\$1,729	\$2,056	\$2,689	\$2,722
Comparison	\$150	\$251	\$696	-\$86
% Increase LTP to WSCCO	9%	14%	35%	-3%
Example: A Property on Restricted Water Supply without Sewerage				
LTP Rates Bill	\$772	\$877	\$1,000	\$1,470
WSCCO Rates Bill	\$837	\$1,003	\$1,341	\$1,361
Comparison	\$65	\$126	\$341	-\$109
% Increase LTP to WSCCO	8%	14%	34%	-7%

Overall, the Council anticipates a partial offset reduction in the General Rates charges.

- Stormwater has not been allowed for in these figures, as it will remain in-house at Council.
- These figures related to the WSCCO are higher due to anticipated setup costs, but as demonstrated here over the Long-Term Plan period, the modelling shows improved charges.

¹ Long-Term Plan Water Bill (what you pay for water from 2024-2034 as part of your rates).

² Estimated cost you would pay under the WSCCO over the Long-Term Plan period to 2034.

Have Your Say

Let us know:

- If you support the Council's proposal to transition our drinking water and wastewater assets and services to a new WSCCO, with stormwater remaining with Council.
- Or, if you prefer that the Council continues its current water delivery model, noting the new legislation will require some changes.
- If you have any questions or comments on the WSCCO model or anything else contained in this consultation document.

How do I provide feedback?

You can provide your feedback on this consultation by:

- Visiting selwyn.govt.nz/localwater on your computer or mobile device and answering the questions on the submission form.
- Completing the submission form on the back of this document and dropping it off with our Customer Service Teams at:
 - Council Rolleston Offices, 2 Nelson Kirk Drive, Rolleston
 - Te Anau area, 56 Myson Street, Rolleston
 - Darfield area, 1 South Terrace, Darfield
 - Leeston Library, 19 Messines Street, Leeston
 - Lincoln Library, 22 Gerald Street, Lincoln

Or, posting to:

- Freepost 104 653
PO Box 90
Rolleston 7643

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

Or, scanning and emailing it to:

- localwater@selwyn.govt.nz

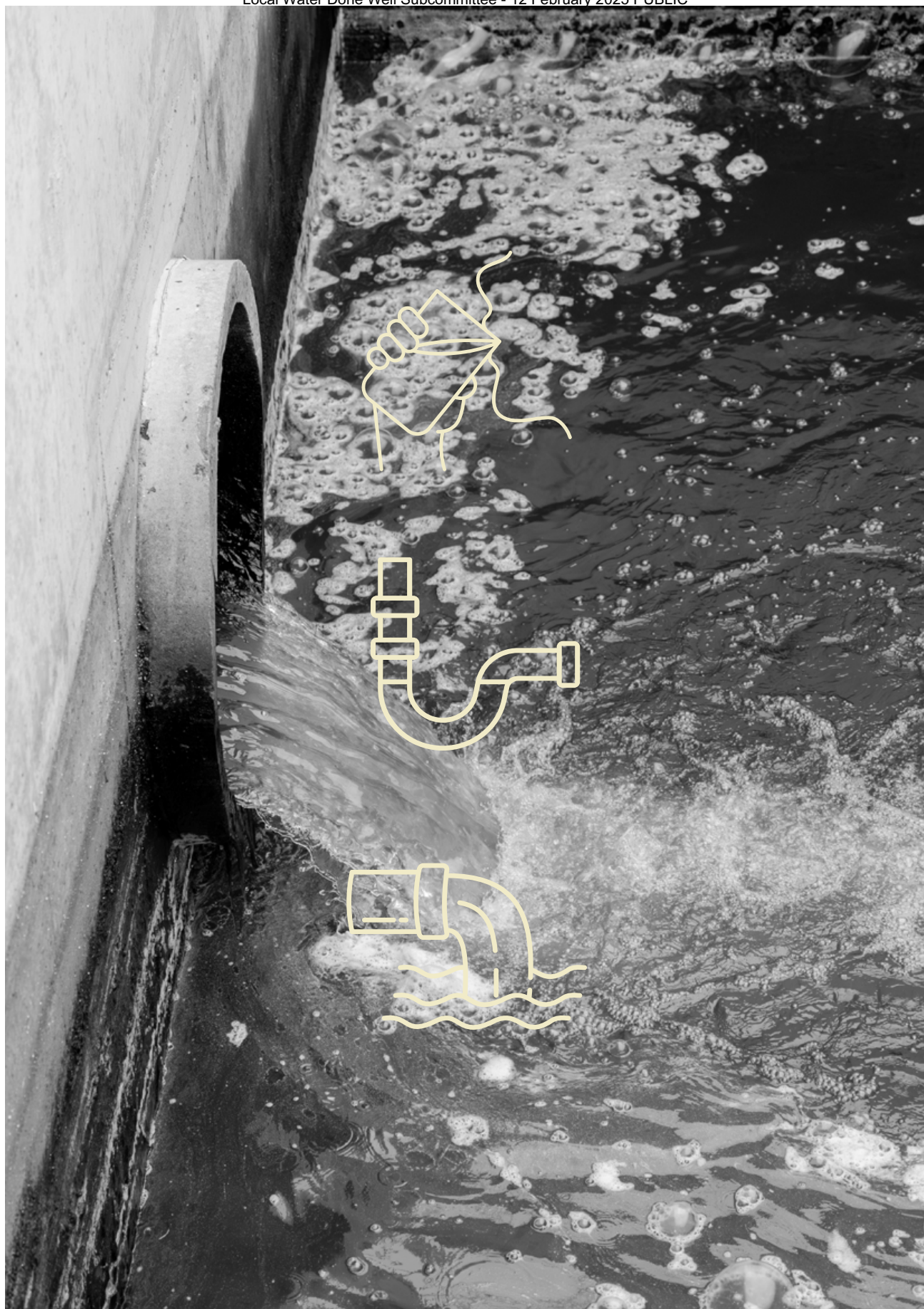
For more information, visit selwyn.govt.nz/localwater

Timeline





Our **Waioira One Water Strategy** has agreed to uphold the mana and mauri of all water in its decision making and to work in partnership to sustainably manage water now and into the future.



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/localwater**

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

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.

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. Submissions will be made publicly available on the Council website and in official documents. We will remove any contact details.

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

Last name

Address*

Town*

Postcode*

Contact number*

Email address*

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.

Questions

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

☐ Yes ☐ No

Please add your comments

2. Do you prefer that the Selwyn District Council continues its current water delivery model?

☐ Yes ☐ No

Please add your comments



3. Do you have any questions or 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 localwater@selwyn.govt.nz

SECRET

Council 19 February 2025 PUBLIC

COUNCIL PUBLIC REPORT

TO: Chief Executive Officer
FOR: Council Meeting on 19 February 2025
FROM: Tim Harris, Executive Director Strategy and Engagement
DATE: 12 February 2025
SUBJECT: **CCO CONSULTATION**

RECOMMENDATION

That Council:

- I. **Adopt** the draft Consultation Document (**Appendix 1**).
- II. **Authorise** the Chief Executive Officer to make any necessary minor changes to the Consultation Document prior to its release for consultation.
- III. **Endorse** the proposed process for public consultation to take place between 20 February 2025 and 12 March 2025, with hearing of submissions on 20 March 2025.

1. PURPOSE

The Local Water Done Well Subcommittee has recommended that the Council adopt a Consultation Document for the consultation process for establishment of a water services Council Controlled Organisation (CCO) in the Selwyn District. The purpose of this report is to enable the Council to consider that recommendation.

2. HISTORY/BACKGROUND

Refer [Local Water Done Well Subcommittee – 12 February 2025](#), Item 4. On 12 February 2025 the Local Water Done Well subcommittee recommended that the Council make the above resolutions.

The options and reasons for the Subcommittee's recommendation are set out in the report. Some minor amendments to the consultation document were recommended and these have been completed. The main amendment sought to make it clear that maintaining current in-house delivery for delivering water services is not an option due to new legislation and increased compliance requirements and that a future in-house water delivery model would still require increased investment.



Tim Harris

EXECUTIVE DIRECTOR STRATEGY AND ENGAGEMENT



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Setting the Scene

In September 2024, the first substantive piece of legislation supporting the Government's Local Water Done Well policy was enacted. The Local Water Done Well policy is aimed at addressing New Zealand's water infrastructure challenges and places emphasis on achieving financial sustainability, appropriate regulation of water services, and ensuring flexibility for communities and councils in determining how their water services will be delivered.

The **Local Government (Water Services Preliminary Arrangements) Act 2024 (the Act)** sets out several transitional provisions, including a requirement for Selwyn District Council (Council) and all other territorial authorities to prepare and submit a Water Services Delivery Plan (WSDP) to the Government.

A WSDP is required to describe the current state of Council's water assets and services, and also describe the future arrangements for delivery of water services. A further piece of legislation, the Local Government (Water Services) Bill is currently before parliament, and will (once enacted) provide a structured framework for managing and delivering water services in New Zealand.

The Bill is progressing on a set time timeline and will apply to Council's future water arrangements in time.

The Act requires all councils to consider on the arrangements for the future delivery of three of the water services that Council currently manages.

These are:



1. **Drinking Water:** Ensuring the provision of safe and reliable drinking water to communities.



2. **Wastewater:** Managing the collection, treatment, and disposal of wastewater to protect public health and the environment.



3. **Stormwater:** Handling stormwater drainage to reduce flood risk and manage runoff in urban areas.



Council 19 February 2025 PUBLIC

Following the introduction of the Act, and the requirement to consult on future delivery arrangements, Councillors decided, in November 2024, to start investigations into setting up a new Water Services Council Controlled Organisation (WSCCO).

This document addresses the arrangements for stormwater, drinking water, and wastewater services within the Selwyn District Council.

By requiring WSDPs, and consultation on water service delivery arrangements, the Act provides an opportunity to revisit Council's current arrangements and provides an opportunity to consider whether a WSCCO will be preferable means of providing sustainable and efficient water service delivery, addressing challenges and laying the foundation for future improvement.

Stormwater, which is the Act for consideration, however, Council has decided not to consult on changes to its delivery. Many stormwater assets deliver multiple outcomes for the community including water quality and quantity, recreation amenity, ecology and cultural values; so keeping the ability to take a multi-values approach is critical. Further to this there are a lot of benefits of interconnections of stormwater management with other Council activities including roading, meaning we can take a catchment based approach to managing surface water. For these reasons the Council's proposal is that stormwater management and delivery is kept in-house.

The Act and this proposal do not discuss arrangements for water races or land drainage. These services will continue to be delivered by Council, but could be reconsidered in the future.

Council 19 February 2025 PUBLIC

The Act requires us to consult the community on maintaining services in-house, and at least one other model including a CCO, or a joint local government arrangement.

Council is asking you to give your thoughts on whether you support this proposal to establish a WSCCO for the management and delivery of drinking and wastewater, and to keep stormwater in house.

Maintaining current in-house delivery for delivering water services is not an option due to new legislation and increased compliance. A future in-house water delivery model would still require increased investment, but that model would have limited access to additional funding for vital infrastructure. Lack of funding could

create significant risks around compliance and providing reliable and safe water supply.

If the decision is made by Council to set up a WSCCO then information will be worked through to establish an operating model to support operations from 1 July 2025.

The Council believes this proposal will build on the great work already done by the Selwyn District Council to create strong, resilient, sustainable and reliable water services and provide certainty for our communities on the provision of water services. The proposal also creates an inter-generational framework in line with **Waikirikiri Ki Tua Future Selwyn**.

	Drinking Water	Wastewater	Stormwater	Water Race	Land Drainage
<i>Existing arrangements</i>	In-house, by Council	In-house, by Council	In-house, by Council	In-house, by Council	In-house, by Council
<i>Our Proposal</i>	Transfer to new WSCCO	Transfer to new WSCCO	No change, in-house by Council	No change, not subject to consultation	No change, not subject to consultation



Water in Waikirikiri Selwyn

In the year to 30 June 2024, Selwyn District Council:



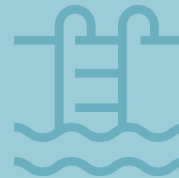
Provided drinking water to

81%

of residential properties

Supplied **9.31**
million cubic metres of
water to households

..... THAT'S



3,124
Olympic size
pools

Provided wastewater to

68%

of residential properties



Treated **4.34**
million cubic metres of wastewater

..... THAT'S



1,736
Olympic size pools

The Council also
maintained...

1,549 km
of water network

693 km
of wastewater network

128 km
of stormwater pipes

1,572 km
of water race channels

372 km
of land drainage drains

Drinking Water Infrastructure



26

Drinking water schemes

- 36** Treatment plants
- 93** Reservoirs
- 17** Groundwater Supplies
- 9** Surface Water Supplies
- 27** Years (average age of asset)

Wastewater Infrastructure



16

Wastewater Schemes

- 7** Treatment Plants
- 63** Pump Stations
- 14** Years (average age of asset)

The Council currently manages water services through a combination of in-house teams and external contractors. It is responsible for delivering safe, reliable, and affordable infrastructure and services for our communities.

81% of residential properties in Waikirikiri Selwyn are serviced with water across 26 water supply schemes, and 68% of residential properties are serviced by the Council's wastewater systems. Selwyn residents are high users of water, using an average of 335 litres of water per person a day in the 2023/24 year.

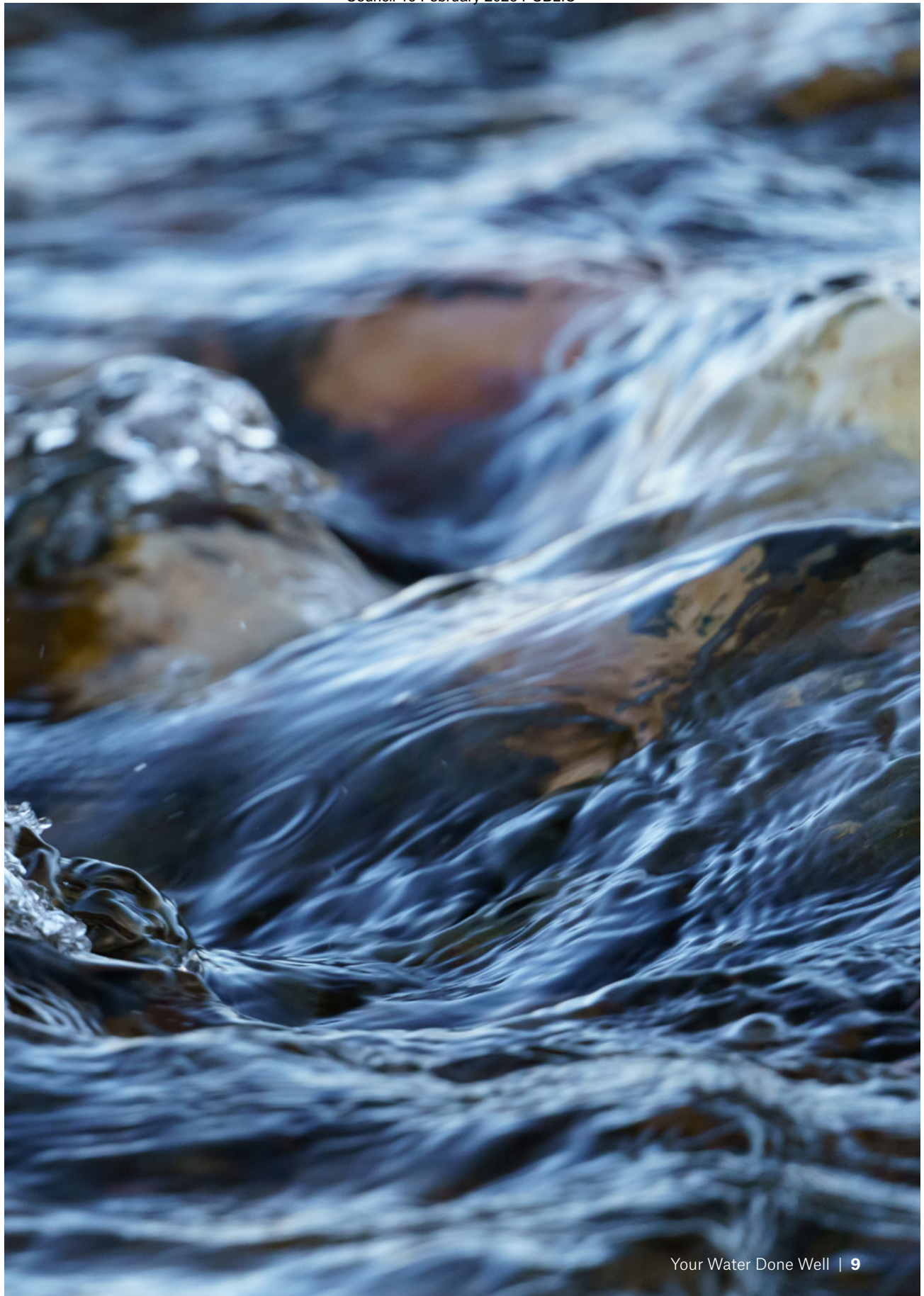
The Council spends approximately \$95 million annually on water services. Over the course of the Long-Term Plan, 82% of the Council's capital spending is budgeted for infrastructure, including water.

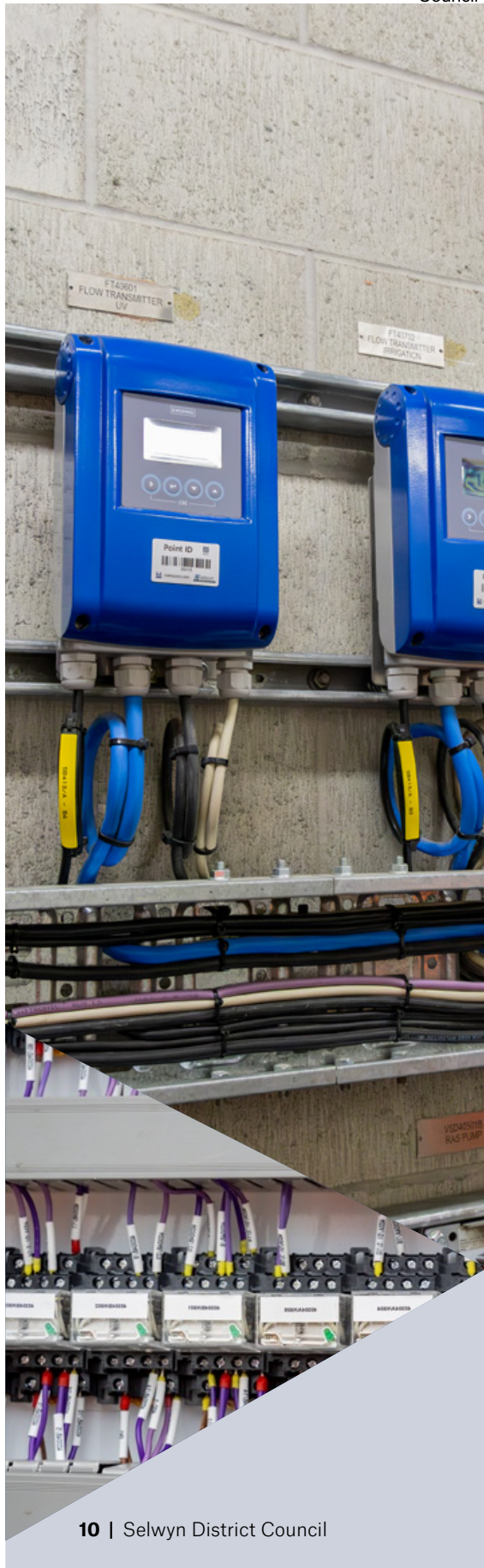
All Council supplies are metered and properties pay by use. This is funded through charging a targeted

rate for water services, depending on the type of property and its need. Residential, commercial, rural and urban properties are charged differently. Wastewater carries an annual charge for residential users, and industry users have a separate rate. High users operate under individual trade waste agreements. Drinking water is charged at a base rate, with a volumetric metered charge for urban supply and a per unit rate for rural properties. Stormwater is charged at an annual rate for properties within Waikirikiri Selwyn townships.

The projected costs for maintaining the current water services model for drinking and wastewater are \$857 million over years 2-10 of the Long-Term Plan 2024-2034. The existing local government rating system and financial/lending constraints applying to Council means that there is limited ability to access borrowing to invest in new infrastructure. In particular, the Council is limited to borrowing up to 280% of its revenue.







Delivery Model Options

The Local Government (Water Services Preliminary Arrangements) Act 2024 (the Act) allows Territorial Authorities (TAs) to explore and establish new delivery models. The options for this include:

- Joint Local Government arrangements
- A Water Services Council Controlled Organisation (WSCCO)
- Consumer Trusts
- Continue to deliver water services in-house.

Our **Waiora One Water Strategy** has agreed to uphold the management of all water in decision making and to work in partnership to sustainably manage water now and into the future.

The partnership approach will remain, with both delivery options being considered.

Council is consulting on the following two options:

1. Set up a WSCCO to deliver wastewater and drinking water. Continue to deliver stormwater in-house.

2. Deliver water services through a future in-house water delivery model.

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

A New Council Controlled Organisation - Proposal Model

After careful consideration, Council is proposing a new Water Services Council Controlled Organisation (WSCCO) as our delivery model for drinking water and wastewater services, with stormwater services to be delivered by an internal business unit of Council.

A WSCCO is a Council-controlled organisation specifically established to manage and deliver water services. This model will allow Council to leverage more specialised governance, enhancing the efficiency and effectiveness of water service delivery.

The WSCCO would be owned locally but would operate independently from Council with its own specialist board structure and management. Council would be the only shareholder, and its board would include members appointed based on competencies consistent with the needs of the new organisation, and specific to water governance.

The WSCCO would be responsible for planning, funding, building and maintaining drinking and wastewater infrastructure, as well as running the day-to-day customer-facing services for those water services. Ownership of drinking water and wastewater assets (and all associated debt and liabilities) would transfer to the WSCCO. As these assets are strategic assets of Council, the transfer will need to be provided for in the Council's Long-Term Plan. The transfer of these strategic water assets would be provided for in a Long-Term Plan amendment. In accordance with The Act, this consultation will cover this requirement.

It is anticipated that the WSCCO will be eligible to raise finance from the Local Government Funding Agency (LGFA) under the Local Water Done Well policy. LGFA offers finance to the local government sector, including the Council, and has recently started financing council-controlled organisations (CCOs) as well. As part of LGFA's financing arrangements for CCOs, there is a requirement for credit support from shareholding councils that is sufficient to cover the amount of LGFA borrowings by the CCO. This credit support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO (not less than the CCO's borrowings), but which leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who could exercise that right in the event (and only in the event) of a default under the CCO's financing arrangements.

Given this requirement, and to ensure that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that Council would subscribe for uncalled capital in an amount of no less than \$450m. This amount is expected to cover initial and future borrowings of the WSCCO for at least a five year period.

The WSCCO would start from a strong platform to enhance the comprehensive investment, construction and future planning by Council's water services team over recent years for strong, resilient, sustainable and reliable infrastructure and water service delivery. If this option is chosen then information will be worked through to establish an operating model to support operations from 1 July 2025.

The Council believes that the proposal will provide certainty for our communities as well as create an inter-generational framework in line with **Waikiri Ki Tua Future Selwyn.**



Benefits

A WSCCO offers benefits such as:

- **Enhanced Service Delivery:**
A WSCCO will have a sole focus on improving water quality and service reliability, which would deliver better customer service.
- **Dedicated Water Governance:**
A WSCCO streamlines operations and over time will improve costs through specialised drinking and wastewater governance and management, leading to better resource allocation and improved service delivery. It also offers a specific focus on water services.
- **Improved Access to Funding:**
A WSCCO has greater borrowing capacity and access to funding specific to water, supporting necessary infrastructure upgrades and expansions, ensuring long-term financial stability. Improved access to funding ensures that the WSCCO can upgrade water and wastewater systems to meet increasing levels of service.
- **Resilience and Adaptability:**
A WSCCO is adaptable and scalable, effectively responding to changing demands and future challenges specific to the delivery of water services, such as rapid population growth and evolving regulatory requirements. This would help ensure our water infrastructure can manage increased growth.
- **Community Benefits:**
A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Council 19 February 2025 PUBLIC



Risks

As well as the benefits noted, there are several risks associated with this model, including:

- **Initial Setup:** Establishing a WSCCO requires significant initial effort and coordination, including legal, financial, and operational setup. This process can be complex and involves increased investment at setup.
- **Uncalled Capital:** From Council's perspective, there would be some contingent risk that the uncalled capital could be called on in the event of WSCCO financial distress. However, it is expected that this would be a last resort, and that LGFA would work with the WSCCO to address any issues before seeking to have recourse to Council. The uncalled capital structure is also a precondition for any WSCCO seeking to obtain financing from LGFA and other financial institutions.

Setup considerations

In setting up a WSCCO, there are several requirements outlined in the Act, which include ensuring the following requirements are met:

- **Governance Structure:** Under this option the Council and the community would agree the high-level expectations on strategy and performance of the new organisation through a Statement of Expectations. These expectations would include the Council's commitment to the ongoing partnership with mana whenua in the delivery of water and wastewater services.
- **Accountability Mechanisms:** When setting up the WSCCO, the Council would develop accountability standards and monitoring arrangements for performance of the assets it transfers to the WSCCO. These will be set out across the Statement of Expectations, the Constitution and Water Strategy. The WSCCO's Annual Report will be a key document for monitoring performance. If adopted, the WSCCO would be established and included in the Council's WSDP, which is due to be adopted in early September 2025.

What is the impact on rates and council debt?

You would no longer pay for drinking water and wastewater through your rates. Those connected to services would pay these charges directly to the WSCCO.

Water infrastructure can last 50 years or more so it makes sense to use debt to share this cost over the lives of those who are here now and those still to come. Councils are currently constrained and can only borrow up to 280% of their revenue. This limits investment options.

The new Local Water Done Well policy allows Council to borrow up to 500% of their total revenue, excluding development contributions and vested assets, to fund their water infrastructure investment.

Borrowing up to 500% of the WSCCO's revenue including the additional operating cost is modelled to have an approximate increase of 12% on top of the 2024/2034 Long-Term Plan. There will be a partial offset saving, in general rates charges.

You will still have to pay to receive water services through a water charge as you currently do, but this would be determined by the WSCCO.

**These projected costs are based on the information available at the current time. Future costs may change as the rate of population growth, actual contract rates and other costs are known.*

Council Delivered Services

Under the Act, Territorial Authorities (TAs) can continue managing and delivering water services directly. This involves preparing and adopting a Water Services Delivery Plan (WSDP) that outlines how they will sustain their existing water services infrastructure and operations.

Under the Council delivered model, Council would continue to partner with mana whenua on the direction and delivery of water services on behalf of the community.

Benefits

Maintaining water services in-house offers benefits such as:

- **Political Influence and Control:** Enables the Council to maintain full control over decision-making processes, ensuring decisions are made with an understanding of local needs and priorities. Residents can engage with their elected representatives about water service issues.
- **Familiarity and Continuity:** The Council can continue using existing systems and processes, which staff and management are already familiar with, reducing the need for extensive training and transition periods.



Risks

In addition to the benefits noted above, there are several risks associated with this model, including:

- Limited Funding Capacity:** The Council may struggle to secure sufficient funding for necessary infrastructure upgrades and maintenance, leading to deferred projects and potential service degradation. Limited borrowing capacity can restrict the Council's ability to finance large-scale improvements, resulting in higher long-term costs. To date, Council has funded the required upgrades for water and wastewater. In the future, funding priorities may change with department capacity allocated to other activities like transportation or facilities, rather than drinking water projects.
- Operational Costs:** Any delayed investment in our infrastructure development and increased operational costs. Unplanned repairs or emergencies can drain the Council's financial resources, leading to budget reallocations or increased rates.
- Regulatory Compliance:** Ensuring compliance with evolving regulatory standards can be challenging, but Council currently has a good level of compliance. Maintaining rigorous monitoring and reporting systems to meet regulatory requirements can be resource-intensive and complex and is set to increase.
- Infrastructure and Service Delivery:** In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model will struggle to scale effectively to meet the increasing demand on our distribution assets, impacting service reliability and quality.
- Political interference leading to leaky pipes:** The council has a \$200 billion debt in water leading into the next 30 years. Much of this is due to the use of political leaders delaying investment in the past 10 years.
- Lack of clear strategy:** Minor projects have time and resource allocated that would otherwise be spent on strategic investment.
- Competing funding:** Water is only one factor in the Council decision making and investment. Water priorities can lose out to transport or solid waste investment.



Comparing the Two Options

Impacts on Services

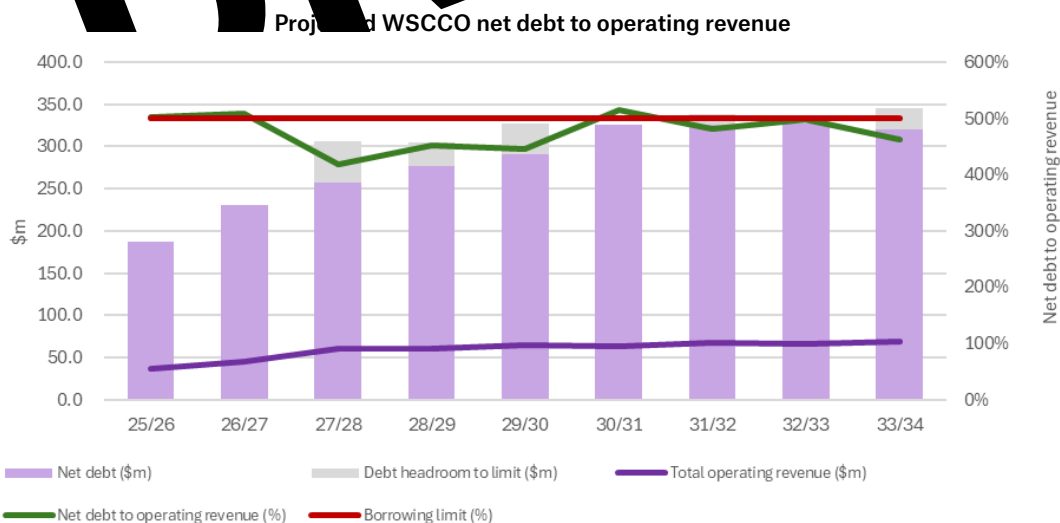
Performance requirements are set by national regulations. The Council does not foresee an immediate difference in service delivery between the two models. Impacts on service delivery when comparing the two models come down to the expertise and focus of having a dedicated WSCCO and associated water specific governance, compared to priorities being set by elected members across a broader scope of activity.

