

Submitter Number	Submission point	Officer response
QUESTION 1: PROPOSED TRANSITION OF DRINKING WATER AND WASTEWATER SERVICES TO A WSCCO		
43	I want the council to maintain control so rate payers can still have a say. A new organization will mean it is separate and might prioritize themselves over what is best for rate payers	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes.
86	Stop trying to change the system!	Comment acknowledged.
128	Corde is becoming too large and there exists limited opportunity to effectively complain about services they provide or elicit change.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
131	This hasn't worked in other countries around the world. It is the people's water and should be managed by the people's elected council. It is not a commodity to be separated away to an organisation that needs to make money and can cut corners to do so. It would be a big mistake to make this transition! I am strongly against you doing it.	A WSCCO would be led by experts in water governance, service delivery, infrastructure funding, and long-term debt management, ensuring a dedicated and highly skilled focus on water services. This specialised expertise allows for a more commercial approach to identifying and achieving cost efficiencies while maintaining high service standards. A WSCCO would also enhance the customer experience for Selwyn residents by operating as a service-focused entity for water only. Additionally, shifting governance to an independent board helps prevent politically motivated delays in long-term water infrastructure investment, while Council retains ultimate control and accountability to Selwyn residents as the sole shareholder. The proposed WSCCO would be 100% owned by SDC. As such any profits achieved by the proposed WSCCO could be used to invest within the WSCCO or alternatively paid out to SDC as income.
132	This is not a consultation you are telling us what you plan to do and what do we think - we are not talking about the options	A proposal has been submitted for community feedback, and no decision will be made until 2nd April 2025.
136	Selwyn District Council lacks the required ability to manage this prudently, as shown by numerous failings in the past.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.

- 141 This approach has the potential to increase the debt burden of the rate payers now and in the future. Setting up a new entity seems like a risky investment, when the government legislation is not finalised. The councillors are also up for reelection this year and I would think that it would be better to wait until both Legislation and new councillors are in. I've been in a business where the government has forced separation and the only people who profit are big businesses, not the people who are the customers. It's also not a good idea to start a business that has the ability to add debt in such a high amount to the ratepayers when the country is struggling to get out of the recession.
- 141 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.
- 141 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.
- 141 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.

153	waste of money - the infrastructure is new and we dont need the debt - i dont want to hear about failures due to out sourcing	The WSCCO provides flexibility to look at larger projects that would be difficult to fund with the inhouse model given its additional borrowing capacity (500%) and our current borrowing cap of 280% to fund all of Council's projects. Whilst our water infrastructure assets are relatively new, SDC is looking at the WSCCO as part of the regions growth (Future Selwyn) and ensuring the appropriate funding mechanisms are in place allowing us to meet future demands.
154	Using this way of providing services will place rate payers out in the cold - we will have NO way to have our say in what this company does or how much debt they will rack up for us & future generations to have to service!	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act. A "Charter" would also allow for management of the relationship including transparency expectations. Funds are required under legislation to be ringfenced for the spending on water. Please note the CCO will continue a volume based charging model of water charges, there will be no rates charged for water.
155	This decision is rushed without awaiting full details from the legislation. Premature to make changes before knowing exactly what changes need to be made.	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.
162	The current model works for us controlled by the SDC. We dont need another organization to pay for.	Comment acknowledged.

202	Extra layer added that reduces visibility and accountability. Current council relationship with subsidiaries have not shown a good track record to bring benefit to the community. Additional cost to run a separate organisation. No confidence this will be done right and done well	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.
202		A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation which is a legal document will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship including transparency expectations. A CCO would remain subject to LGOIMA as Council is.
217	The price of rates is getting unaffordable. Need to look at other options. The average family wont be able to afford this.	We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
234	This will take away the control and the community voice on what we need.	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.
237	This is just another cost that will be passed onto the rate payers.We are already paying too much!	We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.
240	Keep it the same	Comment acknowledged.
247	It would be a better option to deliver water services through an in-house water delivery model.	Comment acknowledged.
248	With rates at an all-time high and about to increase further it is incredulous that SDC would even consider this as a solution.	We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

259	I would be very concerned to see this be at arm length from the Council and rate payers. I am worried about the ability to borrow large sums of money. I also believe such an entity is adding a layer of unnecessary costs by setting up a new infrastructure which will duplicate many of the costs that exist within the Council already.	A WSCCO is designed to improve efficiency, not add unnecessary bureaucracy or duplicate roles. While there are initial setup costs, these are balanced by the long-term financial and operational benefits of having a dedicated water entity.
		One key advantage is access to higher borrowing limits through the Local Government Funding Agency, allowing the cost of essential infrastructure upgrades to be spread over a longer period. This helps reduce the immediate financial impact on ratepayers while ensuring safe and reliable water services for the future.

