

Ashburton District Council

AGENDA

Notice of Meeting:

An **Extraordinary meeting of the Ashburton District Council** will be held on:

Date: Wednesday 29 September 2021

Time: 9am

Venue: Council Chamber
137 Havelock Street, Ashburton

Membership

Mayor	Neil Brown
Deputy Mayor	Liz McMillan
Members	Leen Braam
	Carolyn Cameron
	John Falloon
	Rodger Letham
	Lynette Lovett
	Angus McKay
	Diane Rawlinson
	Stuart Wilson

Meeting Timetable

Time	Item
9am	Extraordinary Council meeting commences
9.05am	Grove Street Park disposal submission presentations <ul style="list-style-type: none"> - Tony Moore - Andrew Mason

1 Apologies

2 Extraordinary Business

3 Declarations of Interest

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest they might have.

4	Grove Street Park disposal – submission hearings and deliberations	3
	- Submission documentation circulated with this agenda	
5	Three Waters Reform Proposal – Council Feedback	6
6	Productivity Commission – Immigration submission	62

4. Hearings and deliberations – Future of Grove Street Park

Author	<i>Richard Mabon, Senior Policy Advisor</i>
Activity manager	<i>Toni Durham, Strategy & Policy Manager</i>
General manager	<i>Jane Donaldson, Group Manager, Strategy & Compliance</i>

Summary

- The purpose of this report is to provide necessary background information for the hearings and deliberations on the future of Grove Street Park.
- Council resolved to consult on the future of Grove Street Park following a request from the developers of the Ashbury grove subdivision.
- Consultation is required in these circumstances, under section 138 of the local government act 2002.

Recommendation

- 1. That** Council receives this report.

Attachments

Appendix 1	Submission summaries
Appendix 2	Submission book
Appendix 3	Consultation document

Background

The current situation

1. The current situation is described in the enclosed consultation document (Appendix 1)
2. Council has received 45 submissions. These are provided under separate cover in the Submissions booklet.
3. Council officers have provided feedback on some of the issues raised by submitters in the Summary of feedback, also under separate cover.

Legal/policy implications

Decision to be made

4. The decision facing the council, after hearing and deliberating upon all the submissions, is whether or not to dispose of Grove Street Park. This is a Yes/No question.
5. Many of the submissions discuss the benefits and disadvantages of the Ashbury Grove subdivision, and its roading and reserves. The decision on resource consents to enable the subdivision are separate matters, and there are two resource consents required. However, the decision on the disposal of Grove Street Park will either allow or rule out road access over the land currently used for Grove Street Park.

Financial implications

Requirement	Explanation
What is the cost?	Direct costs are very limited as the consultation document was produced in house and public advertising was done through the website and the Council Brief which appears in local papers.
Is there budget available in LTP / AP?	Yes.
Where is the funding coming from?	Consultation on the future of Grove Street Park is funded from operating budgets.
Are there any future budget implications?	Yes. Council has programmed renewal of the playground assets on Grove Street Park. If Council disposes of the park, those funds will be spent on the next playground in the programme.
Reviewed by Finance	Erin Register, Finance Manager

Significance and engagement assessment

6. While this report contains no recommendation, the matters to be decided by Council will require a decision. See Table below.

Community engagement

7. At consultation, the matter attracted 45 submissions, which is a strong turnout. This is analysed in some detail in the Summary of feedback. Council staff became aware of a technical glitch with the loading of online submissions through the website. This was publicly notified and the period for submissions extended by a week.
8. Officers became aware of a number of submitters whose submission went astray and in every case we know of, a submission was ultimately lodged in the consultation.
9. Councillors also met on site to view the location of the park and the proposed subdivision.

Requirement	Explanation
Is the matter considered significant?	No.
Level of significance	Issue assessed as being of medium significance.
Level of engagement selected	Consult – formal-two-way communication.
Rationale for selecting level of engagement	Consultation required under the Local Government Act 2002.
Reviewed by Strategy & Policy	Toni Durham, Strategy & Policy Manager

Next steps

10. Depending on Council's decision, there may be one or two processes to follow under the Resource Management Act 1991. If Council agrees to dispose of Grove Street Park, then resource consent to build a road on land zoned Open Space A is required.
11. Regardless of Council's decision on Grove Street Park, Council must still make a decision on the subdivision resource consent for Ashbury grove. This will be made under delegated authority, following normal processes.

5. Three Waters Reform Proposal – Council Feedback

Author *Toni Durham; Strategy & Policy Manager*
Activity manager *Neil McCann; GM Infrastructure Services*
Group Manager *Hamish Riach; Chief Executive*

Summary

The purpose of this report is to update Council on:

- the Government’s 30 June 2021 and 15 July 2021 Three Waters Reform announcements, which change the reform process previously outlined in 2020;
- the specific data and modelling Council has received to date;
- the implications of the revised Three Waters Reform proposal for Council;
- feedback from the community on the reform proposals from a brief survey conducted throughout September 2021; and
- next steps (including uncertainties).

Recommendation

That Council:

1. **notes** the Government’s 30 June and 15 July 2021 Three Waters Reform announcements;
2. **notes** officer’s advice on the accuracy of the information provided to Council in June and July 2021 as a result of the RFI and WICS modelling processes;
3. **notes** that a decision to either support the Government’s preferred three waters service delivery option is not lawful (would be ultra vires) at present due to section 130 of the Local Government Act 2002 (LGA), which prohibits Council from divesting its ownership or interest in a water service except to another local government organisation, and what we currently know (and don’t know) about the Government’s preferred option;
4. **notes** that Council cannot make a formal decision on the Government’s proposed reform for three waters service delivery without doing a Long Term Plan (LTP) amendment and ensuring it meets section 130 of the LGA;
5. **notes** that the Government intends to make further decisions about the three waters service delivery model after 30 September 2021;

Cont’d

- 6. requests** the CEO to seek guidance on and/or give feedback to the Government on
- a. the following areas of the Government's proposal that Council needs more information on:
 - i. How can Council have guaranteed influence over the direction of the WSE, given the complicated and multi-layered proposed governance structure?
 - ii. What further work is planned on alternative ways of achieving balance sheet separation than the current multi-layered structure of the Representative Governance Group and the Independent Selection Panel?
 - iii. How can the community have guaranteed influence, given the size and scale of the entities?
 - iv. How can Council be guaranteed that the District's three waters investment priorities will be met?
 - v. How will Council have visibility of future pricing proposals of the WSE?
 - vi. Will the proposed economic regulator regulate all private supplies and WSEs, and if not, where is the cut-off point for not being regulated?
 - vii. What work was done on the realities of stormwater being included in the reform proposals?
 - viii. How will charging for stormwater work, noting the private and public benefit of stormwater?
 - ix. How will decisions be reached on which stormwater infrastructure transfers to the WSE and which remains with the Ashburton District Council?
 - x. How can Council have a guarantee as to how the WSE will follow Council's planning and land development ambitions and not be an inhibitor to development in the Ashburton District?
 - xi. How will WSEs be compelled to contribute meaningfully to Ashburton District civil defence emergency planning and management?
 - xii. How does the three waters reform integrate meaningfully with the broader local government reform that is currently underway, most notably the reform of the RMA and the Review into the Future for Local Government?
 - xiii. Has Government considered the impact of the reforms on local body governance?
 - xiv. How will rural schemes that are primarily supplying stockwater be treated?
 - xv. How will Government resource the workforce required for the reforms to be successful?
 - xvi. How will the maintenance contract between Ashburton DC and contractor Ashburton Contracting Ltd be treated on transfer (presumably 1 July 2024), including the protection of their workforce?
 - b. the following changes to the Government's proposal/process:
 - i. The Governance Structure to be altered to enable direct Council involvement in Board and Director performance, accountability, appointments etc;

- ii. Ensure all information is available before asking Councils to consult their communities and make a decision on the reforms – including all those matters raised in a. above.

Cont'd

- c. The following feedback from the Community survey conducted by the Ashburton District Council be fed back to DIA/Government:
 - i. 504 responses were received from our community
 - ii. 97% of respondents felt it was important for the community to be able to have its say on how three water services are provided
 - iii. 64% of our respondents believe that the continued improvement of health and environmental standards in three waters from what is currently provided is important
 - iv. 27% of respondents are prepared to pay more for higher standards, with a further 21% happy to do so if the improvements are localised, justified and/or decided upon by local representation
 - v. Other feedback included concern with the:
 - the community wants to make the decision to opt in /out of the reform - risk of the reform being made mandatory
 - loss of local assets, representation and control
 - complexity of the three water structure
 - speed of the process to date
 - governance arrangements, including iwi representation
- 7. **notes** that the CEO will report back further once further information and guidance has been received from Government on what the next steps look like and how these should be managed
- 8. **in noting the above, agrees** Council has given consideration to sections 76, 77, 78, and 79 of the Local Government Act 2002 and in its judgment considers it has complied with the decision making process that those sections require (including, but not limited to, having sufficient information and analysis that is proportionate to the decisions being made).

Attachments

- Appendix 1** Three waters reform feedback
- Appendix 2** Community survey result

Background

Current situation

1. Following the serious campylobacter outbreak in 2016 and the Government's inquiry into Havelock North drinking water, central and local government have been considering the issues and opportunities facing the system for regulating and managing the three waters (drinking water, wastewater, and stormwater).
2. The focus has been on how to ensure safe drinking water, improve the environmental performance and transparency of wastewater and stormwater network and deal with funding and affordability challenges, particularly for communities with small rating bases or high-growth areas that have reached their prudential borrowing limits.
3. The Government's stated direction of travel has been for publicly-owned multi-regional entities with local authority ownership. The Department of Internal Affairs (DIA), in partnership with the Three Waters Steering Committee (which includes elected members and staff from local government) commissioned specialist economic, financial, regulatory and technical expertise to support the Three Waters Reform Programme and inform policy advice to ministers.
4. The initial stage (Tranche 1 - MOU, Funding Agreement, Delivery Plan and RFI process) was an opt in, non-binding approach. It did not require councils to commit to future phases of the reform programme, to transfer their assets and/or liabilities, or establish new water entities.
5. Council completed the RFI process over Christmas and New Year 2020/21 and the Government has used this information, evidence, and modelling to make preliminary decisions.
6. While the Government and LGNZ consider that national case for change has been made, each of the 67 councils in NZ will need to make a decision based on its local context if the process to join one of the proposed entities remains voluntary.

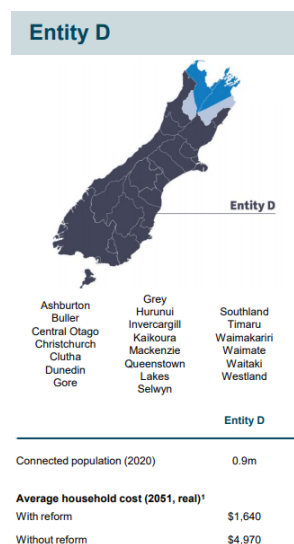
Government's June and July 2021 announcements and information releases

7. In June 2021 a suite of information was released by Government that covered estimated potential investment requirements for New Zealand, scope for efficiency gains from transformation of the three waters service and the potential economic (efficiency) impacts of various aggregation scenarios¹.
8. In summary the modelling indicated a likely range for future investment requirements at a national level in the order of \$120 billion to \$185 billion, an average household cost for most councils on a standalone basis to be between \$1,910 and \$8,690 by 2051. It also estimated these average household costs could be reduced to between \$800 and \$1,640 per household and efficiencies in the range of 45% over 15-30 years if the reform process went ahead. An additional 5,800 to 9,300 jobs and an increase in GDP of between \$14b and \$23b in Nett Present Value (NPV) terms over 30 years were also forecast.

¹ [Transforming the system for delivering three waters services \(dia.govt.nz\)](https://www.dia.govt.nz/transforming-the-system-for-delivering-three-waters-services)

9. As a result of this modelling, the Government has decided to:

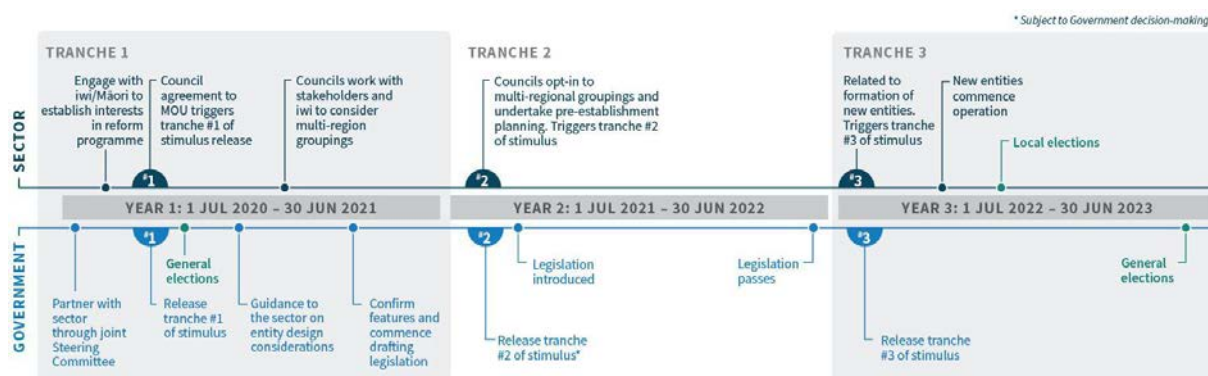
- establish four statutory, publicly-owned water services entities that own and operate three waters infrastructure on behalf of local authorities;
- establish independent, competency-based boards to govern each entity;
- set a clear national policy direction for the three waters sector, including integration with any new spatial / resource management planning processes;
- establish an economic regulation regime; and
- develop an industry transformation strategy.



10. Ashburton District Council has been placed in Water Services Entity D, although the precise boundaries at the top of the South Island are still up for discussion.
11. On 15 July, in partnership with LGNZ under a Heads of Agreement², the Government announced a package of \$2.5 billion to support councils to transition to the new water entities and to invest in community wellbeing. This funding is made up of a 'better off' element (\$500 million will be available from 1 July 2022) with the investment funded \$1 billion from the Crown and \$1 billion from the new Water Services Entities) and 'no Council worse off' element (available from July 2024 and funded by the Water Services Entities). The "better off" funding can be used to support the delivery of local wellbeing outcomes associated with climate change and resilience, housing and local placemaking, and there is an expectation that councils will engage with iwi/Māori in determining how to use their funding allocation.
12. Council's funding allocation is \$16.8m. Conditions associated with the package of funding have yet to be worked through.
13. In addition to the funding announcements, the Government has committed to further discussions with local government and iwi/Māori over August – September 2021 on:
- the boundaries of the Water Service Entities;
 - how local authorities can continue to have influence on service outcomes and other issues of importance to their communities (e.g. chlorine-free water);
 - ensuring there is appropriate integration between the needs, planning and priorities of local authorities and those of the Water Service Entities; and
 - how to strengthen the accountability of the Water Service Entities to the communities that they serve, for example through a water ombudsman.

² [https://www.dia.govt.nz/diawebsite.nsf/Files/Three-waters-reform-programme/\\$file/heads-of-agreement-partnering-commitment-to-support-three-waters-service-delivery-reform.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Three-waters-reform-programme/$file/heads-of-agreement-partnering-commitment-to-support-three-waters-service-delivery-reform.pdf)

14. As a result, the original timetable for implementing the reform (shown below) for councils to consult on a decision to opt-in (or not), no longer applies.

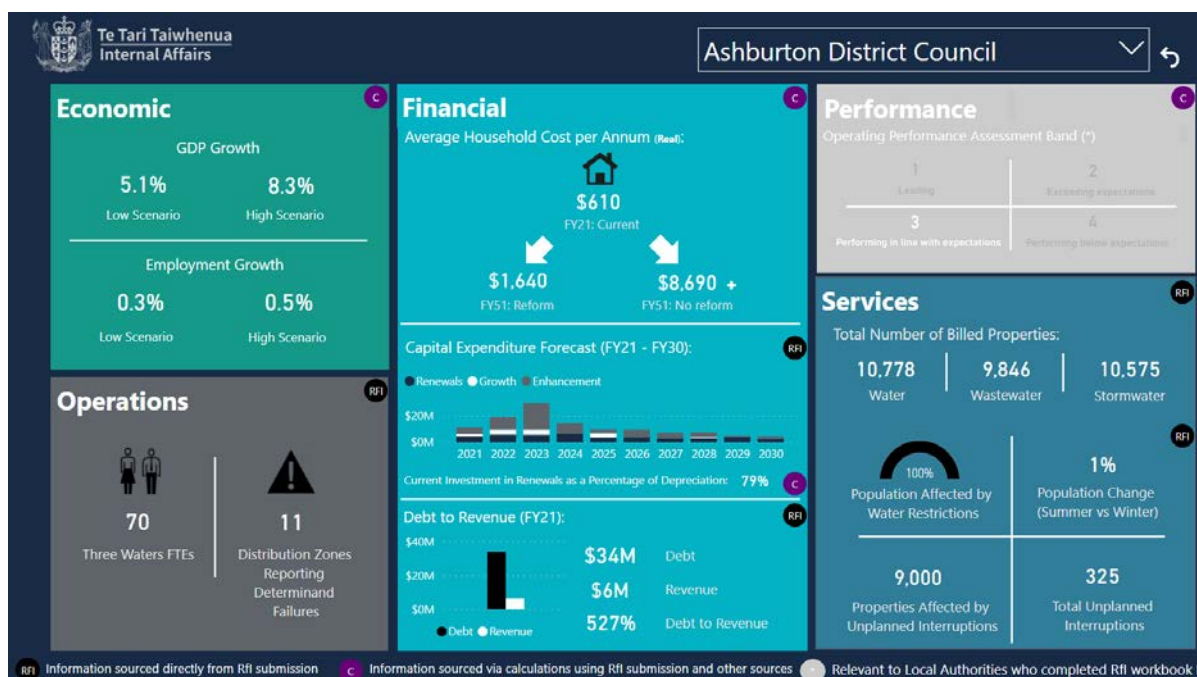


15. Next steps are expected to be announced after 30 September 2021, which would include the timeframes and responsibilities for any community or public consultation.
16. It is also important to note that the Government has not ruled out legislating for an “all-in” approach to reform to realise the national interest benefits of the reform.
17. In the interim the DIA and LGNZ continue to engage with Council elected members and staff on transition matters on a “no regrets” basis should the reform proceed. These discussions do not pre-empt any decisions about whether to progress the reforms or whether any individual council will transition to a new WSE.
18. On the assumption that the reform goes ahead, it is anticipated that councils will continue to deliver water services until 30 June 2024, and council involvement in transition will be required throughout.

Council specific information and analysis

19. While the Government and LGNZ consider that national case for change has been made, each council will ultimately need to make a decision based on its local context.
20. Councils do not have a national interest test for their decision making. Councils are required to act in the interests of their communities and the community’s wellbeing (now and into the future), to provide opportunities for Māori to contribute to their decision-making processes, to ensure prudent stewardship and the efficient and effective use of its resources in the interests of the district or region (including planning effectively for the future management of its assets) and to take a sustainable development approach.
21. Council currently delivers three waters as a mix of in-house and contracted out professional services and contracted out operational services.

22. Our dashboard looks like this:



23. The key aspects Council should note are detailed below.

24. **Average cost per household**

- the DIA (based on several assumptions) states for Entity D it is \$1,368; our council based on the 2021/22 Long-Term Plan is \$610
- DIA's reform (Entity D) projects \$1,640 by 2051; and claims that without reform it would be \$8,690³ for Ashburton District households.

25. **Debt**

- Our Long-Term Plan 2021-31 shows our debt levels peaking in 2026/27 at \$161million (from a capacity to borrow of \$249 million), of which \$70million is for three waters infrastructure. The headroom for other borrowing at this time of planned peak debt is \$88million.
- Officers have estimated that the removal of three waters would mean a reduction in our capacity to borrow to \$205 million and a peak debt in 2026/27 of \$91million. This leaves a headroom to borrow of \$114million.
- Should the proposed three waters reform proceed, Council would therefore increase its headroom by an estimated \$26million.

³ It should be noted that the "no reform" figure was capped at \$8,690. The cap was applied due to the uncertainty of the model at extremes of the range.

26. **Capital Expenditure Forecast**

- The DIA are forecasting \$491 million of new capital and \$117 million of renewal expenditure for the district (2021-31). This has been calculated using population, area, and population density (as a standard calculation for the country) and is based on the WICS experiences/observations in UK.
- This is not reflective of the Council's own position and our LTP 2021-31 shows a capital expenditure programme of \$73.4 million for new capital and \$39 million for renewals. Council developed the Long-Term Plan from the ground up and believes it represents our best response based on what we know now. The programme represents a significant lift on historic levels, but uncertainty remains on the impact of the new water quality regulator (Taumata Arowai)'s approach.

27. Our asset condition, performance (and confidence) levels for

- water are medium
- wastewater are medium
- stormwater are medium

28. We believe our maintenance budgets in the LTP 2021 – 31 are adequate.

29. There is also the potential for Council to have to work with and possibly take over the private water supplies if they are unable to meet quality standards and regulatory requirements. The impact of this is impossible to quantify, but does represent a real risk to Council.

30. While prepared at the national level, the DIA data has been peer reviewed by Farrierswier and Beca to ensure that both the modelling and underlying assumptions are reasonable in the New Zealand context. Both concluded WICS approach was reasonable, and if anything may have understated the investment gap. Morrison Low concluded that the numbers may be overstated, but the general conclusions reached by the WICS data were likely to be sound.