Impacts on Charges

If water services were to remain within the Council, there is no guarantee that the costs or service would not change. Whatever model is considered there will be baseline costs changes related to a more highly regulated environment. This will impact both models, meaning the current delivery costs are unlikely to remain as stated in the Long-Term Plan 2024-2034: The operating model for the WSCCO will be developed within the establishment process, and this will change the level of costs associated as we learn more. While there would be additional cost due to establishment setup, the WSCCO would have access to higher debt limits (500%) under the Act, which would be scalable over time. This isn't an option for the in-house model.

The average increase in Targeted Rates in the current Long-Term Plan 2024-2034 over the 10-year period is 11%, moving to a Council Controlled Organisation would mean you no longer pay anything to Council for drinking or wastewater. Your rates bill will reduce by those water charges. We estimate that the new WSCCO will charge you the same costs as today and rise 23% over the next 10 years. The General Rate will be lower than predicted in the Long-Term Plan, due to the Council receiving overhead revenue from the proposed changes in the WSCCO.

The chart below shows our net debt to operating revenue over the lifespan of the Long-Term Plan.



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.

Impact on Rates and Council Debt?

A WSCCO would have a dedicated board made up of members who have specific expertise in water, focused on the delivery of drinking and wastewater services for Waikirikiri Selwyn, which should result in better service delivery and resource allocation.

The following information demonstrates potential rating impacts across different scenarios in Waikirikiri Selwyn. This modelling only considers drinking and wastewater, as stormwater delivery will be maintained by Council for both options.

The increase shown is the difference between the current Long-Term Plan modelling, and the preliminary

WSCCO calculations. The in-house model would likely see increased rating compared to the Long-Term Plan modelling given the Local Government Water Services Bill is expected to increase regulation and therefore compliance cost.

This modelling shows that there is a rates increase with moving to the proposed WSCCO in the first three years. From year 10 the drinking and wastewater rates are predicted to be lower than what is in the published Long-Term Plan 2024-2034.

This is broken down into the following funding impact statement below.

Stormwater Funding Impact Statement (Excluding Water supply and Sewerage)*

	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	3,437	3,960	4,438	6,864
Total application of operating funding (B)	3,268	3,514	3,655	5,076
Surplus / (deficit) of operating funding (A-B)	169	446	783	1,788
Total sources of capital funding (C)	1,401	3,341	2,483	1,878
Total applications of capital funding (D)	1,570	3,791	3,266	3,666
Surplus / (deficit) of capital funding (C-D)	(169)	(446)	(783)	(1,788)

*Retained by Council

The above table reflects our current Long-Term Plan pricing for services provided. Based on the changes in legislation our current position requires Council to charge how water is delivered to the community.

Drinking Water and Sewerage Funding Impact Statement (excluding Stormwater)

	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	34,010	40,007	45,577	74,929
Total application of operating funding (B)	31,586	34,187	36,857	51,462
Surplus / (deficit) of operating funding (A-B)	2,424	5,820	8,720	23,467
Total sources of capital funding (C)	67,893	59,998	54,576	495
Total applications of capital funding (D)	70,317	65,818	63,296	23,962
Surplus / (deficit) of capital funding (C-D)	(2,424)	(5,820)	(8,720)	(23,467)

The above table outlines the projected costs for the delivery of water through a WSCCO. Years 1-3 show an increase in charging, over time this cost reduces as we reflect the efficiencies in service.

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

	2025/2026	2026/2027	2027/2028	2033/2034
	LTP	LTP	LTP	LTP
	\$'000	\$'000	\$'000	\$'000
Total operating funding (A)	37,233	45,452	61,286	69,060
Total application of operating funding (B)	33,355	36,581	39,309	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	65,872	63,591	24,017
Surplus / (deficit) of capital funding (C-D)	(3,878)	(8,871)	(21,977)	(19,923)

Based on the anticipated changes in legislation.

Rating Examples

Summary Rates	2025/2026	2026/2027	2027/2028	2033/2034
Example: Urban Residential Property with Sewerage				
LTP Water Bill under future in-house model ¹	\$1,552	\$1,769	\$1,948	\$2,730
WSCCO Water Bill ²	\$1,700	\$2,018	\$2,635	\$2,668
Comparison	\$148	\$248	\$687	-\$62
% Increase LTP to WSCCO	10%	14%	35%	-2%
Example: Urban Residential Property without Sewerage				
LTP Water Bill under future in-house model ¹	\$745	\$841	\$955	\$1,392
WSCCO Water Bill	\$808	\$965	\$1,287	\$1,307
Comparison	\$63	\$124	\$332	-\$85
% Increase LTP to WSCCO	9%	15%	35%	-6%
Example: A Property on Restricted Water Supply with Sewerage				
LTP Water Bill under future in-house model ¹	\$1,579	\$1,805	\$1,993	\$2,808
WSCCO Water Bill	\$1,729	\$2,061	\$2,689	\$2,722
Comparison	\$150	\$256	\$696	-\$86
% Increase LTP to WSCCO	9%	14%	35%	-3%
Example: A Property on Restricted Water Supply without Sewerage				
LTP Water Bill under future in-house model ¹	\$772	\$877	\$1,000	\$1,470
WSCCO Rates Bill	\$837	\$1,003	\$1,341	\$1,361
Comparison	\$65	\$126	\$341	-\$109
% Increase LTP to WSCCO	8%	14%	34%	-7%

Overall, the Council anticipates a partial offset reduction in the General Rates charges.

- Stormwater has not been allowed for in these figures, as it will remain in-house at Council.
- These figures related to the WSCCO are higher due to anticipated setup costs, but as demonstrated here over the Long-Term Plan period, the modelling shows improved charges.

¹ This figure represents a future in-house model based on Long-Term Plan water bill (what you are expected to pay for water from 2025), allowing for 10% anticipated compliance cost increase due to new legislation.

² Estimated cost you would pay under the WSCCO over the Long-Term Plan period to 2034.

Have Your Say

Let us know:

- If you support the Council's proposal to transition our drinking water and wastewater assets and services to a new WSCCO, with stormwater remaining with Council.
- Or, if you prefer that the Council continues with a future in-house water delivery model, noting the new legislation will require some changes.
- If you have any comments on the WSCCO model or anything else contained in this consultation document.

How do I provide feedback?

You can provide your feedback on this consultation by:

- Visiting selwyn.govt.nz/yourwater on your computer or mobile device and answering the questions on the submission form.
- Completing the submission form on the back of this document and dropping it into one of our Customer Service bins at:
 - Council Rolleston Offices, 2 Norman Kirk Drive, Rolleston
 - Te Anau area, 56 Wainman Street, Rolleston
 - Darfield Library, 11 South Terrace, Darfield
 - Leeston Library, 19 Messines Street, Leeston
 - Lincoln Library, 22 Gerald Street, Lincoln

Or, posting to:

- Freepost 104 653
PO Box 90
Rolleston 7643

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

Or, scanning and emailing it to:

- yourwater@selwyn.govt.nz

For more information, visit selwyn.govt.nz/yourwater

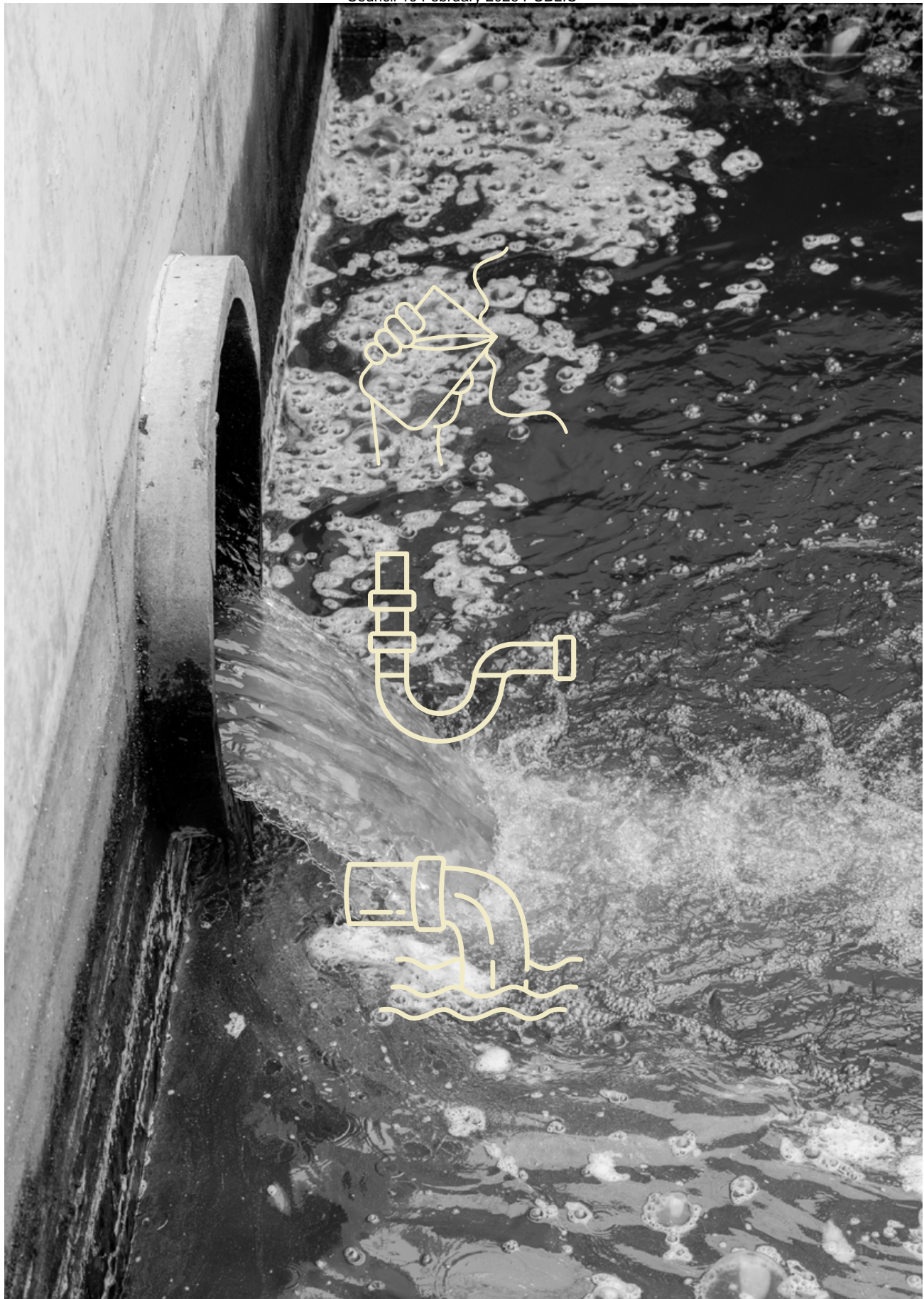
Timeline





“

Our **Waiora One Water Strategy**
has agreed to uphold the mana
and mauri of all water in its
decision making and to work in
partnership to sustainably manage
water now and into the future.



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.

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. Submissions will be made publicly available on the Council website and in official documents. We will not share any contact details.

If you wish your submission to be removed from your submission please tick the box: ☐

Submitter details

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

First name

Last name

Address*

Town*

Postcode*

Contact number*

Email address*

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.

Questions

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

☐ Yes ☐ No

Please add your comments

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

☐ Yes ☐ No

Please add your comments



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

☐ Yes ☐ No

Please add your comments

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

SECRET

Submission Reference	Submission point	Officer response
QUESTION 1: PROPOSED TRANSITION OF DRINKING WATER AND WASTEWATER SERVICES TO A WSCCO		
Support for WSCCO: Long term benefits		
2	Any solution that prevents the ripping off of the Upper Selwyn Huts residents is fine by me.	Comment acknowledged.
10	Short term pain for long term gain. Long term savings are preferable.	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.
22	This is the best long term solution for our water services.	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.
50	If it means we might actually be able to drink water from the tap without tasting like I've drank the town pool water, I agree 100%.	Comment acknowledged.
149	Water needs to be protected and the current pipework etc needs to be upgraded due to lack of modernisation. Long term this will benefit everyone.	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.
		Council has Significant infrastructure work programme budgeted in the 2024-34 LTP.
181	I would prefer that all 3 waters were controlled through an external CCO, including water supply, sewer and stormwater.	Splitting out stormwater from the other surface waters (water races, and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains in Council. Stormwater also integrates with Transport and Open Space assets.
188	Going with the Council recommendation.	Comment acknowledged.
308	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.)	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.
308		Comment Acknowledged.
319	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.	The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO, this include a significant budget for growth.

Support for WSCCO: Better funding and efficiency

24	I think it makes sense to ensure water gets appropriate priority through funding.	Comment acknowledged.
60	Making rate payers lives easier! All for it	Comment acknowledged.
66	This is the only avenue to be able to obtain the funding necessary to update the water system assets.	Establishment of a CCO would give access to funding that could be used to invest in water infrastructure, also enabling management of debt over a longer period of time
92	It is the only way to get good funding to fund the new projects.	Establishment of a CCO would give access to funding that could be used to invest in water infrastructure, also enabling management of debt over a longer period of time
117	Support conditional on allowing the WSCCO full autonomy in making decisions and pushing improvements through without undue interference from the sitting council.	Establishment of a CCO would put the decision on investment in water infrastructure with the CCO rather than Council.
144	This is cautious support for the new entity i.e. a CCO to run the delivery of drinking and waste water services. I think it has the potential to be a more efficient organisation.	Comment acknowledged.
166	Given the concerns about corruption in other areas of the country, I feel this is a most likely outcome from a private organisation (greed being a basic human default) and if some form of accountability can be maintained through a council controlled agency, and the cost you have provided us are to be believed this is therefore the best option for us.	Comment acknowledged.
314	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.	Comment acknowledged.
368	Early information provided indicates the water systems appear to be more sustainable and hopefully more economical in the long term. Thus, this process appeals to me!	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.

418	Acknowledged Potential Benefits	#N/A
418	I acknowledge there are potential benefits, including:	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.
418	· Access to specialist expertise	Establishment of a CCO will benefit from specific water expertise both at a governance and management level
418	· Improved funding and borrowing capacity	One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house.
418	· Opportunity for future collaboration with other councils	There is the future potential for a WSCCO to partner or merge with other WSCCOs.
418	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.	A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. It is anticipated a Board would be appointed via an appointment panel where there is independent, CCO and Council representation. Bill 3 of Local Water Done Well legislation sets out that Directors must be independent and that there must be an appropriate skill mix among the Directors to allow for the effective governance of a water services entity. The same requirement would not exist for an in-house delivery model and they services would continue to be governed by Councillors.

Support for WSCCO: Environment and climate

319

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?

The WSCCO will have access to higher debt limits (500%)

350	Water and water services are a significant activity in terms of capital investment and especially the capacity of highly qualified and experienced professional staff. The transition to a WSCCO will be very significant and the impacts will be felt right across the organisation. Even though there may have to be changes from the way things are done at present, and that may see water activity ring fenced as a 'business unit', the retention in-house of such a unit covering all water services will ensure the Council has much greater capacity and have far reaching beneficial effects across the whole organisation. There are also significant environmental issues associated with water and retaining all water services in a single in-house business unit will have meaningful environmental advantages to the Council and its communities.	An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Support for WSCCO: Challenges of public consultation and misinformation

29	The consultation document was well presented but it lacked sufficient information to be able to make an informed view as a resident.	Comment acknowledged
30	Given the significant financial implications and lack of clarity around debt management, I urge the council to reconsider this rushed process and provide the community with more detailed financial analysis.	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.

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

319	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.	

291	I am tentatively optimistic that a WSCCO would benefit Selwyn. I have concerns that the time to make a decision and consult is only 8 weeks when this will impact the region for many years to come. Personally I am not available for the dates set up for community outreach which is a shame.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
241	There is inadequate evidence-based information provided by SDC on the benefits of moving to a WSCCO - where is the detailed business case that should set this out? Why does the WSCCO cost flatline in years 5-9? I struggle to believe that! - such a major assumption really requires a full justification, which is not provided.	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.
241		In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.
275	No consultation or accountability to the people who own the assets and pay the bills. Consultation is of course relative - Mayor Sam has made up his mind - so a Chair has already been appointed to a non existant body. Mayor Sam has form signing agreements without consultation - the ODT's headline ..." Mayor blasted over 'wrong and abusive process'.	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025.

288	The most alarming aspect of this decision-making process, is that despite the consultation underway, the council is not obligated to vote according to the ratepayers views: LGA 2002 77 Requirements in relation to decisions (1) A local authority must, in the course of the decision-making process,— (a) seek to identify all reasonably practicable options for the achievement of the objective of a decision; and (b) assess the options in terms of their advantages and disadvantages; But, there is no obligation to agree with the ratepayers views. The only recourse for ratepayers is to remove the offending Councillors at the next election after the damage is done. Thin edge of the wedge This move by the council is motivated by a desire to comply with the current coalition government's desire to change the funding modelling for local governments.	Comment acknowledged.
297	The council has not been able to clearly outline what the effects will be on total rates to households. This has been asked for numerous times, across consultation forums since the start of the consultation, yet has not been provided. The only information provided has been for just the sewage and drinking water component. In reality though ratepayers do care about changes to their total rates bill. We expect that if a WSCCO is set up then the SDC component of the total rates bill will decrease. But how that translates through to the total rates bill is still a mystery to ratepayers – this should not be the case, and this information should have been available to ratepayers from the start of the consultation.	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.

346 Pause your decision and make sure that you have considered adequately all issues.

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

357 It's our money, not yours! Consult with the community. I do not trust the council at all! I am furious that the council stopped consultation on the Annual Plan! You need to be held accountable, to the community over your constant overspending instead of sticking to just the basics only!

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

367	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.	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.
367	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.	The ultimate decision to establish a WSCCO rests with the elected officials and not staff. As a result we do not believe there has been a conflicts of interest.
367	Resource documents also mention the LTP in each example, yet councillors have claimed that LTP goals are no longer achievable, why mention them then?	As noted in our Consultation Document, our modelling is based what is reflected within our Long-Term Plan.

Oppose WSCCO: Cost concerns

3	I have lived in Australia and the UK where they did this very same thing and the cost to the people ended up much more. I would like to see water & waste stay with council.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
6	Setting up a third party just lets council off the hook if anything goes wrong, plus requires a whole new management structure so costs will be greater. Doesn't make sense to add complexity.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
6		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

6		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
9	No need to increase an already bloated council head count as you are currently coping with the workload within the current structure...	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
9	Additioanlly, water is not a person therefore does not required mumbo jumbo protection which will no doubt require \$ to cross palms of the special people.	Comment acknowledged.
11	Sets up a whole new bureaucracy with governance and members appointed by council. This cost will be passed on to ratepayers.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

12	The last thing we need is more bureaucrats and more debt! We are struggling as it is with rising rates and now you want to increase our water rates?	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
12		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
15	I prefer that SDC maintain full control of water services delivery. While a WSCCO may increase borrowing capacity there is risk that capital works water delivery being separate from other delivery programmes such as transport, results in inefficiency and extra cost to the ratepayer.	A WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.
18	The short term increased costs of setting up a CCO during this cost of living crisis is unpalatable and I also question the cost of set up. It's underestimated and rushed.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
20	I fail to see the benefit of a new organization, with its added costs, when a perfectly good in house team can be created without the overheads.	Comment acknowledged.
23	There is no way that establishing a new entity can be cost effective. The costs of initiating the entity will be high, and the duplication of back office systems and costs cannot be lower than continuing in house.	Comment acknowledged.
30	Transparency, fiscal responsibility, and a long-term sustainable funding plan must be the priority.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
30	• The consultation document indicates that this proposal would increase council debt from 280% of rates revenue to 500% within five years. This is a significant burden on ratepayers, and it is unclear how the council plans to manage this debt long-term.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

30	• Ratepayers are already facing 14% annual rate increases under the Long-Term Plan. The proposed WSCCO model suggests that an average household could see an additional \$600+ in rates within three years.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
30	• There is no clear debt repayment strategy outlined. If debt reaches 500% of rates revenue, what measures will be taken to avoid further rate hikes?	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
31	From my perspective, the risks clearly outweigh the benefits and the impact on rate payers is significant. As we are currently in a cost of living crisis so this is not a suitable time to increase expenditure and debt.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
31		Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
32	How much is the new water company paying for existing infrastructure /assets that ratepayers paid for? do ratepayers get a refund for the money we have invested in the region.	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income
34	I do not see the need for change, the system at present is working well.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
38	The cost of water being used to be kept as low as possible for everyone.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer

40	Keep it as it is now you are already financially crippling your rate payers we cannot afford this option.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
41	I also understand your desire to access more debt via a WSCCO. Please don't do this. Loading debt onto future generations is unwise.	After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
45	We pay enough people in council now, why pay more to do the same job.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
49	I believe we already pay more than enough for this to be managed within the current council, not paying more to set up a seperate entity and paying even more	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
51	If I don't like what a public entity is doing with the water delivery quality/price I can vote for change at the ballot. There's not a lot I can do to influence what a CCO is doing. The example property model costs in the discussion don't appear to show any economic benefit, the first 3x years of increased costs of a CCO equates to 18 years worth of the rate "benefit" projected in 9 years time.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
51		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

52	The council's history of over costing by setting up a new entity is not needed.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
56	These services should already be supplied by the council within existing rates. It is not beneficial for the ratepayers to have these separate entities setup. The rates burden on residents is already unsustainable for many people and should not be added to any further.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
57	Don't increase our rates even more.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
58	These are services that are supposed to be supplied under the current infrastructure. This will add cost which will duly be passed onto ratepayers, more cost to us for the same product no thanks.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
61	We need less bureaucracy & fewer rate-funded organisations. The initial setup of WSCCO will be enormous spending with little to no results to show.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

63	Too expensive - MUST focus on keeping rates down not going up.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
65	Don't see the reason for the extra expense when we are already paying for the water resources.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
68	We don't need any more rates rises - stick to a budget and deliver with the in-house team you have. Our incomes cannot cope with the constant additions.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
69	More rate payers money going into another deep hole.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
70	We already have massive rates increases people cannot afford anymore increases	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
72	New council to control water will bring in more debt to the people. Our rates are to high now.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

72		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
73	Already SDC is forecasting significant borrowing and cost increase projections without any tangible projects or outcomes which clearly shows any cost benefits analysis.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
74	Water and sewerage fees already make up far too much of our rates, setting up a new organization will surely only cost more.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
75	The council should have enough staff and expertise to manage this themselves. This will just cost rate payers more.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
76	I do not support a new Water Services Council Controlled Organisation (WSCCO) as I do not wish to see another cog added to the cost of the local government machine.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
77	It makes our rates unaffordable	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

79	Stop wasting money we cannot afford any further increases between council waste and a 100% increase in water cost over a few years.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
83	More money, water was fantastic here 12 years ago.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
87	Atop wasting ratepayers money, you are literally bankrupting already struggling people	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
88	It is flawed logic to use debt to assign infrastructure costs to users over the assets life. Over 50 years at 5% interest the cost of finance is 130% of that for the infrastructure itself.... \$2.30 paid for every \$1 invested. Selwyn must join other Councils in adopting a "best total cost of ownership" approach ... restricting capital spend to pay down some debt to create heads pace for future investments as they arise. Paying infrastructure off over 20 years instead of 50 would mean the cost of finance is only 30% of the infrastructure cost. That is \$1.30 paid for every \$1 invested. (5% cost of capital). Yes, future generations will enjoy infrastructure we paid for, but we also enjoy infrastructure paid for by those who came before	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
89	I feel creating WSCCO would have huge start up costs and would mean the community will not have a voice as governance would be transferred to an independent board.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
89		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

90	It's just another level of unnecessary costs and structure. Create a new entity and your costs will escalate.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
91	This is just the first step to privatization and higher cost to the rate payers.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
93	... and yes. Is it really just the ability to debt load that makes savings over time for ratepayers? Debt still has to be paid off, so eventually it is simply a larger debt (albeit focused on water services) that ratepayers need to pay.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
96	I do not support the establishment of CCO for water services for the following reasons: It removes the control of water further from the owners (ratepayers) and from the control of our elected representatives.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
97	I don't believe that this is the fiscally responsible option. Yes - The WSCCO has merits, however we do NOT have the population to support this financially.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
102	While supportive of the formation of this new water body, there doesn't seem to be a distinct advantage delivered to consumers in cost.	Modeling shows an increase in costs over the first 9 years with costs reducing from 10 years.
103	I have not read any costing for this new entity and that is a huge concern. It ought to have been a large part of the consultation documentation. The release of an auditor report last year was an eye-opening insight into incompetencies or negligence in running the financial aspects of SDC and meeting regulatory (H & S) requirements. To this end I have no faith that the costings or projections provided by SDC in relation to this project can be relied upon.	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.

103	In recent years the Council has made significant investment in water infrastructure, but it is critical to continue maintenance and further investment to manage our growing population. Ageing infrastructure increases the risk of service failures, including water outages and quality issues. Taking a long-term view, there is a risk the in-house model may struggle to scale effectively to meet the ever-increasing demand on our district's assets, impacting service reliability and quality. And Unexpected repairs or emergencies can strain the Council's financial resources, leading to budget reallocations or increased rates.	Comment acknowledged.
103		Establishment of a CCO will benefit from specific water expertise both at a governance and management level, improved scalability and enhanced access to higher debt limits
109	Council is out of control with its spending. Rate increases are unaffordable and this new water entity has been touted as increasing our water costs in the first year by 10%, 15% in second year and 35% in the third year before coming down.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
110	In short to medium term the in house version works out cheaper. I don't trust long term predictor of cost as government organisations continually make massive errors around cost modelling to such an extent it is the norm rather than the exception.	Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled.
112	Selwyn council already provides 3 waters services. There is no need for more bureaucracy and cost to already stretched ratepayers.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

112		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
116	Do the job that my rates pay for, stop wasting money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
119	The separate costs to set up a new organisation including premises, logo design etc etc will still outweigh any benefits.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
120	WSCCO represents a duplication of existing services, administration and expertise, already found within CCO Corde. This will inevitably feed through into additional costs to ratepayers.	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
123	It doesn't make sense to split water services with some in house and some out, means more people needed to communicate from one workplace to another, which means more time and money.	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).

125	The increased costs to rate payers and potentially borrowing up to 500% to establish and manage the new entity are not justified.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
127	We do not need a completely new Company with all its attendant costs. Council staff already do the required work and all that would happen would be an unnecessary increase in staff numbers and overheads.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
127		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
135	I believe it will bring more cost to Rate Payers that are already financially stretched by the horrific rate rises we have had in the past 3 years.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
140	The cost of water supply should fit within the current council long term plan and should not have any additional cost. Moving to a separate entity allowing debt to be taken on shows little understanding about who bears the final cost (rate payers).	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

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

143 I believe that the creation of another entity will cost the rate payer dearly. The proposed borrowing is ludicrous.

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

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

145 Setting up a new organisation is costly and will end up with additional salaries etc that will need to be paid by rate payers.

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

148 The administration costs will be too much for ratepayers to have to be burdened with.

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

151 No I don't. As a rate payer all I can see is vastly more expense and more rates.

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

152	The Selwyn district rate payers can not afford it.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
157	No definitely do not support that huge cost to our council which in turn lands on even more rate increases. We are being burdened with 14% rises for the next 3 years.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
159	The rates increase with the LTP is high enough over the next 10 years to also add additional for a new water services operation when there is already infrastructure & staff employed to these services already within the Council	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
159		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
161	Expensive setting up a new controlled organisation. A huge expense. There will be double ups of resources and staff. Keep it simple	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
165	Council should keep drinking water and wastewater assets as they are to reduce rates	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

168	I do not believe that the district council has been good with money. Making a new council will just cause more costs and there is no control over it.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
168		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
169	This is a total waste of resources.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
173	This will have a huge impact on future generations and affordability for owning property. This is only one portion of driving the rates up. It seems crazy to do this so you can borrow more and put the debt as leverage over ratepayers properties.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
173		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

174	The benefits of this change to a WSCCO as a single authority do not seem clear. A WSCCO requires additional set up costs, additional overheads to run with the investment levels essentially being the same in terms of asset renewal over the next 10 years. My view is that the ONLY benefit is to borrow more (i.e. additional cost of debt) to do the work faster rather than prioritise the asset renewal programmes over time. This requires an additional cost ratepayers and seems counter-intuitive as the savings are projected to be 10 years away, and may not be realised due to the huge number of changing variables that may come into play in the intervening period. I also cannot support a WSCCO proposal which is then not accountable to the local democratic process.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
174		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
174		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
174		The work programme is currently based on the LTP. If the proposed WSCCO goes ahead a policy on the use of debt will be put in place, likely to be aligned to the current SDC policy.

174		Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing
174		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
178	Asking the ratepayer to agree to a possible \$2000+ increase in payments per year to establish the WSCCO is out of touch with the cost of living crisis. People simply cannot afford this.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
178		Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
189	I feel creating WSCCO would have huge start up costs and would mean the community will not have a voice as governance would be transferred to an independent board. It also seems very risky if the WSCCO ran into financial distress.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
189		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
189		As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA). A WSCCO would have a Letter of Expectation from SDC which would set out the expectations of the entity, that coupled with regular meetings discussing progress and the financial position would mitigate the risks of financial distress.

204	I think that setting up a new organisation will simply add another layer of costs. I understand the value of having a separate organisation from a borrowing perspective but given that the majority of Selwyn's water infrastructure is new, there should be little need for significant one off costs for some time to come	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
204		The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and our current borrowing cap of 280% to fund all of Council's projects. Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the regions growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.
206	By adding in essay additional costs to rate payers, try better do another more cost effective model. Us ratepayers are not open cheque books we are all not got extra cash to burn. Increase developers fees to help pay.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
206		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
206		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

207	Setting up a separate organisation will bring with it additional unnecessary setup costs and another structure. It will be a pit the council will need to pour more money into, and leaving the stormwater with the council will make things clumpy	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
207		Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
211	Page 7 of your Consultation on Document (CD) says "The projected costs for maintaining the current water services model for drinking water and wastewater are \$857 million over years 2-10 of the Long-Term Plan 2024-2034" That is \$95 million per year for 9 years.	Investment planned is currently detailed in the Councils 2024-34 LTP and 30 Year Infrastructure Strategy. Council has and continues to invest significantly in water services.
211	It is absolutely unbelievable that for such new towns that are Lincoln, West Melton & Rolleston, thanks to the significant urban growth that has happened in the last 20 years, that this amount of money is needed to bring the towns up to standard. Considering that the old parts of the Selwyn towns are outnumbered by the developments over the past 20 years, what is required to meet new standards sounds like serious incompetence by engineers, planners or Council.	The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and our current borrowing cap of 280% to fund all of Council's projects. Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the regions growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.
211	As well, on Page 15 of CD it is stated "Council has a good level of compliance" in relation to regulatory standards & on Page 5 "The Council believes this proposal will build on the great work already done by SDC".	Investment planned is currently detailed in the Councils 2024-34 LTP and 30 Year Infrastructure Strategy. Council has and continues to invest significantly in water services.
211	I cannot reconcile that so much money is needed to fix a problem that exists in a water system that already has "good compliance" and is "building on the great work already done".	Comment acknowledged.