265	This should remain as is.	Comment acknowledged.
420	The council should keep the debt as low as possible. Creating a WSCCO will raise the debt cap to high	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.
423	This will create too much debt and will end up having the rate payers having to pay the short fall	We understand that rising costs are a major concern. Borrowing enables council to continue to provide the required infrastructure to the community while limiting the cost to the rate payer by spreading the cost over the useful life of the asset. This results in lower costs to ratepayers when assets are built and spreads cost across current and future users. The cost of the debt has been modelled based on the assumed interest rate used in the LTP.

QUESTION 2: DO YOU PREFER A FUTURE IN-HOUSE WATER DELIVERY MODEL

20	stay in house, we don't need the added rating costs or the inefficiency this will bring like Auckland and Wellington have been able to achieve when no one was watching. Stay in House, we don't need to add to the empire, that could be sold off with changes to government and council management. stay in house. large debt costs, and must be repaid	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment to meet new government regulations, but Council's borrowing capacity is limited. This means the cost of upgrades would fall more directly on ratepayers.
20		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.
41	As per previous comments. Far, far, far prefer this option for transparency and efficiency.	Comment acknowledged

56	Use the energy put in this to deliver these services at a lower cost in-house	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.
128	More accountable.	Comment acknowledged
149	A separate Organisation with specialist staff & management would be preferred.	Establishment of a CCO will benefit from specific water expertise both at a governance and management level.
153	yes yes yes	Comment acknowledged
205	Yes, I prefer the SDC to continue with an in-house water delivery model. Local Control - Decisions made by local representatives. Accountability - Direct accountability to residents. Service Continuity - Avoids disruptions from transitioning. Community Trust - Greater trust in a familiar system.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
205		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	They already have specialists so Selwyn District is expanding and has newer infrastructure compared to many other regions. The model presented in the document lacks sufficient detail and transparency - it shows increases in the SDC in-house and in the WSCCO data it is missing years and those years missed have the same data repeated showing WSCCO to be cheaper. The rate payer can vote who looks after us and infrastructure.	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.
219		Modelling is based on assumptions drawn from Council's current Long-Term Plan accounting for additional regulatory and operating costs of a new entity. Once the WSCCO is established and has set its own capital plan and operating model, the costs may be higher or lower than those modelled. A WSCCO would remain accountable to Council who in turn have accountability to ratepayers.
226	For council and ratepayers direct control remains.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.

252	Be accountable.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
269	CCOs can be very difficult for councils to manage I prefer Council to retain full control	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
301	ESAI also supports that stormwater, water race and land drainage asset management and services remain, as the document suggests, within the SDC in-house delivery model.	Comment acknowledged. Stormwater, water races and land drainage are proposed to be retained by Council under either delivery model.
314	I like the idea of a focused water services organisation that has the ability to focus on getting things done right. Provided of course that they have good guidance from council and have a fully accountable board.	It is agreed that the WSCCO option would bring long term benefits for delivery of Water Services. Establishment of a CCO will benefit from specific water expertise both at a governance and management level
316	Keep the Selwyn District Council drinking and wastewater assets and services in-house. Retain and build the skills etc to run it within Council so you are not relying on buying-in expensive contractors from the private sector. Council will thus retain the expertise to run the water services efficiently and effectively and remain directly involved with those who use and benefit from great water services done well.	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.
335	See attached. Fundamental function of Council	Comment acknowledged
342	Just leave our water as it is.	Comment acknowledged
380	Leave as is	Comment acknowledged
420	yes council control is a better option and council have a good handle on the water already	Positive endorsement of current SDC management is acknowledged. A WSCCO would remain accountable to Council who in turn have accountability to ratepayers.