31. The data therefore likely provides a reasonable indication of the “order of magnitude”⁴ of the gains that can be delivered through the new system, and the level of future investment Council is likely to need to make over the next 30 years.

32. At this stage it is not possible to fully test the projections as the standards for New Zealand out to 2051 are not known, although it is reasonable to assume that there will be greater community and mana whenua expectations around environmental performance and quality, tougher standards to meet for water quality (drinking and receiving environment) and that monitoring, compliance and enforcement will be greater than it is now. This affects both operational and capital expenditure (costs will go up), including the number of staff (or contractors) that council will need to ensure Council outcomes for water and community and legal requirements are met.

⁴ Page iv, 2021, Farrierswier, Three Waters Reform, Review of methodology and assumptions underpinning economic analysis of aggregation available at [https://www.dia.govt.nz/diawebsite.nsf/Files/Three-waters-reform-programme/\\$file/farrierswier-three-waters-reform-programme-review-of-wics-methodology-and-assumptions-underpinning-economic-analysis-of-aggregation-released-june-2021.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Three-waters-reform-programme/$file/farrierswier-three-waters-reform-programme-review-of-wics-methodology-and-assumptions-underpinning-economic-analysis-of-aggregation-released-june-2021.pdf)

33. There is always a level of uncertainty and therefore risk around assumptions and forecasts, whether prepared by us for our LTPs or by others such as Government, to facilitate policy decisions, such as the current Three Waters Reform process. Officers consider that it would not be a good use of Council's limited resources to spend time and money on a detailed review of the assumptions and modelling.
34. To assess whether the proposed better off and no worse off funding to Council [\$16.8m] is sufficient Council needs further information on the conditions that will be associated with that funding.

Te Tiriti/Treaty of Waitangi and involvement of Māori in decision making considerations

35. The issues covered in this paper are important for Māori. The Crown is currently leading the engagement with iwi/Māori, mana whenua. Council has discussed the proposals briefly with Te Rūnanga o Arowhenua, but given there is no decision to opt-in or out at this stage, these discussions have not been detailed.
36. The Council has been involved in more detailed discussions with Ngai Tahu through the Canterbury Mayoral Forum, and through several Entity D fora (involving Ngai Tahu and those councils potentially included in Entity D).

What is required of Council right now?

37. The law currently prohibits Council's deciding to opt-in to the current proposal (given section 130 of the Local Government Act 2002 and what we know about this option at present). Current decision-making requirements, including the need to take account of community views and strategic nature of the assets involved, would also preclude Council deciding to opt-out at this time without consultation.
38. Similar requirements apply if the council wishes to consider alternative arrangements that involve asset transfers, divestment, change in ownership, and/or the setting up of a Council Controlled Organisation (CCO) to deliver water services in the future.
39. There are a number of issues, concerns and uncertainties for the Government and councils to work through before a robust Council decision (and decision-making process) can be produced, including whether legislative change will enable or require the Water Services Entity or CCO approach to be adopted. Therefore, there is no expectation that councils will make a decision to opt-in (or out) or commence formal community engagement or consultation over the eight-week period.
40. Councils have been specifically asked to provide solutions to three outstanding issues during the next eight weeks:
 - ensuring all communities have both a voice in the system and influence over local decisions;
 - effective representation on the new water service entities' oversight boards, including preventing future privatisation; and
 - ensuring integration between urban growth planning and water services planning.

41. Staff therefore request Elected Members consider the issues that arise from the Government's proposal and any potential solutions so these can be raised with Government and LGNZ before the end of September 2021.
42. Government decisions on entity boundaries, governance and transition and implementation arrangements will occur after the eight week-process ends (30 September 2021).
43. On the assumption that the reform goes ahead, it is anticipated that councils will continue to deliver water services until 30 June 2024 and council involvement in transition will be required throughout.
44. Excluding the Government proposal, Council bears the risk of meeting the new water standards, environmental requirements and achieving compliance. There are also implications and challenges for non-Council supplies to meet water quality requirements, with the risk that these supplies might default to Council in the future.
45. Other Government reforms (Resource Management Act, Future for Local Government) pose opportunities and challenges for the 3 waters reform proposal.
46. Managing transition risks to the Government's proposed model are likely to pose a significant challenge for all Councils, including the Ashburton District Council. Assuming the Government's proposals were to proceed, effective management of the transition by Council, Government and partners will be critical.
47. That said, transition away from the status quo to any other option, carries inherent risks, with potential mitigations to reduce both impact and likelihood and therefore residual risk and sticking with the status quo may not be sustainable in the short, medium or long term.

Options Analysis

Option one – Do nothing

48. This is not the recommended option. Council may decide to stay silent and not provide feedback on the Proposed Three Waters Reform. This would result in Council missing an opportunity to advocate on behalf of the district and would be perceived poorly by the community.

Option two – Approve the feedback as attached in Appendix One (recommended option)

49. This option would see Council officers lodge the appended submission with the Department of Internal Affairs.

Option three – Approve amended feedback

50. This option would see Council approve an amended version of the feedback currently appended, and submit that document to the Department of Internal Affairs. Additional discussion and Elected Member input may well enhance the submission.

Legal/policy implications

Legislation

51. Part 6 of the LGA, sections 76 to 90, provide the requirements for decision making and consultation, including the principles of consultation and information that needs to be provided including the reasons for the proposal and the reasonably practicable options.
52. In particular, section 76 requires that in making a significant decision, which a decision on the future management and or ownership of three waters assets will be, councils must comply with the decision-making provisions. This is a 'higher bar' than the "promote compliance with" that applies for ordinary decisions.
53. Section 77 states that councils must seek to identify all reasonably practicable options and then assess the advantages and disadvantages of each option.
54. Section 78 requires that in the course of making a decision a Council must consider community views but section 78(3) explicitly says that consideration of community views does not require consultation, which is reinforced by case law.
55. Section 79 gives Council discretion to decide how the above Part 6 requirements are met including the extent of analysis done etc. Therefore, while a decision could be challenged, a judicial review is unlikely to be successful unless the decision made by council was manifestly unreasonable, the process was flawed or the decision was beyond its powers (as given in law, i.e. the council did not act within the law).
56. However, despite section 79 of the LGA, a decision to transfer the ownership or control of a strategic asset from the council (or to it) must explicitly be provided for in the council's Long Term Plan (and have been consulted on specifically in its consultation document).
57. Council's existing LTP and the consultation information and process used to develop it will not suffice to meet this test, as Council did not itself have adequate information on the options and the implications earlier this year when it consulted on the LTP. An LTP amendment and commensurate consultation process on the ownership and governance arrangements and asset transfers proposed would be necessary.
58. There are also provisions in the LGA that relate to unlawful decisions to sell or dispose of assets, which can be investigated by the Auditor-General.⁵
59. A decision to opt-out would also be affected by the consultation and decision-making requirements set out in this report, including the need to follow a robust process that could survive a judicial review, as well as make a final decision that was not manifestly unreasonable in the circumstances.
60. Given the Government's
 - 8 week period of engagement with mana whenua and councils
 - commitment to explore issues such as council and community influence of service outcomes, integration with other reform proposals, spatial and local planning

⁵ See sections 43 to 47 of the LGA.

- request for councils to give feedback on the proposal, identify issues and solutions
- and uncertainty around next steps, including whether the reform may become mandatory or legislative change will remove legal barriers to opting in

it would be premature to make a decision to opt out of the reform process and may expose the Council to litigation risk.

61. A Government Bill to progress the reforms could address the issues raised above, for example removing the section 130 requirements has explicitly been raised.
62. At this stage no decision is required on future delivery arrangements. Based on the analysis in this report, Council should wait until it has further information before consulting on and/or making a decision on the Government's proposal.
63. It is recommended that the Council therefore notes the options canvassed in this report, the [high-level] analysis of them and the information and decisions that are yet to be made.
64. If reform is not made mandatory, to ensure sufficient information is available to meet the moral and legal requirements of Council decision-making staff will further develop the analysis of options (based on further information from the Government, advice on next steps, and regional discussions) prior to Council decision making and consultation on future water services delivery. Whether this is ultimately required will be dependent on where the Government gets to with the reform process and the decisions it makes after 30 September 2021.

Financial implications

65. Significant risks, legal responsibility and financial implications have been identified in analysing the reform proposals. However, there is not a decision required, other than to note those issues and to request further information from Government to reduce the risks and implications to Council and its communities.

Requirement	Explanation
What is the cost?	The costs of Council being involved in the three waters reform process to date have been met from within existing budgets.
Is there budget available in LTP / AP?	Yes
Where is the funding coming from?	Funding comes from a number of cost centres including for the Chief Executive, Service Delivery, Finance and Strategy & Policy Teams.
Are there any future budget implications?	Possibly, depending on the next stages of the proposed reform.
Reviewed by Finance	No

Significance and engagement assessment

66. The future of water services delivery is a significant issue. This report however does not commit council to a decision relating to that reform. Instead it provides initial analysis of the reform proposals for Council's information and highlights the uncertainties around information and next steps. As such the significance of this report is medium – not significant.
67. Council is not required to consult at this time. Further advice regarding any future consultation requirements will be provided after September 2021.
68. In the interim Council has received an analysis report from Morrison Low, held a workshop with presentations from staff and Morrison Low, discussed the reform proposal with DIA representatives and LGNZ representatives separately, attended a number of virtual webinars and virtual meetings arranged by LGNZ, posted a video chat between the Mayor and CEO discussing some aspects of the reform and dispelling some of the commonly heard myths of the reform programme, put a summary of the reform proposals on our web-site and a link to the DIA's Three Waters web-site, had a range of meetings with other Councils in Canterbury and the wider South Island and Ngai Tahu in relation to the structure of the proposed Entity D, and conducted a community feedback survey via survey monkey.
69. The survey showed:
 - 504 responses were received from our community;
 - 97% of respondents felt it was important for the community to be able to have its say on how three water services are provided;
 - 64% of our respondents believe that the continued improvement of health and environmental standards in three waters from what is currently provided is important;
 - 27% of respondents are prepared to pay more for higher standards, with a further 21% happy to do so if the improvements are localised, justified and/or decided upon by local representation;
 - Other feedback included concern with :
 - the community wants to make the decision to opt in /out of the reform - risk of the reform being made mandatory;
 - the loss of local assets, representation and control;
 - the complexity of the three water structure;
 - the speed of the process to date;
 - the governance arrangements, including iwi representation

Requirement	Explanation
Is the matter considered <i>significant</i> ?	No
Level of significance	Medium – not significant
Level of <i>engagement</i> selected	Comment – Informal two-way communication
Rationale for selecting level of engagement	The rationale for selecting the comment level of engagement was to recognise that the community are interested and have varied views and concerns with the Government's proposals.
Reviewed by Strategy & Policy	Toni Durham; Strategy & Policy Manager

Next steps

70. While there is uncertainty about the future steps in the Government's reform proposal, and current legislative impediments to it, the current eight-week period gives Council the opportunity to understand the information it has received (and will continue to receive) from the RFI and modelling processes.
71. It also provides an opportunity for Council to understand its potential options, including the financial, workforce and sustainability impacts for Council and the wider economic, social and cultural implications of each option, using the guidance that has been issued. It also provides an opportunity to engage in discussions with other councils in its entity grouping, share information and ask questions and propose solutions to issues it sees to Government and LGNZ.
72. All of this information will be useful to inform future decision making by both council and Government and consultation and engagement with mana whenua and communities.

Feedback

Three Waters Reform Proposals – Feedback and Areas of Clarification

PREPARED BY: Ashburton District Council
PO Box 94
ASHBURTON 7774

SUBMITTED TO: Department of Internal Affairs

Contact: Hamish Riach; Chief Executive
hamish.riach@adc.govt.nz

Introduction

1. Ashburton District Council (Council) welcomes the opportunity to provide feedback on the Three Waters Reform Proposal, as released in mid-July for feedback.
2. Located an hour's drive south of Christchurch, more than 35,300¹ residents live in the district, with the main town of Ashburton accounting for over 50% of residents. The rest of our residents live rurally or in smaller towns or villages across the district.
3. Ashburton District has experienced moderate and sustained population increase since the mid-1990's, increasing by 23% between 2006 and 2013 (a 3.3% increase per year). This growth, however, is now slowing, with an average growth of 1.3% per year since 2013.

A snapshot of our Three Waters

4. We operate 12 drinking water supply schemes across our district, which service over 70% of our residents and more than 10,300 homes and businesses.
5. We manage wastewater collection, treatment and disposal services for our communities across the district. We have three community-based wastewater schemes that service approximately 65% of our population.
6. We provide urban stormwater collection and disposal networks in Ashburton, Methven and Rakaia, while Lake Hood and Hinds have small systems of swales and open drains. These networks and systems ensure property and the environment are protected from flooding, and that roads and footpaths continue to be accessible during rain events.

Feedback to Government on the Proposed Three Waters Reform

7. To inform this submission, Council has undertaken the following:
 - Received an analysis report from Morrison Low,
 - Held a workshop with presentations from staff and Morrison Low
 - Discussed the reform proposal with DIA representatives and LGNZ representatives separately
 - Attended a number of virtual webinars and virtual meetings arranged by LGNZ
 - Held a number of discussions with Canterbury Councils and wider South Island Councils, and Ngai Tahu, in relation to the formation and structure of Entity D;

¹ Statistics New Zealand Population Estimates 30 June 2020

- Posted a [video chat](#) between the Mayor and CEO discussing some aspects of the reform and dispelling some of the commonly heard myths of the reform programme
- Put a [summary of the reform proposals](#) on our web-site and a link to the DIA's Three Waters web-site, and
- Conducted a community feedback survey via survey monkey, which received 504 responses (the results of which have been incorporated into our feedback).

Aspects of the proposal that Council supports

8. The fundamental premise of the reform is that all New Zealanders should have access to safe drinking water and that three waters activities improve environmental outcomes. Ashburton District Council supports these fundamentals in principle, but notes that solutions need to be cost-effective and efficient to benefit the communities that we serve, and the local community voice must be heard.
9. Our community reinforced this in our recent survey, with 64% of respondents telling us that the continued improvement of health and environmental standards in three waters, from what is currently provided, is important for them. 27% of respondents are prepared to pay more for higher standards, with a further 21% happy to do so if the improvements are localised, justified and/or decided upon by local representation.

Financial Case for Change

10. Council considers that the current financial case for change is flawed, and likely over-stated. Our Long-Term Plan 2021-31 has been built from the 'ground-up' using our knowledge of asset data and condition and the need to transform our operational practices and process controls to bring water safety risk management to the levels expected. Our ten-year budgets include sizeable capital upgrades for some of our schemes and development of water safety plans for each of our schemes.
11. When comparing our LTP to the Department of Internal Affairs WICS data, we are concerned that the calculations based on population, area and population density tested against experience and observations in the United Kingdom are over-stated and unnecessarily inflate costs at the local level. This makes comparisons and meaningful conversations with the community about the opportunities and risks with the proposed reform difficult at best and has not helped Government to successfully make the case for change.
12. This is reflected in feedback from our local community who expressed concern with the data and evidence of the need to change, and transfer of assets from local ownership and control to Government.
13. Our Long-Term Plan 2021-31 shows our debt levels peaking in 2026/27 at \$161million (from a capacity to borrow of \$249 million), of which \$70million is for three waters infrastructure. We have estimated that the removal of three waters would mean a reduction in our capacity to borrow to \$205 million and a peak debt in 2026/27 of \$91million. This leaves a headroom to borrow of \$114million. Should the proposed three waters reform proceed, Council may increase its headroom by \$26million.
14. Care needs to be taken when considering that this leaves the Council and community "better off" – the additional borrowing capacity does not consider the ability of the community to pay. When

considering future investments to support community resilience and well-being, affordability will likely be more of a factor than the estimated additional headroom.

15. Further to this, Council needs clarity on the mechanism for debt transfer associated with 3 waters assets.

Entity structure

16. Council does not have any general concerns with the geographic boundaries of Entity D as proposed, and believes the issues in the top of the South Island should be solved by agreement with those communities.
17. We would note, however, the strong links between Canterbury and the Chatham Islands, and would ask for further work to be done on whether the Chathams should join Entity D or C (as currently proposed).
18. Council acknowledges there will likely be some benefits of scale from the proposal, although is sceptical at the claimed efficiencies and actual numbers supporting the proposal.
19. While the community has raised issues through our feedback survey around the risks of privatisation with water, Council notes the level of protections from privatisation included in the proposal. However, given the significance of this point for the community, suggests further protection measures are considered to protect against future legislative change.

How can Council have guaranteed influence over the direction of the WSE, given the complicated and multi-layered proposed governance structure?

20. Council is critically concerned with the loss of local representation to advocate for, and on behalf of, local communities with the governance structure proposed in the three waters reform. This has been reinforced by our community survey, where 97% of respondents felt that it was important that the community was able to have its say on how three waters services are provided.

What further work is planned on alternative ways of achieving balance sheet separation than the current multi-layered structure of the Representative Governance Group and the Independent Selection Panel?

21. Council notes that the DIA understands local authorities and our communities are concerned with the governance structure of the WSE's. We are highly motivated to understand what alternative arrangements could look like to meet our unique New Zealand circumstances.

How can the community have guaranteed influence, given the size and scale of the entities?

22. While Council notes the intention is that the respective entity would be required to engage with the local community on its programme of works, in practise Council is sceptical of how effectively this could be done when Entity D makes up the majority of the South Island. Council and our community is not convinced of how the community voice will be heard and what influence local authorities and communities will have, particularly given that under the proposals the number of representatives will be smaller than the number of Councils it represents.

How can Council be guaranteed that the District's three waters investment priorities will be met?

23. Given the loss of local voice with the proposals, Council believes that the reform is the exact opposite of 'localism', which is, in essence, about 'bringing power to the people' through devolving services tailored to individual citizens, based on the premise that locals are best placed to decide local matters. Local Government New Zealand (LGNZ) argue New Zealand's policy landscape is dominated by a 'one size fits all approach' which is incompatible with local needs. While Council acknowledges the principles of the water reforms, as noted in clause 9, it is not convinced that the proposed large aggregation of existing service provision to three waters reform is the best way to achieve the desired outcomes.
24. The high-level nature of the proposed reform has meant that neither Council nor the community has assurance over the on-the-ground levels of service that can be expected under the reform. Council acknowledges that this is difficult to state given the size and scale of the reform, but notes that without it, it is problematic to ascertain if the community will see tangible improvements to three water services in the district. Levels of service matter, as these are how the community judges and understands if Council is doing a good job or otherwise.

How will Council have visibility of future pricing proposals of the WSE?

25. Council and the community are concerned with the pricing model and associated charges of the WSE's. Included in these concerns are the visibility of future pricing proposals, volumetric charging, timeframe and methodology to achieve standard pricing over the whole WSE area. Our recent Long-Term Plan consultation, where we proposed to introduce district-wide water meters for all of our drinking water supplies, highlighted just how connected our communities are to three water issues and the importance of ensuring our residents have their say.

We request that the Governance Structure is altered to enable direct Council involvement in Board and Director performance, accountability and appointments.

26. The ability of the Regional Representative Group to influence the board of the entities appears too far at arms-length and is exacerbating Council and the communities concern with the proposals. Linked to this is the ability to hold the board to account for local decisions and actions.

Economic Regulator

We request detailed visibility of the structure and role of the proposed economic regulator.

27. Council acknowledges that the details of the economic regulator are yet to be released, however, the conversations over the past two months have highlighted the critical role of the regulator in the three waters reform proposals. As such we are seeking an in-depth understanding of the structure, purpose and role of the regulator.

Will the proposed economic regulator regulate all private supplies and WSEs, and if not, where is the cut-off point for not being regulated?

28. Given the sheer number of water supplies that the WSE's will be providing to the community, as well as the number of private supplies throughout New Zealand, we are not clear on how the regulator will have the capacity to monitor and regulate all supplies. Therefore, we presume that there would be a cut-off for supplies being regulated or not. Clarification on this cut-off point is being sought.

Stormwater

What work was done on the realities of stormwater being included in the reform proposals?

29. Council is concerned that the inclusion of stormwater into the reform proposals needs further work and clarification. The provision of stormwater for Councils outside of the main urban centres are complex and have a myriad of intricate aspects to consider. We suggest that more work should have been done before including stormwater into the proposals.

How will charging for stormwater work, noting the private and public benefit of stormwater?

30. Local authorities throughout New Zealand grapple with how to charge stormwater given the public and private benefits. Council is unclear how WSE's would charge for stormwater given that there is neither a single 'beneficiary or user' of the service nor a system of direct connection to the service in the rural areas (quite different to drinking water and wastewater services. Council seeks further clarification on this important matter.

How will decisions be reached on which stormwater infrastructure transfers to the WSE and which remains with the Ashburton District Council?

31. Linked to the points made above, the stormwater infrastructure transfers to the WSE are ambiguous. Council seeks detailed information about what assets would be transferred and what would be retained (and therefore need to be maintained) by Council.

Local Government Roles & Functions

How can Council have a guarantee as to how the WSE will follow Council's planning and land development ambitions and not be an inhibitor to development in the Ashburton District?

32. Currently, three waters services are integrated with spatial and local planning processes within our organisation. This enables concise and clear advice for the community, including local developers, on where Council has planned for future growth, including infrastructure supply. The removal of three waters from local authorities is likely to make this more complex and difficult for future developments and we are not clear on how the WSE will be involved in this process.

How will WSEs be compelled to contribute meaningfully to Ashburton District civil defence emergency planning and management?