223	I believe it would cost more in the long run. I believe the control would be given to a company who only goal is to make profits. I don't think they will care that its the peoples hard earned money at stake.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
223		The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income
225	It is not very good idea if it is going to inrease the price of the rates that some home owners are struggling to pay now .Its getting ridiculous how many thins the councilors want to bring in without ratepayers wanting or knowing about .	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
228	Based upon my reading of the consultation document there is no real advantage for ratepayers to move Council drinking water and wastewater assets into a new Water Council Controlled Organisation (WSCCO). The rates and water service charges must increase if assets are moved into a WSCCO. There will be duplication of staff and many transition costs that will have to be recovered. The consultation document shows a 10 year period before any possible and unknown cost savings are made, yet there is no evidence to support this.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
228		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

228		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.
235	Our rates cost far to much for alot of stuff we dont need and will never use already. We dont need another charge for the council to add another division of itself.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
235		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
238	The council already has one of the most up to date Water/Waste water programs, so why change this? Adding a new entity will add further red tape and therefore more cost to the rate payers.	Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.
238		Additional access to funding will be important to support significant growth in Selwyn District
238		A separate entity does provide the benefit of having specialised governance with expertise in the sector.
241	The rating information indicates that cost-wise to ratepayers there is no clear benefit to ratepayers, with the WSCCO costing substantially more in 8 of the next 9 years of projections provided.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

250	Ratepayers do NOT want to fund the establishment of a new entity that involves paying for staff, vehicles, buildings and their maintenance when ratepayer-funded people with the requisite skills and knowledge are already on the council's staff	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
252	The council needs to work within it budget and stop loaning money.	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.
252		After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
255	This has not worked in Auckland and why do we need another price hike in Rates as the multiple new subdivisions should be contributing much more money. Would this involve having some overpayed person at the head of this new company .New building building to house it and multiple new employees. Leave the water control as it is with the council	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
255		Developers will still be required to pay development contributions. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around May. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

264	No advantage in changing when SDC water system is one of the best in the country, only a burden to rate payers with horrendous rate increases without this added expense. WSCCO will cost us the rate payers more. The rates will not go down over 10 year period as promising (that will never happen, this council just seems to want to spend spend spend, this is our money and alot of people are already hurting with the huge rate rises last year and again this year no doubt. No more borrowing tighten your belts and help your rate payers	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
264		Comment acknowleged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
264		The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
267	Council acknowledge that, with set up costs suggested around \$2 million, there will be an ongoing additional increase in rates with a WSCCO up until at least 2033/34 when some marginal savings appear. With the projected rate rises already in the Long Term Plan, further increases are unacceptable.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
273	Rates + water service charges will increase faster in the WSCCO model than in the "in-house" model.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

273	There is a promise that after the first 10 years the WSCCO will be cheaper than the in-house model but there is no evidence in the consultation document to support this. The promise that charges/rates will go down after Year 10 is the promise every council makes in the 10 year Long Term Plan (LTP). In every subsequent LTP the decrease at year 10 is not realised. The consultation document has no evidence of any water services project that would require the extra borrowing ability that a WSCCO would have.	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.
273	The SDC already has the best credit rating a council can have, therefore a WSCCO can not borrow money at an interest rate lower than council itself. Council has to guarantee any WSCCO borrowing to enable the wholly own WSCCO to borrow. So where's the savings coming from?	Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
273	Commonsense says extra borrowing means extra repayments. Sure it means more projects can be done sooner, but they will cost more overall if more is borrowed over a longer term.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
274	I don't believe Council can manage a CCO well, seeing how CORDE has been handled. Also, we will not have an Annual Plan since council has claimed that the budget changes within the LTP and Annual Plan would be minimum, however implementing a CCO would have big costs implications.	A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.
274		If the proposed WSCCO goes ahead yes there will be an impact on the annual plan
275	And it's One of the supposed benefits of a WSCCO is the ability for the entity to borrow more money than in-house entity - no consultation, no accountability. Ratepayers saddled with more debt and higher rates. ENOUGH!	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

276	Many cannot afford the proposed increase in rates for the next financial year let alone future years. Every year individuals or Businesses assess investment to expansion, redevelopment or improvements according to ability to finance or service debt. Local Government should be doing the same and focus on essential or needed expenditure and deferring "Nice to Haves" until they are affordable. Your Ratepayers are not "Cash Cows".	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
276		The WSCCO will focus on the essential work of Water and Wastewater services
277	Setting up a WSCCO appears to be an expensive and inefficient way to manage some of the water services	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
279	With Bureaucracy comes the added feeling of a loss of control of local oversight and accountability. Not to mention the added cost of another organisation with the community footing the bill, while we are struggling with the cost of living.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
279		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
280	Moving into a WSCCO will result in rates and water service charges that will increase at a faster rate than the in-house model. This will also allow the Council (WSCCO) to increase borrowings that will be at an unsustainable level. I do not have confidence that this Council can control its spending in a prudent manner.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
282	We can't afford more debt associated with a WSCCO and more rate rises in the short term. SDC and its mayor and councillors are making impossible to afford living in Selwyn	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

282		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
284	The cost of this to rate payers will be unaffordable for many - especially single income households and pensioners	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
287	The Council should aim to keep the debt ceiling as low as possible. A new WSCCO will raise the debt ceiling beyond what the Council/Rate payers can afford.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
288	Uncalled capital Defined as that portion of subscribed capital that has yet to be paid for by the shareholders. The incentive for the Council to enter into this arrangement seems to be the source of lower cost loans. This is a false economy as it places our assets at risk in the event that a "call" is made on the outstanding capital pledged by the WSCCO. Thin edge of the wedge This move by the council is motivated by a desire to comply with the current coalition government's desire to change the funding modelling for local governments. It works best when local councils combine to form regional borrowing entities that have a greater asset base that can securitise loans of very large sums. For this reason the Act allows for joint WSCCO's to be formed from several local authorities.	As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA).
288		As part of the Delivery Model Options there was an option for Territorial Authorities to explore new Delivery models including joint local Government arrangements. SDC consulted with other Councils, however this was currently not a viable option, although this could be considered in the future.
295	It is unethical to commit to such a multi generational debt load, especially as nothing can be known about the future interest rate changes, and it is completely unacceptable to just keep raising rates .	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

295		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
297	The WSCCO is not more cost-effective over the next decade. The cost benefit of the WSCCO has been continuously asserted by the council during the consultation, yet their own figures in the rating examples show that it is only in year 9 of the outlook (2033/34) that the WSCCO option would be marginally cheaper. In the next 7 years (up to 2031/34) it is substantially more expensive. After year 9 there is no information provided that justifies the SDC claim that the WSCCO will be cheaper to ratepayers in the medium to long-term – such assertions need evidence!	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
297		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.
301	Selwyn has experienced excessive growth within the last 10 years which has continued to deliver major rates increases to all rate payers, not just those immediately reliant on Council administered drinking water, wastewater and stormwater servicing. ESAI does not accept that the WSCCO model will deliver any reduction in rates relief over time but will exacerbate even more residential growth over rural land and further put at risk the environmental capacity of the district.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

305	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.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
306	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.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
307	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 outcomes of this has led 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 rate payers covering the difference.	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
307		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

307		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
307		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
309	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.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
310	Either way its going to be more expensive but i value simplified billing	Comment Acknowledged
310		The WSCCO option would continue with targeted billing for Water and Wastewater.
311	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.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
311		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

311		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
316	I see no value in creating yet another Council business. Keep the Selwyn District Council drinking and wastewater assets and services in-house.	Comment acknowledged.
320	Waste of more ratepayers money	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
321	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.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
321		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
322	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.	Council is also investigating an in-house water delivery model as part of this consultation. However, keeping water services in-house does not mean things will stay the same - significant investment will still be required to meet new government legislation and compliance requirements. While both options have benefits and risks, the cost of upgrading and maintaining water infrastructure is unavoidable under the new legislative and regulatory framework. The legislation and regulatory changes have yet to be confirmed by central government.

323	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 additionl debt ia requires to maintain services above what is already factored for, how did council sign off on a plan that didnt cover the costs and need for our infrastructure.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
323		Council is also investigating an in-house water delivery model as part of this consultation. However, keeping water services in-house does not mean things will stay the same - significant investment will still be required to meet new government legislation and compliance requirements. While both options have benefits and risks, the cost of upgrading and maintaining water infrastructure is unavoidable under the new legislative and regulatory framework. The legislation and regulatory changes have yet to be confirmed by central government.
324	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.	Control of costs also means deferral of cost or halting of required activity which may or may not occur. Please note one of the government's rationales for asking Council to consider seperate delivery entities has been to allow for a depoliticisation of water which is some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motive.
324		Comment acknowleged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
326	I believe Council already have ample staff to do the job and will save on costs	Comment acknowledged.
327	Rates will go up either way but less if it stays in house.	The current LTP modelling would require additional costs to what is included due to the Central Governments regulatory updates.

328	I am opposed to this proposal due to the high cost it will incur for the next generation.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
329	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.	Comment acknowledged.
335	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 3320/oincrease 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 ove1r the next 4 years, with the proposal Council is now suggesting an increase on 1 :35% over this 4 year is acceptable (based on water/wastewater making up approximately 30% of a residential account).	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
335		Through the Act there will increased costs and compliance required, this means there will be added costs for either option taken.
335	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 1for growth.	Development contributions have been appropriately setout in the Development Contribution Policy. Council fully funds a 20 year renewal programme.
336	The proposed costs are unnecessary creating more intergenerational debt is not welcome. The current inhouse team have done a great job.	Comment acknowledged.

336		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
343	We do not need another organisation. That means more wages and rates being wasted.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
346	The increases proposed under the WSCCO are significant and arguably unreasonable.	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
346	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.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
346	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.	Operating charges are the costs required to operate the water services. Capital funding is the capital projects required to develop and grow the asset base required to supply water services to the ratepayer

346 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. Comment Acknowledged

346 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. Comment acknowledged.

346 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. Comment acknowledged

346		Comment acknowledged
350	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?	As stated on page 16 of the Consultation Document, modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. 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.
350	In addition, the financials provided show that the in-house costs over a 10-year period for an urban residential property with sewerage are \$19,667 compared with \$22,328 for a WSCCO. They also show that those costs under a WSCCO will remain static in years 3 to 4 and again from years 5 to 9, yet the additional costs of a WSCCO covering governance and management will continue each year. It seems disingenuous to suggest that the costs will ultimately be less for residents in the longer term. It was noticeable, during the panel discussion streamed over the internet, that the two elected members treated with some humour the contention that costs would not rise or would not rise as much with a CCO model. That did not give me confidence in the financial predictions. For my money I would rather retain the ability to be consulted and to influence democratically, even if the costs in-house were to be slightly higher. And that is not a given.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

352	Council should not be using debt secured against ratepayers homes. I do not consent to my home being used as collateral for council debt.	The debt under the proposed WSCCO will be secured by the uncalled capital from SDC. SDC does not have right to claim individual houses unless in extreme circumstances on unpaid rates. The proposed WSCCO would have no direct claim on houses.
353	This is wrong. You will be creating more hardship for households.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
354	Instead, potentially added admin & running costs in areas such as HR & management.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
356	Too high a cost to ratepayers	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
357	Stop increasing charges! Stop over-spending! Keep borrowing to a minimum! Not more! Keep to essential, basics, only!	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
361	No more unnecessary expenses for ratepayers thank you.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer

369	New organisation requires significant rate payer funding to establish and is not easily accessible to rate payer feedback - further removed from the democratic process, thus not as accountable.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
369		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
370	As a rate payer a separate entity but still Council controlled sounds more like a useless expensive double dipping opportunity to me.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
371	I am not in favour of the setting up of a new organisation and the costs involved if only to have access to borrowing more money.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer

372	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 SOC 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 SOC 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.	As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA).
372	• 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 rateis are already high.	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.
372		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

372	• Duplication of Services: Establishing a new WSCCO entity would require additional support services- Financial, Human Resources, Legal, IT, and Management-many of which SOC already exist and would provide capability in-house.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
372	• 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.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
372	Key advantages of in-house: 1. Cost Efficiency & Financial Prudence: o High setup costs and transition expenses associated with WSCCO are avoided at a time when current increases in rates are massive (cf. to Council's in the area having increases around 10%).	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
372	o SDC retains direct control over operational costs and infrastructure investments.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
372	o Prevents excessive debt accumulation and unquantified financial risks which will be borne by the ratepayers.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

372	Minimal Disruption & Implementation Feasibility: Retaining in-house water service delivery avoids unnecessary complexity, restructuring, and transition challenges and expenses borne by ratepayers.	Comment acknowledged.
372	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.	Comment acknowledged.
372	Advantages of In-House Water Service Delivery: Strategic Flexibility & Long-Term Sustainability, o Enables SDC to collaborate with other Councils to improve efficiencies and share expertise and if the need should arise in the future increased co-operation. o Ensures infrastructure planning aligns with Selwyn's growth and sustainability goals.	An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
372	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.	Comment acknowledged.
383	Setting up a new board is expensive, a 500% debt limit! Expensive, who and how is that paid for? For next 10 years what is WSCCO rates increase and LTP rates increases added together for average urban home?	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
383	Rates increases are already too high and hurting a lot of residents. Some are selling because they can't afford the rates increases - especially retired residents.	Debt is used to fund capital projects, debt is used to pay for a project over a long period of time instead of putting the burden on the rate payer all in one year. This provides equity and results in even rate increases. For the average increase to an urban house hold please see the link to the FAQ's with a breakdown.
383	There are many unanswered questions about the model.	Comment acknowledged

385	To great a risk & startup costs to onerous on ratepayers also a leap into the unknown.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
389	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.	Due to and WSCCO establishment requirements, the removal of these water services from council rates would not equate to an initial direct \$1 for \$1 shift, with financial modelling identifying that from year 10 these charges are predicted to be lower than the projected rates requirement published in the Long-Term Plan 2024-2034
389	Will the Council require staff currently involved in safe water provision be required to take positions in the new WSCCO?	Due to the fact a final decision has not been made by council, any activities post that are not able to be predicted, and we are not in a position to consider staff impacts including redundancy costs or other specific impacts . In the event a transfer of staff is deemed necessary, impacted staff would be fully consulted with on any proposed changes before any final decisions in regarding employment are made.
389	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?	Debt is used to fund capital projects, debt is used to pay for a project over a long period of time instead of putting the burden on the rate payer all in one year. This provides equity and results in even rate increases. For the average increase to an urban house hold please see the link to the FAQ's with a breakdown.

389	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.	New Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards. Council is continuing to review all information as we proceed with the development of the Water Services Delivery Plan.
389		Through the Act there will increased costs and compliance required, this means there will be added costs for either option taken.
389	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.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
389		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
389		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Oppose WSCCO: Concerns about privatisation

1	While it sounds good, all future possibilities of selling the entity to a private company must be prevented. We saw it happen to the trains and to other assets before.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
34	Its not necessary to privatize as this will certainly impact our already expensive rates.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
51	In my lived experience I'm yet to see a privately delivered service that was once a council/government entity cheaper than what that public entity delivered it.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
53	It should stay in house to prevent any future privatization.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
59	It's the path to Privatization. We need to maintain our necessary services in-house.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
83	Don't go private. Highly against this.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
88	Once the entity is formed as recommended, the assets and local service would easily be removed from Council focus and leadership through amalgamation with other authorities and the potentially asset sales	Asset sales will still have to be considered in the context of the Water CCO's requirement to provide resilient water infrastructure and comply with water delivery standards. Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
91	This is just the first step to privatization and higher cost to the rate payers. I do not trust this council and their motives for this move.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
133	Stop trying to close or sell all of our assests that the rate payer has already and still is paying for just to be charged more for something we already own.....	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
201	Please don't waste rate payers money to a private company, they are only wanting get most profits.	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income

238	These assets should remain council owned. Transferring to another entity (although proposed to be council owned) risks sale of these assets in the future.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
252	Privatisation of assets has never worked for the benefit of the consumer.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
288	The Act, by allowing council shareholdings to drop to 50%, opens the door for private equity partners to enter the market. The council, with this view in mind, would seek to pass such amendments to the WSCCO, hoping that an apathetic ratepayer base would not object.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC. If another Council joined the SDC WSCCO in time, they would bring their own assets which would grow the asset pool proportionally and shares would be issued in proportion to that asset value contributed. The equity value of SDC's shares in WSCCO would remain the same. The provisions
316	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.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
418	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.	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income
418		The WSCCO will remain accountable to Council. A statement of expectation will be put in place between the Council and the CCO. The Council also remains accountable to the community.
Oppose WSCCO: Preference for Council control		
33	Do not need another company running what we already have set up in council	Comment acknowledged.
36	All water management to remain as a council deliverable.	Comment acknowledged.

46	Subsidiaries and SOE's within local and central govt have not delivered the results we hoped in NZ. Learn from this and keep it internal where the council has better oversight and control.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
57	We don't need another organization to keep the services under the Council.	Comment acknowledged.
62	The council should be able to manage drinking and wastewater in house as it does already.	Comment acknowledged.
71	Why do you need to set up another corporation, Selwyn District Council already is one.	Comment acknowledged
73	Water services should not exclude stormwater as SDC has identified several flood prone areas which by default reduces the properties values however this is not reflected in any rates reduction or remedial mitigation.	Splitting out stormwater from the other surface waters (water races, and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains in Council. Stormwater also integrates with Transport and Open Space assets.
73		This does not relate to part of the consultation
73	In summary keep the status quo in house and in changes need to be made do so within your allocated funding.	Comment acknowledged.
73		Comment acknowledged.
81	Drinking and waste water services are a core part of the council's duties, and should be kept within the council.	Comment acknowledged.
95	I am concerned that the risks associated with transitioning the control of water to a CCO have not properly been identified and thought about in this consultation.	Comment acknowledged. If decision is made to establish a CCO transition will occur over a period of time with a shared service model initially to ensure no drop in level of service.
129	I feel the Selwyn Council can manage this better.	Current water management by Council is provided to a high standard, a WSCCO option would provide a more focused Governance model.

144	I would have liked to see a more fulsome discussion about the benefits and costs of creating a stand-alone entity. There are some in the community who will effectively see this as distancing of a vital community asset from day-do-day Council business. You have put forward some good arguments as to why this could be a more efficient model, but it could come with risks if Council does not have full control of the asset(s) into the future.	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.
167	We have some of the best three waters infrastructure in the country. Currently well managed by an organization that is answerable to the rate payer.	Positive endorsement of current SDC management is acknowledged. A WSCCO would remain accountable to Council who in turn have accountability to ratepayers.
171	We need to keep decisions within Council (and therefore with ratepayers) as much as we can. A new entity is going to have it's own Board which we, as ratepayers, cannot elect. We have no idea if they will do their best to keep the cost of water on our rates down or if they will get driven by profit and dividend payout requirements.	The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income
171		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
176	I strongly disagree with moving the drinking water and waste water being moved into a different company that is appointed and not elected. They will not be accountable and the ratepayers will have no say in how they want their water managed	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
183	We do not believe that a new entity will have sufficient time to produce cost and service efficiencies over a 10 year period of expected return. The SDC already has governance capabilities to provide this service, albeit in an altered form, and should maximise the lifespan of existing entities and capabilities.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

190	By incorporating a CCO model there would be a lack of visibility and accountability from elected members in the operation of the network given this would be done at arms length. Much of the benefits are the increased available funding that can be accessed by going to a CCO model. I might be mis-understanding but given SDC has very high growth and subsequently a lot of capital contributions, relatively simple water supply and wastewater disposal compared to other Councils, it is concerning that the additional funding is seen as a benefit, and therefore should Council be more looking to balance the books rather than create opportunity to create a legacy of debt funding?	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
190		As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
193	In-council water management works very satisfactorily. Why change this when it works well for all rate payers at present.	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
194	Would prefer it was continued to be done in house by the council , so, hopefully, the community will be consulted.	Comment acknowledged.
205	Local representatives understand our community's needs. Accountability - Council members are elected and accountable for service quality. Service Quality - Concerns about maintaining current service levels.	Comment acknowledged.
205		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

214	no public consultation on big decisions. It will create another level of overpaid bureaucrats who can please themselves on how they spend ratepayer money.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
214		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
216	Learn how to manage your assets efficiently. Another layer of management and all the costs that go with it is not the answer.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
218	I believe an in house option could be as effective as wscoco. It simply needd to be resourced and skilled appropriately. A separate organization creates relationship, IT and data, and strategy alignment risks.	The WSCCO would have the additional benefit of a professional board.
218		Shared service agreements would be established to ensure organisation relationship and strategies are aligned.
218		Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

228	The SDC currently manages our water infrastructure very effectively and fairly economically. Why make the change to a WSCCO? We would also lose any say that we have through our Councillors or at the ballot box if a WSCCO is set up. Any individual or organisation that is managing a service and an asset well would be crazy to move that service to a contractor when costs would increase, risks would increase, and there would be a lack of say in how the service and assets were managed in the future. I urge the SDC to retain the drinking water services and wastewater services inhouse	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board.
228		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
242	Why do we need to creat and fund a new seprate entity this is why we have a district council	As highlighted on page 12 of the consultation document there are a number of benefits to the Selwyn Ratepayers: Enhanced Service Delivery; Dedicated Water Governance; Resilience and Adaptability and Community Benefits
244	The proposal adds a layer of management which adds complexity and cost to the delivery of water services and shields the council from direct accountability to ratepayers.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
244		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
245	It should stay within council	Comment acknowledged.
246	It would be a better option to deliver water services through an in-house water delivery model.	Comment acknowledged.

249	It sounds like an expensive undertaking, it's going to require more people, more management. Surely you have the staff to cater for what needs to be done at the moment without spending above and beyond.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
250	Further, the establishment of a new Water Services Council Controlled Organisation will mean the ratepayers' voices will count for even less than they do at the moment.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
266	I would appreciate greater transparency from your team. Currently, we are only servicing the interest on our existing debt, and it appears that your inability to secure additional funding is prompting this change. If managing these issues in-house has proven challenging, I must ask: what has been done over the past 15 years? During my tenure managing a company that frequently collaborated with you on water and wastewater projects, I became well-acquainted with your operations. Selwyn has a capable and knowledgeable team already in place, which raises concerns that this initiative may prioritize borrowing more funds rather than focusing on the best interests of the Selwyn ratepayers. We simply cannot afford to incur millions in additional debt, especially when we are already struggling to manage our current obligations. I quote: Council infrastructure and property executive director Tim Mason said while it will be up to the community to decide, a CCO would allow the council to borrow more for new infrastructure and pay it off over a longer period. The KEY HERE IS LETTING THE COMMUNITY DECIDE!	Council does have a capable and knowledgeable team which will largely transfer to the WSCCO should it be established.
266		Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users

266		Community views will be considered in the decision making process further to s 78 of the Local Government Act.
267	There is general agreement that the current state of Selwyn infrastructure is good, particularly compared to other Councils. This reflects credit on existing staff and Council decisions and there is no reason to expect this to deteriorate in the future. The suggestion that a WSCCO could bring in specialized governance and management begs the question of why it is felt this is presently lacking.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
271	Selwyn District Council has done a great job at managing and maintaining our current water infrastructure, and has done so in a cost effective manner, for the benefit of the ratepayers. I see no reason to change the current system (if it ain't broke, don't fix it) and believe we should keep it in-house. If at some point in the future this needs to be reviewed, please report back to the ratepayers with your proposal as to why a council owned organisation should be formed.	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board.
271		The Preliminary Arrangements Act sets out that only one round of consultation needs to be completed before a decision is made and implemented. There will be no further consultation.

276	Water is an essential part of day to day living requirements and control must be retained by the residents via the Council. Councillors are democratically elected triennially which gives residents an opportunity to have input on major issues of importance such as water. Ratepayers can also have input via the District Plan Review annually in a democratic society which New Zealand prides itself on. Passing control to an autonomous body will result in the users being denied input into issues involving water/water disposal. So often changes of services etc. in NZ have been sold with the promise of greater efficiencies and better services. In so many instances we are still waiting to see or benefit from those promises. Don't let your ratepayers and residents down again. We do not need another "change for change sake". Where do the returns from "CORDE" go?. I haven't seen any figures showing a return or benefit to Selwyn District Council. This proposal to form another entity will result in more increases in costs to ratepayers over which they will have no control. Selwyn District Council/Councillors have lost touch with their Ratepayers/Residents current financial position	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
276		Corde returns will remain to go back to Selwyn District Council as Council it still 100% shareholder of Corde.
276		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
285	It should stay in the council as is , so there is more local control and lower cost plus better accountability	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.

285		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
286	Council already have expertise in running water services. With the addition of a few key people it should be able to fulfill the government requirements. We do not need a separate organisation. Corde is a separate council controlled organisation with vehicles provided to employees that do not require them, and not enough accountability to ensure our rates money is spent efficiently. My belief is that a WSCCO would also require excessive spending to set up with too many managers on high salaries and perks. Stormwater pipes run alongside the other pipes, Maintenance will be easier to co-ordinate if all services are kept together.	Comment acknowledged.
286		A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. A CCO would remain subject to LGOIMA as Council is. Funds are required under legislation to be ringfenced for the spending on water. Please note the CCO will continue a volume based charging model of water charges, there will be no rates charged for water.
286		Surface waters (stormwater, water races, and land drainage) will remain inhouse due to the interaction with other Council assets particularly Transportation and Open Spaces.
287	A new WSCCO will not be controlled by Council and there may be issues in the future when Council don't like the decisions the WSCCO implement.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

290	The Council just want to palm off the responsibility	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
293	we are happy to keep this as is.	Comment acknowledged.
295	Borrowing up to 500% of total revenue is total madness - unless ALL the people on the WSCCO board and in management are held accountable and liable for the debt repayment !!! That would work - because that financial responsibility would make them pause and rethink their blithe overspending. It is undemocratic to have an organisation that is not accountable to voting rate payers - unelected people have NO place in councils, and have absolutely NO right to make financial decisions that affect rate payers.	Comment acknowledged
295		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
295		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
296	The carrot proposed by the present government for establishing a WSCCO is increased borrowing . Governments change. Selwyn currently is managing water and waste water successfully so there is no reason to abandon Council control. My understanding is that for WSCCO's to be economic they should provide for a population of a minimum of 200.000 people.	Comment acknowledged

296		Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
296		Community feedback has highlighted the importance of economic sustainability. To support the region's rapid population growth, there needs to be a clear and shared understanding of the economic sustainability threshold, what level of investment is needed now to ensure long-term value and resilience. Well-planned infrastructure enables managed growth, supports housing and employment opportunities, and delivers broad economic benefits. Without timely investment, the region risks falling behind demand, placing pressure on services and missing the opportunity to realise the full economic potential of growth.
297	Stick with the in-house management of water services, whilst completing the detailed business case evaluation, wait for the uncertainty around the legislative changes to settle with full clarity, and learn from the responses (and mistakes) of other councils. The desire to lead that has been expressed by SDC is folly and exposes ratepayers to unnecessary risks. It is our understanding that it is not a 'now or never' situation for setting up a WSCCO, the council can decide to do this at a later date, once they (and ratepayers) have the full business case and legislative changes available.	Comment acknowledged.
297		Council are unable to delay this given the need to present a WSDP by 3rd September 2025.

297	There is no clarity on the mechanisms that would be used to ensure that the WSCCO will be accountable to ratepayers . This requires independent efficiency evaluations to be conducted regularly, and full transparency to ratepayers. Based on the limited information available around CORDE, the current CCO of SDC, then we question the council's commitment to transparency around the WSCCO. At least with an in-house model ratepayers can directly ask councillors to seek this information, or if necessary, use an OIA mechanism.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
297		The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
298	Staff of the SDC are employed to ensure appropriate installation of those water services, and creating a WSCCO will only cause duplication.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
301	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.	Comment acknowledged

303	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.	Comment acknowledged.

303		Comment acknowledged.
303	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. 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.	
303		The Waiora One Water Strategy will be upheld regardless of any future changes in how water is managed or governed.
303		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
304	Our Selwyn District Council must retain drinking water and wastewater services & assets under its own control, because this District Council is accountable to the ratepayers for the results of decisions made. (And poor decisions will result in how ratepayers will vote) at its next elections.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

316	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.	Comment acknowledged.
316		Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
318	Council should provide this as a core service in house. without any gold plating.	Current water management by Council is provided to a high standard, a WSCCO option would provide a more focused Governance model.
323	My preference is to retain services in house, which could allow more time for thorough investigation to understand the true impact of having a WSCCO	Comment acknowledged.
325	We know what is being delivered now and it is adequate. Why change	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
330	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.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
333	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.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
333		This will be balanced by the Annual Statement of Expectations that Council would sign off on to provide direction to the WSCCO.

335	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.	Comment acknowledged.
335	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. 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.	Compliance risk can be managed in house. The benefit of the WSCCO is the specific focus of a professional board.
335	Council should have long term development plans, with asset management plans to support its service provision and growth.	Council has a 10 Year Asset Management Plan along with 30 Year Infrastructure Strategy for water services and other asset types.
335	• Set of objectives to manage and provide water services. Comment: should be in place now. May require review. • Compliance with financial principle, matching revenue to expenditure. Comment: should be in place now. Separate rate, charges would be readily identifiable. • Operating within planning and financial framework: Comment: Nothing new here.	Comment acknowledged.

338	The chief reason you give for moving to a CCO is the ability to borrow more money. No information has been provided on the actual needs for more borrowing, nor the implications of this on rates (and shifting rates over to water service charges is glossed over, with no transparency as to the combined cost to households over time). You should pause this process, retain FOR NOW the existing 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.	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.
339	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
342	We do not need another organisation. It's the council's job.	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
345	This will be less accountable and add further financial burden to Selwyn over the long term.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
345		Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer

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

350	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.	This matter is more related to our focus on implementing the findings of our recent Representation Review.
354	Also diminished accountability to the community.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
355	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.	An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
360	Why reinvent the wheel, setting up a new organisation and still under council control?	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
363	Selwyn water should be managed and run by Selwyn District Council as this is their responsibility!	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
365	Why another organisation, the Council already has control over water.	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
365	Is this 3 waters in another disguise	Three Waters was repealed by the government in early 2024 and replaced with Local Water Done Well. LWDW is designed to provide more flexible options than Three Waters.