421	It would be far better to have an in house controll of our water in the future	The CCO will remain accountable to Council who in turn have accountability to ratepayers. Bill 3 of the Local Water Done Well legislation also provides for economic regulation and oversight of any water services entity (in-house or CCO) by the Commerce Commission. It is expected this regulatory framework will look similar to regulation for the electricity and gas industries. There will also be a new Water Service regulator established to oversee standards and delivery of water activities.
422	more control	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
423	This should stay in house and be controlled by our local council. This should save costs and have more control.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the WSCCO including the ability to align strategic work programmes. The CCO will be subject to LGOIMA, questions can be asked direct to the CCO via section 35A Local Government Act.
423		We understand that rising costs are a major concern. While the modelling of the proposed WSCCO shows a short term increase in the combined rates/charges it shows that in the medium term it will result in reduced cost to the rate payers. As the WSCCO will bring in income to cover its own costs.

QUESTION 3: DO YOU HAVE ANY OTHER COMMENTS ON THE WSCCO MODEL?

14	Not required.	Comment acknowledged
17	No	Comment acknowledged
41	Please don't do it.	Comment acknowledged
51	Don't do it.	Comment acknowledged
53	Don't do it.	Comment acknowledged
59	It's a really bad idea.	Comment acknowledged
83	Stay away from Selwyn	Comment acknowledged
117	None other than mentioned previously.	Comment acknowledged
122	Don't want it.	Comment acknowledged

168	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	SDC have followed the consultation approach as set out under the Water Services Preliminary Arrangements Act and have used a consultation approach that also recognises our current Significance and Engagement Policy. We recognise the challenge of speed but the decision is needed to enable council to meets its legislative deadline of 3rd September to deliver a WSDP.
168		We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment 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		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.
176	do not want it	Comment acknowledged
183	Thank you for the excellent council website submitter information (short video, precise points etc) offered to support this decision.	Comment acknowledged
206	Ridiculous.	Comment acknowledged
242	This would lead to increases in rates and cost households even more with no direct benefit	We understand that rising costs are a major concern. Under the WSCCO model, water charges may be slightly higher in the early years, but financial modelling shows lower costs from Year 10 onwards. Keeping water services in-house would still require major investment 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	It will fail just like Auckland	Comment acknowledged
256	No to any kind of 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.
316	As I have said above, I don't agree with the WSCCO model - keep it in-house.	Comment acknowledged

335	See attached. I wish to be heard in relation to this submission.	Comment acknowledged
360	The model is not ok and water should remain with the Council.	A WSCCO would remain accountable to Council who in turn have accountability to ratepayers. A statement of expectation will be put in place between the Council and the CCO, alongside a "Charter" which allows for management of the relationship.
364	P11 could you please explain in symbol english what this page means.	<p>Page 11 of the consultation document outlines the proposal for a Water Services Council Controlled Organisation (WSCCO) to manage drinking water and wastewater services, while stormwater remains under Council control. This model would create an independent, Council-owned entity with a specialist board focused on water services, aiming to improve efficiency, governance, and long-term planning. The WSCCO would take responsibility for planning, funding, building, and maintaining water infrastructure, ensuring reliable and sustainable services for the community.</p> <p>Under this structure, water assets and associated debt would transfer to the WSCCO, but Council would retain ownership as the sole shareholder. The organisation would secure funding through the Local Government Funding Agency (LGFA), with Council providing uncalled capital security of at least \$450 million to support financial stability.</p> <p>This means that as part of the LGFA's financing arrangements for CCOs there is a requirement for credit support from the shareholding council (SDC) that is sufficient to cover the projected LGFA borrowing by the CCO. This support takes the form of uncalled capital security, which is an arrangement that requires the shareholding council to subscribe for capital in the CCO, but leaves that capital uncalled and unpaid. The right to call on that capital is assigned in favour of LGFA, who would exercise that right in the event of a default under the CCO's financing arrangements. Given this requirement, and to ensure that that the WSCCO can access the benefits of LGFA finance under the Local Water Done Well policy, it is proposed that SDC would subscribe for uncalled capital that is expected to cover the initial and future borrowings of a WSCCO for period of time. SDC would recognise the uncalled capital as a contingent liability disclosure within the Annual Report. SDC would mitigate the risk through a Letter of Expectation to any CCO (current process with CORDE) along with regular meetings on operational and financial performance.</p> <p>If approved, the WSCCO is set to begin operations on 1 July 2025, aiming to enhance service quality while maintaining strong oversight and financial sustainability.</p>