33. During Civil Defence emergencies, Councils rely heavily on their intimate knowledge of three waters infrastructure and operations. The recent flooding in May of this year reinforced the criticality of local knowledge on the ground as the impacts of the flood unfolded and throughout the continuing recovery for our community.
34. We are concerned that the loss of three waters from Council's will weaken what is an already lean operation for emergency operations at a local level, which is the front line of disaster management. We seek clarification of how WSE's would function alongside local authorities in this important area.

How does the three waters reform integrate meaningfully with the broader local government reform that is currently underway, most notably the reform of the RMA and the Review into the Future for Local Government?

35. There are a number of unknown factors associated with the timing of the water reforms, particularly in the context of the Government's wider reform programme and how this will affect local government and community-based democracy. Council suggests that before the Three Water

Reform process proceeds, an issues analysis is completed and understood in relation to the impact on the water reform of the Resource Management (RM) and the Future for Local Government (FfLG) reforms as these are all inextricably linked.

Has Government considered the impact of the reforms on local body governance?

36. While difficult to quantify, Council is concerned that the removal of three waters governance from local authorities, may impact on candidacy for local body elections. While Mayors and Councillors are generally not elected for their technical expertise of three waters services, the loss of a significant aspect of Council business may influence future candidates on standing for election.

Rural water schemes

How will rural schemes that are primarily supplying stockwater be treated?

37. Council and the community remain concerned about the effect of the reform on rural water schemes. A clear definition on what a rural water scheme is would be a good first step, as right now it isn't clear if it includes stock schemes, rural community, small towns and/or houses supplied by a single sources on a farm.
38. Once this is determined, then clarity is needed on how and when to apply acceptable solutions, and whether local councils will be required to retain water schemes. Right now, what's in the Water Services Bill and how it will affect rural water schemes and how the Three Waters reform will affect them is ambiguous. We urge Government to work alongside Council's and key partners to navigate this complex issue.

Workforce

How will Government resource the workforce required for the reforms to be successful?

39. Council is unclear where the workforce, skills and technical capability will come from to deliver the Three Waters services as proposed. Finding, recruiting and retaining the right people in the industry is a challenge already for local authorities, doing so to deliver the Three Waters Reform given the increased workforce needed will be a significant challenge to the successful implementation of the reforms.

How will the maintenance contract between Ashburton DC and contractor Ashburton Contracting Ltd be treated on transfer (presumably 1 July 2024), including the protection of their workforce?

40. Council has a close working relationship with the local contractor who delivers our three waters services operationally. We are concerned of the impacts of the reform on their workforce, and request advice from Government as to how local contracts, contractors and their staff will be protected.

Process

We request that all information is available to us before asking Councils to consult their communities and make a decision on the reforms – including all those matters raised in this feedback

41. Council is seeking clarity on the process from this point going forward. Communities are highly concerned and sceptical that their voices will be heard by Government, and in turn, this affects our relationship with our community.
42. The Local Government Act 2002 ensures that we are held accountable for our actions as a local authority, including how we ensure that our local community voice is heard and understood **before** we make key decisions. We request adequate time and information from Government to engage and speak with our community before being put in the position of opting-in or out of the reform. As it stands right now, the lack of clarity on the new regulatory environment (Taumata Arawai, the economic regulator and regional councils) and how these all work together for example, make it difficult to convey to the community what this will mean for our local situation.

Transition Arrangements

43. Should the reform process proceed, Council urges Government to work alongside local authorities to ensure that transition arrangements are given the due diligence they will need for reform to be successful.
44. Poor transition management may cause delays and confusion over responsibility exposing Council to liabilities and affecting continuity of service delivery for communities.
45. Key issues for Council that Government will need to plan for, include:
 - Community resistance to change has been greater than expected and will require significant consideration;
 - Speed of change may see an increase in mistakes and unforeseen issues, we urge a considered and methodical approach;
 - The formation of a transition team with representatives from local authorities are ideal, but require resourcing and staff within Council's which are already at capacity workloads continuing with business as usual. We are not prepared to compromise staff health and wellbeing to meet Government reforms, while at the same time we want our staff to have every opportunity to contribute to the successful establishment of the new Entity D. A great deal of thought and planning is required here;
 - Development / financial contribution refunds may affect Council's charges linked to debt (including the possibility of refunds);
 - Different local approaches to our regional neighbours may reduce the economies of scale making regional water solutions more expensive;
 - Community uncertainty may result in residents continuing to call Council for delays in resolving faults;
 - Existing contracts may leave Council liable for compensation if contractors take legal action;
 - The transfer of asset management systems & data will need to be clearly established as the loss of data or failure of systems will affect the continuity of service delivery;
 - Stranded overheads within local authorities will need to be well understood and plans established to mitigate impacts.

Concluding remarks

46. Council is concerned that Government will introduce a Bill to make the reform mandatory. This would be a lost opportunity and would set the reform process up poorly with local communities.
47. Council urges Government to provide further clarity in relation to the economic regulator, environmental outcomes and service levels, and to allow Council to have formal consultation with our community **before** a final decision is made.

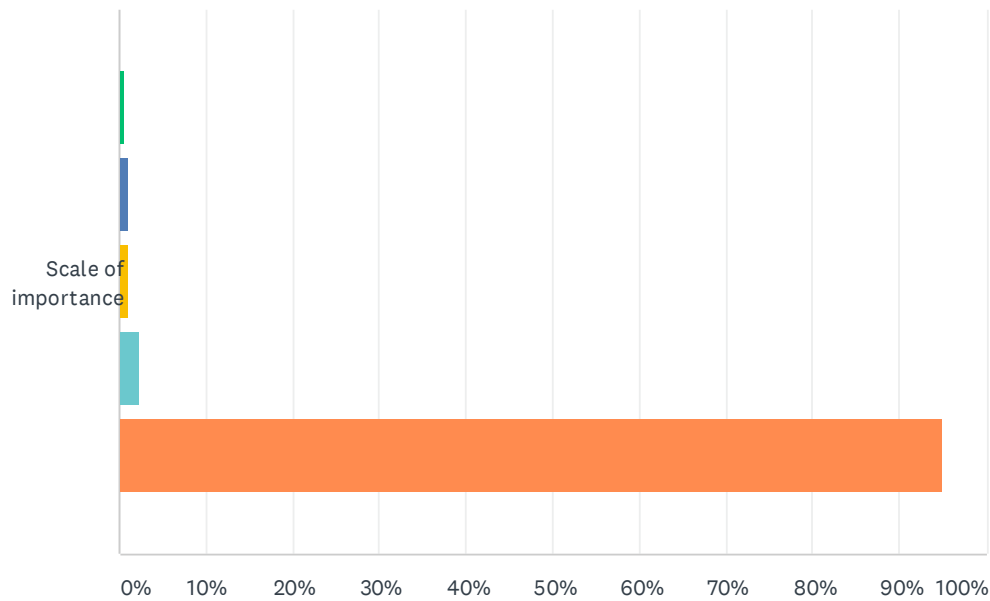
	
Neil Brown Mayor	Hamish Riach Chief Executive – Ashburton District Council

Ashburton District Council

Community Feedback Survey Results
September 2021

Q1 How important is it to you that the community is able to have its say on how three waters services are provided?

Answered: 504 Skipped: 0

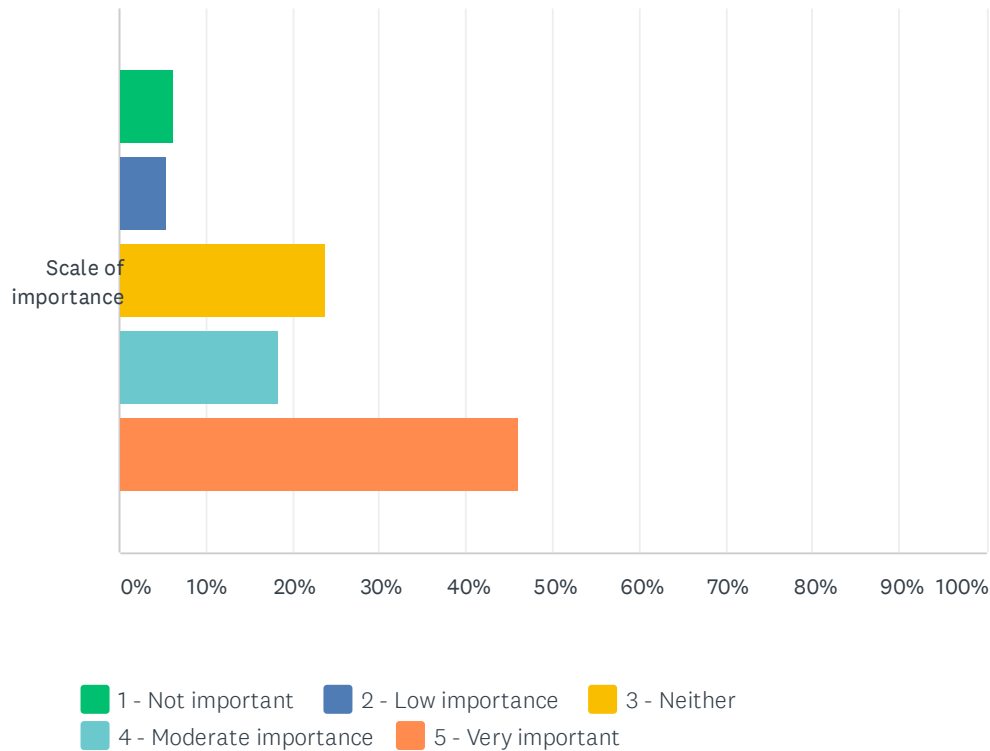


■ 1 - Not important
 ■ 2 - Low importance
 ■ 3 - Neither
■ 4 - Moderate importance
 ■ 5 - Very Important

	1 - NOT IMPORTANT	2 - LOW IMPORTANCE	3 - NEITHER	4 - MODERATE IMPORTANCE	5 - VERY IMPORTANT	TOTAL	WEIGHTED AVERAGE
Scale of importance	0.60% 3	0.99% 5	0.99% 5	2.38% 12	95.04% 479	504	4.90

Q2 How important to you is the continued improvement of health and environmental standards in respect of Three Waters (drinking water, wastewater and stormwater services) from what is currently provided?

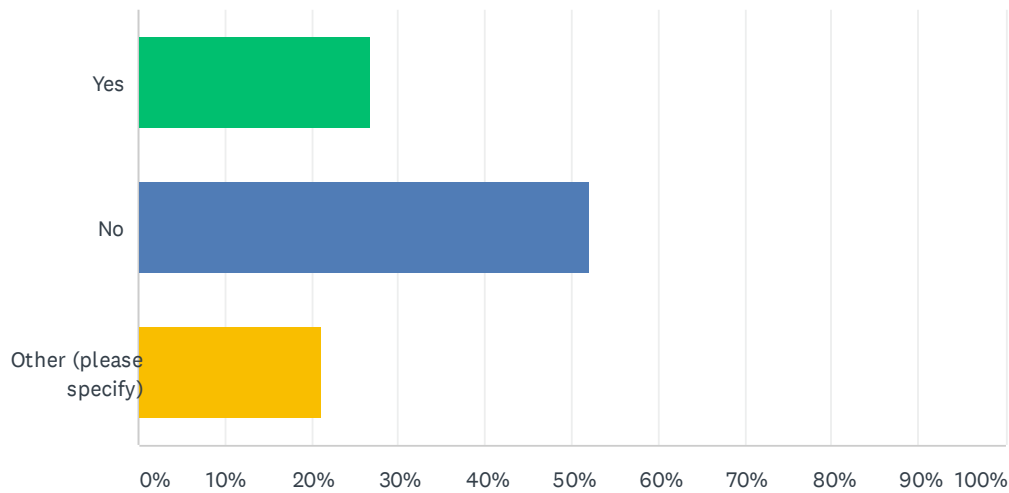
Answered: 504 Skipped: 0



	1 - NOT IMPORTANT	2 - LOW IMPORTANCE	3 - NEITHER	4 - MODERATE IMPORTANCE	5 - VERY IMPORTANT	TOTAL	WEIGHTED AVERAGE
Scale of importance	6.35% 32	5.36% 27	23.81% 120	18.45% 93	46.03% 232	504	3.92

Q3 Are you willing to pay more than current charges for any higher standards, either through rates or water charges?

Answered: 504 Skipped: 0



ANSWER CHOICES	RESPONSES
Yes	26.79% 135
No	52.18% 263
Other (please specify)	21.03% 106
TOTAL	504

#	OTHER (PLEASE SPECIFY)	DATE
1	see comments below	9/22/2021 5:33 PM
2	Only if it is value for money	9/22/2021 5:31 PM
3	Not enough information to make a decision	9/22/2021 5:21 PM
4	Yes we are prepared to fund the costs on improvements to the Three Waters assets of this District on a User Pays basis. However it is vital that these assets remain locally owned and managed.	9/22/2021 2:04 PM
5	Yes only if the improvements are beneficial to our region	9/22/2021 12:28 PM
6	Yes BUT only if there is proven improvement to service & quality that benefits local communities.	9/22/2021 11:40 AM
7	Maybe. Water quality and quantity should be already well covered for in rates as this is one of the most important things in day yo day life for any region so should be main priority for the council to offer the people. There should be many luxury items that the rates currently go towards either dropped or funded differently before major changes to water charges	9/22/2021 6:23 AM
8	It depends on what services are being provided and upgraded	9/21/2021 8:58 PM
9	In line with normal rate increases	9/21/2021 8:08 PM
10	If I'm forced to pay I expect a higher standard of water	9/21/2021 6:11 PM
11	Yes to a degree, but not to totally destroying our built-up natural immunity, which is stronger in the over 40's currently. I don't want a sterile society!	9/21/2021 5:29 PM
12	Inflation comes into it	9/21/2021 5:26 PM
13	Yes - Just adding chlorine is not good enough! For people's drinking water the groundwater issue is now a horror-story. We are in favour of a government entity to tidy-up these worsening water issues	9/21/2021 5:22 PM

Three Waters Reform Feedback

14	Yes but not an extravagant amount	9/21/2021 5:20 PM
15	Depends on whether it is for worthwhile improvements. Agree that some improvements need to be made - ie Methven boil water notices, improvements in stormwater and wastewater. But concerned that the government is wanting to impose unnecessary standards on drinking water that are not required. Our water is fine as it is, we don't need excessive improvements that are unaffordable to cover the rare off-chance something make sneak through.	9/21/2021 4:28 PM
16	Not without further information	9/21/2021 4:18 PM
17	Depends on the standards	9/21/2021 2:00 PM
18	NO!!!! This is outrageous	9/21/2021 12:05 PM
19	This would need to be justified, and the reasons and costs advised prior to implementation.	9/21/2021 10:57 AM
20	cost benefit analysis would need to be relevant and assessed. also needs to be done on a local basis.	9/21/2021 9:21 AM
21	Within reason I understand there are some increases yearly	9/21/2021 7:19 AM
22	in my community (hakatere) there's limited storm water drainage; waste water goes into tanks (septic / holding); drinking water supplied is chlorinated. effectively, the 3 waters proposal has very limited impact on this community. it is, as yet, unclear if the 3 waters proposal will "improve" these facilities in this or indeed similar communities in the district or beyond. hypothetically speaking, if 3 waters dictate this, or similar community / communities be connected to all three, the cost would be gigantic - and i can only foresee that that expenditure / investment will be recovered from all ratepayers. that i find grossly unfair to begin with. second, and most important, the total cost of connecting all similar communities across new zealand will be prohibitive.	9/21/2021 6:46 AM
23	That is not a simple thing to answer, however I strongly believe these assets should be retained and controlled by local government.	9/20/2021 6:59 PM
24	I question the need for more money being spent (i.e. I question how accurate the govt's higher \$\$ estimate figures are) if our current \$100m + budget LTP already suffices.	9/20/2021 4:30 PM
25	This question tries to reduce the question of a fair price for fair value to a simple yes or no. That is too simplistic. The answer depends on what the standards will achieve, how much more than current charges people are expected to pay, and how much people who use more or less water will pay relative to others.	9/20/2021 3:37 PM
26	To me water is our life and yes I would give extra for our water. as long as its affordable.	9/20/2021 9:24 AM
27	Yes...but locally controlled and debated	9/19/2021 1:23 PM
28	Yes, if control is still with the Ashburton District Council	9/19/2021 11:11 AM
29	I am happy to continue to pay charges as they arise but I do not understand how the Government can claim Councils are not doing a good job- yes some are not but policies and ideas can address that. Also the long term projection of Council costs versus Government projected costs for rate payers in the future are a concern. Where does the Government get this data from?	9/19/2021 9:45 AM
30	I believe the quality of water provided is quite adequate, if we exclude issues re flooding and Methven water supply. The government creating imaginary higher standards is a money grab, whether this is to support infrastructure projects elsewhere or not I don't think we should be financially penalised in our district.	9/19/2021 8:36 AM
31	If it is required by ADC in keeping a good quality service	9/18/2021 9:33 PM
32	Only if the increase is backed up by a guarantee that as rate payers we shall not liable to inflated prices for a better quality of water systems.	9/18/2021 5:28 PM
33	No to Three Waters reform. This is a stupid question and doesn't seem logically connected to what I just read on the ADC website on Three Waters reform.	9/18/2021 2:49 PM
34	Cost of any service will continue to rise, but residents need value fo money.	9/18/2021 1:34 PM
35	Increases are expected and ongoing. BUT those increases need to be realistic and in line with other service cost increases. As the town population increases the cost increase should be able to be spread among more rate payers, therefore not be as big an increase for each ratepayer.	9/18/2021 8:37 AM
36	I want to see the choices stay in local hands. I do not want to see the government take control. It is worth paying more to have more control at local level.	9/18/2021 8:08 AM

Three Waters Reform Feedback

37	Nothing is free, but involve practical people not consultants so costs don't get out of hand	9/18/2021 6:39 AM
38	Yes, if the cost of the higher standards are explained well and justified.	9/17/2021 9:13 PM
39	Willing to pay the council as required but do not want the new proposed three waters scheme. I am a rate payer and believe that our council do an outstanding job. We do not need "Aunty Cindy" ruining Ashburton and surrounding areas let alone a "certain iwi" gaining any potential control.	9/17/2021 6:17 PM
40	It would need to be reasonable. And I would expect good results.	9/17/2021 3:41 PM
41	I am a Rural ratepayer on farm so anything I do is entirely at my cost regardless	9/17/2021 1:30 PM
42	Yes, if it's improving Ashburton water not somewhere else	9/17/2021 1:04 PM
43	Prices always increase across the board no matter who owns what.	9/17/2021 12:09 PM
44	On a needs basis	9/17/2021 12:03 PM
45	I would be ok with a small rise in costs as long it does not compromise the roading budget.	9/17/2021 11:16 AM
46	We are rural with own well. But just briefly - Mid Canterbury has some of the best and easily accessed water in nz. Some small problems in some supplies in our area (Mid Canterbury) but surely with modern technology and some local expertise we can get this fixed. Our town wastewater system I would think is as good as it can be. I do not see any way we would benefit from what the Government is proposing - quite the opposite	9/17/2021 10:49 AM
47	We are constantly paying more every year in rates for improvements of all infrastructure be it water, sewage , roading and all that the council has control of so cost will go up regardless.	9/16/2021 10:47 PM
48	depends on the situation	9/16/2021 10:06 PM
49	Govt funding country wide to meet the good new govt compliance standards for local councils to act on.	9/16/2021 9:40 PM
50	I think Ashburton has high standards already and am happy with the current charges	9/16/2021 9:04 PM
51	I support an increase only where it is directly related to improvements within the Ashburton District	9/16/2021 8:54 PM
52	I am happy to pay the annual cost of maintaining and updating our local area supplies.	9/16/2021 11:13 AM
53	It depends how you're going to improve it and what's going to be improved	9/15/2021 8:53 PM
54	Not stated	9/15/2021 4:15 PM
55	not stated	9/15/2021 4:14 PM
56	Not stated	9/15/2021 4:11 PM
57	not stated	9/15/2021 4:09 PM
58	Only if the costs are justified and our local community benefits from the increase, not to paying more for the benefit of the large urban centres at our expense.	9/15/2021 7:27 AM
59	The govt haven't explained their proposed figures well at all, we all need much more information from them before coming to a considered decision.	9/14/2021 9:44 PM
60	I am concerned that our own private supply will be interfered with. Also what expenses will be incurred to family batch?	9/14/2021 4:36 PM
61	For improved infrastructure,as rates,BUT NOT for water itself. Otherwise there will be a hell of a lot more houses and sections with grass up to their windowsills.	9/13/2021 9:54 PM
62	Absolutely not. Our latest rates increase on 23% were to cover the water upgrade in our area	9/13/2021 8:05 PM
63	I believe the standard we have achieved here in Ashburton is very good.I don't think I want to see our standards neglected as we get averaged down by other local bodies that haven't kept their standards up.Also in a time of dire economic scene is the Govt distributing out large sums of money;can these distributions be spent on eg council buildings or sports stadiums;-is this clear to the community who has a say on this	9/13/2021 2:57 PM
64	As far as we are concerned the standard is adequate now.	9/13/2021 2:30 PM
65	It's likely to be less.	9/13/2021 1:13 PM