367	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.	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025. Any budget allocated to the programme team is there to support water services delivery regardless of the delivery model chosen.
367	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.	Wellington Water was a management company delivery services but not responsible for the maintenance of the assets, this is different to the model applied here. there will be external central government oversight (which did not exist in the Wellington Water example) and a statement of expectations and charter will be established between Council and any CCO. The external scrutiny would also apply to an in house delivery model, but the governance structure would be unchanged.
367	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.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
372	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.	Comment acknowledged.

372		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
372	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.	As suggested the cost benefit of the in-house model is a short-term benefit. The initial additional costs helps in setting up the water services for the future while improving quality of service without the cost immediately falling on the ratepayer
372		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
374	Remain as it is	Comment acknowledged.
388	Council is not acting in the best interests of its rate payers	Comment acknowledged.

389	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 Central government is coming out with Local Government (Water Services) Bill 3, this requires SDC to look at how waters are managed. A new WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the CCO including the ability to align strategic work programmes.
389	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?	A separate entity does provide the benefit of having specialised governance with expertise in the sector rather than elected officials with competing objectives.
389	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.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
397	SDC needs to tell ratepayers more	Comment acknowledged

398	We already have the 3 water service at the moment and the council people employed to run this. Why the extra costs to ratepayers!!	The current LTP modelling would require additional costs to what is included due to the Central Governments regulatory updates.
398		Additional access to funding will be important to support significant growth in Selwyn District
399	Ratepayers can't afford this shiny new entity with it's need to borrow huge amounts with no accountability.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
399		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
402	Get rid of the ideas like "got to do something" because "something Might happen"	Comment acknowledged
418	Based on this review and my own understanding of our district's needs, I have serious reservations about the proposed COO model:	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
418	· Loss of democratic oversight and transparency · Reduced community accountability and voice	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
418	· High setup and administrative costs	The benefit of the additional administrative costs will be a governance structure that includes Water expertise that can provide greater management and strategy on the projects performed by the WSCCO
418	· Potential inequity through cost-recovery pricing models	The proposed charges for water will be consistent across the region on a per cubic metre charge with the 'Water Supply charge' continuing to be based on the number of connections
418	· 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.	The WSCCO would remain accountable to Council. A statement of expectation would be put in place between the Council and a WSCCO.

Oppose WSCCO: Concerns about bureaucracy and complexity

12	The last thing we need is more bureaucrats	A separate entity does provide the benefit of having specialised governance with expertise in the sector.
16	Not another bureaucratic entity on top of our council one!	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
25	I cannot see that the inclusion of another organisation in the management of our water will add any efficiencies.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
27	It is adding yet another layer of unnecessary bureaucracy.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
30	Splitting water services between the WSCCO (drinking water & sewage) and the council (stormwater, land drainage, and water races) seems inefficient. This creates duplication in staffing, equipment, and operations, which could increase costs rather than reduce them.	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
37	Look, you do what you like, as you have already made up your minds. You had already signed the waste pipe contract off, before the end of that consultation period, so why waste our money with this consultation. The rate payer detests the Selwyn District Council, but you know that already.	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025. Any budget allocated to the programme team is there to support water services delivery regardless of the delivery model chosen.

73	Going down this path will likely end up a bureaucratic top heavy organisation with no practical hands on experience.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
80	I am opposed to the setting up of a separate entity with its own board and ceo etc because I do not believe that overall the efficiencies claimed will be achieved.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
80	The major benefit in having a separate entity seems to be an increased ability to borrow. If that is the case, surely a simpler approach would be to get the borrowing restrictions changed.	The Debt limits of 280% for Council and 500% for the proposed CCO are not set by council but set by LGFA (Local Government Funding Agency)
94	The competent management of fresh water/waste water is a core and direct responsibility of any Council, and not something to be passed on to an 'arms length' organisation with its own bureaucratic infrastructure and associated overheads which would inevitably and once again be funded by ratepayers.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term, reducing overheads. The CCO will remain accountable to Council who in turn have accountability to ratepayers.
105	A separate entity will require additional layers of administration and overheads to run.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

106	Another entity means more money wasted on management and administration.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
107	I believe when the areas are joined as one this makes it easier for bigger decisions to be made without public having a say about our services.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
122	I want status quo, you can learn to manage assets as it's one of your basic jobs, not to create another bureaucratic nightmare. I don't even understand "Waikirikiri Ki Tua Future Selwyn" I cannot even find our Library. This is not democracy. I don't trust the council, some time ago properties were rezoned to stop the breaking up of land. All I see is West Melton growing and creating congestion. Poor roading layouts. I don't agree to what's happening in our area including slowing traffic down on a main highway with traffic lights and now more intersections from a growing village. Use your intelligence and not agenda against the public will. For your interest there are technologies out there that toilets incinerate waste without septic tanks etc, you also create waste from the atmosphere. How about that. More innovation is required by you not the same old.	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.

156	Keep it simple. Do not need another layer of management etc. Waste of money.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
187	The cost to rate payers, especially pensioners, is beyond reason and our pockets. A WSCCO is absolutely and irrefutably unnecessary. We have already, in Council employ, highly qualified and trained engineering personnel who are quite capable of making informed decisions w.r.t. water concerns into the future.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
187		Council does have a capable and knowledgeable team which will largely transfer to the WSCCO should it be established.
198	I strongly oppose moving to the WSCCO model due to the added burden of increased costs which are astronomical to rate payers who are already battling with economic downturn challenges as well as the foreseen and added layer of bureaucracy to the council model which is unnecessary.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
198		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

203	A WSCCO introduces a separate governing body distancing decision making from direct council control and community oversight.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
203	Given that water services are essential public assets, removing them from direct democratic control reduces transparency and limits resident's ability to hold decision makers accountable.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
214	This will be a huge mistake for Selwyn Ratepayers, massive amounts of debt will be racked up,	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
214	no public consultation on big decisions.	Comment acknowledged.
214	It will create another level of overpaid bureaucrats who can please themselves on how they spend ratepayer money.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
214	We don't need additional bureaucracy.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
227	The proposal does significantly increase the costs to rate payer for providing some of the most basic council's tasks. Minimal promised cost reductions in a decade from now are best a pie in the sky based on unsubstantiated assumptions.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

227		Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
227	I suggest the council focusses on its task of providing efficient and effective water services instead of on increasing complexity and cost for providing some of their core services by outsourcing these tasks.	Management of water services inhouse is one of the possible options.
238	These assets should remain council owned. Transferring to another entity (although proposed to be council owned) risks sale of these assets in the future.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
244	The proposal adds a layer of management which adds complexity and cost to the delivery of water services and,	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
244	shields the council from direct accountability to ratepayers.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

244	The proposal is impelled by the National parties "Water Done Well policy" which posits that ratepayers assets will remain exclusively in their control, as opposed to a 3-water Co-Governance model, yet we see as much control by a central bureaucracy under their plan. They are encouraging Councils to form "joint" WSCCO's that will drive debt even higher. The next logical step in their plan would be for Selwyn to combine with other Councils to establish a mega-borrowing entity that, infused with borrowed money, is likely to fast track implementation of their version of imperative infrastructure. On the other hand, a more frugal council, acting independently, would resist such reckless expenditure and ease the debt burden on current and future rate[payers].	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
273	On the information in the consultation document there is no clear advantage for ratepayers in the next decade if a WSCCO is created. Rates + water service charges will increase faster in the WSCCO model than in the 'in-house' model.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
275	WASCCO will be an expensive,	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
275	multi-layered barrier between ratepayers & accountability through elected Councillors.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

276	Ratepayers can also have input via the District Plan Review annually in a democratic society which New Zealand prides itself on. Passing control to an autonomous body will result in the users being denied input into issues involving water/water disposal.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
276	So often changes of services etc. in NZ have been sold with the promise of greater efficiencies and better services. In so many instances we are still waiting to see or benefit from those promises. Don't let your ratepayers and residents down again. We do not need another "change for change sake". Where do the returns from "CORDE" go?. I haven't seen any figures showing a return or benefit to Selwyn District Council. This proposal to form another entity will result in more increases in costs to ratepayers over which they will have no control.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
276	Selwyn District Council/Councillors have lost touch with their Ratepayers/Residents current financial position	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
279	I feel that moving to WSCCO has the possibility of introducing additional layers of bureaucracy that may slow down any decision-making process, restricting future innovation and upgrades in water infrastructure and technology.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
279	With Bureaucracy comes the added feeling of a loss of control of local oversight and accountability.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
279	Not to mention the added cost of another organisation with the community footing the bill, while we are struggling with the cost of living.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

288	The current submission process would do nothing to halt that trajectory as it is an inadequate consultation process and can be ignored anyway.	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025.
288	Summary With an election in October 2025 it is utterly untenable for the SDC to rush through this proposed change to delivery of our water services. We do not need to be the first guinea pig of a centralist government model that passes burdens onto ratepayers, as opposed to taxpayers.	Comment acknowledged.
288	Selwyn has already invested large sums into water infrastructure which have provided minimal benefit to existing ratepayers. They have been based on ESG policies which are questionable at best.	Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.
288	We do not need another layer of bureaucracy standing between ratepayers and service providers; it adds cost and weakens the role of ratepayers in deciding how these services are provided.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
292	Not interested in paying profit for water. Adding contractors to the process introduces extra cost for no real gain	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
297	There is no clear evidence-based rationale on why SDC should lead ahead of other councils in setting up a WSCCO.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.

322	We are opposed to the duplication of roles and the added expense ratepayers will need to cover.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
348	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.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
348	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.	A WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.
377	There is enough bureaucracy in what is recognised to be the worst council in NZ now.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

406	Add another layer of bureaucracy and layer of top end high cost personal duplicating what can be done by present system.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
418	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.	Comment Acknowledged
418	The costs of establishing a new entity are also substantial.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
418	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.	New Government legislation requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Other: Concerns about timing and process

30	The consultation period is only three weeks, which is insufficient for residents to fully understand the long-term financial and service delivery implications. A decision of this magnitude should involve a more extensive public engagement process.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
30	The Council has already appointed a chairperson to set up the WSCCO, which raises concerns that this consultation is a formality rather than a genuine effort to seek community input.	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025.
30	The consultation document is only 20 pages long, with limited financial details, particularly regarding debt repayment strategies.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

30		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.
41	Please don't create a WSCCO I understand you're reacting to central government legislation. Future governments may enact new legislation too and it's far, far, far easier to respond as one Council rather than then several different CCOs.	Comment acknowledged
121	My submission is about not enough alternative options being explored and presented, so in fact there is not enough information to choose yes or no.	Comment acknowledged
138	Personally think a referendum be held till after the election. We want people to actually do what is best for the area not just the first to implement it as this is huge. The information regarding this is not informative enough.	Comment acknowledged
142	Lack of Information in Consultation Document *The Your Water Done Well Consultation Document lacks sufficient detail. *It presents a generalized intent rather than a clear, comprehensive plan. *The document appears biased in favor of WSCCO while portraying Selwyn District Council (SDC) as incapable.	We are bound to follow the legal guidelines provided under the Local Government Act, and the Water Services Preliminary Act regarding connection with the community and they have provided the parameters for us to work within for decision making.
142	*The government's legislation on this matter has not been finalized. *Without a legal framework in place, WSCCO cannot accurately outline its intentions or predict outcomes for ratepayers	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

142	*A decision of this scale should be made with full public input. *A local referendum is necessary to ensure residents can make an informed choice. *The current two-week consultation period is inadequate, especially given the low public awareness of this proposal	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
146	On the first page of the submission form, the tick box indicating "Do you wish to make a submission before council?" is pre-marked as No. I strongly feel this box should be left blank, allowing submitters to actively make their own choice rather than being led by a pre-selection.	Comment acknowledged.
146	• The Yes/No options appear before there is space to provide any reasoning or comments. This gives the impression that the act of ticking Yes or No is the most important part, rather than the ability to engage with the issues fully. I believe this ordering undermines the consultative process and discourages detailed public input.	Comment acknowledged.
146	• One has to tick a box before the submission can be accepted, there fore I ticked NO to each option.	Comment acknowledged.
146	I urge council to take these concerns seriously and to prioritise transparency, proper public engagement, and thorough analysis over adherence to arbitrary timeframes.	Comment acknowledged.

146	Without clear answers to these questions, it is very difficult to offer meaningful support for either option. Decisions made under pressure, with incomplete information, are likely to lead to poor outcomes for the district and for future generations of ratepayers.	Comment acknowledged.
173	This is being rushed without proper consultation. What is the actual benefit to rate payers for being the first local authority in NZ to set this up? It feels like the decision has been made with ratepayers an afterthought.	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025.
173	Three Waters was opposed. Wait for legislation to be written to understand the full implications and effects.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
173	Water should stay in house to manage! Assets aren't being properly maintained now. How about fixing the current issues instead of creating more.	Comment acknowledged.
173	I also cannot support a WSCCO proposal which is then not accountable to the local democratic process.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
184	Aside from not providing enough information as to what changes need to be covered, I have worked in local government and silo working is bad for the Council and the community especially in the case of essential services.	A statement of expectation will be put in place between the Council and shared service agreements will be establish to ensure organisations relationship and strategies are aligned.
184	Also, rather than borrowing more to just do what the government asks, SDC should stand more for fighting for what your community needs and wants at an affordable price. This long term decision should not be made without comprehensive consultation with the community and rushed through before all of the facts are available. Any reasonable organisation with good leadership would not proceed with a major structural decision like this without the all the facts being known and with full bi-directional consultation with it's key stakeholders and understanding of the stakeholders desire.	Comment acknowledged

184	As I understand, local councillors have been asked to hold / attend community meetings on this matter and have ignored these requests. I can't see how these councillors can therefore truly represent the views of their community which makes the whole process very undemocratic.	Drop ins were held in all four wards, and some Councillors chose to also hold their own meetings, or speak at residents association meetings. There was an online session for those able to access the internet and this was recorded and made available after the fact.
185	After having attended a public consultation forum and reading through the submission i don't feel that there has been sufficient information to make me vote any other way.	Comment acknowledged
185	For now the SDC has the ability to retain these services inhouse and use their existing staff who have the best understanding of the area and how water is used etc.	We recognise that our water team are a highly skilled and knowledgeable group of people who are passionate about delivering water services to our community. Staff who currently perform work that would be impacted by a CCO potentially becoming responsible for drinking and wastewater will be fully consulted on the impact of the transfer
185	I feel the SDC is moving too quickly on this and should take a more considered approach By transistioning the control to a third party does not appear to be in the best interests of the community (in my view from what i have read or listened to).	Comment acknowledged.
195	This is a ' cart before for horse' , unlegislated, premature, grandiose, bordering on criminal proposition. SLOW THE HORSE DOWN. We do not need to be leaders in this field. Most of our infrastructure is new. A WSCCO may free SDC to leaverage more; but rate payers will still be paying for EVERYTHING.	Comment acknowledged.

195		The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
195		Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.
214	Full disclosure, I have already made a submission but I am told that due to not selecting yes in either option, my submission wouldn't count. This will add another layer of highly paid individuals. Ratepayers already pay people to manage our water services. I choose no to both options because there has been no legislation passed in parliament regarding the setting up of such agencies. I see the setting up of the WSCCA as an underhanded way of securing more debt for the council to inflict on the Ratepayers, creating intergenerational debt. I feel the Mayor has a conflict of interest as he sits on the board I believe of the LGFA, and wants Selwyn District Council to be the first in the country to set their ratepayers up for a huge unsustainable debt. So I say no to WSCCA	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
214		The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

214		After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
219	•The government's legislation on this matter has not been finalized.	New Government legislation passed in September 2024 requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
219	The Your Water Done Well Consultation Document lacks sufficient detail, it is also missing data in the Example, which is misleading.	Comment acknowledged

219	•Lack of Public Consultation - 2 weeks is not enough for the whole district to be informed	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
219	•Selwyn District is expanding and has newer infrastructure compared to many other regions.	Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.
219	Requires a Local Referendum so they are informed.	SDC have followed the consultation approach as set out under the Water Services Preliminary Arrangements Act and have used a consultation approach that also recognises our current Significance and Engagement Policy. We recognise the challenge of sepped but the decision is needed to enable council to meets its legislative deadline of 3rd September to deliver a WSDP.
224	The consultation documents are nothing more than a sales pitch, and given the Mayors preference to the previous government's '3 waters' scheme, I do not trust the new proposals to be in our best interest.	Comment acknowledged.
226	Defer decision until more info on requirements available.	We are required to have selected a model to submit our WSDP in early September, which is why a body of councils are now out consulting. This could be changed in time, if needed, but we will already have substantially have invested in the selected model.
226	We don't need additional bureaucracy.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

228	The only advantage of a WSCCO, that I can see, is its ability to raise capital easier than a Council can, yet there are no records of any project that would need that advantage. Add to this that the Selwyn District Council (SDC) has a very high credit rating, a WSCCO is not needed. It appears that the SDC has not given the ratepayers all the facts it has. Why is this?	There is no proposed change to how or who capital is raised from. The LGFA is providing additional financing to assist high growth councils with Local Water Done Well allowing for borrowing up to 500% of operating revenue
231	The Government has yet to pass Local Government (Water Services) Bill 3 which SDC are basing their preferred option on.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
241	There is inadequate evidence-based information provided by SDC on the benefits of moving to a WSCCO - where is the detailed business case that should set this out?	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
241	The rating information indicates that cost-wise to ratepayers there is no clear benefit to ratepayers, with the WSCCO costing substantially more in 8 of the next 9 years of projections provided. Why does the WSCCO cost flatline in years 5-9? I struggle to believe that! - such a major assumption really requires a full justification, which is not provided.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
254	as yet there has been no presentation to the ratepayers as to the perceived need to outsource care and control of these assets.	Comment Acknowledged
254	the new legislation anticipated is not currently available. when it is discussions can be initiated with ratepayers allowing an appropriate time period within which to debate the factual requirements of good stewardship of the assets and the finances envisaged.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

257	This process is being rushed through with insufficient detailed information being supplied. A decision does not need to be made this early in the year.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
257		We are required to have selected a model to submit in our WSDP in early Sept which is why a body of councils are out consulting. Implementation time is the flexible but not model choose. We must choose in house or cco. This could be changed in time if needed but we will already have substantially have invested in in house
260	Because the government have not written the new legislation I think the SDC have tried to pre-empt what will be in it. Because of this the costing figures they have supplied are meaningless.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
260	Council infrastructure and property executive director Tim Mason said while it will be up to the community to decide, a CCO would allow the council to borrow more for new infrastructure and pay it off over a longer period. The KEY HERE IS LETTING THE COMMUNITY DECIDE!	Comment acknowledged.
267	Much is made of the enhanced borrowing capacity of a WSCCO but, quite apart from questioning the need for greatly increased borrowing, the interest costs on this will fall on existing ratepayers, not the long term beneficiaries.	One key advantage is access to higher borrowing limits through the Local Government Funding Agency, allowing the cost of essential infrastructure upgrades to be spread over a longer period. This helps reduce the immediate financial impact on ratepayers while ensuring safe and reliable water services for the future.

267	It is suggested the borrowing may be required for as yet unspecified additional legislative requirements. Surely it is sound planning to wait to see what those requirements might be before committing to a system which may not need the extra capital.	Comment Acknowledged
267	Council set out a Long Term Plan last year which was so fixed in stone there was no opportunity to submit on it for this year and presumably setting up a WSCCO will have major impact on this plan. There is a general consensus among ratepayers that extra costs at this time are unacceptable unless there is good justification for them. The obvious answer for Council regarding water services is to stick with the working in-house model, with provision to review around 2033/34 if legislative requirements and finances then show a real need for change.	Comment acknowledged. An in house solution is a possible outcome following deliberations. We know with regulation it will look different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
273	Councilors state that there is more information not in the consultation document that would better explain the rationale and need for a WSCCO !!!	Comment acknowledged
273	Why, then, is that information not in the consultation document?	Comment acknowledged
273	Does council not trust our community to understand this information?	Comment acknowledged
273	On the basis on extremely short timeframes & incomplete documentation the Rolleston Residents Association ask the Selwyn District Council to retain in-house management of potable and waste water assets and services.	Comment Acknowledged

275	No consultation or accountability to the people who own the assets and pay the bills. Consultation is of course relative - Mayor Sam has made up his mind - so a Chair has already been appointed to a non existant body. Mayor Sam has form signing agreements without consultation - the ODT's headline ..." Mayor blasted over 'wrong and abusive process". And it's One of the supposed benefits of a WASCCO is the ability for the entity to borrow more money than in-house entity - no consultation, no accountability. Ratepayers saddled with more debt and higher rates. ENOUGH!	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025. Any budget allocated to the programme team is there to support water services delivery regardless of the delivery model chosen.
278	The council have not got all the information from the Government. The council has be delivering the water now so why waste more ratepayers money on a new entity. Wait until all the information is received from the Government and so then we can be informed.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
283	No punctuation, so this question can read two ways. I bet submitters got confused by question 1.	Comment Acknowledged
287	Where is the legislation, has it been confirmed and released?	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
288	On the surface, it appears that assets owned 100% by the Council will be transferred into an entity which is also 100% owned by the Council. Why would the Council bother to consult the ratepayers on such an absurd idea? I note that the 10-year plan, which was approved in 2024, made adequate provisions to meet projected expenditure for these services, yet the Council's own modelling proposes that costs will increase by almost \$80 million under the new delivery model.	The benefit of the WSCCO model means there would be dedicated water-focused operational and governance experts in water delivery, infrastructure funding, and long-term debt management, ensuring compliance with new regulations and improving service delivery for growing communities. The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility).

- 288 Disappointingly, we see that once the public has been consulted, once, on the establishment of a WSCCO, the Council is not obligated to consult further on the proposed arrangement for delivering water services. This takes the matter out of the control of ratepayers.
- The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

288	The Council appears determined to push forward in this regard in response to the pending Local Government (Water Services Preliminary Arrangements) Act 2024, which states: 2 Commencement (3) Any provision of this Act that has not come into force by 1 July 2025 comes into force then. Disappointingly, despite the costs of implementing this new arrangement, central government has passed the cost onto ratepayers, as per Schedule 1: Part 1 Provisions relating to this Act as enacted There are no transitional, savings, or related provisions in this Act as enacted. I note that the Act requires consultation with ratepayers, as per 62 Alternative requirement: consultation (1) This section applies if a territorial authority— (a) is deciding whether or not to establish, join, or amend— (i) a water services council-controlled organisation; (b) when adopting its water services delivery plan, is making decisions in relation to an anticipated or proposed model or arrangement for delivering water services in its water services delivery plan (see section 13(1)(k)); (2) Before a territorial authority makes a decision described in subsection (1), it is required to undertake consultation only once. (3) A territorial authority that makes a decision described in subsection (1)(a) is not required to undertake any further consultation before making a decision described in subsection (1)(b). Disappointingly, we see that once the public has been consulted, once, on the establishment of a WSCCO, the Council is not obligated to consult further on the proposed arrangement for delivering water services. This takes the matter out of the control of ratepayers. I also note that in section 68 Exemption from cost-effectiveness review (1) This section applies if a territorial authority— (a) is deciding whether or not to establish, join, or amend a WSCCO; or (d) has established, joined, or amended a WSCCO:	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

288	The most alarming aspect of this decision-making process is that despite the consultation underway, the council is not obligated to vote according to the ratepayers' views... The only recourse for ratepayers is to remove the offending Councillors at the next election after the damage is done.	Comment Acknowledged
291	I have concerns that the time to make a decision and consult is only 8 weeks when this will impact the region for many years to come. Personally I am not available for the dates set up for community outreach which is a shame.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
296	This process was supposed to be a consultation with the community. The Consultation document is clear that the Council's preference is for a WSCCO. Already the Council has employed two people to manage the process. Will their contracts finish and new positions be advertised on the open market?	We are bound to follow the legal guidelines provided under the Local Government Act, and the Water Services Preliminary Act regarding connection with the community and they have provided the parameters for us to work within for decision making.
296	The Council already employs people to manage water and waste water. If a WSCCO is the outcome these people must be made redundant. this costs. Any employment process for a new body must be an open process.	We will abide by the good faith and consultation process in Employment Relations Act
296	Directors' fees will be another new cost.	Directors fees will be a cost needed for the Proposed CCO, the current modelling has taken the predicted costs into consideration.
296	Rate payers will not elect Directors.	Comment acknowledged

297	It is clear that the council does not have adequate information or understanding to run a fair and informed consultation with ratepayers, let alone make such substantive changes to SDC organisational structure, as well as substantively restructuring household rates and council debt. To proceed with the WSCCO model in the current rushed process appears to have a number of risks and borders on reckless Governance. Based on the very limited and confusing information thus far by SDC, we feel that the only responsible governance decision is to not proceed with the WSCCO at this point in time	Comment acknowledged
297		The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
297	There has been inadequate consultation documentation and underpinning data for ratepayers to be able to make an informed decision. From observing the large number of questions from ratepayers, through various online and in-person forums, it is clear the 14 pages of 'glossy' consultation documentation has been confusing in content and also does not provide the level of information that ratepayers need for informed decisions. Many fundamental questions have been asked by ratepayers, and the council has not been able to answer those straight away. Many answers to questions have been just as confusing (as outlined below).	Comment acknowledged
297	The legislation is not complete. It is clear this proposal is based on a series of guesses on what the final requirements and implications of the Government legislative changes will be. Councillors and staff have said this directly on the livestream Q&A. Relying on a substantive proportion of guesswork is close to reckless Governance to push through such huge structural changes to both the SDC organisation, rating structure, and ratepayer debt arrangements.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

306	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.	The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility).
306	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.	Performance monitoring framework in the Statement of Expectations and a charter which sits alongside
312	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)?	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
322	We don't believe they're has been enough information and clarity around a WSCCO provided to facilitate informed decision making.	Comment acknowledged
323	with council saying " they want to be the first & lead the way" if a Wscoco is the best way to go, why havent every other council opted for a WSCCO?	SDC is the first of many councils to assess the value of a WSCCO. Council are currently consulting with the community whether to create a WSCCO or retain an in-house model noting this status quo is not an option.

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

336 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. Comment acknowledged

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

338 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.

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

344	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.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
344	The consultation document contains the summary information but lacks detail including the basis of increased costs regarding the WSCCO.	Comment acknowledged
344	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 staU' under pressure to provide quick answers to very important questions.	Drop in sessions were held in the four wards in person, and online, and a recording posted. There was an FAQ section on our consultation page which was regularly updated with answers to questions we were receiving, and Mayor Sam Broughton also filmed and posted videos answering some key questions.
346	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. 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.	Comment acknowledged

346	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	The projected chart that was included in the consultation paper illustrates the net debt position in dollars along with the total operating revenue as the dark purple line. The borrowing limit is 500% of operating revenue with the limit illustrated as the red line (using the right hand axis) and the modelled ratio as a percentage as the green line (also using the right hand axis)
346	required. Yes, lodge a water services plan by the deadline but select the inhouse delivery until all matters	Comment acknowledged.
349	We are concerned that without all relevant legislation passed there are too many unknown factors. 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.	Comment acknowledged
349	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

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

350 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. Comment acknowledged.

351	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.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
351	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
354	Lack of evidence to support service efficiency and cost effectiveness of this proposal.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
364	Since when did the Council start making policy based on religious beliefs? Why has water been personified?	Council has not made policy based on religious beliefs. Council are required to meet the legisltave and regulatory framework in place and set by the Crown and we set out the specific approach in our Long-tem and Annual Plans.
367	Information from council has been vague and contradicting,	Comment acknowledged.
367	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.	In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

372	❖ 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 three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
372	❖ the information provided by SDC was lacking in substance. This is evident in reading the Consultation Document and was evidenced further by the majority of questions, and some statements, at the various Drop-In sessions held by SDC. In fact, feedback from some persons who attended more than one Q & A make it clear that are legitimately concerned that there was a lack of consistency in the information provided as between SDC staff (including members of the Senior leadership team). This is at best not helpful and may make the consultation process nugatory!	Comment acknowledged
372	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	Comment Acknowledged

372	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.	Comment Acknowledged
372	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	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals. The options are being carefully considered and examined to ensure that the final outcome is sustainable.
372	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.	Drop in sessions were held in the four wards in person, and online, and a recording posted. There was an FAQ section on our consultation page which was regularly updated with answers to questions we were receiving, and Mayor Sam Broughton also filmed and posted videos answering some key questions.
372	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.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

389	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?	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
400	Loss of direct accountability through elected councilors. No consultation. Borrowing and spending ratepayer funds with no accountability.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
418	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.	Comment Acknowledged.

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

Other: Alternative models and recommendations

30	The council states that maintaining in-house water services is not viable due to legislation, funding constraints, and compliance costs. However, Christchurch and Dunedin have opted to keep their water services in-house. Why is Selwyn taking a different approach, and why hasn't this been clearly explained?	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.
44	Has the council looked at the option of installing smaller wastewater systems throughout the region using the HTC system, whereby waste is converted into renewable resources, provide its own energy, plus energy into the grid, create activated carbon, and clean water. The quality and volume of water is clearly declining. We need to think smarter if we want to continue to grow our primary resources, whilst still have sources of potable water. There are some really innovative solutions out there, we just need to pick wisely, do it once and do it right. I ask that you all take the time to go to a company called Somax, and investigate their method of handling wastewater using a system created in Germany in the 1920s. The pros for using this system speak for themselves.	Comment acknowledged.
44	In summary keep the status quo in house and in changes need to be made do so within your allocated funding.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

88	Funding new infrastructure ahead of growth (new housing etc) may be funded by SPVs (special purpose vehicles) at development-by-development level rather than by carving off the entire Selwyn water/wastewater service. Infrastructure built under SPVs may be transferred to Council ownership once capacity is substantially taken up, rates income being received for that capacity	
88	We are lucky to have the Selwyn Council. I recommend restructuring the existing water/wastewater teams to accommodate the growth, continue to share expertise through consultancy and aligned services contracts, but retain ownership and hands on leadership (and accountability) within the Selwyn Council.	The WSCCO would remain accountable to Council. A statement of expectation would be put in place between the Council and the CCO including the ability to align strategic work programs Although Water Services are currently managed professionally by in-house staff with support from consultancy and service contracts the WSCCO would have the additional benefit of a professional board.
180	From a cost perspective overall, it seems cheaper to do this in-house. Other councils are doing this - is it possible to share services? If the issue is really greater borrowing, this should be clearer, but how much would this extra borrowing cost?	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
296	Selwyn does not have that population. Our neighbouring Councils are keeping water and waste services inhouse. So should Selwyn.	Consultation is currently underway for neighbouring Councils with decisions yet to be made.
301	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.	Comment acknowledged - this matter is outside of the scope of this consultation.