Three Waters Reform Feedback

66	Only if needed for local services	9/12/2021 7:17 PM
67	Only if justified	9/12/2021 5:45 PM
68	If controlled by ADC and not part of a national conglomerate	9/12/2021 4:21 PM
69	Yes, but only if there was a clear benefit to the community.	9/12/2021 4:10 PM
70	Ambiguous question, am I willing to pay Central Govt, no way. Am I willing to pay ADC more for higher water quality - yes if it is required	9/12/2021 1:37 PM
71	improvements to be paid for when needed	9/12/2021 12:33 PM
72	Only if we need to	9/12/2021 11:18 AM
73	Ever increasing rates are a concern to me as a rural ratepayer. Provided rates are targeted to those receiving the direct benefit from higher standards rather than from a general rate I have no problem with rates increasing or a separate water charge being levied to those who directly benefit	9/12/2021 10:28 AM
74	The ADC are investing in the infrastructure every year and are doing a good job in keeping it up to date	9/11/2021 1:03 PM
75	Only as necessary to keep up with maintenance, repairs and up grading , not beauracratic bs.	9/11/2021 8:14 AM
76	Sensible water management that progressively improves our water and is affordable	9/10/2021 11:34 PM
77	If it was required to ensure we had safe drinking water and our other water systems were well maintained	9/10/2021 8:48 PM
78	Why would the current charges be higher?	9/10/2021 7:36 PM
79	Depends on specific examples.I think standards locally are already pretty good	9/10/2021 6:22 PM
80	Essentially yes but it depends how much more - the current service we get in regard to drinking water is poor but struggle to see how a massive increase in costs is required to rectify the intake which seems to be the main issue in our Methven area	9/10/2021 3:14 PM
81	Yes/No answer too black and white for a question such as this. Rate should reflect the cost of providing a safe supply, without a 'profit' for a QUANGO or an effectively commercial provider. Provider should be 'responsible' in the way district/regional government is currently.	9/10/2021 12:09 PM
82	Have our own supply	9/10/2021 11:02 AM
83	Consistent quality is key.	9/10/2021 7:59 AM
84	If it means we keep our water asset's then Yes	9/10/2021 7:08 AM
85	Yes, within reason	9/9/2021 10:21 PM
86	local standards are fine.	9/9/2021 10:13 PM
87	Nor prepared to pay a cent to centralized organizations. Rather pay the predicted "more" to retain local control and ownership. The claims that these changes will save money is not realistic.	9/9/2021 6:50 PM
88	Our water is good now. We have our own wells and with the government indicating changes here the costs to the everyday nz'er is getting out of control.	9/9/2021 6:09 PM
89	Willing to pay if absolutely necessary when it is being dealt with by local councils as this means we still have a way to have our say on a regular basis.	9/9/2021 4:39 PM
90	What are the higher standards - there is not enough detail in these questions. Does this relate to Ashburton or the whole country?	9/9/2021 4:38 PM
91	As a person who lives rurally, I'm fine with targeted rates to the people who are using the service.	9/9/2021 3:54 PM
92	this isnt relevant to rejecting the governments proposal	9/9/2021 3:52 PM
93	Not water charges, and certainly not a high rates increase as was seen in methven	9/9/2021 2:18 PM
94	Think the model chosen if way out price rage	9/9/2021 1:02 PM
95	Depends on the additional charges and whether the would be administrative or actual improvements	9/9/2021 8:14 AM
96	No, I live rural	9/9/2021 7:52 AM

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97	Only if there is a demonstratable need.	9/9/2021 7:29 AM
98	If it stops central government controlling our district. Yes x10	9/9/2021 4:27 AM
99	What are the "higher standards". The current standards seem fine	9/8/2021 11:34 PM
100	It would depend on the type/standards that are to be improved	9/8/2021 9:09 PM
101	I am not willing to imply an open cheque book. What sort of increase?	9/8/2021 8:23 PM
102	There needs to be more clarity on this We do not want water meters	9/8/2021 8:17 PM
103	Don't make it an easy way to gather more money we experienced this recently with the council deciding to call us a lifestyle block without notifying us they can charge for excess water	9/8/2021 8:05 PM
104	Yes if quality and security improve not keen on water meters	9/8/2021 7:24 PM
105	Yes but not too much more	9/8/2021 5:58 PM
106	Only if there is an improvement and would want to be better than it is now.	9/8/2021 11:48 AM

Q4 Are there other aspects of this proposal that are of concern to you that you would like us to include in our submission to government?

Answered: 448 Skipped: 56

#	RESPONSES	DATE
1	We must not let Government have control of our local services. I do not trust them	9/22/2021 5:48 PM
2	We cannot allow Government to have their say over what happens within our local district when the Government is basing decisions on inaccurate evidence.	9/22/2021 5:46 PM
3	1. Government claim we will be paying \$8690 for three waters in 30 years if we opt out and only \$1640 if we opt in. So a 1400% increase if we opt out and only a 270% increase if we opt in. 2. Loss of local control is a huge concern. When will our voice be heard? Having a centralised structure will be like dealing with NZTA. Projects will be prioritised across our region. 3. I am appalled and insulted with the misleading media advertising which is blatant propaganda. Viewing these advertisements could leave you with the impression that we are a third world country, with green sludge spewing from pipes. In Ashburton our water is safe to drink and bathe in, as it is for most of NZ. Bad water is rare, not the norm, like the government ads have been telling us. 4. The government are budgeting on the new water authorities to improve efficiency by 50% over 30 years, a real stretch of the imagination to accept. 5. Finally, a referendum must be held to ascertain the feelings of our District on this topic. I am totally opposed to the three waters reform.	9/22/2021 5:44 PM
4	As rate payers we really need our council to stand up on our behalf and tell the Government in no uncertain terms to leave our water infrastructures alone. Roading and flood damage in the here and now seems more important at the moment.	9/22/2021 5:35 PM
5	1 The question the Council is considering, will the reform proposals benefit the residents of our district. The answer is definitely No. 2 This is Council core business. Responsibility to maintain and improve services to the community. This is an ongoing challenge to improve our infrastructure . 3 When Govt get policy wrong it is Council responsibility on behalf of the Community to get it corrected. Brief ex In the 1990s Govt intended to Nationalise Nz Roads. Early 1990s Ashburton Hospital services were to be slashed due to centralisation policy of medical services. 4 Past generations have forte hard to ensure that community's could make local decisions, that right must be retained. 5 Best practice has generally been acknowledged as involving stakeholders in the design of the process itself, underpinned by rigorous analysis of options, outcomes, costs and benefits. One of the objectives of the 2002 Local Government Act was to end the bad practice used by some councils where they would develop a detailed proposal ' behind closed doors ' based on little analysis and then release it for ' consultation' using a very short time frame for consultation and inadequate detail. How ironical that the Government's Three Waters proposal breaches all the hard won principles established over the last 30 years in terms of process for developing good public policy and engaging with stakeholders. Local Govt, has received tremendous criticism of the failure of one specific drinking water system, that of Havelock North. This was a serious disaster and every effort to safeguard human health is paramount . In the 5years since this disaster occurred much progress has been achieved . 6 It has long been recognised that the fragmentation of responsibilities between DHBs, Regional Councils, Ministry of Health and Ministry for Environment is a source of confusion. But this is not a consequence of the councils' operations but the regulatory framework put in place by Parliament. 7 The review continually talks of the (three waters) as a single system. They are not. Drinking water, surface water, storm water, river catchments, Sewerage, Environment management . 8 Revenue sharing. For 30 years Central Govt has agreed with the principle of revenue sharing recognising the inequities of rates as the principle means of funding. However Govt have failed to commit the necessary finance to enable LG to carry out all of its activities to the desired standard. Council must demand that this issue gets some certainty as discussions progress. 9 The financial figures given on comparisons between 3Waters Entities and the present LG Management in my view is quite irresponsible. Also that it will employ an additional 9,000 staff. I understand the Scotland model that this is based on has reached 25% of It's committed target to date. In other words it is 75% behind in achievement at this target date. 10 Local Govt you are representing our community interests today but also ensuring local decision making is retained in the future.	9/22/2021 5:33 PM
6	I am concerned that there will not be the efficiency to provide the governments proposal, either financially, responsibility in providing long-term higher standards, responsibility to rate-	9/22/2021 5:29 PM

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payers, business, community water schemes, as is the current goals. How can the scheme be more efficient when more staff are needed over and above that already employed to provide the service? I am concerned that the bureaucracy involved in large amalgamations like this proposal, will mean that no-one becomes accountable/responsible for good outcomes for our community.

7	I only use potable water, how do you sort out storm and waste charges? I am also wondering about the questions you have raised in the feedback document.	9/22/2021 5:26 PM
8	Judging by what I have read concerning any debts incurred by other Councils that the government won't cover, leave the system as it is. With only having 4 entities, the quality of water, if there are problems arising, won't be dealt with as quickly as our area is vast, and we have a skill shortage that would be needed. I am proposing the Council says NO to this scheme.	9/22/2021 5:25 PM
9	I don't like the idea of a big entity. We need local Councils providing our water management	9/22/2021 5:21 PM
10	I would like to register my opposition to the government's proposed three waters reform. I consider it totally undemocratic and taking away the rights of the Council. It is not well researched and unacceptable with many questionable assumptions. I ask you as a Council to totally oppose the Government's proposal for three waters reform.	9/22/2021 5:20 PM
11	Reasonable increases can be acceptable. I believe the ADC have built a good infrastructure to cater for drinking, waste and stormwater and that it should maintain control of that infrastructure rather than lose it to an entity that may not have Ashburton's welfare as their to priority.	9/22/2021 5:17 PM
12	We need local knowledge & input from people in our area	9/22/2021 4:59 PM
13	I am not in agreement of taking this away from local councils as we have had payment along the way already for our local district	9/22/2021 4:42 PM
14	Handing ANY percentage of control to ANY particular group of people is racist, creates segregation and is an absolute recipe for disaster. "They are us" aren't they or are we no longer one in this government's eyes??? DON'T FIX SOMETHING THAT ISN'T BROKEN!	9/22/2021 4:27 PM
15	My comment/question would be 'What was the intent of our forebears when services in Mid Canterbury were eventually set up for the community?' and 'Does this proposal sit within our Treaty principles?'. In answer to the first question I believe their intent was for community involvement and direction or self-determination. This leads us to the treaty principles such as Partnership - Participation - Protection. If the Three Waters proposal takes place I don't believe any of the above principles can be achieved. Partnership with the community would be lost forever. Community participation would be lost and protection of our resources would move out of our control. I would like to suggest, very strongly suggest, that this proposal would be a very serious step backwards to ensuring better standards and outcomes for this district regards our water resources.	9/22/2021 4:19 PM
16	Don't give control away	9/22/2021 4:08 PM
17	Our water should be locally monitored and cared for	9/22/2021 4:06 PM
18	Money wastage in paperwork	9/22/2021 3:30 PM
19	Community owned and operated is important.	9/22/2021 3:25 PM
20	The division of people based on race, and the pressure this is putting on our rural community, it needs to be put on hold and some serious discussion with all ideas put forward	9/22/2021 3:21 PM
21	I am hugely concerned about what the government would do to our water if they were to be in control of it	9/22/2021 2:27 PM
22	4.1 There is insufficient information from Govt. as to how this would all work. 4.2 Given this Govt's performance on implementing and completing any major project this project will end up as nothing like what is proposed and be a costly mess! 4.3 There should be a public referendum on the issue before anything further takes place. 4.4 I am totally opposed in giving the Government all of the District's water assets at a ridiculously low price. 4.5 I do not trust Adhem to give Maori control of our water assets. 4.6 Water is and should not be owned by anyone, it is our lifeblood and should be shared by all New Zealanders. 4.7 Ashburton District Council should not agree to but reject the Three Waters Proposal, I think it is a massive Con. job! 4.8 I am concerned that it is reported that the Local Body Assn. has confirmed that they are not opposed to Government acquiring these assets if necessary. 4.9 Who gave this Body the right to take away the rights of Ratepayers who collectively own these assets. 4.10 If necessary A.D.C. should leave and resign from this	9/22/2021 2:14 PM

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organisation. 4.11 As often proved in New Zealand, bigger isn't always better and the loss of local knowledge on how local water schemes work would no doubt be extremely costly as new people have to re-invent the wheel! 4.12 I suspect that in the long run Districts like ours will end up subsidizing many Cities who are facing major problems with their water works. Another reason to say NO!

23	This proposal is the State legislated theft of local assets bought and paid for by many generations of local residents. This proposal must be opposed.	9/22/2021 2:04 PM
24	No	9/22/2021 2:00 PM
25	There is very little evidence to scrutinise the cost advantage stated by the govt. in their proposal. I do not agree that Iwi need to be a separate party to the Three Waters for a payment to them is likely to be the next step.	9/22/2021 12:28 PM
26	No	9/22/2021 12:26 PM
27	Iwi ownership of 50% of the assets when they represent less than 1/5 of our population is absolutely ridiculous! Also ratepayers have already paid for these assets and their upkeep. Why are they only being compensated 8-10 cents for each dollar invested? Ratepayers will also then need to pay again to use the water they have effectively already paid for. How is that fair? The four entities are too large and include areas with differing water needs so this plan will not work.	9/22/2021 12:22 PM
28	No, just make sure Council acts responsibly and gets the best outcome for its ratepayers, and doesn't get protective about 'ownership' of assets or its role in 3 waters.	9/22/2021 12:00 PM
29	Retained asset ownership	9/22/2021 11:43 AM
30	I believe the lowest common denominator will rule with this proposal and Govt will include all councils by mandate to lift the poorest performing TLAs at the expense of those who have performed well, and been properly funded by their ratepayers.	9/22/2021 11:40 AM
31	I understand ADC has been very pro-active in keeping up with improvements and should not be penalized and paying for areas that have not kept up with requirements.	9/22/2021 11:07 AM
32	My concern would be who is responsible when the river floods or stormwater backs up and floods property.	9/22/2021 10:57 AM
33	Centralisation is not always the best approach to a local situation. Economies of scale sometimes mean that good practices, resources or solutions are overlooked for the perceived "greater good". We need to retain control of our own resources and provide our own solutions.	9/22/2021 10:47 AM
34	I refer you to the NBR article this morning by Brent Edwards "Three waters reform queried by Treasury as govt ponders next steps" as this articulates many of the concerns I would ask you to seriously consider. Also, the whole process is undemocratic. Local Authority ownership is a 'Claytons'. We are a well resourced Region and can stand on our own. Give the people to invest in a local Bond although our borrowing power is great. Governance is a joke and is an affront to all electors! Please DO NOT go with this rushed undemocratic, poorly thought out 'sledgehammer' to crush a nut. Sure there are things we can do better in Mid Canterbury but lets talk about these and sort them out instead of throwing the baby out... Space prevents me to expand here but happy to be contacted. PLEASE read the NBR article if you haven't already done so and/have already assessed all that in-house yourselves. Thanks for the opportunity to contribute. Be watching with great interest.	9/22/2021 10:27 AM
35	The ownership model is far too complex. It takes over ownership of assets paid for over generations by local communities with no return back to those communities. Financial projections being used to coerce councils into the proposal, appear to be wildly inaccurate.	9/22/2021 9:40 AM
36	No to Three waters	9/22/2021 9:21 AM
37	The 2016 Havelock North water supply outbreak is an engineering failure and should not be the reason for Three Waters Reform. You need to bring the engineers who stamped and operated the system to Court for trial. Three Waters done right should reflect good planning and good planning pays. Rework the plan. A good model: https://www.epa.gov/laws-regulations/summary-clean-water-act	9/22/2021 9:01 AM
38	Interference from central government in local government infrastructure is a real concern.	9/22/2021 9:00 AM
39	Government should pay trough value for our infrastructure	9/22/2021 8:44 AM
40	Anything controlled by central government is a backward step compared with current local govt control. ADC is doing a pretty good job of things with the exception of perhaps Methven, but steps are being undertaken to address this	9/22/2021 8:37 AM

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41	The assets and the infrastructure of the community should not be handed over to a central governance.	9/22/2021 8:29 AM
42	That we as the rate payer won't have a say in anything if 3 waters goes ahead	9/22/2021 7:47 AM
43	It is extremely important to retain control of OUR water infrastructure not give it away for a fraction of its value especially gifting a large chunk to iwi . If the three water confiscation of our water services goes ahead I believe this to be the thin end of the wedge with roading next. Although this will save the council from having to move into new buildings enabling the buildings to be sold due to the fact that only a portacom will be needed because there will only be his worship the mayor and that bloody meter maid left ! So if you haven't guessed I am absolutely AGAINST the three waters proposal/confiscation.	9/22/2021 7:15 AM
44	This government is untrustworthy and doesn't stick to its word. This is just one more thing they are wanting to take control of. If they own this, they can charge whatever they like and put whatever they like in the water. They are reckless and dangerous. Please don't let this happen	9/22/2021 6:54 AM
45	Letting central government take away the running and ownership of water from the local people is very scary. I don't think this is a good idea	9/22/2021 6:23 AM
46	Ashburton can't get a 2nd bridge from central funding. How will this proposal be any different? Smaller communities will miss out.	9/22/2021 4:53 AM
47	ADC IS MORE THAN CAPABLE TO MANAGE THE DISTRICTS 3 WATERS, FUNDING TO UPGRADE MUST BE INTERGENERATIONAL. MAINTENANCE TO BE PAID FOR BY CURRENT RATING - UAGC AND TARGETED, WITH MINIMAL INCREASES	9/21/2021 11:24 PM
48	While we all know the ADC very rarely listens to its community, this is the time ADC actually does need to listen. The government isn't going to pay the ADC anywhere near what the current water scheme is worth, so a loss for the residents yet again (we won't look at roading or the swimming pool and just how much that's cost). Put the town first and look after our water.	9/21/2021 11:11 PM
49	Control of local authority water infrastructure and assets, paid for by ratepayers, is lost. The 12 member entity appointed to control this proposal will be 6 members appointed by Councils and 6 by iwi. This is undemocratic as Maori are a minority in New Zealand at only 16.7% of our population. Iwi should not have the right of veto. Are the figures quoted from the Scotland survey even relevant to the distribution of population in New Zealand?	9/21/2021 10:47 PM
50	What say/controls are there for Councils & ratepayers	9/21/2021 10:31 PM
51	Yes	9/21/2021 10:09 PM
52	Need to hold a referendum to let ratepayers decide	9/21/2021 10:00 PM
53	Do not agree to this!! Keep the districts water and assets managed and held with the ashburton district. I strongly disagree to everything outlined in three waters..	9/21/2021 9:27 PM
54	Governance - it should not be run by any other party than a local council	9/21/2021 9:23 PM
55	I belong to the Highbank District Water Scheme which is community run for 150 houses costing \$250a year per household, passes all health requirements with out chlorination. What will happen to this under government control.	9/21/2021 9:15 PM
56	I have concerns about losing local knowledge and control on how services are managed in Mid Canterbury. Our rates being used to subsidise upgrades in other areas. Not sure why a Scottish model was being used to base reforms on. Don't believe these numbers as being accurate. Not sure why this is being pushed through as fast as they are without giving a lot more consultation with the people of NZ Rushed reforms do not help anyone. I do not support these proposals.	9/21/2021 8:58 PM
57	I think there should be a referendum, this is a decision that ratepayers should be making for our District not our Council	9/21/2021 8:53 PM
58	Councils seem uncomfortable with the proposal. This suggests not enough benefits and identifying potential problems in the proposal have been communicated. Uncertainties should be addressed prior to finalisation.	9/21/2021 8:53 PM
59	I do not understand how combining services will result in a more cost effective water service. If the delivery cannot happen with the way things are it will be even worse with the Country combined. A larger organization is less efficient. Take Ecan as an example. The more people they employ leads to a deterioration in the level of service. There will be a group of people with the 3 waters just Monitoring activities within the group instead of delivering a	9/21/2021 8:12 PM

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reliable service. You have some other agenda if you think combining Councils will provide a better service. The same service delivery people will be used to do the job as at present ,the difference being that 3 waters will be clipping a large section of the ticket. Government subsidy will help lower the direct cost which we are paying for also. There are no free lunches with Government policy. Smoke and mirrors and inefficiency would cover the way this country is run.

60	The ownership and control going to some bureaucrats in Wellington	9/21/2021 8:08 PM
61	Why Maori need to be involved in the ownership of the proposed entity They must have a say in the processes but not ownership	9/21/2021 8:04 PM
62	yes the centralized ownership and increased control. These assets have already been paid for by the ratepayers.	9/21/2021 7:51 PM
63	Do not do it. Do not give up our assets.	9/21/2021 7:51 PM
64	it is local govt responsibility not central every region has its own issues	9/21/2021 7:39 PM
65	I don't believe anything is broken apart from a lack of investment - so the Govt steals an asset from rate payers, borrows a heap of money against it and then charges the rate payers to pay it back for them. Where did they get their costs from for a councils non acceptance to the 3W. How can an area the size of the SI be ran as one entity. It is possession by stealth. This country is not South Africa. Look at the problems they now have. Dont make this a race decision as we are all one	9/21/2021 7:39 PM
66	Local management is in touch with local problems. Having 1 big extra level of management (probably in Christchurch or Dunedin) will be costly and will not care about small country towns even worse than Ashburton. This is a really bad centralising costly idea. I oppose it.	9/21/2021 7:06 PM
67	It's a huge concern that it will be taken out of our community's control.	9/21/2021 6:39 PM
68	No you are covering most aspects. Stipulation that 50% of the governing body need to be of Maori descent. This will be necessary in some areas maybe but not everywhere. Areas which have maintained their water infrastructure will be supporting those which have not kept up. Is it a large city problem which is needing addressed which is being given a blanket solution?	9/21/2021 6:25 PM
69	"We" already own it.....it shouldn't cost "us" tax payers another cent	9/21/2021 6:11 PM
70	No	9/21/2021 6:10 PM
71	State purchase and control is unprove and dangerous. Quoted cost expectations lack any scientific backup. ADC upgrade (potable and wastewater) have taken account of population growth and much of locan funding repayed. Do ratepayers want to mortgage themselves for Te Anau, Dunedin or Kaikoura upgrades? Do we want another foreshore and seabed? PLEASE - don't have a bar of it.	9/21/2021 5:29 PM
72	Our Council have provided a good service and have invested in what we have. What service would we get from a government system that will pay people huge salaries ad won't even know where Ashburton is and won't know the circumstances. Are we to give away our assets to this sort of organisation - I don't think so. Socialisation! Does the government really expect Council's throughout the country to give up the assets they have, which were put there by the ratepaters of the district. Really? What world do they live in!	9/21/2021 5:26 PM
73	ADC past and present Councillors are (have been) had been conflicted over many water issues	9/21/2021 5:22 PM
74	I feel that our smaller communities could get overlooked	9/21/2021 5:20 PM
75	No added fluoride	9/21/2021 5:17 PM
76	While I'm ok with a 'competency based' board running the services, there should be at least some representative from the general public, ideally someone who isn't a specialist. This would help to bring 'real world' knowledge to the table. It does concern me that the control is being taken from our local community, we are only a small part of the suggested area covered by the proposed water provider. And what happens with our small rural water schemes? They will be so insignificant to the larger body I can see them being forgotten - or worse, made to pay for unnecessary upgrades that are unaffordable. I also don't believe the figures that the government has provided. And then lastly, the adverts the government are running are simply insulting. To me, their adverts and numbers look like gross exaggerations. Unless they can provide better information that is more realistic, I find this deal very hard to trust.	9/21/2021 4:28 PM
77	There doesn't seem to be enough accurate information to make decisions. We are opposed	9/21/2021 4:18 PM

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to centralization. It is being forced on regions too quickly.

78	Large Regional organisations do not serve Ashburton well.. eg CDHB--very slow to introduce vaccination locally; Racial discrimination with pop up sites. National Roads Board; ignored Ashburton's needs for many years- Tinwald corridor Large network no getting adequate subsidy . Will require another 3 layers of bureaucracy with no more work being done as the work will still have to be done locally with with our own resources. Cross subsidisation will occur to Ashburton's disadvantage. Finance offered is not at valuation. 50% Maori representation on regional boards is not democratic and indicates Govt.is going to appoint the boards -unlikely Ashburton will have a direct voice. No economies of scale. Scotland has nothing to offer NZ- look how they are always whinging about England.	9/21/2021 3:43 PM
79	Nobody can take ownership of the waterways, keep it local	9/21/2021 3:28 PM
80	We own it not them, if they want to buy it then they need to pay back everything that's been paid by rate payers	9/21/2021 3:22 PM
81	I think it needs to stay in local control, not in government control, all decisions are slowly been taken away from the little people . One size does not fit all!	9/21/2021 2:47 PM
82	With the centralisation of water the potential is great for areas of larger population to be favoured with planning and funding. Meanwhile we have lost access/control to the assets our community has built and paid for. I do not agree with local Iwi being 'given' 50% of the assets. I do not agree with the Three Waters proposal.	9/21/2021 2:39 PM
83	Have Maori been consulted and are they happy with the proposal?	9/21/2021 2:03 PM
84	Not all regions work the same. A one size fits all approach is not a good idea	9/21/2021 2:00 PM
85	Why does Manua phenua have a 50% impact on the management of this new plan? Are they representing 50% of our population?	9/21/2021 1:52 PM
86	Let local councils sort out local issues. Having central govt interferr with local issues is just a recipe for disaster!!!	9/21/2021 1:52 PM
87	central control doesnt work for well run local water supplies	9/21/2021 1:36 PM
88	Why should we as a public who have paid for the services provided that are currently paid for by ourselves and our ancestors, well maintained by the council which we pay rates for, be sold back to us for the smallest proportion of its current worth, to then have to pay for them again via our taxes because the current government can not afford to pay for that out of pocket but borrow the money which we as the people of the country have to pay back via our taxes plus pay for the use of on top of that. This whole proposal is one that has not been made fair to the people but more of how the current government can make our wages (that are not living wages for a majority of the tax payers) be taxed highly for something we already own as a whole plus pay for the use of on top of. It should be left as it is for the local councils to look after as they have done so for many years now.	9/21/2021 1:33 PM
89	At this stage the Govt want an answer Yes or No. This answer is very easy it must be No. Please refer to my email submission The Council must accept this responsibility the council	9/21/2021 1:16 PM
90	It's racist. Only allowing some race to own water and others not	9/21/2021 12:05 PM
91	Each council needs to stay in control of their own water supply as it isn't a one size fits all. Each district has different needs and those need to be decided by our own council - not the government.	9/21/2021 12:00 PM
92	How can the Maoris be given ownership of this and any other entity? Why can the government sell off assets at a huge discount of value? Each council should be supplying their own water (storm, waste and drinking) as each area is so different.	9/21/2021 11:41 AM
93	Local authorities should have the right to say how their water is managed	9/21/2021 11:30 AM
94	we have good water here	9/21/2021 10:58 AM
95	Their has been discussion in the media regarding co governance of these assets. I would oppose 16-17% of a population having 50% say in how a public asset is run and administered. There is no justification for this in a democracy.	9/21/2021 10:57 AM
96	SI does not focus on the Governments radar at all as seen in the flooding, roading, Covid. Ratepayers will pay more for less service as is already in force	9/21/2021 10:15 AM
97	As I currently stand I see nothing is to be gained by change. The centeal govt ought to fund all or part of any upgrade necessary rather than dumping additional costs on ratepayers	9/21/2021 10:10 AM
98	Why should we pay more for the assets that we already own and maintain. Government	9/21/2021 10:10 AM

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	doesn't have the money for such projects.	
99	This proposal is not about economical , safe, sustainable services ,it is about govt control. The PM has spoken at the Goalkeepers conference declaring she is proud to be implementing UN agenda 21 /30 policy in this country.	9/21/2021 10:10 AM
100	I think 3 waters reform is a great plan. District Councils have neglected water quality for over 100 years and reduced the state of our rivers and groundwater from what once were a pristine environment to one of ruin with high levels of contaminant, algae, bacterium and nitrate. Money has not been spent to adequately curb degradation. Ashburton Council is not immune from past poor practice with closed landfills in close proximity to rivers, and a poor network and quality of drinking water provided to outlying communities (e.g. Methven). I say bring on 3 waters reform, and quickly!	9/21/2021 9:53 AM
101	The government borrowing billions, then buying water resources off councils/rate payers at a fraction of the value. Then getting rate payers to 'buy back" and pay more for what they have already paid for in the first place!!	9/21/2021 9:38 AM
102	Local input and control being taken away. Costs skyrocketing. Subsidising other regions. Decisions made with a high intensity urban view (from Wellington). Decisions being made by people who have no connection to or understanding of the district. Impact of He Puapua intentions on decision making and control of water assets into the future. Asset base being removed from council balance sheet without due payment.	9/21/2021 9:21 AM
103	Any decisions on water supply etc should stay with the local councils, they have a better understanding of the supply, usage etc for local people, this reform would not benefit local people. If it goes ahead then outside persons or groups have a larger say on who can use water etc.	9/21/2021 9:03 AM
104	The need for a national referendum	9/21/2021 8:13 AM
105	Seems the council are already keen to give into this 3 waters. Us residents and rate payers, are not! Listen to us	9/21/2021 8:09 AM
106	We demand a referendum , the water system has been paid for in the past by locals and it must stay owned by locals . I do not support selling off this asset we already own just to buy it back in rates and other charges .	9/21/2021 7:58 AM
107	Local control of locally built up assets. A big no to centralised power over OUR ASSETS	9/21/2021 7:53 AM
108	It's unclear what the actual plan is & what is going to happen going forward. Until we have a more detailed plan in place, accurate coatings to both ratepayers & council.	9/21/2021 7:19 AM
109	The public needs more information and the truth about this three waters	9/21/2021 7:11 AM
110	the proposed "management" structure is unbalanced, not reflecting the ethnic diversity of new zealand (including this district). to give 50% control over an essential utility to one ethnic group (still a minority group) is unbelievable and, in my opinion, unacceptable. essential utilities should NEVER be 'privatized' or, as in this instance, be controlled by one single entity based on ethnicity. in essence, the 3 waters proposal is a covert privatization model. the consequences of the privatization of another essential utility (electricity) to the 'average' household must have provided a valuable lesson to the government on the socio-economic impact of such so-called 'restructuring' programs.	9/21/2021 6:46 AM
111	My concern is if this went ahead is....how would the list of priority be calculated for work done and would there be a waiting time, or would each district still do any work required themselves	9/21/2021 6:45 AM
112	I dont support the three waters asset grab. Its a no from me. They are not paying market value to take our assets	9/21/2021 5:28 AM
113	My concern is that being a small town in amongst practically the whole of the South Island makes our needs pretty insignificant.	9/20/2021 11:33 PM
114	I feel the Govt could spend most of the monies on fixing sewage problems north of Ashburton, and not improve drinking water .	9/20/2021 10:37 PM
115	We locals need to be able to control what happens to the beautiful water in our district.	9/20/2021 10:32 PM
116	Local services should stay local	9/20/2021 9:23 PM
117	We think there needs to be a public referendum to fully gauge what what the local constituents feel about these proposals as we feel the whole process has been rushed under the guise of Covid when it hasn't allowed a full and proper discussion of all the implications and true costs that have been properly verified so we feel there needs to be a	9/20/2021 9:07 PM

Three Waters Reform Feedback

halt to further participation until these conditions can be met with full buy-in by all our rate payers

118	Lake of full and honest information	9/20/2021 9:02 PM
119	Our local elected council are the best ones to take care of our water!	9/20/2021 9:01 PM
120	- Loss of local community assets paid for and funded by locals for generations. - Lack of consultation. Government seems bent on pushing this through against our wishes. - disgusted at use of Government money to fund propaganda advertising in the media - Loss of democratic process's around these assets. - Don't trust the Governments numbers around the benefits. Seems to good to be true. - Big is not always better e.g Auckland council amalgamation.	9/20/2021 8:08 PM
121	We don't want this to happen	9/20/2021 7:33 PM
122	I have serious concerns that infrastructure in smaller towns will be neglected in favor of resources being focused on cities, particularly Auckland. Local infrastructure owned by local government and controlled by local communities via their elected representatives. I urge ADC to keep our assets in local hands, especially given recent upgrades, that our community is funding - we don't need the financial burden of other councils.	9/20/2021 6:59 PM
123	We pay for all aspects of water in our rates, I'm sure our rates will not go down following these massive changes the government is proposing. I do not trust the government has our best interests at heart by taking control of our water inferstructures and pawning it off to its established corporations and iwi. This whole thing stinks to high heaven and we will pay for this eventually if it goes ahead	9/20/2021 5:51 PM
124	Govt's research on Scottish model was limited with this model for New Zealand focussed only on jurisdictions with centralised control of water, including Scotland, Wales, and Tasmania, excluding those with any private sector involvement. New Zealand's regulatory regime is far more complex, with some 78 local authorities – comprising District Councils, City Councils, Unitary Authorities, and Regional Councils – operating under a complex regulatory regime that includes National Policy Statements, Resource Management Act requirements, environmental standards, Health and Safety guidelines, and a mountain of associated constraints, including Treaty of Waitangi considerations and Maori consultation obligations. Much research has been non cited, questionable and consultation has been limited mostly to Maori without independent scientific, commercial and financial review. The Australian business consultants Farrierswier was invited to peer review the Scottish analysis and warned, “the analysis is high-level and directional and should not be relied on to project actual expenditure, revenue and pricing outcomes.” The engineering consultancy group Beca was also asked to assess the Scottish analysis and expressed concerns that it may underestimate the cost of reforms: “New Zealand is facing a period of major changes in land, air and water environmental legislation, and for regional and local government responsibilities. It is very difficult at this time to predict impacts on the New Zealand three waters segment and on the timeframe and total costs of subsequent changes in standards which apply.” The economic advisors Castalia, commissioned last year by Local Government New Zealand to evaluate the reform process, warned, “The Government’s policy process appears flawed and is focusing on high-risk options that may not deliver benefits.”. In his report Three Waters: lifting the veil of complexity, investment analyst and former councillor Frank Newman provides a valuable analysis of many of the key reports relied on for reform decisions and concludes, “that amalgamation itself is highly unlikely to provide the financial benefits claimed by central government and used to justify the proposed reform”. Not only are the assumptions, costs and timing of the Scottish Water model being challenged, but questions are also being asked if Scotland should be used as a “standard” at all. A recent BBC report revealed that sewage spills in Scotland had increased by 40 percent over the last five years. While Scottish Water runs the country’s wastewater system, it turns out they only monitor 3 percent of the 3,697 overflow pipes that discharge sewerage into rivers and the sea after heavy rainfall. Of last year’s 12,725 “spill events”, 654 of the overflow pipes lacked sufficient screening to retain debris, with 192 of them categorised as inadequate since before the publicly owned firm was established in 2002. As a result of Scottish Water’s sewerage management, which sees minimally treated sewage being regularly discharged into coastal waters, a monitoring system has been set up to assess whether Scotland’s designated bathing beaches are ‘swimmable’. The Scottish Environmental Protection Agency, which advises “against bathing for up to two days after heavy rain due to the risk of poor water quality”, claims to be working with Scottish Water to prioritise the upgrading of sewerage infrastructure. However, this year only 29 of Scotland’s 85 designated bathing beaches were classified as ‘excellent’, 31 were ‘good’, 20 ‘sufficient’, and 5 were rated as ‘poor’. Unnecessary and increased bureaucracy is not an answer to maintaining water structures. Three waters proposal will ‘confiscate’ billions of dollars’ worth of local authority water infrastructure and assets from ratepayers – without fair	9/20/2021 4:30 PM

compensation. The grants to councils are not for water infrastructure but have divisive cultural conditions. The Government claims the assets will remain in council 'ownership', but that is misleading, since ownership confers a right of control and local councils would have no such right. In return for their assets, councils would receive no shareholding in the new water authority, only shared representation in half of a 12-member governance group. With only six members representing the councils that provide the assets, and the other six members representing local iwi, the influence of small councils will be virtually non-existent. As if that's not bad enough, a requirement for a 75 percent majority to pass any board resolution, will result in Maori gaining control of water services in New Zealand. Cabinet papers confirm a separatist agenda underpins Labour's approach: Each 'co-governed' water authority would appoint a four-member Independent Selection Panel to choose the 10-member boards that will run that region's water services – ensuring they are “adequately competent both as a Treaty partner, and with expertise in accessing matauranga Maori, tikanga Maori and Te Ao Maori knowledge to inform the water entities activities.” In other words, while the new water authorities will provide services that are vital for all New Zealanders, they have been designed to prioritise Maori rights and deliver on Labour's He Puapua goal of Maori control of water. But deeper concerns are now emerging that while the Government intends removing existing ownership rights of councils over freshwater, wastewater, and stormwater assets, they intend creating new ownership rights for iwi. In a recent NBR article Gary Judd QC explains what the Cabinet papers reveal: “It was agreed that the water services entity would fund and support capability and capacity of mana whenua within an entity's boundary to participate in relation to three waters service delivery. Bear in mind that getting a return from an asset is a right attributable to an owner. Therefore, the proposal would confer on iwi, but no one else, a direct attribute of ownership.” If the Government was really genuine about wanting to help local authorities to improve water services, here are two key things they could do. First and foremost, they could start paying rates. Around thirty percent of New Zealand's total land area is held by the Department of Conservation, which, like other government agencies, is exempted from rates. With stewardship land making up almost 90 percent of some council areas, if the Government fronted up and contributed its fair share to the cost of council services and community infrastructure, local authorities would be in a far better position to invest in upgrading their water assets. And secondly, they could adopt a funding model that emulates the 50:50 shared funding arrangement used for roading projects, so water infrastructure could be directly co-funded in partnership with local government – or at least, they could make funds available on terms similar to that which central government itself enjoys. As it stands the Three Waters proposal is irrational from every perspective, but one. The only rational reason for this deeply flawed upheaval is to use it as a smokescreen to pass ownership and control of water to Maori tribal interests. The Government has no mandate for that course of action – it is completely unacceptable. So, even though there is no constitutional foundation for the 'partnership' claim, Jacinda Ardern's Government is now using it to advance He Puapua as they attempt to transfer control of billions of dollars-worth of the country's community owned and operated water infrastructure to iwi. Unlike public entities, which are required to prioritise the national interest, iwi trading enterprises are profit generating corporations worth billions of dollars. They have no unique community role in governing council-owned water services for the benefit of all New Zealanders, rather, the focus of iwi is on advancing their own situation. By giving control of 50 percent of the country's water services' decision-making power – along with a right of veto – to those representing just 16.7 percent of the population who call themselves Maori, the Government is undermining the proportionality principle on which New Zealand democracy is based. Their proposed arrangement would leave the 83.3 percent majority of non-Maori New Zealanders under-represented and discriminated against – a breach of section 19(1) of the New Zealand Bill of Rights Act 1990. As a representative democracy founded on the principle of equal rights, it is abhorrent that Labour is destroying that culture through the 50:50 co-governance requirement of the Three Waters proposal. Imposed without warning or any electoral mandate, the total upheaval of water services in New Zealand – designed to deliver control to Maori – is He Puapua in action.

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Yes, there are. 1. The lines of accountability from the ratepayers who have historically funded these water supplies, wastewater systems and stormwater systems to the directors and management of the new entities are too long and too far removed. 2. The claims about the levels of savings that the new entities will generate (compared to existing Councils) defy credibility. The calculations are complex and I am yet to meet anyone who believes that scales of economy of that magnitude are realistic. 3. There is an implicit assumption of cross-subsidisation - generally that larger communities will subsidise smaller communities - or that communities that have managed their assets well will subsidise those who have not. Many people feel this is unfair, even if it is necessary for the smallest communities to meet the new higher standards. In Ashburton District, figures of \$12,000 per household have been talked about for Montalto. 4. One aspect of the proposal that I like is bringing iwi into the governance conversation. In my experience, iwi take a longer view, and place more importance on a holistic perspective that includes the environment. Those perspectives

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would add value to future water governance, although for reasons noted earlier, I do not favour the 'extreme arms' length" between the ratepayer/consumer and the service delivery entity. 5. I do not entirely agree with the view that many Councils have "done a pretty good job" with the three waters. For the most part, Councils (and governments) stand or fall on their ability to set rates (and taxes) at a politically acceptable level, and historically Councils and governments have not built the infrastructure we need to meet population and economic growth, to meet modern environmental standards, and to be resilient in the face of future challenges like climate change or an AF8 earthquake. This is true of three waters, it is true of schools and hospitals, and it is true of state highways. 6. The Government has created a Water regulator and proposes an economic regulator - the latter to ensure fair pricing. If Government persists with this service delivery model, the way the economic regulator will work is an important part of the system and there is precious little detail available on that. This kind of gap in the thinking is another reason to reject the proposal. 6. Storm water is quite different, at least at a provincial level, from the other two waters. It is funded far differently, there is a less direct connection between the beneficiaries and the assets, and in many small towns the asset is much more closely associated with the road network. 7. If Government proceeds with this change, it leaves many people who work in the local government sector waiting to see what is the next limb to be amputated. We already have one of the smallest local government sectors amongst english-speaking democracies - this will reduce many Councils by 25% to 30%. It looks like amalgamation by not-much-stealth - and communities up and down the country have by and large resisted amalgamation. 8. I expect in excess of 90% of residents and ratepayers will oppose this change. While they often do not trust their local Councils, they trust us far more than they trust the Government. Government needs to see quite how much opposition they could be dealing with. 9. This proposal is one size fits all. My previous work experience in Wellington showed me that at an officer level, Wellington does not always understand that communities are not all the same, and that one size does not fit all. Often, when addressing a policy issue, the implicit assumption is that there is "a" problem that needs "an" answer, when the problem may vary between metropolitan, provincial and rural areas, between high-growth and low-growth communities, between affluent communities and low-decile communities, and so on. 10. My view is that local government needs to oppose the Three waters reforms very strongly. Government needs to proceed with the work of the Three Waters Regulator and holds Councils to account for meeting the requirements of their water safety plans under the NZDWS. Councils who fail to comply with approved plans (or who fail to produce an approved plan) must be put on notice that public water supplies may be put under a Commissioner or transferred to the management of another entity.

126	Yes I am not comfortable with 6 for the Governing board memebers being appointed and not elected and only 12 poeple to try and look after most of the south island seems silly	9/20/2021 1:53 PM
127	Concerns over the decisions with costs and use of equity being removed from our locally appointed officials adn thereby losing the ability for our ADC to use tht equity to fund projects for our local community. Councils already have to meet compliance standards set by the MOH. Unfair disadvantage on rate payers whose councils already deliver compliant clean healthy water as per the MOH standard compensating for other councils who do and have not. Loss of having a fair and 'heard' voice. Lack of ratepayer input who have through rates paid for the current infrastructure. Total lack of transparency from the Government proposing this regarding costs, not listening to councils that have concerns or do not wish to be part of the Three Waters Reform. Independent choice will be removed, that the Government will railroad councils so that they have no option.	9/20/2021 1:14 PM
128	it seems unfair that councils that did the least will benifit the most. The governance structure seems undemocratic to me being weighted towards race not expertise. How are they appointed, do we get to vote?	9/20/2021 12:57 PM
129	Taking water away from council control and centralizing control concerns me	9/20/2021 12:52 PM
130	Lack of local control of local services	9/20/2021 10:17 AM
131	my opinion is, our council is doing a great job and why should the Goverment take over what our Ashburton people have worked hard for, honestly they are not going to do any better , leave councils to do there own good works.	9/20/2021 9:24 AM
132	Increased cost for water us have but also continue being charged for water through rates to keep community water services functioning	9/20/2021 8:53 AM
133	Where do I start? Board members will not be elected. Where is the accountability? Why are half the board members chosen due to the colour of their skin or who their ancestors were? Central government could provide no more than a pittance to repair damages to our communities caused by the floods. How can we expect them to maintain our water? Why are they only offering a fraction of the value of the assets? Assets that ratepayers have invested in for generations? It's a disgusting, racist proposal that provides less than 0	9/19/2021 6:24 PM

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benefit to our community and has no hope in hell of working out to anybodies benefit, except the iwi in control! Tell central government to stick their proposal somewhere uncomfortable and refuse their blatant power grab.