305	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.	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.
305	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	There is the future potential for a WSCCO to partner or merge with other WSCCOs.
344	The initial information provided suggests that a WSCCO will be very expensive to set up and involve a duplication of staff and services.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
344	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.	Comment acknowledged.

344	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.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
344	I do not believe that a WSCCO is the right option at this time for Selwyn. I believe we should support our awesome staU and build on our current water supply and waste services teams.	Council does have a capable and knowledgeable team which will largely transfer to the WSCCO should it be established.
344	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!	Shared service agreements would be established to ensure organisation relationship and strategies are aligned.
344	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.	Council must present a WSDP by the 3rd September 2025 and we are working to confirm the position in advance of our new financial year on 1 July 2025
344	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.	Council must present a WSDP by the 3rd September 2025 and we are working to confirm the position in advance of our new financial year on 1 July 2025

346	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 projected chart that was included in the consultation paper illustrates the net debt position in dollars along with the total operating revenue as the dark purple line. The borrowing limit is 500% of operating revenue with the limit illustrated as the red line (using the right hand axis) and the modelled ratio as a percentage as the green line (also using the right hand axis). Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.
346	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. 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. 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.	Comment acknowledged.
346	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.	Comment acknowledged. Council have established a Project Management Office to create the WSCCO should the decision be made to proceed on the 2nd April.
346	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.	Positive endorsement of current SDC Management and Council is acknowledged. The WSCCO would have the additional benefit of a professional board.

346	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.	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
353	Other councils have rejected it, Wellington is a mess.	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.

353		Wellington Water was a management company delivery services but not responsible for the maintenance of the assets, this is different to the model applied here. there will be external central government oversight (which did not exist in the Wellington Water example) and a statement of expectations and charter will be established between Council and any CCO. The external scrutiny would also apply to an in house delivery model, but the governance structure would be unchanged.
418	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.	SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.
418	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.	The proposed model is being developed under the current legislative framework. Within this, Councils can partner but would be done under whatever model the Council has adopted for its WSDP. Any changes outside of this would require a change and would potentially trigger wider consultation again.

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

Other: Governance and entity structure

7	Do not support a separate entity with a whole new set of paid consultants, directors, etc when the council already pay people in these roles.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
41	Having several CCO with several Boards and potential for different future owners is duplication and inefficient. I am concerned about this proposal and am strongly opposed to it.	Comment acknowledged

73	There is no need to set up a separate entity to manage water services for the following reasons: A separate entity will require administrative functions. This is already in place within SDC.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
88	I like that the Council feels tension to prioritise how it spends capital. Relieving this tension seems counter to good choices between water, libraries, stormwater, transport etc. I recognise the issue of long term planning and good infrastructure decisions being disrupted by political interference, however separating water services will not resolve this. Either model must respond to the pressures from the Council.	Comment acknowledged.
88	Water and wastewater are core Council services. These should be central to Council's business, your their thinking and being.	Comment acknowledged.
88	Good governance is essential, as proposed. This applies equally across both options. Not a point of difference.	Comment acknowledged.

103	SDC CEO has indicated Corde cannot provide these services as it has a conflict of interest as a water maintenance provider. This Govt is running a platform on efficiencies, reduced bureaucracy and demanding Council's focus on must haves. Requiring us to spend an additional \$750k pa on a CEO and Board when we have both in Corde, including the former CEO of Watercare and who is also on Infrastructure NZ Commission is bewildering. Setting up a new entity, branding, hiring, lawyers, consultants accountants will bleed money and create the gravy train we are trying to avoid. Council need to lobby Govt to expose their own contradictions and allow us to utilise Corde for the provision of these services.	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
103		The benefit of the additional administrative costs will be a governance structure that includes Water expertise that can provide greater management and strategy on the projects performed by the WSCCO
108	The board of the WSCCO will be too far removed from us ratepayers who supply the funds to implement any of their decisions.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
144	My final point is a top priority for me. The governance of these entities is going to be critical. You allude to 'experts' in water infrastructure funding, long-term debt management, and water delivery. These are laudable but I suggest that both management and governance of these entities should also include environmental experts e.g. people who understand the setting of environmental limits and targets, impacts of over-allocation of the ecology of streams, lakes and rivers, etc. This is not mentioned in the documents.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Additionally, a skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

144	Finally, it would be good to see a good and robust appointment process for all governors to ensure that the entity is governed by a wide diversity of community voices - not the same old perspectives. Some active recruitment to ensure that a diversity of skills apply for, and are appointed to, these boards will be critical for the long term success of the entity if it goes ahead.	A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.
103	It goes without saying that having these entities foistered on us with the dangling of a 500% loan carrot rather makes a nonsense of this being genuinely about Local decision-making. While Democracy can be a hindrance to some to others it is important. This process reeks of by-passing Democracy, forcing our hands with Loan offers and duplicating costs unnecessarily. I am aware the Govt has threatened Councils that if they don't comply they will appoint a Statutory Manager. Another sledgehammer approach.	Comment acknowledged
244	As per the LGA, under the term, "Council Controlled Organisation", the council is required to only have a 50 % share in securities and therefore a 50% share of voting rights for any decisions made by the CCO. This opens the possibilities for other entities to enter the "organisation" over which the ratepayers will have no say, stifling competition and efficiency.	Comment acknowledged.
244	I'm interested in the reason for not including storm water management in the WSCCO model. This 2024 Proposed Act specifically mentions this aspect of water management, which is extremely important in water recovery and flood mitigation.	Comment acknowledged.
301	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.	Comment acknowledged

335	"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?	Comment acknowledged.
335	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.	SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.
338	Furthermore the decision to appoint people into roles at a CCO Establishment body is premature, and only serves as evidence SDC do not truly wish to consult - you have made a decision, and are now engineering the process towards that outcome. This is not democracy, and it is not good governance.	Council has appointed an establishment chair on a short-term contract and there is a fixed term contract Programme Director. Due to the timeframes for developing Water Services Delivery Plans (WSDP) some activity is occurring simultaneously to ensure we can meet regulatory deadlines regardless of whether a WSCCO or enhanced in-house delivery option is chosen.
346	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.	Debt collecting would need to follow a normal business process, using an external debt collector if/when required.

346	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.	An operating model will determine the billing mechanisms and frequency between SDC and a WSCCO.
346	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.	CCOs are not automatically tax-exempt and treated under the same rules as a normal company. If the proposed WSCCO goes ahead further work will be done to look at whether a tax exemptions can be granted

346	Pause your decision on service delivery structure and make sure such matters as above are resolved as to how they will work. 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.	We are required to have selected a model to submit our WSDP in early September, which is why a body of councils are now out consulting. This could be changed in time, if needed, but we will already have substantially have invested in the selected model.

346	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.	Comment Acknowledged

347	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.	If established, the WSCCO will have its own constitution and will be directed by a binding Statement of Expectation from Council provided each year to the WSCCO. A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.
349	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.	As part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO,. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.

350	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.	Comment Acknowledged
350	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.	Comment Acknowledged. The in-house delivery of the water services is an option that is being consulted on.

418	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.	A CCO would remain under the control of SDC as the only shareholder and be directed each year by a Statement of Expectation. A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

418	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.	Your comment is acknowledged and staff will look to address this approach in the establishment of the WSCCO if this is confirmed. This will also be addressed through the development of the constitution and the letter of Expectation from SDC to the WSCCO.

Other: Rural water needs

5	We have our own well for drinking water and our own waste water disposal system.	Any change would not impact properties that are not connected to the Council Supplies.
190	The consultation documentation does not include visibility of the effects on rural properties such as with a water race and whether they will be disproportionately required to fund the start up of a CCO.	The consultation addresses the future delivery of reticulated water and wastewater services. Rating and water charge examples are included in the Consultation Document as stated on page 18, including for rural properties with restricted water supply connections or no connected services. Costs to properties that do not have any connection to Council services are outlined in the LTP. Please refer to the FAQs for a further breakdown of Urban and Rural costs. Water races are not included in this consultation and will remain as part of in-house service delivery.

301	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.	Comment acknowledged.

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

Other: Developer contributions

30	Many councils require developers to contribute to infrastructure costs through development contributions. Has the council considered increasing developer contributions instead of placing more financial pressure on existing ratepayers?	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

57	Charge the developers for new infrastructure if they want to continue developing new subdivisions.	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
73	Any future expansion to water services cost should be met by any developers	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
355	Water infrastructure in Selwyn largely new, any new projects should be funded by developers and not ratepayers.	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
211	Page 15 of the CD says that “further investment is required for further investment to manage our growing population”. How come capital infrastructure investment has not been modelled into new development costs by developers for the past 20 years. This is unbelievable.	As stated on page 16 of the Consultation Document, 'Modelling is based on assumptions drawn from the Council's Long-Term plan, accounting for additional regulatory and operating costs of a new entity'. Development Contributions are built into the modelling as part of the LTP process. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

346	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.	Minister Bishop announced the changes early March. The levy system will be implemented through a Local Government (Infrastructure Funding) Bill. The legislation is expected to be introduced in September 2025 and enacted in mid-2026. The Government intends to take a phased approach allowing local authorities and developers time to adapt to the new system so that it applies from 2027. As the changes are not yet in place we are not in a position to state what the impact will be to ratepayers and/or debt. New Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
350	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.	Minister Bishop announced the changes early March. The levy system will be implemented through a Local Government (Infrastructure Funding) Bill. The legislation is expected to be introduced in September 2025 and enacted in mid-2026. The Government intends to take a phased approach allowing local authorities and developers time to adapt to the new system so that it applies from 2027. As the changes are not yet in place we are not in a position to state what the impact will be to ratepayers and/or debt.
	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.	Minister Bishop announced the changes early March. The levy system will be implemented through a Local Government (Infrastructure Funding) Bill. The legislation is expected to be introduced in September 2025 and enacted in mid-2026. The Government intends to take a phased approach allowing local authorities and developers time to adapt to the new system so that it applies from 2027. As the changes are not yet in place we are not in a position to state what the impact will be to ratepayers and/or debt.

Other: Role of mana whenua

144	The current Ngāi Tahu claim going through the courts is most interesting in terms of Tino Rangatiratanga. Even if their claim fails, I think there will be some legal precedents set, and it would be good to see Council being more clear about what you will do to respond. I say this because at the moment there is quite coded language about 'partnership' in the document - presumably because you didn't want to rile up the haters - but in my view the way of the future is going to be to have greater input from tangata whenua and mana whenua. I would like to see Council being very clear (proudly and with respect) about what this means for our communities - and that it could be very good for everyone. Perhaps painting some positive benefits about co-management and co-governance.	Comment acknowledged. Councils One Water Strategy Wai-Ora sets out this at a strategic level.
144	Further, in terms of governance it would be good to be clear about the role of mana whenua (i.e. that they will have seats at the table as is their right under Te Tiriti)	Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).
204	Consideration also needs to be given to Ngai Tahu's petition to have control of the South Island's fresh water, there is no understanding what this will mean to the individual councils so setting up a totally separate organisation at this time is not in the best interests of the rate-payers.	Comment acknowledged. Council are unable to delay this given the need to present a WSDP by 3rd September 2025.
211	What is it going to cost for mana whenua to be consulted? They bring zero engineering skills. If they do, they should be paid as engineering consultants based solely on merit.	Comment acknowledged.

Other: Water operations / quality concerns / infrastructure

49	the water was fine prior to all the chlorine etc was added now it is undrinkable and causes skin irritability	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.
88	There will be increasing challenges that are unique to specific towns across Selwyn. Nitrates, water sources, treatment solutions will differ with different feed waters. Some of these are (need to be) engaging politically, as our community weighs whether to improve the incoming water source (contamination) or invest more in treating the downstream. This is why we elect representatives	Comment acknowledged
142	Selwyn's Existing Water Infrastructure Selwyn District is expanding and has newer infrastructure compared to many other regions. *Areas like Lincoln, Rolleston, Leeston, Darfield, Kirwee, and West Melton have benefited from recent investments.	Comment acknowledged.
346	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.	Comment acknowledged.

346	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.	As noted in our Consultation Document, we have limitations in what we can fund with the LGFA 280% borrowing cap. Council will have oversight of a CCO through good governance mechanisms
350	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.	Water Supply and Wastewater are currently charged based on usage and the number of connections that a ratepayer has at equal rates across the region. The modelling that has been prepared does not change the way in which the water charges are calculated
30	To ensure that residents can make an informed decision, I request the following: 1. A detailed breakdown of the financial impact of this proposal, including long-term debt repayment strategies and the overall impact on rates beyond the water component.	As outlined on page 16 of the consultation document, if Council decides to establish a WSCCO to manage drinking water and wastewater services, these costs would no longer be included in council rates. Instead, they would be billed separately by the WSCCO as water charges. For examples of the rates and water charges for urban and rural properties, please refer to the FAQs.

30	2. An explanation of why Selwyn is not following Christchurch and Dunedin in keeping water services in-house.	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.
30	3. A comparative cost-benefit analysis of separating water services (WSCCO for drinking water/sewage vs. in-house stormwater and drainage).	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.
30	4. An extension of the public consultation period to allow more residents to engage with this important decision.	The Preliminary Arrangements Act requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
146	Questions Requiring Council Response: 1. What is the total amount the council plans to borrow through the new WSCCO? The consultation document refers to \$450 million—please confirm if this is correct.	The proposed WSCCO net debt (including existing borrowings taken over from Council) are modelled to reach a maximum of \$328M over the next 10 years, as illustrated on page 16 of the consultation document. As per page 11 of the consultation document, \$450M is for uncalled capital - this is where Council will act as a guarantor for the WSCCO, and is in place until such time a WSCCO has its own funding arrangements set up with the Local Government Funding Agency (LGFA).

146	2. If the WSCCO model proceeds, will this reduce the debt that council plans to take on through the Long Term Plan (LTP)? If so, by how much?	The debt based on the LTP that the Council will not need to take on over the remaining periods is \$170M if the proposed WSCCO goes ahead.
146	3. For each of the next 10 years, what will the combined debt be across the WSCCO and the council's LTP?	The total Council and proposed WSCCO debt would be approximately \$600M at the end of 2033/34. This includes any debt repayments over the respective years.
146	4. What will the WSCCO borrowings be spent on specifically (broken down year by year) over the next 10 years?	As stated on page 16 of the Consultation Document, 'Modelling is based on assumptions drawn from the Council's Long-Term plan, accounting for additional regulatory and operating costs of a new entity'. The benefit of the WSCCO model means there would be dedicated water-focused operational and governance experts in water delivery, infrastructure funding, and long-term debt management, ensuring compliance with new regulations and improving service delivery for growing communities. The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility).
146	5. For the average urban household, what will be the effect on rates for each of the next 10 years under the WSCCO model?	Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Please refer to the FAQs for a breakdown of these costs.
146	6. For the average urban household, what will be the combined rates increases for each of the next 10 years when WSCCO charges and LTP rates are added together?	Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Please refer to the FAQs for a breakdown of these costs.
146	7. Will the implementation of the WSCCO alter any of the projects planned through the LTP? If so, which projects?	The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO. There are no extra projects planned under the WSCCO. The benefit of the WSCCO model means there would be dedicated water-focused operational and governance experts in water delivery, infrastructure funding, and long-term debt management, ensuring compliance with new regulations and improving service delivery for growing communities.

146	8. Why has the council not sought a time extension for this consultation, given the complexity, the potential significant cost to ratepayers, and the need to fully evaluate these costs and communicate them transparently?	The Preliminary Arrangements Act requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
146	9. Why has the council not requested a time extension if full legislative requirements and implications from central government have not yet been released?	The Preliminary Arrangements Act, passed in September 2024 provides the framework for water services delivery and requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
146	10. Why did council not initially schedule any public information sessions, drop-ins, or meetings to allow the community to ask questions and understand the issues before completing their submissions? (I understand some are now being arranged, but a full week of the consultation period has already passed.)	Drop ins were held in all four wards, and some Councillors chose to also hold their own meetings, or speak at residents association meetings. There was an online session for those able to access the internet and this was recorded and made available after the fact.

146	11. If full information on costs, debt, and rates impacts cannot be made available immediately, will council either pause the consultation or extend the consultation period until this information is clearly provided to ratepayers in an accessible and transparent way? If not, why not?	Comment acknowledged - noting the consultation does include the financial scenarios on costs, rates and debt for both options.
146	12. If the full debt and rates implications cannot be provided now, will council confirm that no binding decisions on debt and rates will be made as part of this consultation or the associated council decision? In such a case, these financial decisions must be subject to a further future consultation with the public.	Comment acknowledged - noting the consultation does include the financial scenarios on costs, rates and debt for both options.
297	Where is the accompanying detailed business case evaluation? – this is standard practice for Government cabinet decisions, and these are publicly released (e.g. regulatory impact analysis, cost-benefit analysis). This is also standard practise for decisions by boards and executives of medium-large businesses.	Our Consultation Document recognises the options we have considered for the proposed WSCCO along with the modelling to support each option.
297	Where is the evaluation of the current state of our water services delivery? The council has not provided ratepayers any 'baseline' documentation of the current state in: a) The current state of our drinking and sewage network; b) what works are already planned to be completed over the next decade via the LTP; c) where is the shortfall in works?	Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. In-house delivery was included, as the second option in the consultation and outlined in the financial modelling.
297	Where is the independent analysis of our current in-house approach? The short 'glossy' consultation document provides no information on the in-house delivery model. Where is the independent evaluation of the councils' current water services delivery group? If they are doing a good job as we assume, then why would we want to change this without some very good evidence-based reasons.	Our Consultation Document recognises the options we have considered for the proposed WSCCO along with the modelling to support each option.

297	Councillors do not have the understanding that is needed to answer basic questions from their ratepayers. It is clear that through the drop-in-sessions, facebook posts, and the live-stream that the councillors don't have a clear picture of the options and consequent implications of each. Core questions of what is wrong with our current in-house management? How will this affect my total rates bill? How will the council debt change? - have been either glossed over, answered with waffle, or met with inconsistent numbers.	Comment Acknowledged.
297	Why does the WSCCO cost flatline after the next 5 years, but the cost of the in-house model keeps increasing? The only reason the WSCCO appears to eventually be cheaper in 9 years time is that after year 5 its cost to ratepayers is claimed to flatline at \$2668 /yr – but no evidence or reasons are provided. What business or service can say that they will keep their fee the same for 5 years?	In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.
241	There is inadequate evidence-based information provided by SDC on the benefits of moving to a WSCCO - where is the detailed business case that should set this out? The rating information indicates that cost-wise to ratepayers there is no clear benefit to ratepayers, with the WSCCO costing substantially more in 8 of the next 9 years of projections provided. Why does the WSCCO cost flatline in years 5-9? I struggle to believe that! - such a major assumption really requires a full justification, which is not provided.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
241		In the current WSCCO modelling the charges flatline after year 5 as there is an assumption that the charges will be at a level that they cover the operating costs of the proposed WSCCO. The assumption is that any additional costs and the impact of inflation will be covered by the growth in the number of water and wastewater connected households rather than requiring an increase in the water charges.

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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.

As part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO,. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.

346	*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.	An operating model will determine what/if any overhead charge SDC would pass to a WSCCO. As an example, if there was an initial hybrid model, SDC would pass those costs across to a WSCCO. Similarly if costs for insurance have already been paid for a period of time for water assets, a proportionate charge for the relevant time period may also be charged to a WSCCO.
418	Unanswered Questions: Significant gaps in the proposal remain, including: · What level of control will the Selwyn community retain over its water assets?	A CCO would remain under the control of SDC as the only shareholder and be directed each year by a Statement of Expectation. Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.
418	· How will community engagement and oversight be maintained in the new structure?	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers.
418	· 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.	Benefits of the WSCCO are as outlined in the consultation document

38	The safety of our water is very important to our household but I don't agree with fluoride being added at any stage	The submission opposing fluoridation is acknowledged. The Health Act 1956 was amended in 2021 to enable the Director-General of Health to direct local authorities to fluoridate drinking water supplies, to provide nationally consistent decision-making on this health-centred matter. Selwyn District Council has not received such a directive and therefore has not budgeted for the implementation of fluoridation.
116	Stop polluting the water we drink.	Comment acknowledged.
235	Our water was perfectly fine before you started adding all your chemicals last year, now it is undrinkable and smells like a pool.	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.
142	*There was nothing wrong with SD water in the first place, until they put Chlorine in it.	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.
303	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.	Comment acknowledged.

Submission Reference	Submission point	Officer response
QUESTION 2: DO YOU PREFER A FUTURE IN-HOUSE WATER DELIVERY MODEL		
In-house not preferred: Funding and future benefits		
24	I think water will get politicised at times and struggle to get funded appropriately.	Comment acknowledged.
24		The WSCCO would have ability to borrow up to 500% of revenue vs Council 280%
66	This option limits the funding available	The WSCCO would have ability to borrow up to 500% of revenue vs Council 280%
117	The council spends too much time deliberating and meeting rather than organizing and doing. Water must not be politicized as it's done now and fresh, clean water must be made available for everyone - even it this comes at a cost.	Comment acknowledged.
117	Water must not be politicized as it's done now and fresh, clean water must be made available for everyone - even it this comes at a cost.	Comment acknowledged.
181	In house delivery of 3 waters has been the model previously and has not delivered the level of service that is sustainable. A lack of funding over many years has led to our old and failing pipelines. A separate entity is needed for accountability with a separate structure, separate funding and a separate Capital Programme.	Comment acknowledged.
181		The WSCCO would have ability to borrow up to 500% of revenue vs Council 280%
181		One of the benefits of establishing a WSCCO is depoliticising decisions relating to investment in water infrastructure.
291	The consultation document outlines that the WSCCO has scope for more future benefits than the status quo.	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services.
308	Too short-term. Water should be planned for generations.	Comment acknowledged.

Submission Reference	Submission point	Officer response
Other options		
103	Lobby the govt to let us use Corde so we dont waste money on 2 boards, 2 ceos and enormous duplication of cost	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
120	It does make sense to provide the services through a CCO. But we already have a CCO that is very well equipped to deliver. The Council needs to lobby central government to allow for existing organisations to fulfill the role.	CORDE cannot be used under the Preliminary Arrangements Act.
More information needed		
5	We have our own system, and have nothing to do with a council supplied system.	Any change would not impact properties that are not connected to the Council Supplies.
29	As per my previous comments, I would need more intonation before I could form a view	Comment acknowledged
93	... and yes. See previous answer. There is not enough information to properly understand how the debt loading will work under the WSCCO, how much will need to be borrowed, and where this will be spent. It appears the only true advantage is the potential removal of some of the arguments over where Council spends ratepayers money.	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.
121	There is not enough information to choose yes or no.	Comment acknowledged
168	Neither options are good and the community has not had enough time to understand the pros and cons of this suggestion. I am sick of the council not talking to its community enough considering we are the ones who pay you.	Comment acknowledged.

Submission Reference	Submission point	Officer response
168		The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
144	See previous comments - while I cautiously support the idea of a stand-alone CCO, it would be good to see Council running a robust, open and transparent process to appoint the governance board of the entity, to ensure that a diversity of community perspectives and expertise are sitting around the table and not the 'same old same old'. Also, please set up a process to ensure that mana whenua / tangata whenua have seats at the (governance) table in the new entity.	Comment acknowledged.
144		A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Submission Reference	Submission point	Officer response
168	Neither options are good and the community has not had enough time to understand the pros and cons of this suggestion. I am sick of the council not talking to its community enough considering we are the ones who pay you.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

In-house model preferred: Costs

1	If it stays with the council, the costs may be higher, but the assets are safer.	A WSCCO is a council-controlled organisation, meaning the council maintains control with accountability back to the community. The key difference is that an independent board would oversee day-to-day operations, ensuring that long-term investment decisions are made based on expertise rather than short-term political pressures. This structure helps safeguard water services while ensuring they remain affordable, reliable, and in public hands.

Submission Reference	Submission point	Officer response
6	What is wrong with this model. Everything you need to do can be done within this model. It should not stop you working with others and sharing costs for big infrastructure etc	Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
7	In house will save money.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
9	No need to increase an already bloated council head count as you are currently coping with the workload within the current structure... Additionally, water is not a person therefore does not require mumbo jumbo protection which will no doubt require \$ to cross palms of the special people.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
9		Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Submission Reference	Submission point	Officer response
11	Holds council directly accountable to ratepayers. Does not add another layer of bureaucracy and a new division and all those costs at management level eg HR, finance, boards etc	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
11		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
14	Looking at the Council staffing and the recent comments of no extra work required for staff at a parking ticket court case m guess is there is enough staff to carry on in house. No need for another separate board, CEO etc as a further expense to the ratepayer.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
14		Both options will require ongoing review of capacity and delivery reviews to ensure they are appropriately resourced.

Submission Reference	Submission point	Officer response
18	Live within the means of what we have today, prioritise spend and ensure value for money and public value is realised.	As mentioned in the risks of the Council delivered model with the limited funding capacity there is the possibility that funding priorities change and the funding may be allocated to other activities across the Council
36	That's the expectation my rates should be prioritised against	As mentioned in the risks of the Council delivered model with the limited funding capacity there is the possibility that funding priorities change and the funding may be allocated to other activities across the Council
38	As long as the cost is at an amount that is affordable for each rate payer /household but at the same time keeping the water at an acceptable cost to maintain its high standard.	Comment acknowledged.
49	I am not comfortable paying or contributing to these proposed changes	Comment acknowledged.
51	SDC and it's current arrangements already delivers a quality & value 3 waters system. At council presentations regarding the chlorination of water in Selwyn it was estimated to have a \$83million cost in compliance costs to prove our water was safe enough to not have chlorination. For Selwyn's ratepayers that was \$231 each. Can 't imagine the testing and reporting requirements (plus a little inflation) for WDW would be much higher. The proposed CCO is \$1000's more in costs.	We note though that the regulatory changes expected are going to require a different approach, regardless of option chosen.
51		It is unlikely that further chlorine exemptions will be applied for due to cost and risk.
53	Keep it in house to capitalize on synergies already in place between council departments.	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
57	This way you don't need to borrow more money for establishing a new company. And our rates will not increase to the point of people not being able to pay them. Stop spending money that you don't have at this moment when everyone struggles.	Debt will not be used to fund the operating costs. Debt will fund Capital projects that don't have Development contributions attached to them

Submission Reference	Submission point	Officer response
57		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
59	Setting up a separate company will increase cost and will be sold off in future making our water services privatised.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
59		Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
63	Keep costs down !! Please this is out of control	Through the Act there will increased costs and compliance required, this means there will be added costs for either option taken.
68	Make it happen, without consultants, without more managerial levels that just suck up the rates when we cannot afford any more increases	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
68		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Submission Reference	Submission point	Officer response
75	We should already have the people and expertise to cover this within council and also ensure our democratic voting rights on our water are protected. I do not agree with paying the additional overheads and costs to set up a new organisation.	Although Water Services are currently managed by in-house by Council staff the WSCCO would have the additional benefit of a professional board.
75		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
75		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
75		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
91	We already have people that are paid to look after our water in council. Why would we want to set up another entity to look after this and spend a lot of money setting this up.	Although Water Services are currently managed by in-house by Council staff the WSCCO would have the additional benefit of a professional board.

Submission Reference	Submission point	Officer response
91		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
90	Keep control of the costs. We already have a disgraceful blow out in rates what do you think would happen when you have yet another entity charging rate payers?	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
90		Through the Act there will increased costs and compliance required, this means there will be added costs for either option taken.
96	Water is a core council service. The cost and staff should remain part of the council and be directly answerable to our elected councilors.	Comment acknowledged.
105	This will require greater control of spending and require more focus on core council service and delivery costs.	Comment acknowledged
109	Based on costs of a CCO it has to. Having lived in Auckland, CCOs have got out of control there and I see it being no different in Selwyn. Plus, the costs for the new infrastructure for subdivisions etc should be paid for by the developers and costs passed on to those buying the land - not existing rate payers. This would most likely happen in some, shape or form judging by current Selwyn District Council standards	Comment Acknowledged

Submission Reference	Submission point	Officer response
109		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
112	Water is done well now - keep doing it as is - not adding more bureaucracy and unnecessary costs	A separate entity does provide the benefit of having specialised governance with expertise in the sector.
112		Positive endorsement of current SDC management is acknowledged. The WSCCO will have the additional benefit of a professional board. An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.
116	That is what the rates are paid for. You are increasing the rates so do the job that you are paid to do. This council is a joke at times and are so wasteful with money.	As mentioned in the risks of the Council delivered model with the limited funding capacity there is the possibility that funding priorities change and the funding may be allocated to other activities across the Council
119	Even though Council say it will restrict borrowing that can only be a good thing, as 500% sounds like a huge level of debt.	Comment acknowledged, Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users
129	It would be hopefully better for rate payers	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
132	Not perfect but fixable with the money you would spend setting up a new entity	The WSCCO would have the additional benefit of a professional board.

Submission Reference	Submission point	Officer response
136	Selwyn District council lacks the expertise to manage a WSCCO. The leadership has a penchant for borrowing that is fiscally irresponsible.	Comment Acknowledged
140	It will be more efficient to keep in house to stay within the long term plan and the cost associated.	As mentioned in the consultation paper on page 5 maintaining the current model under the new legislation is not possible and a future in-house model would still require increased investment.
143	Selwyns water system is actually pretty good! A few of the outlying rural villages require work and this can be done in house in a systematic manner. You have a terrific team of people on the ground so continue to use them. All the major growth that has occurred re new developments have water and sewer reticulation that's is awesome. Simply put if you can't afford it without borrowing then you can't afford it at all.	Positive endorsement of current SDC management is acknowledged. A WSCCO would have the additional benefit of a professional board and would remain accountable to Council who in turn have accountability to ratepayers.
143		Debt will not be used to fund the operating costs. Debt will fund Capital projects that don't have Development contributions attached to them
145	This will save rate payers money over time. Projected savings from the alternative aren't predicted for a long time and there is no guarantee that they will actually eventuate.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
145		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
150	The first few years of the new model are extremely expensive (even though long-term it is the better option). Selwyn has been relatively proactive with infrastructure investment in comparison to other TA's. If the CCO model is adopted, then it is likely that upgrades and maintenance expenditure would be prioritised for degraded assets outside of Selwyn. Therefore, as a Selwyn rate payer, I would be paying more in the short term, for potentially no benefit in infrastructure improvement. It would be better for SDC to continue to operate an in-house model and leverage future central government opportunities to make 'growth pay for growth' (e.g. infrastructure), as part of the Phase 3 of the RMA Reform. Also, the additional ability to take on further debt is not necessarily something that should be accepted.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
150		Selwyn has and continues to invest significantly in water services. Regardless of delivery model, investment will continue.
150		Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.
150		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
150		After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.