134	Excellent to see mama whenua have their rightful place around the table	9/19/2021 5:45 PM
135	Fully support the proposal. Elected officials with no skills or expertise should not be on charge of three waters.	9/19/2021 5:43 PM
136	The iwi ownership of water	9/19/2021 1:24 PM
137	The economic projections using such a long time frame seem to be very dubious (and manipulative) . There is no well thought out plan.....just a socialist control grab.	9/19/2021 1:23 PM
138	No	9/19/2021 11:50 AM
139	yes the loss of control and ownership over our own assets and services is not acceptable the proposed savings seem fanciful in light of cost inflation and real world experience	9/19/2021 11:44 AM
140	Please note, Question 2 is very confusing - Please disregard our answer, but we needed to fill it in to submit the survey. We have serious concerns how this is getting pushed through Parliament without Kiwis getting enough say on it. As a Mid Canterbury rate payer, we have contributed to the assets our community owns and looks after well. Why change it?? If it's not broken, don't fix it. Our water being put into Iwi hands should be of great concern to every Kiwi. Is the Government trying to split our nation?	9/19/2021 11:19 AM
141	I'm completely against the Three Waters proposal. We will lose autonomy over our water. We will have no say in who the governors will be as they will be appointed NOT elected as our councillors are. The mega agencies will be far too big which leaves the whole scheme open to mismanagement, fraud, failure and a total collapse of our water systems. PLEASE reject this proposal.	9/19/2021 11:11 AM
142	Also, I do not believe that 3 groups can fairly control such massive areas. Would money be fairly distributed to all towns etc? It is also concerning how the Committees are selected to run the 3 main boards/ groups. It feels like those elected are owning/ or governing everyone's water- no one should really own the water. We all own it.	9/19/2021 9:45 AM
143	After what has happened to ecan with govt appt members and the river quality this water proposal isnt giving me much confidence that we'll have much of a say if this goes through. I dont agree with it. Leaves me quite uneasy about giving away our council's control of its water.	9/19/2021 8:46 AM
144	I think the general concern is that money and decision making processes will be taken away from our district. Ultimately if this happens we know that we will be of a lower priority to other more populous locations, thus we will resultingly pay a high price for likely a lower level of service. There is always room for improvement at a local level, taking the control away from the district council is not a positive way to bring about this change in a cost effective manner.	9/19/2021 8:36 AM
145	That if the government take control the community will loose control when now we have very knowledgeable with many year of experience who have lived locally all the life	9/18/2021 9:33 PM
146	No	9/18/2021 8:43 PM
147	Leave it all under local control	9/18/2021 5:44 PM
148	Just get it right first time please.	9/18/2021 5:28 PM
149	I want to keep it local	9/18/2021 4:52 PM
150	Keep control of our water local even if it costs more	9/18/2021 4:50 PM
151	What was the modelling based on for the figures provided? I want good water. I'm willing to pay for supporting water improvement in my area. I do not support centralised systems controlling our water in our area.	9/18/2021 2:49 PM
152	Ashburton District has invested heavily in all "three waters" over recent years and has plans to continue this investment though Methven needs addressing ASAP. Ratepayers appear to generally be in agreement. "Regional" governance would be too far removed from the ratepayer. I would question the "savings" being promoted.	9/18/2021 1:56 PM
153	Definitely not in favour of 3 waters proposal. Keep it local, more accessible, more accountable. We as a district need to keep control of such a vital resource/service.	9/18/2021 1:34 PM
154	The 'Three Waters Reform Programme' should be absolutely scrapped!	9/18/2021 1:34 PM

Three Waters Reform Feedback

155	The proposed Three Waters should be rejected ,don't waste time ,take a stand that is why you are elected. We must keep control of our own assets. Not allow central government to hoodwink the public with their communist agenda	9/18/2021 12:00 PM
156	Council assets should not be sold.	9/18/2021 11:45 AM
157	Yes, lack of consultation. NZ is a democracy and we the people deserve to have our concerns and decisions heard. I totally believe that central government has no right to impose Three Waters upon us and that they are way off track as to the savings they think will be made	9/18/2021 11:30 AM
158	Local iwi having too much say	9/18/2021 10:07 AM
159	There has been no detail in the government's plans as to how the claimed castings have been arrived at.. This appears to be part of their agenda to give control of key assets to iwi by 2040	9/18/2021 9:19 AM
160	Our individual requirements will be under central government and iwi control	9/18/2021 8:45 AM
161	Yes - this proposal means we loose local control of the water - giving it to an identity outside our region. Giving control to the one sector of our community is concerning. The Treaty of Waitangi says we are one people and are to be treated as such, therefore the water should not be split between two parties. Without local knowledge there are going to be areas of the country who will miss out, funding going to areas that make the most noise/have the biggest population etc.	9/18/2021 8:37 AM
162	I am concerned that the 75% requirement will lead to inaction and manipulation.	9/18/2021 8:08 AM
163	Individual councils understand local issues far better than an overarching government who try and have a " one rule for all" approach. I would hate to see water fall under a ownership structure, water is a natural resource which should be available to everyone. Consent costs to used water should be at a cost recovery level with ongoing management and compliance conditions monitored Delivery infrastructure costs need to be realistic and include ongoing maintenance and future replacement. Water metering "if you don't measure it, you can't manage it". Base payment and then a usage charge which includes the wastewater removal/disposal and treatment.	9/18/2021 6:39 AM
164	Central government control of local assets	9/18/2021 6:31 AM
165	It doesnt actually say how the problem is physically going to be fixed. All it's really saying is that the government and local council own the water and we the rate pays have to pay more for probably not much change	9/17/2021 10:19 PM
166	The structure of the proposed legislation is poor, effectively nationalising the provision of drinking, waste and storm water. A small community like Ashburton may lose funding/support in favour of a larger community that may not have kept up with the necessary historical investment required . The present ADC infrastructure is very good and I believe our community will be better served manging it's own requirements. The Government financial savings projections look very optimistic - "if things seem too good to be true, they generally are" ! I think the underlying drive behind this proposal is to assist cities like Auckland and Wellington who have very significant issues following substantial growth and historical under-investment in core services. The Three Waters proposal must be "compelling" for the Ashburton District Council to support it - I do not think this is presently the case !	9/17/2021 9:53 PM
167	I'm unconvinced that a large entity will give adequate focus to all the water services that so many councils currently take responsibility for. I'm also very concerned that the Govt has done adequate homework on the financial costings that they have provided for this proposal.	9/17/2021 9:13 PM
168	Ashburton local Council to keep charge of our water	9/17/2021 7:41 PM
169	You are our council and as such should be able to manage existing and future water infrastructure with NO interference from government. We do not want the new proposal in any way, shape or form	9/17/2021 6:17 PM
170	Transfer of community assets at a fraction of actual value to a central government agency with control of water assets eventually being transferred to the relevant regional Maori tribes. The implications for irrigation assets in this county alone are extremely serious and this proposal from a government that has no commercial qualifications must NOT be adopted.	9/17/2021 5:01 PM
171	I believe our council is doing an excellent job in maintaining and improving our drinking water and waste water and should be left to continue as is.	9/17/2021 4:47 PM

Three Waters Reform Feedback

172	The dishonesty of how the reform programme has been presented to the public by the Govt.	9/17/2021 4:46 PM
173	This document reads like three waters is a dun deal. We are losing democracy.	9/17/2021 3:41 PM
174	Yes the one size fits all and the 50% lwi ownership. The blatant TV advertising that the Govt. is using to promote (scare) the need for their proposal. Concerned that individual councils who are doing a good job and have had significant costs to do so (paid for by ratepayers) are having this ignored. The figures that the Govt. are putting out are not accurate or even known.	9/17/2021 3:38 PM
175	Fear that the proposal is just the first step toward fully lwi controlled and owned and that all water even private supply will fall under the same conditions and restrictions	9/17/2021 3:30 PM
176	Why would we donate assets and control worth so much to a government who is most likely going to fudge it all up!	9/17/2021 3:21 PM
177	No	9/17/2021 3:17 PM
178	I'm definitely AGAINST this proposal. The proposed model is racially flawed in favour of Maori control and to their benefit, not the rate payers who already own the assets and to be reimbursed a mere pittance to what they have paid for via their rate payments. This is a very sinister ploy by the Govt by alarmism and stealth to take away peoples assists cheaply and latter on via charges / tolls payable to Maori who will demand they be paid for as the have 'rights' to water. This must not proceed and I urge the council to opt out of the racist proposal.	9/17/2021 3:12 PM
179	I find it farcical that any government can predict what our water prices will be in 30 years. And I loath the idea of a faceless bureaucracy being in charge of something so important. And just to think; they will be essentially be 'robbing Peter - who has been prudent -, to pay Paul - who has not. Government theft!!	9/17/2021 2:37 PM
180	Loss of control of the asset, governance 50% to lwi interests without them paying for that shareholding,the absurd thought that central govt can do things more efficiently ..see KiwiBuild, Covid MIQ response....	9/17/2021 1:30 PM
181	The loss of democratic elected officials. If how I understand some of the new board members of the proposed water bodies are will not democratically elected which means we lose control. Transferring the ownership of infrastructure which has been paid by and built by rate payers would have to see a substantial amount paid back to ratepayers for the asset. My other concern is it is one step closer to privatization and water is the one thing essential for human life.	9/17/2021 1:04 PM
182	Under no circumstances should the council relinquish our water assets to the government. The ratepayers of the district have paid for our water infrastructure over many generations. What is being offered for these assets is a pittance! We will end up with no say, no service and massively increased costs. lwi have no right to have a 50% stake in water assets! The council must not partake in this separatist take over of the countries water infrastructure! No, no, no!!	9/17/2021 1:04 PM
183	Keep compliance costs down - Scrap the Three Waters Proposal	9/17/2021 12:50 PM
184	Very afraid of the outcome of this idea It could lead to complete control of our water	9/17/2021 12:20 PM
185	The loss of current council assets , loss of jobs for current employees, loss of price control for services provided, another bureaucratic monster that council or ratepayers will need to fight	9/17/2021 12:13 PM
186	Taking local decisions out of local hands can be a backward step. Government are'nt handling things that well at the moment.	9/17/2021 12:09 PM
187	Extra beuracracy not needed, resources and funds must stay under local control	9/17/2021 12:03 PM
188	Mid Canterbury overall has really good assets relating to water. This has been paid for by the good people in the community. Giving control of these services to our current government would be a huge risk considering their current treatment of the mid Canterbury people. Also they have proven they can't get any projects across the line nationally.	9/17/2021 11:16 AM
189	The whole idea of 3 Waters is flawed and corrupt.	9/17/2021 10:58 AM
190	Keep there hands off our assets	9/17/2021 10:54 AM
191	do not believe this is best for our district	9/17/2021 10:50 AM
192	Because we are a small council we won't get our needs met. Water rates will be more expensive. Government has an ito agenda to meet for 2040 with 50 percent ownership of	9/17/2021 10:48 AM

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everything. Large farming region with farmers making huge environmental steps and because they have wells will incur incredible costs to be able to even provide their own drinking water

193	Yes. Should be left in the hands of local councils	9/17/2021 10:46 AM
194	this proposal is thr coverments first step to hand all water over to the maori	9/17/2021 10:39 AM
195	I am strongly opposed to the 3 waters proposal.	9/17/2021 9:58 AM
196	If they privatise the water then it will be a disaster cost will increase to were people cannot afford it the standard of service will drop and you are giving one person all the power to decide what is best	9/17/2021 8:48 AM
197	Say no to 3 waters	9/17/2021 7:04 AM
198	Loss of local control of infrastructures. Less local input into decisions.	9/17/2021 1:03 AM
199	The fact that in the future the ownership could be privatised depending on the government after all the generations of Ashburton rate payers in our families. Also the fact that the whoever is on the independent board have to have full knowledge of the treaty of Waitangi and every thing else Maori may lead to a very biased board. Last of all where do the government get their numbers from for the huge margin between what the water charges will be if the water remains in council hands as a posed to their Three Waters reform?	9/16/2021 10:47 PM
200	i believe the structure of the three waters will be beneficial for region going forward	9/16/2021 10:06 PM
201	Local knowledge by councils is invaluable. We could end up being a little fish in a big pond where bigger fish have more needs!	9/16/2021 9:40 PM
202	Operators not knowing or wanting what is best for the area.	9/16/2021 9:25 PM
203	ADC should opt out from central government confiscation and coercion	9/16/2021 9:18 PM
204	Everything that will apply with this new proposal needs to be open and clear before the public votes or before the next step is taken as there is too much that hasent been develged yet	9/16/2021 9:04 PM
205	Nitrate Chemical and excrement contamination of our water ways and aquifers has got to stop!!!	9/16/2021 9:02 PM
206	Yes. I have a strong issue around the co governance model that is being proposed. These Three Waters Proposition is not the place for this model. This is community assets being placed under iwi control	9/16/2021 8:54 PM
207	Keep doing what you are doing now and we won,t need their interference	9/16/2021 8:51 PM
208	Terrible biased survey. Assumes three waters is going to happen.	9/16/2021 8:49 PM
209	what will happen to all the small water and sewage schemes around our county and Ashburton? With the extra 2 tiers who is going to pay the extra cost for all extra personnel involved over and above the Ashburton council involvement. This new proposal is definitely not in the rate payers interests and the costs reported in the Ashburton Guardain are probably around the wrong way in my opinion	9/16/2021 7:58 PM
210	Take a lesson from the Chinese , " Don't sell an asset" I can see a Govt., buying our asset and that also gives them total control. Our District Council have done a brilliant job setting up "Our Three Waters" to date and into the future.	9/16/2021 7:53 PM
211	Water is our most precious resource and I have grave concerns about how it would be managed if it was taken out of our local Council's jurisdiction. The current Government is secretive with it's plans and needs to be totally transparent whatever the decision.	9/16/2021 7:52 PM
212	I think local councils and people should be in control of their own water because they have a vested interest in finding the best outcomes and options for the community regarding changes. The area allocation in the South Island is massive and it is difficult to understand how and who will make decisions and understand the priorities of each district. I think it is a really bad idea to go ahead with this and we need to keep the control in local hands.... Not give it to a board of people who are out of touch.	9/16/2021 7:50 PM
213	The devaluation of current assets the council have now.	9/16/2021 6:42 PM
214	My concern is the lack of input the ratepayers of Ashburton would have & the figures that are being used, how accurate are they?. I feel it's being rushed through, its to important decision to rush. At this stage definitely against the proposal	9/16/2021 6:07 PM

Three Waters Reform Feedback

215	There is not enough information from the government. I am happy with the way my council is operating our services, I don't want govt taking over.	9/16/2021 5:25 PM
216	Ashburton must maintain control of its Three waters network , we have excellent infrastructure that the rate payers have invested heavily in over the past 15 years, the level of service will drop dramatically if the control of the assets is lost. The numbers provided if the three waters stay with the district are preposterous and lack any sense of reality. All IP of the network will be lost and delivery of network performance will be diminished.	9/16/2021 4:53 PM
217	Needs to.be kept under local control.	9/16/2021 4:53 PM
218	No	9/16/2021 4:26 PM
219	The unrealistic GDP growth forecast (affordability) given enviromental constraints, appalling neglect of Ashburton's needs by other national services.	9/16/2021 1:54 PM
220	My main concern is rate rises to cover the costs will be used to subsidize cities and not for the benefit of our county	9/16/2021 1:50 PM
221	ownership passing to one large body. Each area should be in charge of their own infrastructure.	9/16/2021 12:12 PM
222	Our Council is the best to consider and deal with all local issues regarding the "Three Waters" They understand the different schemes within the County, and can remedy any problems at short notice. I am sure this would change with a large Supply Authority as proposed, and we would regret the day that supply management went out of the County.	9/16/2021 11:42 AM
223	Many grandiose schemes have been introduced by the government over the years on the promise of savings and efficiency none of which have had that effect. Big is not Beautiful and does not work. "Think Big" and "Electricity Reform" would be examples.	9/16/2021 11:13 AM
224	Loss of local democratic control of ratepayer owned infrastructure, higher operating costs with no benefits particularly to smaller community schemes. Disproportionate amount of input given to certain groups which is undemocratic. Losing ownership and management of key infrastructure should never be considered.	9/16/2021 11:05 AM
225	Keep our water in local ownership. This Government proposal is a poorly thought through document, with dubious costings. Agreeing for our ratepayers involvement is equivalent to selling our soul to the devil at a discounted price. Government is not to be trusted on this proposal. There are too many hidden agendas.	9/16/2021 10:21 AM
226	The amount of money that councils have saved to put towards projects that will now just be taken away and spent or given to other people for no reason. How about upgrading and giving the community what they deserve rather than taking their tax payers money away from the council. Also why taking away the councils right to decide what happens in their community, how is one central body meant to know what is good for what community when they may be sitting behind their desks in Wellington, not actually within the community in Ashburton.	9/16/2021 9:38 AM
227	As a ratepayer I say no to Three waters.. I will be very unhappy if the Ashburton District Council joins and hands over assets that ratepayers for generations have paid for.	9/15/2021 9:38 PM
228	The whole idea is downright thievery of ratepayers owned and paid for infrastructure.	9/15/2021 9:29 PM
229	Lack of consultation. Rushing it through without public knowledge.	9/15/2021 8:53 PM
230	The three waters must stay in the ownership of district councils.	9/15/2021 5:09 PM
231	I am writing with respect to the Government's Three Waters proposal. As I am sure you would agree, it is perhaps the most significant decision affecting ratepayers since the amalgamation of councils in 1989. The Local Government Act requires councils to consult with their communities over any plans to transfer water services, and a strategic asset like water requires the highest level of consultation. I therefore respectfully request that a full consultation process be undertaken by the Council to not only ensure ratepayers are properly informed about the consequences of central Government taking essential council-owned water services without compensation, but are also able to have a say on whether to accept or reject the Government's proposal. While the Government has made the claim that the assets will remain in Council ownership, this is simply not true. Once the assets have been passed to new water entities, control will be passed over to an unelected board, and lost to local ratepayers for ever. The proposed Three Water Authorities will be huge bureaucracies, and while the Government talks about economies of scale, experience shows almost without exception, that the bigger the bureaucracy the greater the inefficiency. The proposed Governing body is to be a "partnership" between iwi and councils. Half of the positions on the decision-making board will be appointed by iwi and the other half by all of	9/15/2021 4:16 PM

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the councils in the region. The result is smaller councils will have virtually no say at all. Since decisions of these governing authorities will require a 75 percent majority, in effect, that means the total control of water will be passed to unelected and unaccountable private iwi corporations. Why are iwi being given the power to control our water? That has not been explained by central Government, yet it is a core part of these reforms. I would respectfully suggest that you should refuse to join the Three Waters scheme until you have received clarification on the role of iwi. The infantile advertising campaign being run by central Government that denigrates the reputation of local council water management, and the instructions by the Government for councils not to consult with their communities over Three Waters, indicates the politicians are walking all over councils and treating them like fools. Again, with respect, our council needs to stand up for ratepayers to protect the assets that we ratepayers have paid for over many years. At the very least, a referendum should be held so ratepayers are fully involved in the decision about the assets that their families have paid for.

232	The survey is very poorly worded and does not include the simple question - " do you or do you not support the Government proposal to pay out the Councils for their resources " I hereby urge the Council to totally reject this Govt proposal to steal - and completely undervalue - our water infrastructure...	9/15/2021 4:15 PM
233	I am a local Ashburton rate payer and have had family connections in this District for over 100 years and would like to share my thoughts on this survey. I have read the articles on this Gvt proposal and am absolutely opposed to it. Our Council over the last 150 or so years have been the instigators and movers to keep our area supplied with these necessities. They have been held to notice by the local ratepayers, as it should be and we now have a very high quality Three waters system. To sell this to Central Govt would be a folly as not only are we giving away control of the years of local investment, we suddenly lose total control of future improvements. The figures quoted in the article of the future cost comparisons are not only inaccurate but sound to me like a 'Spoonful of sugar', to sway the argument. You can't tell me that someone can estimate what 'anything' will cost in 30years time, let alone something that covers such a large area that 'The Three Waters' covers. I really hope our Council will listen to the people and say NO to this proposal. Let's be the owners of our area's infrastructure and not have to go to the Central Govt. when we want something.	9/15/2021 4:14 PM
234	NEVER give away something that generations of other people have paid for (You have no right to). Control for the public would be totally lost altogether. (if the proposal goes ahead, any water problems rate payers had, would be like David against Goliath) I am angry the Council would even consider the Governments proposal on 3 Rivers. And , Who the hell came up with this ridiculous idea? And why should these companies be half owned by Māori? I'm all for having the mud shower. (If any company tried to advertise such rubbish, they would be fined for false advertising) But I guess this Government can do whatever they choose.	9/15/2021 4:12 PM
235	Regards three waters, Never sell assets. Never give up control of water in our own district. It is a absolutely a con and false advertising.	9/15/2021 4:11 PM
236	By giving control of our most precious resource to an unelected, minority, racist group,--- What could go wrong ???? How much will the rates go up?? Will it be possible to change the board when the wheels fly off.? Are you all crazy ?	9/15/2021 4:09 PM
237	Why try and change something that isn't broken! We have perfectly good drinking water	9/15/2021 3:17 PM
238	I don't want the government to own it. They need to pay more for it if they do buy it. I don't want to subsidize regions that haven't spent the money to keep up with growth	9/15/2021 12:59 PM
239	Keep it local! Our council has worked hard for the infrastructure we already have in place and plan robbery for the Government to pay nothing for it. Don't sell it please.	9/15/2021 12:57 PM
240	I do no want Three Waters to happen. Leave control where it is	9/15/2021 9:56 AM
241	Loss of local control and accountability, lack of comparative costings, Ashburton already has excellent facilities ,economies of scale figures highly suspect.	9/15/2021 9:21 AM
242	We are against the following Confiscation of assets Government assuming they can do a better job 50% of the three waters being handed to iwi Excessively bureaucratic system	9/15/2021 9:20 AM
243	The governance structure appears convoluted and unbalanced at the high level. Additionally only having one council member represented will create unnecessary tension between difference districts due to their different needs and outcomes. It has been shown time and time again centralising assets like this - especially without a fair representation of community members, leads to significant opportunistic behavior from leadership and major inefficiencies are created as the one rule for all approach does not work. It also has the	9/15/2021 7:40 AM

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opportunity to increase the rural and urban divide as the governing bodies would consider the needs of both communities at a larger scale. Councils can work on a smaller scale and are able to better understand the needs of users, with only one representative these nuances will be lost.

244	-who will be overseeing the entity? Are they elected by the public so if they aren't doing a good job they can get elected out....or will we be stuck with whom ever is appointed and have no say over their decisions? Effectively losing any say over what we're 'our' assets to start with. - in being lumped into the whole of ngai tahu's region will we be treated the same as larger urban centres like Christchurch and Dunedin or will our assets be maintained and improved second to them?	9/15/2021 7:27 AM
245	Yes, leave it as it is, under ADC control	9/15/2021 7:10 AM
246	No	9/14/2021 10:41 PM
247	Yes. It is ridiculous to think the government is combining the whole South Island in one group. Communities are going to be forgotten and left in the dark. Once again the government are making rules from the walls of wellington without having any logical thought process. The outcome of this happening would be detrimental to our rural communities and water supply.	9/14/2021 10:01 PM
248	Is all about local control, we need to keep hold of and control the assets we have all paid for.	9/14/2021 9:44 PM
249	The assets belong to the ratepayers we dont want the Chinese buying them at ten cents on the dollar	9/14/2021 8:10 PM
250	The whole proposal is one sided and is a joke! This should not go ahead!!	9/14/2021 4:45 PM
251	We live in the foothills and have always protected our river. We have a uv filter and don't want to have our water regulated. We feel our freedom could be compromised and that regular testing is pointless and expensive. We are also scared that water bottling businesses could get access to our water.	9/14/2021 4:36 PM
252	No one owns the water	9/14/2021 4:07 PM
253	Don't want local infrastructure taken away by central government	9/14/2021 3:48 PM
254	Not yet	9/14/2021 1:22 PM
255	Lack of consultation and clear direction! Poor price offered, little transparency about how it will be run.	9/14/2021 12:32 PM
256	Grey water collection, should be encouraged more for garden watering	9/14/2021 11:54 AM
257	HE PUAPUA report having so much influence on the 3 waters reform. keep it in council ownership.	9/14/2021 10:43 AM
258	Possibility of offshore companies ending up in control of our assets. The other problem is small rural schemes that will fall foul of excessive compliance costs...	9/14/2021 8:36 AM
259	The south island is always forgotten in the budget for infrastructure so water won't be a priority	9/14/2021 7:14 AM
260	This proposal will generate yet another over staffed over paid, under performing conglomerate. Don't join it.	9/14/2021 4:27 AM
261	Yes I think the whole of three waters is a dangerous concept. I dont believe that Ngu Tahu should get control of the water.	9/14/2021 2:38 AM
262	Councils need to control their own water needs as they know their their Communities needs best. To do this need more funds from Govt.	9/13/2021 10:08 PM
263	Yes. In govt control,we will be paying for water,almost immediately, and the govt will be taking in huge amounts of revenue,via gst. And any other tax they can find.	9/13/2021 9:54 PM
264	The modelling done by the department of internal affairs, where did they get the costing from . Looks like they made them up for job creation. The biggest growth area in employment is Government departments up by 8% .	9/13/2021 9:02 PM
265	The compulsory testing of drinking water when supplying more than one household.	9/13/2021 8:07 PM
266	What will happen to the latest 23% increase in our rates recently which was to cover an upgrade in our water system due to damage from the earthquakes 11 years ago.	9/13/2021 8:05 PM
267	I don't like the idea of this reform, the government doesn't always have my best interests in	9/13/2021 7:44 PM

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	heart for my industry	
268	We are giving away our property to central government. Will our rates that are proportioned to go to water infrastructure go else were.	9/13/2021 7:13 PM
269	Don't like the fact it is going to be controlled by incompetent central govt. or the fact the Maori's being over represented	9/13/2021 6:45 PM
270	In the future some political person will decide that they can sell a three waters company for billions and the people will pay and pay for water at very high prices. Keep it under council control, that way we have direction and a true user pays instead of paying for other areas that may not be up to scratch. Plus we have already paid for the infrastructure in our rates to date so why should we give it away!	9/13/2021 6:34 PM
271	If we go into 3 waters opens up for privately owned companies buying or running our water. our ashburton council does a great job managing our water. Do not join 3 waters.	9/13/2021 6:15 PM
272	The last thing I want is for the central government to take over our water infrastructure. I would vote no to 3 waters, I don't trust them	9/13/2021 6:08 PM
273	An entity that has to develop a plan for both Hokitika and Ashburton is not going to be efficient, and will just be an expensive bureaucratic nightmare funded by ratepayers. Leave well-enough alone and return GST collected from rates to the ADC to help fund further development. The government is not offering a fair price for the existing infrastructure. Information has not been freely forthcoming yet decisions are demanded quicktime. On 12/9/21 the PM announced on national tv that "one of the best things we can do is listen to the people on the front line". In this case as ratepayers, we are on the front line so must surely be consulted. The government's top priority when elected was to reduce child poverty and homelessness. As they continue to fail at both although they have had plenty of time to work on, why would anyone have faith that Three Waters would be effective. This enterprise was not campaigned on so they have no mandate to introduce it.	9/13/2021 5:35 PM
274	The fact that we will loose control of our asset that we have paid for over the years and have very limited control over what happens to our water in the future	9/13/2021 5:06 PM
275	Z	9/13/2021 4:34 PM
276	I THINK EVERY ONE SHOULD KNOW MORE ABOUT THIS SUBMISSION AND WE SHOULD HAVE TO VOTE ON THIS.	9/13/2021 3:29 PM
277	Loss of local input on local resources, and small communities having to fund large cities infrastructure seems unwise and unfair. I do not support the proposed 3 waters bill	9/13/2021 3:17 PM
278	I am very concerned regarding administration of the proposals-who is going to administer this and how are these positions be selected; I see no other administrators than "political appointments" here-no clarity at all on this matter. Also in a time of dire economic scene is the Govt distributing out large sums of money; can these distributions be spent on eg council buildings or sports stadiums; is this clear to the community who has a say on this. To me this is a huge overkill to try and solve one communities problem ie Havelock North -the report was peer reviewed but I am not aware of their methodology and don't think I am aware of any local reviewers	9/13/2021 2:57 PM
279	Our government are very good at making promises which they do not fulfill. We worry that smaller communities, like ours, will not get the same advantages as bigger centres.	9/13/2021 2:30 PM
280	Three waters is a far better option than all the different councils doing the same thing and some of them not doing it very well. One entity is a far better option.	9/13/2021 1:13 PM
281	Ownership to Maori of 50% and having rights to influence all decisions feels quite daunting and dangerous, maybe I misread that?	9/13/2021 8:57 AM
282	How is it that the Government run system is projected to be over 5 times cheaper than the Council provided current scheme? Will we get our fair slice of the 'water rate' take in our district or will it go to the larger centres that seem to have very large infrastructure issues? Our Council has been forward thinking in terms of our 'three waters' - will we be penalised for that?	9/12/2021 9:44 PM
283	The local infrastructure should be managed by the local council. Rates have been paid for water infrastructure and with the proposed changes decisions will be centrally made, to the possible detriment of the water quality and services in the Ashburton district. All water related issues should be handled locally and note enough information has been investigated to give possible cost saving projections. This should not be happening in a pandemic, the Govt is trying to push this through when so many other life changing issues at stake.	9/12/2021 9:09 PM

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284	I am relocating to Ashburton later this year and would like to offer my views on this 3 waters proposal. I saw a video by the council that says that local govt retains ownership? Having looked at legal review of the proposal by Gary Judd QC, I can't see that interpretation being correct. This whole 3 water scheme looks to be a travesty of democracy and appears to me to be more about transferring assets to the local lwis than an attempt to improve water services. I would be very disappointed if the ADC agreed to this proposal.	9/12/2021 8:43 PM
285	We must keep full ownership and control of our local services	9/12/2021 7:17 PM
286	Removal of asset ownership and control of infrastructure, cities get the \$\$ and regions are left out, also the fact the government is planning on borrowing against the assets once aquired so potentially influence by whoever they borrowing off, and also iwi (a small portion of Maori and New Zealand population getting 50% veto rights	9/12/2021 7:05 PM
287	It is not right for any person or organisation to control or be given control over something they have not paid for.	9/12/2021 5:45 PM
288	The govt cost saving benefits of 3 waters don't add up. The value of the assets are a lot higher than the amount the government has offered	9/12/2021 5:39 PM
289	Selling off the assets to cheaply isn't a good option. Especially as they were paid for by current local ratepayers	9/12/2021 5:32 PM
290	How will the proposed entity know the views and concerns of each community within the entity?	9/12/2021 4:59 PM
291	The ADC has just spent millions upgrading its infrastructure. Why would you accept a pittance to nationalise it and expect local ratepayers to pay more to subsidise councils that have not invested in their infrastructure	9/12/2021 4:21 PM
292	Bigger entities are not necessarily better. Local govt should deal with local issues. I don't believe a large south island water governance will help any smaller township have improved services. We can govern our own services and have done so all along. We do not need another enormous level of beaurocracy.	9/12/2021 4:11 PM
293	I am totally opposed to the government having control of water services which have been paid for by local ratepayers. It should remain the asset of the District Council, and it should be the Council which maintains and manages it. This Government has not shown that it could manage its way out of a paper bag, let alone run our water services appropriately. And there is no way that government departments are going to run things cheaper than the local council. I strongly recommend that Council refuse to accept this "offer", which to my mind is little better than theft. I see no advantages for our district in the proposal.	9/12/2021 4:10 PM
294	Control and promptness of responses	9/12/2021 3:55 PM
295	Leave it up to the local council . They are doing a good job in our area. We have a big asset here and I don't believe it should be taken away. What tgey are ogfering for it is a pittance. Beware...they are wanting to take control of all things including water, freedom f speech etc away from the people.	9/12/2021 3:52 PM
296	yes its blatantly racist .and will divide NZ further .and is HE PUA PUA mandated	9/12/2021 3:29 PM
297	Leave it alone let our own council do what they are doing. Give them more money to upgrade what we have. Government has to much say now let our councils do there towns. Please leave water alone thank you	9/12/2021 3:05 PM
298	We need to keep it local, not under the government.	9/12/2021 1:38 PM
299	ADC cannot sell our water assets that we have paid for over the years for such a pittance to Central Govt. I am totally against selling our assets	9/12/2021 1:37 PM
300	yes. Mahuta declaring that this will employ 9,000 people. How is this more efficient? We are 100 per cent in favour of District control which has served us well	9/12/2021 12:33 PM
301	"We must keep control at all cost .Dont even consider allowing govt.control , it would be theft .Murray Anderson's letter to the editor says it all.	9/12/2021 11:18 AM
302	Dont do it! Dont let the government take this off us, leave it how it is now!	9/12/2021 11:00 AM
303	I would like to see an independent audit of the figures the government are tossing a around as a savings to encourage our district to buy into three waters. This audit needs to be done on a district by district basis. Assets also need to be valued at a market value somehow. I have yet to see a Government organisation have less bureaucratic (administration) costs than a private or local body so have difficulty in seeing any cost savings.	9/12/2021 10:28 AM

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304	I do not agree that you have the rites to take our rate payed for plants and services and combined with any other councils or three water government decided crap	9/12/2021 8:35 AM
305	The proposal is a good idea. The council fails to deliver quality water to Methvem.	9/12/2021 8:03 AM
306	Let us organise our own water reforms. Don't want an assesst grab or neglect. Don't like to be controlled by central gvt. Previous reforms in centralising things have not worked	9/12/2021 6:56 AM
307	Under the new proposal there would be too many layers of beauracracy and red tape to wade through and costs would sky rocket disadvantaging the average rate payer when water meters are installed. Iwi should not have a share in water rights, we are handing too much over to them as it is, and it would be a disproportionate percentage of ownership going to Maori. I do not agree to individual councils loosing control of our waste water, drinking water etc, I'm sure in the long run we would come to regret the change, leave things in our councils hands please.	9/12/2021 12:40 AM
308	To be kept under local council control	9/11/2021 11:08 PM
309	Maori Ownership with the potential new entity. proportion of representative ownership within the potential new entities This level of infrastructure needs to be locally owned and operated! Not our fault other districts haven't reinvested in their water infrastructure appropriately	9/11/2021 8:43 PM
310	I do not think central government should run our 3 waters. I think local council should as it is now. I think the current system is fairer and means local people with local water interest at heart are doing a good job and collecting and spend local money locally. I believe we could end up with less funding in Ashburton if central government allocates some of the money collected locally elsewhere. I don't believe central government will do better for Ashburton and I don't think they have worked out the details properly. I think there claims of reduced cost and better quality are a wild dream rather than having any sound financial calculations behind them	9/11/2021 8:05 PM
311	I would like to see the 3 waters remain under local council ownership and control, as ASHBURTONs infrastructure is not broken like Wellington and other cities and towns. If it ends up under central govt control we will end up subsidising other areas water improvement	9/11/2021 6:59 PM
312	our systems have been upgraded ie wells in the last few years also the effluent farm.	9/11/2021 6:33 PM
313	should be put to a referendum, it is not appropriate for the government to hoist this upon us	9/11/2021 1:42 PM
314	We are able to look after our selves ont like the others up North. NO NO NO under any circumstances.	9/11/2021 1:03 PM
315	Generally our local three waters system works adequately and at least local issues can be dealt to promptly with local knowledge and experience. The present assets have been funded by local rates and developed utilising local knowledge and experience. Local oversight by interested locals is most important.	9/11/2021 12:16 PM
316	Stay locally governed . Concerned about potential new regulations that will be more easily introduced under their proposal that are totally unnecessary .	9/11/2021 9:26 AM
317	Water ownership shd be public and under localised control. Govt have taken control of other systems . Do not trust the govt to make the correct decisions. The Council knows the local are better than anyone. .	9/11/2021 9:06 AM
318	I'm concerned about the complete lack if elected representatives, ,lack of accountability and iwi representation that amount to water ownership Ashburton has invested heavily in our water infrastructure which will last well into the future so the projected increases in the delivery cost by the government may be true for the underperforming councils it's not the case for Ashburton so in summary Im totally against the three waters proposal	9/11/2021 8:36 AM
319	I believe the work the council is has been doing to date is working fine . We don't want to loose local control.	9/11/2021 8:14 AM
320	We have paid for our water infrastructure over many years; please don't 'give it away' due to a bribe from the Government. Also I am opposed to the three waters structure with 50:50 Govt/ Iwi ownership as we will lose any meaningful local representation. We can lift quality of drinking water ourselves better than an inefficient central bureaucracy. Please don't accept this proposal as we will lose control of our infrastructure assets.	9/11/2021 7:23 AM
321	1. I'm concerned about the ability for local representation and the lack of democracy that comes from the proposed structure. 2. Regardless of the management entity that funds the three waters money to do upgrades will need to come from rate payers, the proposed entity won't create any more money. 3. The proposal will create another layer of bureaucracy with	9/11/2021 7:20 AM

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	associated overheads. 4. The definitions of community drinking water supplies captures too many small private supplies. The water quality of these smaller private supplies should remain the responsibility of their users. Personal responsibility should not be a bad concept.	
322	The needs of our community will be weighed up against more densely populated areas which will put us down the priority list.	9/11/2021 7:00 AM
323	I think it is very good as is. ADC does a very good job of managing current drinking water, waste water and stormwater services. I am very opposed to this changing.	9/11/2021 5:14 AM
324	The fair balance of representation and allocation of resources from a centrally and remote controlled body	9/10/2021 11:34 PM
325	we have paid for these assets already Three Waters would effectively seize our asset, give back under a 1/4 of its value, take away any local community say in its future then expecting us to pay back the money they borrowed for the whole of entity D and we will end up paying more in a separate rate to them. effectively we are paying for something we already own and what other councils own. this is central government led pyramid scam to take away any community and local body say in our water future. by all means set the water standards for the country but let local bodies manage. we can keep our rates cheaper than there predicted model We need to keep full local body control.	9/10/2021 9:45 PM
326	The water needs to be in the hands of the local communities. Not held by the national government. I would prefer for the ashburton council hold our water rights. I can see that if three waters goes ahead we will have to pay more for the same quality of water. This is not an option. We will have no control over our water once three waters goes ahead.	9/10/2021 9:03 PM
327	The 'costings' are a major concern. It sounds like a scare tactic to force people into accepting this proposal, or shows that our district will be assessed with the wider group, and not assessed on its own infrastructure	9/10/2021 8:48 PM
328	Councils do not want to abdicate their responsibility of planning, management & service delivery of water services. We want to make our own decisions & oversee our valuable assets that we've worked hard for.	9/10/2021 7:36 PM
329	I am very concerned about lose of local control of our water infrastructure and believe the council should do everything in its power to fight this proposal. I also believe there should be a referendum on this	9/10/2021 6:22 PM
330	I struggle to see how a central entity can provide a more efficient service than a local one - we need more information and guarantees	9/10/2021 3:14 PM
331	Water charges Lack of local community input into decision making Transfer of local assets to central government Input of iwi into decision making around water assets More bureaucratic cost, less investment in services needed	9/10/2021 2:46 PM
332	Leave the water alone	9/10/2021 2:13 PM
333	We as rather payer have paid for this asset over generations and we should not give it away	9/10/2021 1:45 PM
334	Matters pertaining to water are best resolved at a local level where local understandings can be factored in. A one-size-fits-all approach will not be effective.	9/10/2021 1:09 PM
335	How much control/partnership is being given to iwi	9/10/2021 1:06 PM
336	The provider should be responsible to the users, and should reflect local conditions and interests. Water supply and waste are core responsibilities of local/regional government and should remain so! A provider with an area split between two islands is ridiculous!	9/10/2021 12:09 PM
337	I just cannot comprehend that a government entity running water supply and waste and storm water can be anywhere near as efficient as local District Council. Very much need to maintain local control.	9/10/2021 11:06 AM
338	That the govt will on sell then lootout	9/10/2021 11:02 AM
339	Following the Govt publicity on these "reforms" it is clear they are a gross, arrogant, and typically clumsy attempt to give control of ALL water to the Maori minority who will replace any involvement by our Council in safeguarding the public assets owned by the ratepayers and permanent residents. Allowing this to happen would place our Council in the invidious position of aiding and abetting this unconstitutional takeover by a duplicitous central Government. PLEASE don't have a bar of any part of it.	9/10/2021 10:10 AM
340	I believe government should not control our water	9/10/2021 10:09 AM
341	that we lose control of the infrastructure	9/10/2021 9:53 AM

Three Waters Reform Feedback

342	Why would we have a regional representative group of 12 of whom half are mana whenua. That is outrageous, illogical and racist. The council already has its employees/contractors with a deep knowledge of Ashburton's system and needs. Why would we put control in the hands of people whose main concerns will not be those of Ashburton. As the Council notes on their website, the government is fabricating large numbers for future water costs to terrify people to their side (remember 90,000 dead from Covid). They are clearly not to be trusted. The 3 waters proposal must be resisted/ridiculed.	9/10/2021 9:40 AM
343	I am very concerned about our water quality. Having said that, big is not always better. Also concerned about the accuracy of Government predictions of our possible rates at a future date. Government rate vs Local rates. I wonder what they based their figures on? In fact I wonder if their figures would be the other way round, with the highest possible rate demand from the Government with all the other listed Gov departments who will be involved. With my limited experience it all ways seem much easier to get answers from a local District Council, than trying to get a prompt answer to a request. Than of a Government department. Local people have local experience and know their Districts better than anyone else. Thanks for this opportunity to have my say Cheers Derek B. Howden	9/10/2021 8:45 AM
344	It is theft as what the region have now is worth a massive amount more than what is being offered!! The fact that Iwi are trying to take over and own systems that they have nothing to do with them and they contributed nothing towards. Another divided stance by this government.	9/10/2021 8:00 AM
345	The numbers seem a long way off. I have never known a government project to be on budget.	9/10/2021 7:59 AM
346	If the company proposal is implemented what security is there if the company goes bankrupt or sells water rights to overseas concerns, or if the company fails to deliver minimum requirements of water to individual people. What protections are there for consumers catching rainwater?	9/10/2021 7:46 AM
347	Giving iwi control over our water is a bad idea. It's local water and should be locally managed. We also need to stop putting our waste water plants in river beds.... That's just stupid.	9/10/2021 7:08 AM
348	Yes. Centralisation of essential services isn't a good idea. We need local solutions to local problems. This is very very important to me personally and as a ratepayer.	9/9/2021 11:52 PM
349	Local government have a much better idea of local requirements. Centralisation would likely see in-fit for purpose ideas or investments implemented due to a lack of local understanding central government has.	9/9/2021 11:32 PM
350	That the small towns/areas will be swallowed up and end up paying more and having more restrictions put on farmers	9/9/2021 10:55 PM
351	I don't see how one entity can successfully manage water services for the whole South Island. Each individual Council understands the issues facing their district, and it is quite likely that cities and bigger districts would receive more focus at the expense of smaller towns.	9/9/2021 10:36 PM
352	I have major reservations regarding the 3 rivers reform preferring local council to continue managing local water systems	9/9/2021 10:21 PM
353	There has not been enough information provided. The current government cannot be trusted with their hidden agendas	9/9/2021 10:08 PM
354	it seems to me this is just a way to fast track privatisation. much like electricity and how did that go?	9/9/2021 9:56 PM
355	These assets should remain under Council ownership, they were purchased and developed using Rates and need to stay	9/9/2021 9:51 PM
356	Lots of concerns Rushed, no consultation, creating essentially monopolies with little community accountability,, under payment for assets etc	9/9/2021 8:54 PM
357	Concerning that central government want to take over control of our local assets I am scared that some day down in the future that a government will want to sell them off and privatise them	9/9/2021 8:37 PM
358	There will be additional costs, bureaucracy, rate payers already own the infrastructure, reeks of socialism	9/9/2021 7:57 PM
359	The government or other parties should not be in control of district water. It should stay in the hands of each district council to take care of our water . Water belongs to every New	9/9/2021 7:54 PM

Three Waters Reform Feedback

Zealander if this three waters goes ahead it will be handed over to the Maoris to own and control.