Submission Reference	Submission point	Officer response
154	This option gives me a slight hope (albeit very faint) that we, as tax payers will have some say in how things are Donetsk & will reduce the racking up of huge debt	Comment acknowledged
154		After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
159	Keeping the existing services means it can be improved upon if required. 3 of the 5 services will stay with the Council with the proposed new water services which seems a waste of rate payer money.	The WSCCO would have the additional benefit of a professional board.
159		Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
161	Far better financially and structurally. No logic having a separate organisation.	As mentioned in the consultation paper on page 5 maintaining the current model under the new legislation is not possible and a future in-house model would still require increased investment.
165	Prefer to keep rates lower with the old system	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
169	Improve on what u already. Remember that a lot of ratepayers are not able to continue to pay the huge rising cost of living easily.	The WSCCO would have the additional benefit of a professional board.
169		While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
171	This is the best option of what's been presented in the submission. I would rather everything just stays as it is without all these increases to our rates.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

Submission Reference	Submission point	Officer response
171	An Urban Residential Property with Sewerage is suggested to be \$1,552 (in house model) for 2025/2026. My current rates bill for Urban Water Supply is \$370 + Sewerage \$702 + Stormwater \$152 (if my assumption on the "3" waters this will cover is correct) = \$1,224. What you are proposing is a 26% increase	The example stated on page 18 of the consultation document is reflective of an average urban residential property. Please refer to the FAQs where there is additional information and further breakdown.
174	The council is currently a single entity with a democratically led approach to delivering what are essentially the same challenges for the future of water services in our district either way. The in-house council team need to improve their efficiency in the way they manage and renew their assets, and they also need to optimise the way they manage externally-driven development that adds pressure to the existing assets through a proper framework that charges developers for their expanded growth and additional demands for service. Rather creating an additional WSCCO overhead, the existing SDC in-house water delivery team need to maximise their management capability to justify appropriate government funding and make strong data-driven renewal and investment programmes to achieve efficient and prioritised delivery programmes to meet increased legislative requirements and ratepayer's level of service needs. I do not accept the need for ratepayers to pay \$3,000+ of additional charges over 10 years to accommodate WSCCO overheads and the cost of additional debt with no guarantee of a reduction from 2034 onwards.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
174		Council runs an advanced IDS renewal model.

Submission Reference	Submission point	Officer response
174		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
178	Agreeing with this option as a way to reduce costs to the rate payer.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
183	As detailed before, this is the most cost efficient means of achieving the job at hand. To do anything other would be to waste governance and infrastructure funds on an entity that has a high chance of being decommissioned before the 10 year pay-back is up.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
184	This is a key service that needs to operate within the Council not as external silo. Cost should be managed to meet the community requirements whilst standing up to legislation to represent the community that you serve rather than moving to an external model just to increase borrowing capacity and ultimate debt.	Comment acknowledged.
184		Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
184		Council has submitted on previous Bills and this response is addressing the current legislative requirements before Council.
189	The council up to now has successfully managed the water services for Selwyn. Retaining the services in-house would ensure cost efficiency and accountability to the rate payers (well, as much as they currently have).	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
189		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
193	My water rates are quite manageable at present & I fear the setting up of the proposed WSCCO will add unforeseen costs to our already burgeoning rates for Selwyn Council. Also, what do you mean by "more specialised governance?" Shall ALL members of governance be voted onto this Council by elections every three years, or will members be appointed by Ngai Tahu, the local Maori tribe? If that is the case, I want nothing to do with WSCCO.	While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
193		The Board will be appointed through a public recruitment process and the skills will be assessed against a skills matrix. It will be a skills based Board should the CCO be established.
204	Currently the water delivery model is working, it fits in with the current rates structure and, while it has its own costs, there is not a layer of management and other overheads, which at this time will add little if any value to the rate-payers	Positive endorsement of current water delivery model is acknowledged.

Submission Reference	Submission point	Officer response
204		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
207	Makes sense to keep it in house - that how it's already done - keeping it in house it will be easier to control costs - well it should be. Council need to be held more accountable for their function - keeping it in house with strong leadership will be a better way to go, and mean that council cant simply blame a separate entity for failures	A new WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the CCO including the ability to align strategic work programmes.
214	This the bestcof a bad situation, we shouldn't be doing anything until government has finilised legislation. There should be no decisions made till after ghe local body elections. A new council should be able to take more time than 3 weeks to make the biggest decision for the Selwyn Councils since the amalgamation. The WSCCA will have no accountability to the ratepayers, no input or very little input from elected Councillors. And a massive ability to borrow mollions of dollars using ratepayers properties as the security, with ratepayers having no say. I am staggered that any Councillor would be prepared to put that kind of organisation into being without legislation finalised.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Submission Reference	Submission point	Officer response
214		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
214		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
227	Water services are one of the councils care tasks. You better do that and get it right. So far I am not aware of any example where outsourcing of councils core services resulted in a cost reduction to rate payers.	Comment acknowledged.
227		The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
231	Cost	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
234	There will be greater control over delivery of these service and lower overall cost with this option.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
234		The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
237	Hopefully this will be and continue to be a cheaper option.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.

Submission Reference	Submission point	Officer response
241	Given the big information gaps on the WSCCO, and its is clearly more costly to ratepayers in 8 of the next 9 years, then I see no clear evidence-based rationale to take-on the risks of splitting up the current council. There is no evidence provided that the current inhouse approach is underperforming to warrant such a big restructuring. I also have concerns that there is no examples of WSCCO's that are actually working really well in the NZ context. I also have concerns on there is no clear information that the benefits of transparency and accountability mechanisms to ratepayers, that the current inhouse model has, will be guaranteed in the WSCCO approach.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
241		The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
241		SDC's proposed WSCCO is a fit-for-purpose, single-focus entity to deliver, protect and enhance the resilience of water services (fresh and waste) in the Selwyn District. The WSCCO would remain accountable through the Statement of Expectations and "Charter" which prioritise service delivery and our communities.
241		Performance monitoring framework in the Statement of Expectations and a charter which sits alongside
247	I would rather see these services remain within the council. This option will also cost rate payers less, which is an important consideration for many.	The cost implications of the In-house vs WSCCO options are provided on page 17 of the 'Your Water Done Well' Consultation document. Cost efficiencies are realised in the longer term 2033/2034.
254	Selwyn district currently has excellent water facilities, the cost of which has already been borne by the ratepayers. firstly establish that there is a priority need to change any part of the current system and secondly determine what the options are. should the ratepayers agree with council presentations and the projected costs to the people a WSCCO can always be created later.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
254		The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Submission Reference	Submission point	Officer response
259	I think the infrastructure already exists within the Council along with the necessary management. This model gives greater accountability to rate payers and also will not increase the rates as much as the projected costs with the other proposed model.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
264	already managing inhouse why change when this is working wellKeep costs down	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
266	As I have previously mentioned, you have been managing this internally, and your team is fully capable of handling it. We have already invested in the infrastructure, and as a community, we cannot afford to squander our funds to enrich the affluent while neglecting those in need. It is imperative that you gauge the current situation and exercise caution regarding expenditures that exceed our budget. I urge you to extend the timelines for each initiative and reconsider projects that we cannot financially support. If this pattern of overspending continues, we risk jeopardizing our financial stability. It may be necessary for you to regain control of the situation or delegate responsibilities to someone within the current council who can manage it effectively. The continuous increases in our rates are untenable; they only serve to alienate residents. I am increasingly frustrated by the lack of responsiveness to the concerns of us ratepayers, as well as the persistent encroachments from property investors attempting to disrupt our community and convert our cherished lifestyle blocks into residential housing.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
266		Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Submission Reference	Submission point	Officer response
271	All towns in Selwyn are in a growth mode, meaning much of the water infrastructure is relatively new. Council has managed this growth and infrastructure well, and I see no reason why, with increased resources as the district grows, the in-house model should be changed. Under the current system, Council reports to the people, the very people who voted them in, and many of these people are struggling financially at the current time. Retaining an in-house delivery ensures accountability, cost efficiency, and community input. I know the council has been leading the way on many issues in local government, but this doesn't mean we have to lead in every area. There may be a need to re-look at this in the future, but now is not the time.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
271		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
273	Retaining in-house management of potable and waste water assets and services is the best model for Selwyn's ratepayers. If in the future a WSCCO needs to be reconsidered then the retention of in-house management allows this. The converse is not true. If the WSCCO model is adopted and this turns out to be the wrong decision it will be much more expensive to reverse the creation of the WSCCO. Prudence would recommend that the Selwyn District Council choose the option that has the least impacts on rates and charges to Selwyn's ratepayers, that is retain in-house management of potable water and waste water services and assets.	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals. The options are being carefully considered and examined to ensure that the final outcome is sustainable.

Submission Reference	Submission point	Officer response
279	Keeping the in-house water delivery model allows for greater local oversight and accountability, enabling the community to have a say in how their water services are managed, possibly fostering a closer relationships between us and the council, leading to more responsive services tailored to our own needs. Managing all services under one roof can streamline operations, potentially reducing administrative overhead and improving coordination between departments (e.g., drinking water, wastewater, and stormwater). Reducing the costs incurred on the rate payers.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
279		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
282	We can't afford more debt associated with a WSCCO and more rate rises in the short term. SDC and its mayor and councillors are making impossible to afford living in Selwyn	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
283	Given when a family max out their credit card, they reduce spending and pay down the debt. Normally they don't simply pick up a new credit card with the same limit. For new infrastructure the proposed plan of expenditure is obscene in the WSCCO model.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
284	Provided that this is not a cost that will increase (such as the approx. \$2000 described to be added onto rates)	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
285	See previous commentsAlso the council needs to operate within budget instead of aiming for more loans = more debt and more vulnerable	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.
287	Kept it in-house and keep it simple. Keep the debt level low and keep Council in control.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
290	The ratepayers at least have some say in the matter	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
292	better control of the water. costs are tracked properly	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
305	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
305		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
305		Properties within a Stormwater management area pay the targeted stormwater rate. Costs are recovered for the management of stormwater within the greater stormwater management area e.g. runoff from the roading network, flood protection etc.
306	. I recall that we have been told that the water infrastructure is in relatively good shape, if so that would indicate good planning and performance is in place.2. The costs are higher for ratepayers it seems with the CCO option but the benefits are unclear.3. A CCO has additional management and operating costs and it would make sense to merge with the other surrounding growth local authorities to split these costs if a CCO goes ahead.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
306		The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.

Submission Reference	Submission point	Officer response
306		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
306		Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.
321	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.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
321		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submission Reference	Submission point	Officer response
323	Please see previous comment. Council managed delivery could provide council with full control over project's, maintenance and upgrades to ensure they align with timings of other projects, which ultimately should reduce costs as roading etc won't be dug up a 2nd time	A WSCCO would remain accountable to Council. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.
324	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?	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
324		Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.
328	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.	Centralised treatment, with economy of scale, provides the most cost effective solution.
329	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.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
329		We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.

Submission Reference	Submission point	Officer response
338	As above - FOR NOW retain services in house, and do a properly considered cost-benefit analysis. Provide details as to why increased borrowing would be necessary, and the implications if that borrowing ability is not available. In addition, exploring the option of using Corde should be done - do not simply say they're doing a good job so we don't want to change things, or we have "move at pace". That is a cop out, and incredibly poor management. Make decisions based on evidence and rationale, not trite sound bites from the Mayor.	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.
338		Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
345	No large setup costs plus greater accountability.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
345		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
349	*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.	Control of costs also means deferral of cost or halting of required activity which may or may not occur. Please note one of the government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which is some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motive.
349		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
349		We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.
351	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.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
355	Give ratepayers a break.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
356	Lower cost to ratepayers	The current LTP modelling would require additional costs to what is included due to the Central Governments regulatory updates.
363	I prefer to let the responsibility of the water be left with The Council and our democratically elected representatives. Creating a new body will entail more costs!	Control of costs also means deferral of cost or halting of required activity which may or may not occur. Please note one of the government's rationales for asking Council to consider separate delivery entities has been to allow for a depoliticisation of water which is some districts has meant a deterioration of water infrastructure to a critical point where elected officials have favoured retaining lower rates. Selwyn District Council in its recent submission on Bill 3 of Local Water Done Well strongly supported the depoliticisation of water and the decoupling of critical, life supporting infrastructure investments from political motive.
363		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
365	More infrastructure, more costs why.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
371	The Council must borrow and spend responsibly not just at the whim of a new unproven organisation.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
374	We cannot afford the ridiculous amount of money proposed. Rate payers cannot afford money especially on the pension	We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.
388	Work within a budget we aren't endless pits of money	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.
398	As above just another cost to ratepayer which is an at time high. Leave it as is.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
400	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.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require additional investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
401	Sick of rate increases for nothing :(	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
406	More cost effective, currently Council has the workmen/tech/tools to do the job why duplicate and add massive cost.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
In-house model preferred: Council Control and Accountability		
16	That is what the council is supposed to do! Not creating another entity!	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
25	Local people know and understand the local issues. Bulk purchasing options could however help.	Comment acknowledged.
27	The current delivery model appears to work reasonably well, and should require only a few minor tweaks to adapt	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
33	Seems sensible to keep control of our very valuable resource	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
34	If its not broke why fix it	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
43	Yes, then rate payers can have a say and if we aren't happy with how it is handled we can use our votes to express that and change leadership	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
46	The council need to own the water supply and services as one of their core services.	Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.
51	SDC and it's current arrangements already delivers a quality & value 3 waters system. At council presentations regarding the chlorination of water in Selwyn it was estimated to have a \$83million cost in compliance costs to prove our water was safe enough to not have chlorination. For Selwyn's ratepayers that was \$231 each. Can't imagine the testing and reporting requirements (plus a little inflation) for WDW would be much higher. The proposed CCO is \$1000's more in costs.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
51		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
52	Don't dump the basics take responsibility and make it work within a budget	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
52		Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals.
60	If the plans you have for water go ahead, then it's looking really good for selwyn.	Comment acknowledged.

Submission Reference	Submission point	Officer response
61	All water should stay in-house & to manage this better, we need fewer useless departments, not more. More practical approach without ridiculous wellbeing and cultural considerations.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
74	Its not broken leave it be	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
75	We should already have the people and expertise to cover this within council and also ensure our democratic voting rights on our water are protected. I do not agree with paying the additional overheads and costs to set up a new organisation.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
75		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submission Reference	Submission point	Officer response
75		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
77	No need for duplication with our water supplies	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
80	The ratepayers have ore control and the operation is more efficient.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
86	Selling off our water service to outsiders so the SDC has more money to waste on frivolous "woke" nonsense is NOT your mandate.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Submission Reference	Submission point	Officer response
88	CONTROL, INFLUENCE OVER CORE BUSINESS - Water and wastewater are core Council services. These should be central to Council's business, your their thinking and being. Once the entity is formed as recommended, the assets and local service would easily be removed from Council focus and leadership through amalgamation with other authorities and the potentially asset sales.	Any CCO's assets will still be consolidated back to the Council balance sheet. The remain within ownership of Council simply in a separate entity.
88		Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
9	No need to increase an already bloated council head count as you are currently coping with the workload within the current structure... Additioanly, water is not a person therefore does not required mumbo jumbo protection which will no doubt require \$ to cross palms of the special people.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
91	We already have people that are paid to look after our water in council. Why would we want to set up another entity to look after this and spend a lot of money setting this up.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
91		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
94	The management of these services is a direct accountability of SDC to its ratepayers. The SDC needs to review and improve its in-house efficiencies and better manage the funding provided by ratepayers.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
96	Water is a core council service. The cost and staff should remain part of the council and be directly answerable to our elected councilors.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
96		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
106	Already have a structure to manage this.	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
107	Take care of our own area.	Comment acknowledged.
108	In house model is more responsive to ratepayers(who fund the council).	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
110	With an in house model we at least have the ability to vote the people responsible for it out if it's not performing well.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Submission Reference	Submission point	Officer response
112	Water is done well now - keep doing it as is - not adding more bureaucracy and unnecessary costs	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
14	Looking at the Council staffing and the recent comments of no extra work required for staff at a parking ticket court case m guess is there is enough staff to carry on in house. No need for another seperate board, CEO etc as a further expense to the ratepayer.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
127	Staff have done this for a long time and should know it all	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
11	Holds council directly accountable to ratepayers. Does not add another layer of buearacracy and a new division and all those costs at management level eg HR, finance, boards etc	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
11		A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submission Reference	Submission point	Officer response
136	Selwyn District council lacks the expertise to manage a WSCCO. The leadership has a penchant for borrowing that is fiscally irresponsible.	A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.
138	Have a referendum until the council elections then hopefully much more information regarding this. As a retired person one pension and a mortgage I would have to sell	SDC have followed the consultation approach as set out under the Water Services Preliminary Arrangements Act and have used a consultation approach that also recognises our current Significance and Engagement Policy. We recognise the challenge of sepped but the decision is needed to enable council to meets its legislative deadline of 3rd September to deliver a WSDP.
138		We appreciate the input from the community and will ensure that all voices are considered as we move forward with a balanced, informed, and strategic approach.
143	Selwyns water system is actually pretty good! A few of the outlying rural villages require work and this can be done in house in a systematic manner. You have a terrific team of people on the ground so continue to use them. All the major growth that has occurred re new developments have water and sewer reticulation that's is awesome. Simply put if you can't afford it without borrowing then you can't afford it at all.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
148	Water is a core requirement along with roading, rubbish, etc. Council should be mindful that we as ratepayers ALL need these utilities as the core reason for the need to have a council at all.	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
151	As per reasons above using Corde as an example! see many staff driving around in shiney new vehicles and very little in the way of work progress happening.	A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.
156	Less management , do the core job well with less people , more system . Simple effective management .	The current 'in-house' management structure is responsible for the delivery of all council delivered services. One of the benefits of the WSCCO is management and governance are focused solely on the delivery of water services and are considered specialists in water service delivery.

Submission Reference	Submission point	Officer response
162	Keep it in house with more control and accountability	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
167	It is unreasonable to spend huge amounts of money on setting up a new CCO when we what we have works.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
176	Looking after the water is part of their job, no need to pay extra people to do this task	The proposed option of a WSCCO enables the establishment of an organisation that remains in the control of Council.
173	Better transparency and collaboration between departments who do the work behind the scenes. Gives ratepayers more say for something we pay for. Come up with more efficient in-house solutions to manage water assets.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
173		An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations.

Submission Reference	Submission point	Officer response
189	The council up to now has successfully managed the water services for Selwyn. Retaining the services in-house would ensure cost efficiency and accountability to the rate payers (well, as much as they currently have).	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
190	I am sceptical that there will be significant long term operational savings with a CCO having been involved in water maintenance over the last 10 years. As demonstrated with the Wellington Water situation there is reduced accountability over a long period of time when CCO's are engaged in critical infrastructure.	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing
190		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
195	As rate payers we would have a greater voice if kept in house,	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
201	Council is much more reliable than a private company.	Current water management by Council is provided to a high standard, a WSCCO option would provide a more focused Governance model.

Submission Reference	Submission point	Officer response
204	Currently the water delivery model is working, it fits in with the current rates structure and, while it has it's own costs, there is not a layer of management and other overheads, which at this time will add little if any value to the rate-payers	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
204		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
207	Makes sense to keep it in house - that how it's already done - keeping it in house it will be easier to control costs - well it should be. Council need to be held more accountable for their function - keeping it in house with strong leadership will be a better way to go, and mean that council cant simply blame a separate entity for failures	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
217	We have been drinking tap water for years and we are fine and never got sick	Comment acknowledged.
218	Least risk option if resourced. The legislation requires the inhouse finances are ring fenced so has separation from other Council activities.	The WSCCO would have the additional benefit of a professional board.
223	This is the councils job and we have the right to vote differently if we do not like the results. We have no power if its a private company we just have no say.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
224	Yes, the system works, it has a proven track record.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
228	The Selwyn District Council (SDC) is currently managing the water and waste water infrastructure quite well, also much of the infrastructure is relatively new due to big growth within the district. What change this system when it appears to be working well ? The ratepayer would be disadvantaged by any move to establish a Water Services Council controlled organisation (WSSCO)	The advantages for the proposed WSSCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSSCO functions and how these are proposed to be managed.
228		We understand that rising costs are a major concern. Under the WSSCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
234	There will be greater control over delivery of these service and lower overall cost with this option.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
234		We understand that rising costs are a major concern. Under the WSSCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
255	Council control inhouse is the only way to go	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
275	Apparently in-house entity is unable raise money at the level of a WSCCO - this is a real bonus, - accountability and consultation in the in-house model, whats not to like? And perhaps in time the Carter Group in particular will have to pay a realistic contribution toward their developments rather than the ratepayer subsidizing the company's subdivisions and contributing directly to their profits.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
275		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
276	Control must remain with the duly elected Council in any true democracy. Ratepayers through Selwyn District Council have invested in infrastructure which is the envy of many regions/districts/Cities of NZ. Now is the opportunity to reap the benefits of that investment. Remember, we are a democracy which entitles the ratepayers to rights and the council has no mandate to remove that right. The Oxford Dictionary definition of Democracy "A system of Government by the whole population or all the eligible members of an area, typically through elected Representatives".	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Submission Reference	Submission point	Officer response
276		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
278	You will still be doing the storm water so why would you not do all 3 waters and save ratepayer paying for 2 entities to perform the same job water.	Council acknowledges the importance of keeping the three surface waters together (stormwater, water races, and land drainage).
278		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
286	Council already have expertise in running water services. With the addition of a few key people it should be able to fulfill the government requirements. If the council is concentrating on it's baseline services, it should be able to keep the water rate under control. Ensuring all new housing developments add rainwater tanks for garden watering would be a start. Has the new Foodstuff building added rainwater tanks to water their landscaped plants?Selwyn has the advantage of having new water networks in many areas due to new growth, that should have been largely paid for by developers. They can then concentrate on older established towns that may need updated services which I am sure have been budgeted for in long term plans.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
286		Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Submission Reference	Submission point	Officer response
286		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
295	This is the democratic option - the council is held accountable to the rate payers, and when we dont like your decisions , we vote you OUT !	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
295		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
296	Present Council controlled system is working well. Ratepayers have some control through three yearly elections. A WSCCO would distance ratepayers from the expected services. While there has been considerable work to produce the figures in the Consultation document the basis for these figures are estimates.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
296		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
296		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.

Submission Reference	Submission point	Officer response
298	They have the skills and staff. Should CORDE become the WSCCO, we will end up with the tail wagging the dog.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
298		Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

Submission Reference	Submission point	Officer response
303	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. vouna and old. male or female. have a unique	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
303		The Waiora One Water Strategy will be upheld regardless of any future changes in how water is managed or governed.

Submission Reference	Submission point	Officer response
307	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.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
307		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
311	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!"	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
311		Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
312	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	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
325	I am happy with the current model	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Submission Reference	Submission point	Officer response
330	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
330		It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
348	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.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
352	Innovate, do your job, serve the district, focus on critical infrastructure	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
354	The setup and business structure are also in place, the council's management of water hasn't been an issue thus far, so why fix something that isn't broken.	Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
360	Our water. It should be under Council control and part of normal Council procedures.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
364	We do not need to double up on the infrastructure and personale.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.

Submission Reference	Submission point	Officer response
367	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.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
369	Selwyn has one of the best water infrastructures in the country so why change this. Also there is good institutional knowledge concerning water infrastructure in the differing communities which should be preserved. Also council is more accountable to rate payers.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.

Submission Reference	Submission point	Officer response
369		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
383	Governance has input from community and elected representatives. Therefore, decisions are accountable to rate payers. Council run water services are well run, cost manageable.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
383		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
383		Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
385	In-house has good water staff & water infrastructure better than in most areas of the motu.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
395	Keep services in house. Keep control of all services, no privatisation of services.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
395		Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
399	Elected representative oversight present when in-house.	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
In-house model preferred: Governance and Entity Structure		
157	As I previously mentioned I don't want a separate business for water. If u did why not use Corde?	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
157		Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
333	I support neither, due to the cunning insertion on p10 and p27 of a commitment to co-govern based on race. As for SDC wanting to be first in NZ to progress this co-governance it is blatant virtue signalling and career advancement for particular individuals. Also the ACT is not even law yet and may never be..	Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).
333		The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

In-house model preferred: Concerns about privatisation

Submission Reference	Submission point	Officer response
133	Yes keep our assets in house and stop selling them off only for the rate payer to be charged more for something we used to already own	If a WSCCO was established the assets would be transferred but overall ownership would still sit with Selwyn District Council.

In-house model preferred: Bureaucracy and Complexity

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

Other: Water Quality and Safety

32	increase development contributions on any land sales or new houses. Make rainwater tanks mandatory for lawn/garden irrigation, this will reduce demand to make drinking water.	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
32		Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Submission Reference	Submission point	Officer response
71	without adding fertilizer by product and chlorine	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.
83	All houses should be supplied with whole house filters for chlorine and other bugs. Not acceptable adding chlorine	Centralised treatment, with economy of scale, provides the most cost effective solution.
101	You need to manage the services by making decisions that are appropriate to our district. Not just dumping chlorine into drinking water without showing result's of testing and independent advice. Following the same solutions as councils in other districts makes zero sense	Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.
101		The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.
235	I prefer you went back to leaving our clean water from the ground, filtered and not full of "cleaners". There was nothing wrong with the southbridge water supply before you ruined it and made it un drinkable.	Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.
235		The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.
327	Yes but please fix the need for chlorination. I hate drinking swimming pools	The submission opposing chlorination is acknowledged. Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Other: Developer contributions

Submission Reference	Submission point	Officer response
304	The Selwyn District has approximately doubled in population - and this means more funds from the Ratepayers! Maintenance of existing water services must continue (and improve where poor original installation has been disintegrating). SDC needs to decide whether land developers for homes or other buildings should partly contribute to water costs, before seeking sales.	Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.
304		Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
Other: Concerns about timing and process		
142	*The consultation period should be extended to allow proper community engagement.*A local referendum should be held to ensure residents are informed of the legislation and cost, so they can have a direct say in this decision.*This whole agenda needs to be re looked at due to lack of transparency and detailed information.You can always go forward but you can never go back - 2 weeks consult with the public is appalling!	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
141	This uses the existing infrastructure to provide the best possible service to our community. I understand that this will also require some additional resources and potential debt. Again I don't think we should rush into anything until the legislation has been passed and the new council is sworn in. Sometimes it is better to be the tortoise and make the changes once all of the factors can be determined. I see too much money spent on consultants and nothing to show for it and I can see that being a possibility under the other model.	Positive endorsement of current water delivery model is acknowledged. Ensuring financial sustainability is a key priority for either model. Council is committed to making cost-effective decisions that balance affordability for ratepayers with long-term infrastructure needs.
141		The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
141		The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
155	This could change once legislation outcomes what is required. Why not leave status quo til then.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Submission Reference	Submission point	Officer response
260	Once the government have written the new legislation and we the rate payers have more information, then perhaps this consultation process should occur. If we chose WSCCO option we cannot go back, and we the rate payers will in the future have no input into how these services are delivered.	Council remains committed to open dialogue with residents, ensuring that decisions align with the best interests of our communities while adhering to regulatory requirements and long-term sustainability goals. The options are being carefully considered and examined to ensure that the final outcome is sustainable.
260		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
322	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.	The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.

Submission Reference	Submission point	Officer response
322		The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
322		The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
280	It is a sensible approach as it is not known (at this stage) what the finalised legislation will look like. In fact, the Council should have applied for an extension so it could have all the facts at hand instead of rushing in and developing an incomplete WSCCO model.	The Preliminary Arrangements Act, passed in September 2024 provides the framework for water services delivery and requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
280		The Preliminary Arrangements Act requires us to make a decision on model by 3 September 2025. This piece of legislation is in force now.
Other: Alternative methods		
31	This is consistent with other regional councils in this area (Christchurch and a Dunedin).	Consultation is currently underway for neighbouring Councils with decisions yet to be made.
31		Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.

Submission Reference	Submission point	Officer response
180	Is it possible to share services with other councils? Do we really need to replicate services?	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based on their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.
180		Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.
Other: Mana whenua		
62	Ensure everyone in the community has an equal say in water and wastewater infrastructure, not have Iwi over ruling local ratepayers	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.
62		Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).

Submission Reference	Submission point	Officer response
QUESTION 3: DO YOU HAVE ANY OTHER COMMENTS ON THE WSCCO MODEL?		
Support WSCCO: Specialist expertise and governance		
22	Having a specialised water management team and board would be the best outcome.	Establishment of a CCO will benefit from specific water expertise both at a governance and management level
319	Provide specialist expertise for water management, drawing on technical expertise that councils may not have in-house. Maintain community-centred governance, ensuring local governance representation, transparency, and accountability through strong partnerships with Selwyn District Council and the community. Create increased transparency and performance monitoring, as CCOs operate under a governance framework that requires clear performance targets, frequent reporting, and external audits.	Comment acknowledged.
Support WSCCO: Long-term benefits		
2	Any solution that prevents the ripping off of the Upper Selwyn Huts residents is fine by me.	Comment acknowledged.
60	There is a huge desire to have chlorine removed. There's comments in the community on how bad our skin and hair has been since living here... it just dries you out and feels like you're in the swimming pool. Any changes here would be incredible	Under the Water Services Act 2021, Councils are legally required to ensure public drinking water supplies are treated with residual disinfectant (chlorine) unless they obtain an exemption from Taumata Arowai, the national water regulator.

Submission Reference	Submission point	Officer response
181	A structure separate from Council is need so as to deliver sustainable 3 Waters infrastructure from now and into the future.The previous model of in-house delivery has been a failure due to a lack of separation and budgets.Budgets for 3 Waters have over many years been kept low, with other spending given priority.Old pipelines are now reaching the end of life and need replacing.Rolleston central has poor stormwater drainage and flooding is a problem every time it rains.Looking to the future we need a new model of delivery where the focus is on 3 Waters, with a separate dedicated structure to delivering what is needed for the next 50 years.A separate structure provides more visibility and accountability, with a Long Term Plan and guaranteed dedicated funding, that only gets spent in 3 waters projects.	Comment acknowledged.
319	Deliver long-term infrastructure investment, focusing on the long-term planning and funding needed for maintaining, upgrading, and expanding water infrastructure. Reducing the risk of short-term budget pressures undermining essential investments. 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 metric	Comment acknowledged.
308	Like the long-term focus, ability to raise funds.	Comment acknowledged.
Support WSCCO: Climate resilience		

Submission Reference	Submission point	Officer response
319	Dedicate resources implementing climate-resilient strategies such as future-proofed water services that adapt to changing environmental conditions while safeguarding resources for future generations.	A WSCCO would ensure specialist focus and funding on water infrastructure.
Support WSCCO: Leadership and innovation		
319	We have an opportunity to lead by example and be seen as the exemplar. 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	Comment acknowledged.
Support WSCCO: Strengthened partnerships and mana whenua		
4	Vital that mana whenua are included on the board. Please remove the chlorine from our drinking water.	Comment acknowledged.
319	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.	Comment acknowledged.
Oppose WSCCO: Concerns about cost		
3	Check other countries and see how this has not worked and the cost involved to revoke the changes when you realise it hasn't worked. It will cost us more!	Through the Act there will be increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer

Submission Reference	Submission point	Officer response
7	Another top heavy administration to pay for out of rates. Not needed. Our rate increases are already unaffordable for many.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
11	How much will this setup costs. Not enough transparency or detail of costs of this operating model. Given CCC have opted in house suggests it's a better model	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
20	its to costly, giving the extra 200Mil to play with will still ned repaid, Auckland and wellington didnt work because nobody was watching. stay in house.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
31	Moving to a WSCCO is fraught with risks, and have significant debt implications and sovereignty for the future. The consultation documents are not sufficiently detailed and the consultation period is very short for the nature of this proposal.	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
32	costs more to locals til 2034, -no control, just expectations of service, - subcontracting out to another company means headaches. eg the govt establishing companies to deliver major projects in CHCH have all failed, hospital, sports centre, convention centre, stadium costs	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
40	As stated ear we as rate payers cannot afford this. Stop spending rate money like its a bottomless pit!	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
46	Seperation of governance and operations for local and central govt services only brings communication gaps and lack of visability from those who are utimaltely reponsible. We also do NOT want any further rate increases or council debt from developing new organiations.Remove the council fat, cancel projects we can't afford and be fiscally responsible please.This is another example of appalling fiscal responsibility by this mayor and his council.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
49	It is a waste of time and money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
57	Yes a waste of money from the rates payers pockets.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
61	We don't need any extra organisations that will just be bleeding money on our rates & creating debt.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
71	History will say it never reduces the cost to rate payers .	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
72	We cant afford to pay another body to take control of our water.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
74	This will only lead to more cost, manager at WECCO reporting to a manager at council rate increases are high enough	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
75	Do not go ahead with this proposal. It will cost ratepayers too much.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
77	Its to expensive to push onto the already over stretched rate payers	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
79	Waste of money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
86	A further waste of SDC ratepayers money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
90	Its floored before it starts as Council will loose control of costs and running costs will ballon out.	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing
91	waste of tax payer money. We need to stop spending money of things we don't need. Make what we have work.	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing
93	Two advantages: you can borrow more, but not enough info as to how much and what it would be used for, or the process for paying back debt; you will potentially reduce in-house argument over competing use of ratepayer money.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
97	You are putting a large financial burden on the residents of Selwyn community. Whilst I can see the benefits, its clear that the costs are far too high and puts SDC in a position of large debt which will take a long time to recover from	Through the Act there will increased costs and increased compliance required, this means there will be added costs for either option taken. The current modelling for the proposed WSCCO has been done from the position of utilising the additional borrowing that is available to minimise the impact on the ratepayer
101	Produce to the public the cost breakdowns of your expenditures over the last 5 years things like your construction spending and how much of that is given to CORDE on a platter rather than offered up to other local contractor's. Also id like to see how much has been spent on working groups looking into these services	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Submission Reference	Submission point	Officer response
102	Besides having the advantage of a higher loan ceiling to debt, the main consideration should be what is the advantage it can deliver to residents, a core consideration being cost. Reducing rates from Council but increasing it from this front makes 0 difference.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
105	A separate entity will require another highly paid ceo and management structure. This will also require buildings/fitouts, vehicles, self promoting advertising.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
107	To bigger entity with big fish being over paid	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
108	Way too much power, and will not feel the financial impact their decisions have on us ratepayers.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
110	Though it sounds positive in some respects government organisations are notoriously inefficient and costs will increase above those forecast. Without competition it will become inefficient. It will also be used to give board positions and incomes to political favourites and through creative accounting will be used to take on more council debt, like CCC has done with Orion over the years. If it does operate more efficiently it will simply mean council will pile more debt onto it to make council books look better.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
Comment Acknowledged.		
112	The costings are unrealistic. It will patently cost more in the long and short term to operate a separate entity	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing
116	Stop increases rates to fund private companies/ separate organisations to take over. Do the job you're paid for.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
124	Don't do it!! Waste of money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
125	There is insufficient information about potential costs and risks assoc with borrowing up to 500% of revenue. This is excessive borrowing and risky for rate payers. No other council is doing this locally.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.

Submission Reference	Submission point	Officer response
127	An absolute waste of funds, a \$2m set up cost, a whole new organisation to basically do what Council is already doing. In spite of Council contending that in 10 years time the WSCCO model would be cheaper than on house I do not believe that. How can Council truthfully contend that an additional business being established would be more economic? Such a contention defies all reasonable logic and economics.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
132	Expensive- work with what is set up and save ratepayers money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
133	It's another cop out for the council. Pull up your big girl pants and work for this community like your supposed to and not treat it all like a bloody business and money making scheme or fucking the rate payers and upping rates to cover your fuck ups	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
134	I just DO NOT want to be paying for any more shit in my rates	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
140	Funding needs to fit into existing long term plan. I am disappointed to see other councils make adjustments to their ongoing building, infrastructure and other related costs to reduce the high rate rises. This needs to be addressed urgently.	An in house solution is a possible outcome following deliberations. We know with regulation it will look significantly different to the current 'in-house' model with significant additional cost to meet those new regulations. The 'in-house' option will not have access to additional funding mechanisms either, restricted to borrowing up to 280% of revenue. With SDC significant growth projections, this provides limited ability to manage our debt head room and restricts our ability to be adaptable to unforeseen situations. The council consistently seeks opportunities to enhance cost efficiency and ensure the prudent use of resources, prioritising value for the ratepayer.

Submission Reference	Submission point	Officer response
142	**Financial Concerns** - Where does WSCCO derive the claim of 500% leverage from with the LGFA? - What are WSCCO's actual equity and collateral? -	Under the new legislation, councils must fund water infrastructure upgrades without additional government funding. One key advantage of a WSCCO is its ability to borrow up to 500% of its revenue through the Local Government Funding Agency (LGFA), compared to the 280% cap for councils managing water in-house. If the decision is made that a WSCCO is created, as stated on page 11 of the consultation document, 'Ownership of drinking water and wastewater assets (and all associated debt and liabilities) would transfer to the WSCCO. The equity in a WSCCO would represent the residual interests in assets (including those transferred) after deducting all liabilities (overheads and other direct costs).
143	It would be a bit like setting up another entity of any type within the same business that doesn't make money. It just cost more money. This is not a good idea. Manage it in-house.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
151	Seeing massive expenses and inefficiencies.	Comment acknowledged.
152	Too expensive. Council needs to operate within its budget and control its spending like all other businesses have to and stop borrowing money to pay for nice to have projects then increasing rates to try and cover poor council budgeting skills.	Comment acknowledged.
157	Far too expensive. We don't want to have a huge capacity to borrow even more money to put us into bigger debt.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
165	Why change something that will increase rates substantially.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
167	This organisation is removed from the rate payer, there are unnecessary set up costs, we already have a council that operates with a board, and local representation. The staff working at Council and you CCO, Corde, have already been through the uncertainty of the Three Waters Reform, enough is enough. Corde have heavily invested in their staff and training to ensure they can meet the needs of the maintenance contracts they hold with council, employing many locals. They have worked hard on having good systems and a good reputation. Why 'fix' something that is not broken, it is a ridiculous proposal. At least wait until all of the legislation is out, and give the community a decent amount of time to look at this, three weeks is an insult to the rate payer paying your wages.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
169	Unnecessary expense and obviously getting ready to sell off asset and mortgaging the properties that are privately owned	The debt under the proposed WSCCO will be secured by the uncalled capital from SDC. SDC does not have right to claim individual houses unless in extreme circumstances on unpaid rates. The proposed WSCCO would have no direct claim on houses.
185	its too expensive and control is not local	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
186	An enormous waste of taxpayer money to set up and run an entire new company. SDC already charges a large amount of rates for this, and we should expect they have the competencies and cash flow to deliver our water within their existing system which we as rate payer have already be so heavily charged for.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
192	Set up costs would be a concern as well as doubling or more the number of staff involved. All these costs could be wasted if a new government changes things again.	Comment acknowledged.
195	A new entity would have the freedom to spend & charge uncontrollably. This would very much be too risky for our rate payers	Comment acknowledged.
196	A new entity should not be set up, as it will be too expensive and have duplication of governance/management services. The existing model of delivering inhouse should be kept.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
203	Financial UncertaintyThe long-term financial impact of setting up and maintaining a WSCCO is unclear.Residents could face higher costs if the WSCCO struggles financially similar to water privatisation failures overseas.If a WSCCO faces funding shortfalls, ratepayers may be forced to cover unexpected costs.ConclusionA WSCCO creates more risks than benefits, including governance failures, service quality issues, financial uncertainty, and reduced local control. Keeping Selwyn's water services in-house is the best way to ensure accountability, reliability, and affordability for the community.	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing

Submission Reference	Submission point	Officer response
211	I am extremely surprised that setting up specialists in water management is costing more than doing it in house. Surely experts should make the task cheaper, so I do not accept that the project will be more expensive for rate payers.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
215	The councils inability to manage sicon/corde effectively means I have no faith in management of our money being spent this way with zero accountability, at least if kept in house is (the ratepayers) have an ability to fire mismanagement at the next electionAlso I have absolutely no desire to saddle my grandchildren with the debt proposed by have a wscoco	Comment acknowledged.
219	The data set model in the Documentation has been falsified to make WSCCO look cheaper - this is fraudulent!How can the WSCCO even create a data set when the legislation has not been finalized?How do local and central governments expect ratepayers to afford the costs of setting up a new entity? - This transition could place a significant financial burden on the community.- If this new entity fails, who will be responsible for the financial consequences? Just looks like 3 waters re branded!	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.
223	As i have said they will be out to make money off us the rate payers. We don't have any left to give.	Comment acknowledged.

Submission Reference	Submission point	Officer response
224	The WSCCO model talks of further borrowing being made available. Further borrowing generates repayments and interest charges. No mention of repayments is mentioned, nor the 'dead money' of interest on the borrowing. All increased costs are only cited on maintaining the in house system. WSCCO is a very bias sales pitch, that is economic with the truth.	Comment acknowleged
233	It costs farr too much and will put our rates up far too much and thats after they have gone up already this year	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
234	This external model will result in significantly higher costs which has been shown by other LGA's	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
237	All I can see is more people employed nothing will change except it will cost the rate payers more money \$\$\$\$	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
241	I also have concerns over why the council continues to justify the WSCCO as being important so that they can access more debt - but no evidence is provided on the current state of water infrastructure? What are the gaps in our current LTP investment plan? If they existed then surely they would have been set-out to ratepayers when setting the LTP - it was only completed less than a year ago. How can SDC show such enthusiasm to increase our debt so significantly, without the detailed evidence to justify this? We would be crazy as ratepayers to endorse the council to do this - yet if we support the WSCCO, then it appears we would be endorsing this potential debt increase with no evidence on why it is needed.	As stated on page 16 of the consultation document, modelling is based on assumptions drawn from Council's current Long-Term Plan, accounting for additional regulatory and operating costs of a new entity.
245	We don't need a council controlled organisation draining ratepayers of more money and pushing up rates when the council is already providing this service.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
246	It would be at a considerable cost to ratepayers, when rates rises are already at peak percentages. The council should apply for an extension to the consultation period. There is no need to rush such an important position to be seen at the first/a frontrunner to adopt new policy. The council should seek to utilise the already established Corde, which would significantly lower the cost of setting up a new WSCCO.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
247	Rates + water service charges will increase faster in the WSCCO model than in the "in-house" model. There is a promise that after the first 10 years the WSCCO will be cheaper than the in-house model but there is no evidence in the consultation document to support this. The consultation document has no evidence of any water services project that would require the extra borrowing ability that a WSCCO would have. extra borrowing means extra repayments. Sure it means more projects can be done sooner, but they will cost more overall if more is borrowed over a longer term.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
259	This model concerns me greatly as there are less controls around how it is managed, its ability to borrow. which is ultimately the responsibility for the rate payer to repay. I am also concerned that the Council appears to be rushing in with no good reason prior to the legislation even being passed which also worries me.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
260	The information supplied is inadequate to make a decision. The time frame in which this has been delivered is too short and not given rates payers adequate time to comment. The WSCCO model will ensure that the rate payers of Selwyn (now an in the future) will be lumbered with unnecessary debt.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.

Submission Reference	Submission point	Officer response
262	The consultation document was pitifully short on detail and information. It was so short on information that we cannot make an informed decision. It appears some are on an ego trip and wanting to be the first out of the blocks. I have yet to see any evidence this system works. It appears to remove the ability for ratepayers to have their say on how water is managed, and opens us up to millions of dollars in generational debt. The consultation period has been way too short for the immensity of this decision, and councillors and council representatives have been conspicuous by their absence. This is not a decision the outgoing councillors should be making. It will be a dump and run on their part. This decision has far reaching consequences and time should be taken before irreversible decisions are made.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
262		The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
262	Hierarchy will be duplicated doubling costs.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
264	dont do it, an astronomical cost that is not needed. pull your heads in.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
265	This should not happen due to it costing ratepayers to set up and run when it's not necessary	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.

Submission Reference	Submission point	Officer response
266	The current model lacks transparency, relying on theoretical projections rather than concrete data. This approach risks creating an environment where blame is shifted among stakeholders if community feedback is disregarded. Furthermore, I understand that there are plans to impose charges on residents who maintain their own water and sewage systems, despite the fact that your organization neither installs nor maintains these services. This strategy seems misaligned with the financial realities of your ratepayers, their existing assets, and your current expenditures. I strongly urge you to reconsider this approach, as it could lead to significant backlash from the community, who may feel that their concerns are being overlooked. It is essential to prioritize fiscal responsibility and eliminate unnecessary expenditures on initiatives that do not resonate with the community's needs. While aspirations for luxury items are common, it is crucial to live within our means. I encourage your team to take a step back and reflect on these important considerations.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
266		A comparison of an urban and rural property water rates and charges, under a Council future in-house and WSCCO model is now available in the FAQs.
267	We do not need the costs associated with an additional bureaucracy which will increase ratepayer charges until at least 2034.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submission Reference	Submission point	Officer response
273	The consultation document did not identify any projects that would require any additional borrowing that WSCOO would provide that aren't already in the Selwyn District Council Long Term Plan (LTP). Vague statements about that there may be a need at a future point for funding for unidentified projects at some unidentified time are simply not good enough. Our community signed off on the LTP last year with the assurance from Council and elected members that this was the plan for 10 years. The consultation document doesn't identify any changes to the LTP. Creation of the WSCOO will impose extra costs on our community in which many ratepayers are already struggling to pay their rates and charges. If Council has more information why wasn't this extra information in the consultation document?	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
		There are no extra projects planned under the WSCCO. The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO. The WSCCO does provide flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and ability to carry/spread debt over a longer period. (An example is a Trade Waste facility).
282	We've lost any trust in Sam Broughton and the councillors. They are doing nothing to ease the cost of living crisis for the Selwyn population, in fact they are making it way worse, therefore we don't trust anything they propose	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
283	The consultation process is flawed, we've had numerous different answers to the same questions depending on what drop in session I attended. Staff earmarked to shift to CCO are running and participating in drop in sessions and advocated for CCO model, if these council staff receive a severance or redundancy package this would most definitely be considered a conflict of interest.	The ultimate decision to establish a WSCCO rests with the elected officials and not staff. As a result we do not believe there has been a conflicts of interest.
	Currently the CFO can't confirm or deny after 11 months what's owed, to who and what the rates of interest are. Why would residents trust you to borrow \$1 more let alone \$600,000,000?	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
	Where's the 2 million dollars gone that was allocated for the establishment team? And why is the council suggesting this amount will need to be topped up for something we haven't decided on yet?	The \$2million budget for the Local Water Done Well team was agreed by Council to allow the programme to get professional advice, legal consultancy, and some additional resource to cover the programme. The programme team was tasked with exploring the impacts of the Water Services Bill, and associated preliminary Act, which included scoping options available to Selwyn, and exploring the feasibility of a WSCCO, as well as identifying what impacts would affect an in-house delivery model. This figure may need to be reviewed if the decision is made to proceed with a WSCCO, but that will not be known until after Wednesday 2 April.
285	It should stay 100 % under control of the local council plus it creates more rates. This means rate payers and council will have to go in more debt.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
286	The WSCCO will cost to set up and I cannot see that as a effective use of our rates. Councilors were not prepared to confirm that water rates would not go up more under a WSCCO in the future than under an in house model. That gives me no confidence in a WSCCO. The government has not yet finalized their requirements. Waiting to network with other councils on a knowledge base could be worthwhile. I am aware they do not wish to work with Selwyn DC on a physical basis.	A WSCCO maintains local control and accountability, ensuring that local needs and priorities are addressed while maintaining transparency in operations, through the establishment of a dedicated board and accountability back through Council.
290	The ratepayers have no control of cost. Developers pay for infrastructure	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.
298	Flawed in concept and an unacceptable addition to rates and ratepayers costs.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
302	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.	A comparison of an urban and rural property water rates and charges, under a Council future in-house and WSCCO model is now available in the FAQs.

Submission Reference	Submission point	Officer response
311	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!	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
312	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!	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
321	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.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

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

As stated on page 16 of the consultation document, modelling is based on assumptions drawn from Council's current Long-Term Plan, accounting for additional regulatory and operating costs of a new entity.

Submission Reference	Submission point	Officer response
323	I do not support the creation of a WSCCO at this time. I don't support taking on millions of dollars of debt to fund a board of directors, and executive leadership team and other duplicated admin costs, not to mention us taxpayers bearing the cost of company tax under a WSCCO. If any WSCCO is projected to make a profit, why do we the ratepayers have to bear an increase in rates, when the entity is going to be profitable? Council have said a WSCCO would pay dividends to SDC so again, it's not clear why ratepayers would then require such large increases in rates. If a WSCCO is going to be profitable then ratepayers are a cash cow for council and are not going to get any additional services whether under council or as a cco. It is hard to see how a projected \$62 saving in 10 years time is possible given the additional roles & role duplication required to facilitate a CCO. Council have said they will be no role duplication but council require admin staff, Accountancy teams, HR and compliance/ regulatory teams and the creation of a WSCCO would also require all of these	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
324	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 makes taking dollars off Selwyn District Council rates, but is a falsehood as the accounts will still come, but from WSCCO instead.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
328	Outside experts/consultants can put the prices up anytime they like and they are also not elected representatives by Selwyn rate payers.	Comment acknowledged.

Submission Reference	Submission point	Officer response
329	Costly and replicating a system that is already working well.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
333	I am deeply concerned that SDC is prepared to use its ratepayers as pawns and inflict identity politics on them, while increasing our costs.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
340	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 fall back directly onto the ratepayers.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
342	Stop wasting our rates we already pay ECAN to look after our water & they do a shit job & have wasted our rates on their 4x4 Trucks that they all drive around in.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
348	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.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
353	Just think of the cost of setting it up - no proof that it will work except that they will do it for profit!	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
354	Why aren't other options such as working in collaboration with other councils being considered or presented as alternative options? How about working with Christchurch Council? Lack of evidence-based costing and the projected meagre savings in 10 years aren't given the community the confidence that they won't face cost blowout in future which will be a huge burden to the community.	Dedicated resource will allow for more strategic operations of the drinking and wastewater business units at the same time as being able to spread the cost across generations through borrowing

Submission Reference	Submission point	Officer response
357	The WSCCO would come with massive start-up costs (eg. office equipment, vehicles, + a management team) all funded by ratepayers, when our rates are fast becoming unaffordable, so we don't want or need that expense. The WSCCO would strip ratepayers of their voice, transferring governance to and independent board with not input from the community. If by retaining water services in-house, decision makers remain accountable to ratepayers and not an external organisation. There is also the risk factors on page 5. So keep in-house water service delivery. To ensure accountability, cost efficiency + community input compared to the opposite, of all of these because of the WSCCO.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
363	A separate body would entail duplication of administrative functions leading to higher costs for the rate payer.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
365	Waste of money Less control rate payers will have little say on what happens. More costs to the rate payers who are struggling with rate payments as it is.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
371	To many times Council has gone down a new road at the behalf of so called experts and at the cost of unparalleled rate rises. Please live within a budget.	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
374	Listen to the people you are supposed to be representing. Stop more money debts thanks. No more communities use what we already have. Please listen to your people who put you in your jobs.	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
379	A waste if ratepayers money	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
383	WSCCO operating with a 500% debt limit!! What would that money be spent on for the next 10 years? How is that financially manageable? Our rates increases are already too high and hurting a lot of Selwyn residents. Some are selling because they can't afford the rates increases.- especially retired residents, there are many unanswered questions about WSCCO model. Having only 3 weeks for public submissions for this was disappointing, especially since it is so important!	We understand that rising costs are a major concern. Regardless of the water delivery model chosen, the Government has proposed the establishment of a new regulator who will monitor financial sustainability, pricing and water delivery standards. This regulator would provide a layer of monitoring for either Council or the WSCCO to ensure they make good decisions for the benefit of the community.
398	Waste of money. Your saying that Local Water done well policy is not working? Just another cost to ratepayers ie \$2000 per year??	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
407	Waste of money too much bureaucracy. Not in favour of increasing debt.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Oppose WSCCO: Concerns about cost

Submission Reference	Submission point	Officer response
15	That it should not proceed. I don't believe that SDC would be considering this as an option if it weren't part of a government mandate therefore it is not in the districts best interest.	The Local Water Done Well process is a legislative requirement and all councils across New Zealand are required to consult their community on models for future of water delivery services.
31	Moving to a WSCCO is fraught with risks, and have significant debt implications and sovereignty for the future. The consultation documents are not sufficiently detailed and the consultation period is very short for the nature of this proposal.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
93	Two advantages: you can borrow more, but not enough info as to how much and what it would be used for, or the process for paying back debt; you will potentially reduce in-house argument over competing use of ratepayer money.	Comment Acknowledged

Submission Reference	Submission point	Officer response
94	there appears to be a potential political motivation behind this proposal. Councils have no place in this area. They are there to represent the best interest of ratepayers. If the SDC feels that it is unable to internally manage the ratepayer owned infrastructure and assets with which it is charged then perhaps an appeal to the Minister of Local Government to address this issue is the next step for ratepayers. While Corde as a CCO already does the majority of maintenance work on SDC Water/Waste Water assets, and this seems to work OK, to divest any further responsibilities such as determining where expenditure is required on new assets or asset improvement is a step too far for a non democratically elected CCO.	The Local Water Done Well process is a legislative requirement and all councils across New Zealand are required to consult their community on models for future of water delivery services.
		Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
101	Produce to the public the cost breakdowns of your expenditures over the last 5 years things like your construction spending and how much of that is given to CORDE on a platter rather than offered up to other local contractor's. Also id like to see how much has been spent on working groups looking into these services	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.

Submission Reference	Submission point	Officer response
141	In my opinion this solution is being rushed into being. It has the potential to line the pockets of a few people at its inception but not provide value to the ratepayers and our community	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
142	**Lack of Information and Clarity** - The model presented in the document lacks sufficient detail and transparency. - How can WSCCO create an accurate model without having access to the finalized legislation? - **Affordability for Ratepayers** - How do local and central governments expect ratepayers to afford the costs of setting up a new entity? - This transition could place a significant financial burden on the community. - **Risk and Accountability** - If this new entity fails, who will be responsible for the financial consequences? - Will ratepayers be left to cover the costs? - This is inter-generational debt once again! Plus you didn't give the SDC time to even give the rate payers enough time for consultation - this is being pushed through and looks like a re branding of 3 WATERS!	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
154	I feel this whole consultation has been far too rushed & am disappointed that we were not informed until the last day about the central government's consultation regarding the legislation that is imposing all these changes. The whole exercise is just money grabbing.??	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
155	Rushed, poorly consulted, not enough info given, contradicts professional advice.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
161	Why don't you allow us to vote on this at the next election.	Comment acknowledged.
167	This organisation is removed from the rate payer, there are unnecessary set up costs, we already have a council that operates with a board, and local representation. The staff working at Council and you CCO, Corde, have already been through the uncertainty of the Three Waters Reform, enough is enough. Corde have heavily invested in their staff and training to ensure they can meet the needs of the maintenance contracts they hold with council, employing many locals. They have worked hard on having good systems and a good reputation. Why 'fix' something that is not broken, it is a ridiculous proposal. At least wait until all of the legislation is out, and give the community a decent amount of time to look at this, three weeks is an insult to the rate payer paying your wages.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
167	There is not enough understanding about this because the council has not explained it properly. Instead it has been rushed through. To make a decision on any contract i need to understand what i am signing. Therefore it is a no until the council consults the community properly and focusses on reducing wasteful spending and other things like annual pay increases to staff . When we have lots of tough economic years we dont go creating more debt. Start communicating properly with reasonable times for people to decide	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
173	How can this go ahead when legislation is still being developed? The model moves staff and you end up losing connections and collaboration between council and CCO. There's a lot of risk for ratepayers and it should not proceed.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
192	Set up costs would be a concern as well as doubling or more the number of staff involved. All these costs could be wasted if a new government changes things again.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
214	Very dangerous concept, setting something like that up without government legislation in place is would quite frankly be negligent and a disgrace.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
216	A condensed consultation period for a material change in delivery is unacceptable.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
217	Where is the risk assessment that was done in order to determine the proposed model?	Comment acknowledged. If decision is made to establish a CCO transition will occur over a period of time with a shared service model initially to ensure no drop in level of service.
219	The data set model in the Documentation has been falsified to make WSCCO look cheaper - this is fraudulent! How can the WSCCO even create a data set when the legislation has not been finalized? How do local and central governments expect ratepayers to afford the costs of setting up a new entity? - This transition could place a significant financial burden on the community.- If this new entity fails, who will be responsible for the financial consequences? Just looks like 3 waters re branded!	The approach proposed is driven off existing legislation as set out in the Water Services Preliminary Arrangements Act, an Act that has been through formal approval by the Crown. Bill#3 is in the final stages of approval by the Crown which we expect in June. Regardless, the requirement to submit a Water Services Delivery Plan by 3rd September is set out in legislation.

Submission Reference	Submission point	Officer response
226	Risk of losing local control of CCO, expensive setup with not even all requirements known at this stage. Keeping water service in-house ensures accountability and community input. Seems rushed!	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
231	Rate payers we would have no say in appointment of Board members of WSCCO. It is premature to be setting this up when Bill 3 hasn't been passed. Expense of setup and running of WSCCO	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
238	This seems to be a done deal by the council, but I hope that you do in fact take into account the responses by ratepayers to this submission	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025.
241	I also have concerns over why the council continues to justify the WSCCO as being important so that they can access more debt - but no evidence is provided on the current state of water infrastructure? What are the gaps in our current LTP investment plan? If they existed then surely they would have been set-out to ratepayers when setting the LTP - it was only completed less than a year ago. How can SDC show such enthusiasm to increase our debt so significantly, without the detailed evidence to justify this? We would be crazy as ratepayers to endorse the council to do this - yet if we support the WSCCO, then it appears we would be endorsing this potential debt increase with no evidence on why it is needed.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
246	It would be at a considerable cost to ratepayers, when rates rises are already at peak percentages. The council should apply for an extension to the consultation period. There is no need to rush such an important position to be seen at the first/a frontrunner to adopt new policy. The council should seek to utilise the already established Corde, which would significantly lower the cost of setting up a new WSCCO.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
247	Rates + water service charges will increase faster in the WSCCO model than in the "in-house" model. There is a promise that after the first 10 years the WSCCO will be cheaper than the in-house model but there is no evidence in the consultation document to support this. The consultation document has no evidence of any water services project that would require the extra borrowing ability that a WSCCO would have. extra borrowing means extra repayments. Sure it means more projects can be done sooner, but they will cost more overall if more is borrowed over a longer term.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
259	This model concerns me greatly as there are less controls around how it is managed, its ability to borrow. which is ultimately the responsibility for the rate payer to repay.I am also concerned that the Council appears to be rushing in with no good reason prior to the legislation even being passed which also worries me.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
260	The information supplied is inadequate to make a decision. The time frame in which this has been delivered is too short and not given rates payers adequate time to comment. The WSCCO model will ensure that the rate payers of Selwyn (now an in the future) will be lumbered with unnecessary debt.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

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

Submission Reference	Submission point	Officer response
271	My comments don't so much relate to the WSCCO model, but my findings as I have endeavoured to seek information and understand this document. For such an important issue, we have only been given two options. Surely the need to revisit a WSCCO model could be considered. On Tuesday 4 March I went to the Council office in Rolleston to obtain copies of the document to pass to neighbours and friends as many people seem unaware of this project (as I was until recently when I attended a Residents and Ratepayers meeting). I want to be fully informed and believe we all should be. I was given 19 copies of the document and told "this is all we have". I was astounded that with such an important project 19 copies were all that were available. I had also checked the Council's website for dates and times of public meetings, but I could find no information. I mentioned this to the person I dealt with at the Council office and, after checking, they admitted the information was missing and advised it would be added. There were four meetings in total; three taking place during the week at 6 pm for one hour, and another taking place at 10 am on a Saturday. These times would hardly seem suitable for many people returning home from work, and those with families to feed. Surely, surely the meeting times should be planned to fit in around schedules of the people to whom you are seeking feedback, and not your staff. I attended a meeting at the Lincoln library on the evening of Thursday 6 March at 6 pm. I spoke to several staff members. I advised the lead person that I had only been able to obtain 19 copies of the document. He was shocked and told me that there were "cartons of them". I informed him that the staff didn't know as I was told only 19 were available. I also told him that the meeting venues, dates and times	Community consultation followed the same process as for the Long Term Plan and Representation Review held last year. We have a digital version of the consultation document online which people are able to print themselves. Printed copies do come at a cost to council, so we print in smaller quantities to avoid wastage.

Submission Reference	Submission point	Officer response
		Drop ins were held in all four wards, and some Councillors chose to also hold their own meetings, or speak at residents association meetings. There was an online session for those able to access the internet and this was recorded and made available after the fact.
273	The consultation document did not identify any projects that would require any additional borrowing that WSCOO would provide that aren't already in the Selwyn District Council Long Term Plan (LTP). Vague statements about that there may be a need at a future point for funding for unidentified projects at some unidentified time are simply not good enough. Our community signed off on the LTP last year with the assurance from Council and elected members that this was the plan for 10 years. The consultation document doesn't identify any changes to the LTP. Creation of the WSCOO will impose extra costs on our community in which many ratepayers are already struggling to pay their rates and charges. If Council has more information why wasn't this extra information in the consultation document?	The submitters response is acknowledged. There are no extra projects planned under the WSCCO. The agreed programme of work as outlined in the LTP, would transfer to the newly established WSCCO.
280	You have failed to explain the rationale and need for a WSCCO when the in-house model is currently meeting our needs. The community have asked a lot of questions that have not been answered, therefore cannot be expected to make a decision in favour of a WSCCO.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
283	The consultation process is flawed, we've had numerous different answers to the same questions depending on what drop in session I attended. Staff earmarked to shift to CCO are running and participating in drop in sessions and advocated for CCO model, if these council staff receive a severance or redundancy package this would most definitely be considered a conflict of interest.	The ultimate decision to establish a WSCCO rests with the elected officials and not staff. As a result we do not believe there has been a conflicts of interest.

Submission Reference	Submission point	Officer response
287	There needs to be more consultation with the rate payers, once a WSCCO is implemented there will be no turning back. The decision needs to be held off until the local elections are complete, and the legislation is finalised.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
291	I wish the consultation period was longer to allow for more community outreach for such a large decision.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

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

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

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

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

Submission Reference	Submission point	Officer response
351	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'.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
383	WSCCO operating with a 500% debt limit!! What would that money be spent on for the next 10 years? How is that financially manageable? Our rates increases are already too high and hurting a lot of Selwyn residents. Some are selling because they can't afford the rates increases.- especially retired residents, there are many unanswered questions about WSCCO model. Having only 3 weeks for public submissions for this was disappointing, especially since it is so important!	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Submission Reference	Submission point	Officer response
385	Consultation timeframe too short for complexity & lack of information available.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
415	Very difficult to understand both options.	
419	There has not been enough information or time given to rate payers about the WSCCO model. The small amount of information that I have seen indicates the Selwyn rate payers can not afford this WSCCO model.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

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

Submission Reference	Submission point	Officer response
422	not enough information. Government have not passed legislation yet	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
423	Once this is turned over to WSCCO we will have no control over what happens. It is not something that should be rushed.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.

Council control and accountability

Submission Reference	Submission point	Officer response
11	As previous comments. Unnecessary additional layers of management and no direct accountability to ratepayers. How much will this setup costs. Will elected officials be appointed. Will iwi be appointed. Not enough transparency or detail of costs of this operating model. Given CCC have opted in house suggests it's a better model	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Additionally, a skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.
25	Not sure how this could add efficiencies.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
32	costs more to locals til 2034, -no control, just expectations of service, - subcontracting out to another company means headaches. eg the govt establishing companies to deliver major projects in CHCH have all failed, hospital, sports centre, convention centre, stadium costs	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
33	Will you just sell it off? I'd say that's what will happen then we will be further removed from controlling what we need the most	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
43	If rate payers are going to pay for this then it shouldn't be separate from the council	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
66	There is no political accountability in this model.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
90	It's floored before it starts as Council will lose control of costs and running costs will balloon out.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
91	waste of tax payer money. We need to stop spending money on things we don't need. Make what we have work.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
116	Stop increasing rates to fund private companies/ separate organisations to take over. Do the job you're paid for.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
133	It's another cop out for the council. Pull up your big girl pants and work for this community like you're supposed to and not treat it all like a bloody business and money making scheme or fucking the rate payers and upping rates to cover your fuck ups	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
142	**Risk and Accountability** - If this new entity fails, who will be responsible for the financial consequences? - Will ratepayers be left to cover the costs? -	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
148	Not a viable option at this time, this model sitting outside of council should only be considered on a much wider regional basis.	As part of the Delivery Model Options there was an option for Territorial Authorities to explore new Delivery models including joint local Government arrangements. SDC consulted with other Councils, however this was currently not a viable option, although this could be considered in the future.
151	Seeing massive expenses and inefficiencies.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
167	This organisation is removed from the rate payer, there are unnecessary set up costs, we already have a council that operates with a board, and local representation. The staff working at Council and you CCO, Corde, have already been through the uncertainty of the Three Waters Reform, enough is enough. Corde have heavily invested in their staff and training to ensure they can meet the needs of the maintenance contracts they hold with council, employing many locals. They have worked hard on having good systems and a good reputation. Why 'fix' something that is not broken, it is a ridiculous proposal. At least wait until all of the legislation is out, and give the community a decent amount of time to look at this, three weeks is an insult to the rate payer paying your wages.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
171	As mentioned, it removes the say on water further away from ratepayers with a Board in place that we cannot elect. They will be driven by profit and dividend payouts. Keeping it in house in Council means ratepayers are at least closer to being able to make decisions on our water.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
174	The case for a single authority CCO is not strong. Council already has the responsibility and accountability to ratepayers to deliver water services and meet the government's requirements so setting up a CCO seems an unnecessary step. The case would be different if this was a multi-authority CCO where there would be economies of scale and the need to manage cross-boundary politics - if this situation were to eventuate then the council could re-visit the CCO option in the future.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
185	its too expensive and control is not local	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
186	An enormous waste of taxpayer money to set up and run an entire new company. SDC already charges a large amount of rates for this, and we should expect they have the competencies and cash flow to deliver our water within their existing system which we as rate payer have already be so heavily charged for.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
188	Ownership must remain fully with Council	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
189	I think it is a dangerous option - the community cannot risk losing local control to a bureaucratic structure, risking loss of accountability, community input and cost efficiency.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
193	The,"in- house water delivery model," works perfectly well. I oppose the WSCCO proposed set up	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
196	A new entity should not be set up, as it will be too expensive and have duplication of governance/management services. The existing model of delivering inhouse should be kept.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
203	A Water Services Council Controlled Organisation (WSCCO) presents several risks and challenges that make it a poor choice for managing Selwyn's water services. Here is a breakdown of my concerns. 3. Keeping services in-house ensures the council remains directly responsible to residents and can adapt to local needs. 5. Unproven Benefits There is no clear evidence that a WSCCO would outperform an improved in-house model. Other councils (e.g., Cherbourg Aboriginal Shire Council in Australia) have struggled with outsourced water management, showing the risks of moving away from direct control. Conclusion A WSCCO creates more risks than benefits, including governance failures, service quality issues, financial uncertainty, and reduced local control. Keeping Selwyn's water services in-house is the best way to ensure accountability, reliability, and affordability for the community.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
		The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
205	The case for a single authority CCO is weak. The Council already handles water services and meets government requirements, making a CCO unnecessary. However, if a multi-authority CCO with economies of scale and cross-boundary management were needed, the Council could reconsider the CCO option in the future.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
215	The councils inability to manage sicon/corde effectively means I have no faith in management of our money being spent this way with zero accountability, at least if kept in house is (the ratepayers) have an ability to fire mismanagement at the next electionAlso I have absolutely no desire to saddle my grandchildren with the debt proposed by have a wscoco	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
226	Risk of losing local control of CCO, expensive setup with not even all requirements known at this stage. Keeping water service in-house ensures accountability and community input. Seems rushed!	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
231	Rate payers we would have no say in appointment of Board members of WSCCO. It is premature to be setting this up when Bill 3 hasn't been passed. Expense of setup and running of WSCCO	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
243	Just adds costs another board ceo etc does not add efficiency	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
245	We don't need a council controlled organisation draining ratepayers of more money and pushing up rates when the council is already providing this service.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
254	considering the fact that Selwyn district has such a good system already provided and maintained, the haste to hand it on to an other body of contractors with only three weeks notice to ratepayers but accompanying establishment costs, no accountability to those ratepayers and untenable and irreversible rates rises, can only be viewed as highly suspicious. in an election year this haste to commit Selwyn ratepayers to such a future with inadequate care to their voice on this matter will undoubtedly undermine further the trust in current Council members	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
285	It should stay 100 % under control of the local council plus it creates more rates. This means rate payers and council will have to go in more debt.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
295	To repeat, it is completely undemocratic to have an unelected organisation that is able to have a financial influence and apply a resulting financial burden on rate payers - there MUST be accountability to us, the rate payers. Without us, the council would have NO revenue ! Therefore , the Mayor and councillors should think VERY carefully about their decision, every decision in fact !	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
296	Puts distance between rate payers and service delivery.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
303	A very bad idea. There is no point in entertaining this. We, the people, voted the last government out due to our large concerns over the Three Waters model. We hated the idea of a central government or outside water agency lording it up over everybody regarding our precious water and control over it. Keep democracy alive. Local first and foremost. WSCCO OUT!	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
304	Option 2 is necessary. There would be I believe inadequate accountability to the Ratepayers otherwise	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
305	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
306	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.	The advantages for the Proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document.
311	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!	It is anticipated a Board of the WSCCO would be appointed by an appointments panel on which Council sits. This would operate in a similar manner to how Council's other CCO board is appointed.

Submission Reference	Submission point	Officer response
321	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.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
322	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 terms to focus on water as stormwater will still be retained. There are also the additional costs for directors, and executive leadership roles that wouldn't 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% that's a cost that a lot of ratepayers are saying they won't be able to afford. If the work is planned for under the LTP with an expected increase of 16% why does a WSCCO require a 12% increase? The increase is directly related to the 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 advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.

Submission Reference	Submission point	Officer response
328	Outside experts/consultants can put the prices up anytime they like and they are also not elected representatives by Selwyn rate payers.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
329	Costly and replicating a system that is already working well.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
330	Once it is removed from the council, there decisions will be independent and no longer need to require answering to the voters	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
340	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. This should not be allowed to happen. If WSCCO does proceed then all the SDC residents should vote in the controlling board members.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
343	Do you job that's our rates pay you for.	The advantages for the proposed WSCCO are set out on page 12 of the 'Your Water Done Well' Consultation document. Positive endorsement of current SDC management is acknowledged. Any transfer agreement will also legally be required to cover interrelationships between Council and WSCCO functions and how these are proposed to be managed.
347	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.	Establishment of a CCO would place responsibility for decisions on investment in water infrastructure with the CCO Splitting out stormwater from the other surface waters (water races, and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains in Council. Stormwater also integrates with Transport and Open Space assets.

Submission Reference	Submission point	Officer response
357	The WSCCO would come with massive start-up costs (eg. office equipment, vehicles, + a management team) all funded by ratepayers, when our rates are fast becoming unaffordable, so we don't want or need that expense. The WSCCO would strip ratepayers of their voice, transferring governance to and independent board with not input from the community. If by retaining water services in-house, decision makers remain accountable to ratepayers and not an external organisation. There is also the risk factors on page 5. So keep in-house water service delivery. To ensure accountability, cost efficiency + community input compared to the opposite, of all of these because of the WSCCO.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
365	Waste of money Less control rate payers will have little say on what happens. More costs to the rate payers who are struggling with rate payments as it is.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
374	Listen to the people you are supposed to be representing. Stop more money debts thanks. No more communities use what we already have. Please listen to your people who put you in your jobs.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
399	Despite S Broughton's comments to the contrary, it's not working in Wellington - contractor rip offs. No accountability or oversight apparently.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.

Submission Reference	Submission point	Officer response
423	Once this is turned over to WSCCO we will have no control over what happens. It is not something that should be rushed.	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
Other: Privatisation concerns		
1	Again, the security of water is important, and I do not want a loophole for the government to sell the WSCCO to a private company to make money and gain savings.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
33	Will you just sell it off? I'd say that's what will happen then we will be further removed from controlling what we need the most	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
42	This seems to be the first step in privatisation of our water supply.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
116	Stop increases rates to fund private companies/ separate organisations to take over. Do the job you're paid for.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
120	Two comments. If the WSCCO proceeds, there must be an equitable framework for charging water related rates or fees. The current fees are too low. Users should be charged by volume, irrespective of whether they are town or rural users. Heavy users get off far too lightly under the current system and have no incentive to minimise consumption. Secondly, the WSCCO constitution must have sound protections protecting against acquisition or privatisation.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
169	Unnecessary expense and obviously getting ready to sell off asset and mortgaging the properties that are privately owned	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.

Submission Reference	Submission point	Officer response
188	Ownership must remain fully with Council	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
212	Please include an assurance that at no point in the future will water services in Selwyn be privatised; as in sold or taken over by any person, persons or corporation that is not wholly and only owned by all the taxpayers and/or residents of Selwyn.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
276	Control by any Quasi/Quango runs the risks of higher rates for bottom line performance ratings. Previous actions of privatization by Central Governments have not resulted in better performance of better service which Selwyn Ratepayers are entitled too in a true democracy.	Shares of water services entities cannot legally be held by any person or entity except territorial authorities (District Councils). The proposed WSCCO would be fully owned and controlled by SDC.
Other: Governance and entity structure		
109	Yes, as per my previous comments, CCOs in Auckland haven't worked particularly well (like AT and Watercare), what makes a CCO (or as termed here - WSCCO), function any better?	Comment acknowledged.

Submission Reference	Submission point	Officer response
203	A Water Services Council Controlled Organisation (WSCCO) presents several risks and challenges that make it a poor choice for managing Selwyn's water services. Here is a breakdown of my concerns 1. Governance and Accountability RisksA WSCCO operates at arm's length from the council, reducing direct democratic control.Decision-making becomes less transparent, making it harder for residents to hold leaders accountable.Past examples (e.g., Wellington Water) show governance failures, slow responses, and lack of clear accountability. 2. Service Delivery RisksA separate entity does not guarantee better water management—Wellington Water and other WSCCOs have had major issues with service quality and infrastructure failures.Potential service disruptions and delays in upgrades or maintenance due to complex governance structures.	A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. It is anticipated a Board would be appointed via an appointment panel where there is independent, CCO and Council representation. Bill 3 of Local Water Done Well legislation sets out that Directors must be independent and that there must be an appropriate skill mix among the Directors to allow for the effective governance of a water services entity. The same requirement would not exist for an in-house delivery model and they services would continue to be governed by Councillors.

Comment acknowledged.

Other: Bureaucracy and complexity

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

Submission Reference	Submission point	Officer response
34	To me its just starting another business that has not been proven	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
45	Don't change the system we have to try and make another system means there will be more things to go wrong	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
156	Too much structure, too many layers of management . Making work for the sake of it .	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder.
164	Current quality is known. Moving this to a new model has risk in terms of quality and service delivery. I am hesitant to choose another council owned entity given inefficiency of beurocracy.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
290	Another level of bureaucracy	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.

Submission Reference	Submission point	Officer response
318	It introduces a layer of overhead I don't think is necessary or justified, and transitions to a for-profit model. The only way I would support a CCO model is if it was clearly non-profit in focus, and deliberately structured so as to be hard to change from that focus. Perhaps something like the old electricity boards that were community owned.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
407	Waste of money too much bureaucracy. Not in favour of increasing debt.	Through the Local Government (Water Services Preliminary Arrangements) Act 2024 there is a requirement to explore the options. Under the regulations there will be additional cost and complexity under either model. Now presents an opportunity to set Water Supply up for the future. As well as potential to partner with other territories in the longer term.
Other: Rural / Environmental water needs		
301	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.	All drinking water supplies are subject to a Source Water Risk Management Plan. Environment Canterbury are responsible for the setting of Community Drinking Water Protection Zones which takes into consideration any affected party. Surrounding land use is a major consideration when any new source is being considered.

Submission Reference	Submission point	Officer response
302	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.	Comment acknowledged.
347	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.	Comment acknowledged.
355	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.	Maintaining and improving our infrastructure is essential for community well-being. We are continuously assessing and upgrading systems to meet current and future needs.

Submission Reference	Submission point	Officer response
366	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.	Comment acknowledged.
402	Most of our good drinking water goes to waste, encourage people to collect rain water.	Comment acknowledged.
Other: Mana whenua		
11	As previous comments. Unnecessary additional layers of management and no direct accountability to ratepayers. How much will this setup costs. Will elected officials be appointed. Will iwi be appointed. Not enough transparency or detail of costs of this operating model. Given CCC have opted in house suggests it's a better model	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities. Additionally, a skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.
62	Remove any mention of the Mana or Mauri of water unless these terms can be defined permanently in English. Remove any Iwi or Mana Whenua partnerships in association with ratepayer funded services.	Council recognises the explanation of mana and mauri would have provided context. The goal is to ensure that all parties involved in managing water resources work towards protecting and enhancing the mana (spiritual authority) and mauri (lifeforce) of all water bodies, regardless of any future changes in how water is managed or governed.
64	One water strategy whilst I support Ngai Tahu & Mana Whenua support on strategy, I do not support any dollar value paid to Ngai Tahu, Mana Whenua. No one owns the water	Council is committed to giving effect to our Treaty-based future by continuing to strengthen relationships to provide outcomes that benefit our whole community. This is confirmed in Council's LTP 2024-2034 and Te Rautaki Tikaka Rua (Bicultural Strategy).

Submission Reference	Submission point	Officer response
301	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.	Our Waiora One Water Strategy has forms part of the Council's wider strategic direction for Waikirikiri Selwyn. It aligns with other plans and strategic documents including the District Plan and Selwyn District strategies. The Waiora One Water Strategy, used in conjunction with Council's other strategies, forms one part of a suite of guidance amterials that will direct planning, development and investment across Council. Its implementation will require integrated planning across land, water and infrastructure and these decisions will be made through Council's 30 Year Infrastructure Strategy, 10 year Long-term Plan and its Annual Plans, all of which are subject to consultation with the community.
130	Dear Council It seems a sensible solution. However in the document you use terms such as 'mana' and 'mauri'. You should really explain what you mean by these words. It might sound nice but what impact do they have and who decides in what way these concepts are applicable to the water Concern ovstrategy. Mana and Mauri are lovely kind of spiritual almost religious terms and might not be appropriate in this context.	Council recognises the explanation of mana and mauri would have provided context. The goal is to ensure that all parties involved in managing water resources work towards protecting and enhancing the mana (spiritual authority) and mauri (lifeforce) of all water bodies, regardless of any future changes in how water is managed or governed.
314	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.	A skill matrix would be developed that sets out the required mix of skills of the Board, which can include Mana Whenua expertise and competencies. The Board would likely be appointed via an appointments panel with representation from Council, WSCCO and an independent.

Submission Reference	Submission point	Officer response
		Our Waiora One Water Strategy has forms part of the Council's wider strategic direction for Waikirikiri Selwyn. It aligns with other plans and strategic documents including the District Plan and Selwyn District strategies. The Waiora One Water Strategy, used in conjunction with Council's other strategies, forms one part of a suite of guidance amterials that will direct planning, development and investment across Council. Its implementation will require integrated planning across land, water and infrastructure and these decisions will be made through Council's 30 Year Infrastructure Strategy, 10 year Long-term Plan and its Annual Plans, all of which are subject to consultation with the community.
Other: Alternative models and recommendations		
30	The council states that maintaining in-house water services is not viable due to legislation, funding constraints, and compliance costs. However, Christchurch and Dunedin have opted to keep their water services in-house. Why is Selwyn taking a different approach, and why hasn't this been clearly explained?	Based on Selwyn's rapid growth, geography, and specific water infrastructure requirements, a WSCCO has been determined as the best model for the future. Other councils will be making their decisions based their own unique circumstances including different infrastructure challenges, borrowing capacity, and service delivery considerations compared to a fast-growing district like Selwyn. For Selwyn, a WSCCO is about creating reliable and safe intergenerational water services that are also expected to be more cost-effective over the long term. Keeping water services in-house would still require significant investment to meet new government regulations, but Council would be limited in how much it could borrow to pay for these upgrades.
56	Look at the wSCCO model failure in Wellington. There is no evidence or realistic expectation that SDC can do this better.	Comment acknowledged.

Submission Reference	Submission point	Officer response
88	Instead of applying this to the water/wastewater service as a whole, apply a SPV to individual developments.	The previous government introduced new regulations, created Taumata Arowai (a new water regulator), and planned to shift water services from councils to larger entities. However, after the 2023 election, the new government repealed these changes and replaced them with the Local Water Done Well (LWDW) policy, returning control to councils with specific options to establish new delivery models and to consult with our community, these options are: - In-house business unit for water delivery (our current model) - A Water Services Council Controlled Organisation (WSCCO) - Joint Local Government arrangements - Consumer Trust – where council assets would transfer to a consumer-trust owned organisation After carefully considering all the options, Council has indicated that a WSCCO is the preferred option in order to future-proof Selwyn's water infrastructure. As New Zealand's fastest-growing district, we need an appropriate model that ensures safe, reliable water services both now and for future generations.
120	Two comments. If the WSCCO proceeds, there must be an equitable framework for charging water related rates or fees. The current fees are too low. Users should be charged by volume, irrespective of whether they are town or rural users. Heavy users get off far too lightly under the current system and have no incentive to minimise consumption. Secondly, the WSCCO constitution must have sound protections protecting against acquisition or privatisation.	Comment acknowledged

Submission Reference	Submission point	Officer response
121	It is difficult to understand why the Council hasn't explored the option of using an existing Council Owned Company (Corde) to take on the tasks described. Unexplainably the consultation document appears to be completely silent on this option. There may well be good reasons for dismissing this as an option, but they need to be presented. If there are no good reasons for dismissing this as an option, then it needs to be included as a genuine option with an analysis of advantages and disadvantages.	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
138	Perfer to utilize what we already have meaning CORDE	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
167	This organisation is removed from the rate payer, there are unnecessary set up costs, we already have a council that operates with a board, and local representation. The staff working at Council and you CCO, Corde, have already been through the uncertainty of the Three Waters Reform, enough is enough. Corde have heavily invested in their staff and training to ensure they can meet the needs of the maintenance contracts they hold with council, employing many locals. They have worked hard on having good systems and a good reputation. Why 'fix' something that is not broken, it is a ridiculous proposal. At least wait until all of the legislation is out, and give the community a decent amount of time to look at this, three weeks is an insult to the rate payer paying your wages.	Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.

Submission Reference	Submission point	Officer response
246	It would be at a considerable cost to ratepayers, when rates rises are already at peak percentages. The council should apply for an extension to the consultation period. There is no need to rush such an important position to be seen at the first/a frontrunner to adopt new policy. The council should seek to utilise the already established Corde, which would significantly lower the cost of setting up a new WSCCO.	The three-week consultation period was chosen in response to tight timeframes set by new Government legislation, which requires councils to submit Water Services Delivery Plans (WSDPs) by 3 September 2025. These plans must outline how water services will be delivered and financed over the next 10 years, ensuring compliance with new regulatory standards. To meet this deadline, councils need to consult with their communities promptly on a preferred water services delivery model. Delaying consultation could jeopardise the ability to develop a comprehensive plan that reflects community input and meets governmental requirements within the required timeframes. While we understand concerns about the length of the consultation, we are also mindful that this is not a new conversation, we have had Government enforced changes in local water as a conversation for the past four years and the Council is aiming to be proactive in addressing the changes and providing certainty to both the community and our staff. The new model, whether an in-house model or a WSCCO, needs to be in place by 1 July to ensure staff are prepared, and the WSDP is developed in line with regulatory standards.
		Corde is not eligible to be a water service CCO under the new arrangement government have put in place via the Local Government (Water Services Preliminary Arrangements) Act, WSCCO can only provide services for the council(s) that own it. CORDE would need to terminate all non-Selwyn District Council contracts and all roading, facilities and other civil contracts meaning loss revenue and income.
254	It will fail just like Auckland	Comment acknowledged.

Submission Reference	Submission point	Officer response
275	Empire building by of Mayor Sam, who states in a video that Selwyn's WSCCO will be nothing like Wellington's entity and it's water woes. He can't know that and its disingenuous to say otherwise - Wellington's entity is being mightily ripped off by contractors on top of other problems. Selwyn as a new post-earthquake district has for the most part new infrastructure - no EQ damage, no 50 year old pipes and if Selwyn does have compromised infrastructure then ratepayers money has been squandered on other non-infrastructure spending. Medical Centre - leave that to Govt or the market..If there are problems requiring larger sums that an in-house model can deliver then ratepayer money has been	Comment acknowledged.
278	Why is no viable option to join with other councils for a joint WSCCO?	Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.
301	Recommendation: 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.	All drinking water supplies are subject to a Source Water Risk Management Plan. Environment Canterbury are responsible for the setting of Community Drinking Water Protection Zones which takes into consideration any affected party. Surrounding land use is a major consideration when any new source is being considered.
338	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.	Comment acknowledged.

Submission Reference	Submission point	Officer response
354	Why aren't other options such as working in collaboration with other councils being considered or presented as alternative options? How about working with Christchurch Council? Lack of evidence-based costing and the projected meagre savings in 10 years aren't given the community the confidence that they won't face cost blowout in future which will be a huge burden to the community.	Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.
356	Not working elsewhere even where three or four councils have banded together to keep costs down - lower N.I.	Council has decided to consult on a Selwyn District Council only owned WSCCO, as at this time, there is no viable option to join with other Councils for a Joint WSCCO. If the establishment of a Selwyn WSCCO proceeds and other Councils express an interest in integrating at a later time, this would be considered and worked through.
399	Despite S Broughton's comments to the contrary, it's not working in Wellington - contractor rip offs. No accountability or oversight apparently.	Comment acknowledged.

Submission Reference	Submission point	Officer response
424	NPHS Te Waipounamu does not have a view on the preferred option for the delivery of water services in the Selwyn District. However, we are aware that the Council's Your Water Done Well plan may have significant implications for public health and as such should take into consideration the following factors: -The delivery of three waters services is maintained or strengthened and allowance is made for population growth. Council should continue to operate its existing three waters infrastructure and not reduce or withdraw services. -There is sufficient investment in drinking water and wastewater treatment plants to meet regulatory requirements. -There is sufficient investment in the renewal and maintenance of infrastructure to maintain levels of service in the medium and long term. -The chosen delivery model is cost effective and keeps costs manageable for users to protect people's health by ensuring access to safe drinking water and wastewater disposal is affordable. -Adequate resources are being allocated to higher risk communities, including those that are currently under-serviced or not serviced. -Intergenerational equity has been considered. This should include consideration of the impacts of climate change and ensuring this essential public health infrastructure is protected from extreme weather events. -If water metering and charging is considered, this should be equitable, and there should be provision for adequate water to be provided to meet health and sanitation requirements. -If stormwater is included. there should be evidence of	Council has developed 30 year masterplans for water and wastewater services to meet future growth demand Council 2024-34 LTP and 30 Year Infrastructure sets out the investment required to maintain regulatory requirements Council runs an advanced IDS renewal model and funds renewals over a 30 year timeframe Affordability is one of the priorities for both delivery options Council provides the same high level of service to all communities Climate change considerations will be a factor of planning with both options Council is already fully metered (99.8%) on all on-demand supplies. Stormwater and flood protection interconnections is noted Council 'One Water Strategy' provides the framework for integrated water management The above strategy was co-design with Te Taumutu Rūnanga

Submission Reference	Submission point	Officer response
424	Comments There is no reference in Your Water Done Well to servicing of higher risk communities and how those with higher needs will be approached. The current proposal also doesn't address plans to connect existing or future properties to the network. Council should ensure that these groups are considered in future planning whether it be through the council's own internal business unit or the proposed Water Services Council Controlled Organisation (WSCCO). Council also needs to ensure that there are mechanisms in place to ensure the WSCCO applies an equity lens to its operation. Although intergenerational equity is mentioned in Your Water Done Well, climate change is not. Council should ensure that climate change is at the forefront of any plan development as the effects of extreme weather events will affect the provision of infrastructure such as drinking water, stormwater and wastewater. Consultation with other local and regional councils to reduce impact of drought and flood risk on the provision of drinking water and wastewater services should be imbedded in Council's approach to Your Water Done Well, as these risks are not restricted to council boundaries. There is no indication in the Your Water Done Well proposal that there has been such a discussion between Selwyn District Council and Environment Canterbury, for example. The Your Water Done Well proposal does not discuss continued drinking water access for health and sanitation including life-preserving services, such as home dialysis. It is acknowledged that the supply of	Council provides the same high level of service to all communities. Planning is in place to connect or new properties within our water supply boundaries. There are currently no plans to extend the community supplies to subserviced private properties with the exception being the Ngāti Moki marae.

Submission Reference	Submission point	Officer response
424	Although intergenerational equity is mentioned in Your Water Done Well, climate change is not. Council should ensure that climate change is at the forefront of any plan development as the effects of extreme weather events will affect the provision of infrastructure such as drinking water, stormwater and wastewater. Consultation with other local and regional councils to reduce impact of drought and flood risk on the provision of drinking water and wastewater services should be imbedded in Council's approach to Your Water Done Well, as these risks are not restricted to council boundaries. There is no indication in the Your Water Done Well proposal that there has been such a discussion between Selwyn District Council and Environment Canterbury, for example.	- Climate change considerations will be a factor of planning with both options.
424	The Your Water Done Well proposal does not discuss continued drinking water access for health and sanitation including life-preserving services, such as home dialysis. It is acknowledged that the supply of water for these purposes (such as exemptions for medical purposes) may be covered in other council plans. Passing control of water services to a WSCCO means that any matters of this nature covered by existing specific Council plans must also migrate to the new organisation. Further to this, there also needs to be a formalised process for residents who are unable to meet the costs of drinking water. We note that Section 25 of the Water Services Act requires a water supplier to ensure a minimum quantity of drinking water is to be provided.	Council maintains a register of customers on home dialysis. Should the WSCCO option progress, this list and requirement will be transferred to the WSCCO.

Submission Reference	Submission point	Officer response
424	We understand that if the new WSCCO is agreed as the delivery model, it will encompass drinking water and wastewater with stormwater services continuing to be delivered by an internal Council business unit. It will be important to coordinate and align the two delivery models since all these components of water services are interlinked and cannot be managed in isolation. As you will know, stormwater entering sewerage systems can create problems for treatment plants and lead to sewage overflows. We also note that stormwater services need to be aligned with flood protection planning undertaken by the regional council.	Splitting out stormwater from the other surface waters (water races and land drainage) would result in inefficiencies and therefore it is recommended that Stormwater remains with Council. Stormwater also integrates with Transport and Open Space assets. Councils Engineering Code of Practice sets out the designed LoS for stormwater. Co-ordination with the Regional Council is in place.

Other: Developers

400	Selwyn has new infrastructure, no need for large scale rebuilding or repairs. Make developers pay their share.	Development Contributions will continue to be required under the proposed WSCCO. However, the details of how these contributions will be structured under a WSCCO are still being determined. The Local Government (Water Services) Bill, which will set the rules for development contributions, only recently closed for submissions and is expected to become law around September. This legislation will clarify how much councils can require developers to contribute and whether there is flexibility to adjust these amounts in the future.

Unuhia, unuhia
Te pou, te pou
Kia wātea, kia
wātea
Āe, kua wātea

Remove, uplift
The posts
In order to be
free
Yes, it has been
cleared