360	How is a centralise government agency going to do any better then currently and cheaper? I cannot see it working form Wellington	9/9/2021 7:27 PM
361	The ownership and control absolutely needs to be kept in local hands. When has anything that is controlled by central government been better than that of local government. Ashburton requires a referendum on this, we can not let this go through.	9/9/2021 7:16 PM
362	The countries water is sourced in different ways at Caitlin's amounts and used/distributed in different ways. There is no way one group can manage the entire country with blanket solutions. Each region must have the ability to manage its water efficiently.	9/9/2021 6:58 PM
363	you don't need to make a submission. Just reject it STRONGLY	9/9/2021 6:50 PM
364	No	9/9/2021 6:36 PM
365	Yes. ADC and ratepayers will not be fully compensated for the value of our water assets. What compensation we do get will come with strings attached as to how ADC spends it. The 3 Waters authorities will be established with a heavy racial skew rather than being formed on a democratic basis. Therefore, they do not have to account to the communities they are supposed to serve. Many existing government formed entities perform poorly in terms of governance and service to their communities. 3 Waters is not likely to be any different given what the government is proposing. In pushing the 3 Waters reforms, the government is displaying very poor judgement, a total disregard for democratic process and runs the risk of political suicide. It is likely they have a strong ulterior motive which is driving them to take that risk.	9/9/2021 6:14 PM
366	Do not trust the government in keeping to what they promise. All NZ'ers should have equal rights. NZ can not afford the cost of this plan.	9/9/2021 6:09 PM
367	This proposal has overtones that are not in the best interests of all NEW ZEALANDERS. This will turn out like the great electricity reforms. We will get screwed again and one entity will own all the water rights.	9/9/2021 5:02 PM
368	I am concerned how it will affect the rural sector and that they will suffer the most. Once more being given one size fits all rules and charges that punish them unfairly and does not take into account individual areas and situations.	9/9/2021 4:39 PM
369	We have very little consideration given to our district in terms of roading - what commitment is being given to the ratepayer/taxpayer in dollar terms given this agreement is in perpetuity. What ability is there to change the contract with 3 waters if it doesn't work as they believe.	9/9/2021 4:38 PM
370	Private rural water supplies being treated like a council water supply is unrealistic. The idea that the control and treatment of water supplies which have been paid for and maintained by local residents for generations, being given to a faceless group of people that have no personal stake in the district is very concerning. We have enough issues with Ecan in this respect!	9/9/2021 3:54 PM
371	I urge the Council to totally reject the Govt proposal to steal our local assets ...	9/9/2021 3:52 PM
372	Yes, I oppose the government Three Waters proposal and the council should be more vocal and hard nosed in their approach to this very bad legislation. It is just a way to give Maori control of this resource which belongs to all New Zealanders. Control should stay out of government hands!	9/9/2021 3:32 PM
373	These services have been developed and paid for by ratepayers throughout New Zealand, and if some councils have not kept up their improvements in these services, then why should communities who have ,be brought down to their level. I strongly oppose Government take over of any thing, plus the price or bribe that they offer councils to opt in, is an insult. Once Government takes over anything, individuals loose control, plus they will try to run it like any other state owned business, and that is to pay a dividend to the crown. Please say no, to this Socialist takeover, and continue to invest in this local asset, for the good of all those who have paid for it.	9/9/2021 3:20 PM
374	I dont want to pay more. I'm happy with the current quality of the services.	9/9/2021 2:42 PM
375	It just doesn't seem very well thought out	9/9/2021 2:18 PM
376	Yes the public needs to be consulted on this through the likes of this survey. I think the figures quoted for the reason why this is needed needs to be further clarified as I dont actually believe them!!	9/9/2021 2:02 PM
377	I am totally against half of the ownership of the proposed new entity being held by Maori.	9/9/2021 1:32 PM

Three Waters Reform Feedback

378	Say no to three waters	9/9/2021 1:13 PM
379	Why would you sell all assets to government only for the people that paid for it to be shafted	9/9/2021 1:02 PM
380	no	9/9/2021 12:44 PM
381	It should be kept local, as only the local Council knows problems related to them. A Government group would have us paying for under performing Councils and have no knowledge of local terrain. The amount offered is nowhere enough to cover what Ashburton has put into the services. The 900 jobs would go to pencil pushers and not on the ground workers, probably not local ones and what happens to them?	9/9/2021 12:34 PM
382	I cannot believe that centralising this will give a better service than keeping it local. I am suspicious of central bureaucracy capability	9/9/2021 12:31 PM
383	iwi involvement/control	9/9/2021 11:48 AM
384	Looks like a race based asset grab from Central government. Ashburton district is well serviced by companies specializing in 3 waters and best handled locally. No advantage to have central govt involved in the nuts and bolts. NO ONE owns the water	9/9/2021 11:28 AM
385	As soon as they have it they'll give it to the Maoris and they'll screw us all over	9/9/2021 11:00 AM
386	Anything that is centralised is inefficient and removes the community engagement that is so important when water is concerned. It also removes financial capability from communities that is able to be used for other things in other areas. The council should push back as hard as it can on this one!!	9/9/2021 10:06 AM
387	Totally opposed to the board set up where 6 seats are Maori and the others appointed. Smaller regions will end up with no say	9/9/2021 10:05 AM
388	Taking control of 3 waters away from small local authorities will result in less control on what needs to be done locally. Authorities who have NOT upgraded their facilities will be better off but the ones that have won't. This new government department will no doubt have staff making decisions that affect local ratepayers 100's of miles away with no regard to local opinions and feedback. I can't see where the figures quoted come from, they seem to be completely sensational. And as for their ad campaign, treating us as children is not on.	9/9/2021 9:39 AM
389	Keep it local, it's needs to be kept out of central government hands. We will lose control and costs will sky rocket.	9/9/2021 8:59 AM
390	That local councils & people will lose control of what's happening to the water in their areas they will not be on the ground here to see what is required stay with local council control	9/9/2021 8:45 AM
391	Can iwi be represented on the proposed 3 water board be democratically elected? Why are iwi being included? Can't a one New Zealand approach be taken?	9/9/2021 8:34 AM
392	It's our water, we pay for it so the government has no right to take control	9/9/2021 8:25 AM
393	The 50 per cent control held by iwi with the right of veto on commercial water takes. The concept that entities would now own the water. No individual or group should be able to own water. It belongs to all New Zealanders	9/9/2021 8:14 AM
394	The community will lose control of its resources	9/9/2021 8:00 AM
395	I do not believe the Three waters ownership & governance structure is correct. Ownership & governance needs to remain with the local districts councils, I believe this very strongly	9/9/2021 7:58 AM
396	Massive shortfall in the price they will pay for local assets	9/9/2021 7:52 AM
397	Needs to stay in local hands	9/9/2021 7:35 AM
398	It amounts to theft of our assets and will lead to us subsidising other districts which have under invested in their infrastructure	9/9/2021 7:31 AM
399	Giving control to a minority, non elected racist group is not good policy.	9/9/2021 7:29 AM
400	Local solutions for local issues	9/9/2021 7:20 AM
401	I question the ability of the government to do a better job of providing any better service than local councils.	9/9/2021 7:02 AM
402	More costs already too high	9/9/2021 6:37 AM
403	What they're offering compared to what it's worth is a complete joke. I'm unsure why a	9/9/2021 4:27 AM

Three Waters Reform Feedback

	decision is taking so long when it is blatantly obvious what the answer should be.	
404	Control of our water assets should remain under the control of local councils.	9/9/2021 12:37 AM
405	Losing council assets and centralised control in general.	9/9/2021 12:21 AM
406	The government is advertising this around the place...but not providing information about what the plan is, how costly it will be, and even what it is really. Very suspicious, especially with the current government.	9/8/2021 11:34 PM
407	I want it to be controlled locally NOT by Central Government	9/8/2021 10:58 PM
408	The loss of assets with so little compensation is unacceptable. This needs to be addressed.	9/8/2021 10:54 PM
409	Ridiculous to lump basically the whole south Island into one. Not enough information of how it will work and what part local Govt will play	9/8/2021 10:23 PM
410	I do not have confidence that a government agency can successfully manage our 3 waters. Think it should stay with local bodies	9/8/2021 10:14 PM
411	I do not want our district to sign over our water to the government.	9/8/2021 10:02 PM
412	Concerns around extra costs for current rural water schemes including very small ones that may not be able to afford them.	9/8/2021 9:39 PM
413	It is still unclear how they got the end figures. How will it be so much cheaper?	9/8/2021 9:33 PM
414	The lack of local voice at the table making decisions.	9/8/2021 9:25 PM
415	The price they are paying for the infrastructure, how they can't tell us how they come to the payable amount by residents.	9/8/2021 9:20 PM
416	Homeowners of the local community should have a say in all aspects of any proposals made by future governing authorities.	9/8/2021 9:10 PM
417	The theft of our locally paid for assets by this government. The failure of this government to complete anything	9/8/2021 9:09 PM
418	The whole thing is a waste of taxpayers money	9/8/2021 9:07 PM
419	I am strongly against the three waters reform. I don't believe that rural communities will get good service if resources are dictated by a 'HEAD OFFICE'- cities will be prioritized and see the majority of funding and people who have no idea about our districts will be making decisions on our behalf.	9/8/2021 8:55 PM
420	There is no way this community can let our water etc be driven by the government. You just have to look at other times the government have done it has been a disaster. Also why should a group of people with 16% of population get 50% share in it and have veto rights. The council must at all cost hold on to our 3 waters.	9/8/2021 8:55 PM
421	It's a complete rip and a joke.	9/8/2021 8:50 PM
422	Yet again you're selling off an asset that the people own It's literally been bought and paid for by the hard working members of the communities over the years. Your rate payers definitely deserve better.	9/8/2021 8:38 PM
423	Any centrally controlled system is by the very nature, over run with bureaucracy and the investment in infrastructure will be prioritized for big cities. Ashburton district has had huge investment in water supply recently and the government is looking at paying cents on the dollar for this. It will be the 'Auckland super city' 2.0 (A complete failure) for small towns. I haven't heard anyone in the district that thinks this is a good idea. Please don't be bent by pressure from the government with these radical changes.	9/8/2021 8:36 PM
424	The loss of local control is highly undesirable. The suggestion that centralized control with greater beuocracy will improve service delivery and reduce the cost is absurd	9/8/2021 8:29 PM
425	Handing control to bureaucrats in will never be better for the local Ashburton community	9/8/2021 8:28 PM
426	The multi tier beaurocratic nightmare that will surely result in higher costs and less accountability is completely unacceptable. Local water should stay under local control. The govts incentive payments, effectively buying the assets falls far short of true asset value. They're expecting to spend less than a billion dollars to "buy" 35.1 billion worth of water assets. If you care about this district you will strongly oppose these reforms.	9/8/2021 8:26 PM
427	Taking away the rights of people. No accountability for councillors	9/8/2021 8:24 PM
428	How much will the three waters reform cost me as a ratepayers for the services? Front up	9/8/2021 8:23 PM

Three Waters Reform Feedback

	with facts and figures first...	
429	Future ownership, community control, proportional capital investment throughout region, pathetic compensation	9/8/2021 8:19 PM
430	Yes A lot of our excellent pure water is literally given away through bottling companies exporting water This has to stop	9/8/2021 8:17 PM
431	All large government entities end up costing more wasting more keep control local of their set you've built up over all the years with local knowledge and keep improving it	9/8/2021 8:05 PM
432	Leave it with local councils	9/8/2021 8:05 PM
433	We pay a lot in our rates already, I am not prepared to pay more for a third party to manage the water.	9/8/2021 8:05 PM
434	We have paid for it with our rates. Don't hand it over.	9/8/2021 8:04 PM
435	I do not wish the ownership of our water to be taken out of the hands of local government, to which it becomes impossible to hold anyone accountable for anything that goes wrong. It also takes away our rights as individuals to have any say on what goes on in our immediate community. I also don't agree with the huge increase in charges for rain collection or bore water that people have on their property. Water is everyone's right and no one body should have control over a whole area that may not understand individual regions needs or what different regions require. Also don't agree with the government offering huge money as a bribe to council if they proceed with 3 waters.	9/8/2021 7:39 PM
436	Taking away of local assets and no evidence the water will be cheaper	9/8/2021 7:24 PM
437	That water will be privatised. That decision making is being taken away from local communities.	9/8/2021 7:11 PM
438	We don't want it Tell the government to get stuffed	9/8/2021 6:32 PM
439	Private domestic water suppliers need alot more information, are they even being considered ???	9/8/2021 5:58 PM
440	From the information I have heard it is highly unfair and they want to charge us more while paying a pittance for our schemes	9/8/2021 5:34 PM
441	It all seems a bit wishy washy and not very transparent. The advertisements on TV make it seem like it's already a done deal.	9/8/2021 4:51 PM
442	No	9/8/2021 4:07 PM
443	Three waters should not go ahead, the figures do not add up	9/8/2021 3:46 PM
444	Distrust that this will A. Not be sold off in the future B. That Iwi will not fight over it. C. People will finally benefit from it and not the right ones. D. Our area pays for others that havent been keeping on top of their commitments. E. Did I mention distrust it wont be sold off, by any furture Government.	9/8/2021 2:54 PM
445	The 3 water should be abolished. Ownership needs to stay 100% local	9/8/2021 1:53 PM
446	Should stay with local council	9/8/2021 12:27 PM
447	Remember one thing. The Council do not own these assets. The ratepayers of the District own them. We have been paying them. Dont sell off these assets without first consulting the ratepayers.	9/8/2021 11:48 AM
448	get the numbers right	9/8/2021 8:54 AM

6. Submission to Productivity Commission – Immigration, productivity and well-being issues paper

Author	<i>Rachel Thomas; Policy Advisor</i>
Activity manager	<i>Toni Durham; Strategy & Policy Manager</i> <i>Simon Worthington; Economic Development Manager</i>
Group Manager	<i>Jane Donaldson; Group Manager, Strategy & Compliance</i>

Summary

- The purpose of this report is for Council to consider a submission to the Productivity Commission on its issues paper *Immigration, productivity and well-being (June 2021)*.
- The Productivity Commission is undertaking an inquiry into New Zealand's immigration system which will result in recommendations in early 2022 to the Government on changes to immigration.
- Immigration policy is of particular importance to Ashburton District given the large migrant population who contribute to the workforce, and the primary industries labour shortage currently faced in Canterbury.
- Officers have prepared a draft submission based on:
 - their knowledge and experience of the current situation;
 - discussion with community members who are impacted by immigration policy;
 - data observations.
- To summarise, the submission argues in support of policy which enables regional settlement. Immigration policy is currently directed at a national level and this fails to identify unique local level factors, such as the labour workforce shortage in the primary industries sector.

Recommendation

- 1. That** Council approves the submission to the Productivity Commission's issues paper *Immigration, productivity and well-being*.

Attachment

Appendix 1 Ashburton District Council draft submission

Background

The current situation

1. The Government has engaged the Productivity Commission to undertake an inquiry into what immigration policy settings would best facilitate New Zealand's long-term economic growth and promote the well-being of New Zealanders. The immigration system has not been reviewed since the 1990s. Globally, many countries are looking at their immigration policies as they plan their economic recovery from COVID-19.
2. The consultation material is available at [Productivity Commission | Immigration settings](#). Council's submission provides specific recommendations and responses to some of the consultation questions in the [Issues Paper](#). Before the end of the year, the Commission will release draft recommendations and Council may submit on these.
3. The review addresses immigration settings and the effects on productivity and well-being. The Commission is taking a 10-30 year view to consider what the immigration needs of New Zealand should be, and how to achieve them.
4. The review does not cover refugees, day-to-day operational immigration decisions, decisions taken in relation to COVID-19, the rights of Realm citizens⁶, and other forms of travel that do not involve rights to work, settle or invest in New Zealand.
5. The Government is currently looking at changes to some existing visa categories and conditions, such as the skilled migrant category and several temporary work visas. The focus of this review, however, is longer-term.
6. Immigration plays, and will continue to play, a crucial role in promoting economic and cultural well-being of our district, most notably in the agricultural sector as this sector employs the majority of migrant workers.
7. While not the immediate focus of the Commission's review, it is important to note that current immigration delays/freezes are impacting the productivity of businesses in the district. The labour shortage is likely to intensify if the Government does not change the position on immigration.
8. Officers suggest the Council's recommendations to the Commission are:
 - a. The Government determine a clear population policy for New Zealand which identifies the needs of both urban and regional/rural areas. This could include a model similar to that of Canada by working closely with local authorities to determine workforce needs, assessing infrastructure pressures through the Infrastructure Commission, and providing increased local support services for migrants when they arrive in New Zealand.

⁶ Cook Islanders, Niueans and Tokelauans and Australians and their right to freely enter New Zealand.

- b. Clearing the backlog of applications currently in the system to enable migrant workers to stay and contribute to our communities, and to give migrants certainty over their future.
- c. Providing incentives through immigration policy to settle in regional/rural areas.
- d. If a points based system is the preferred policy approach when processing applications, more points should be awarded for migrating to regional/rural areas, for employment in the primary industries sector, and where it can be shown that the employment creates multiple jobs (e.g. a specialist role may create additional support roles).
- e. Reducing visa costs and barriers for rural/regional locations.
- f. Adopting a performance target to ensure a minimum percentage of migration goes to the regional/rural areas.
- g. Enhancing general immigration programs for regional benefit to ensure manaakitanga. An example of this is the Welcoming Communities programme which has been rolled out to fifteen councils in New Zealand (including Ashburton District).
- h. Publicly acknowledging that regional and rural connectivity must vastly improve for the agricultural sector to successfully transition the workforce. Limited connectivity impacts on well-being through enhancing feelings of isolation for those living rurally (as noted in the submission by [Dairy NZ](#)).

Options analysis

Option one – Do nothing

- 9. This is not the recommended option. Council may decide to stay silent and not make a submission on immigration policy. This would result in Council missing an opportunity to advocate on behalf of the district.

Option two – Approve the submission as attached in Appendix One (recommended option)

- 10. This option would see Council officers lodge the appended submission with the Productivity Commission.

Option three – Approve an amended submission

- 11. This option would see Council approve an amended version of the submission currently appended, and submit that document to the Productivity Commission.
- 12. Officers recognise that useful points of improvement often arise from elected member input and this option may be preferred for those reasons.

Legal/policy implications

- 13. The lodging of a submission does not breach or trigger any statutory or legal duty of the Council.

Financial implications

14. There are no immediate financial implications in making this submission.

Requirement	Explanation
What is the cost?	Officer resource in preparing the submission. This has been met from within existing operating budgets.
Is there budget available in LTP / AP?	Yes
Where is the funding coming from?	Strategy & Policy
Are there any future budget implications?	Not currently
Reviewed by Finance	No

Significance and engagement assessment

15. The overall significance level in regards to the preparation of this submission is considered low.

Requirement	Explanation
Is the matter considered <i>significant</i> ?	No
Level of significance	Low, not significant
Level of <i>engagement</i> selected	1. Comment – informal 2-way communication with stakeholders
Rationale for selecting level of engagement	The ‘comment’ level of engagement was selected as this provides an opportunity to discuss the matter with key stakeholders in the community.
Reviewed by Strategy & Policy	Toni Durham; Strategy & Policy Manager

Next steps

Date	Action / milestone	Comments
30 September 2021	Lodge submission	
By end of 2021	Submit on recommendations	When the Commission releases its recommendations, officers will prepare a submission and bring this to Council

Submission



Immigration, productivity and wellbeing – Issues paper

PREPARED BY: Ashburton District Council
PO Box 94
ASHBURTON 7774

SUBMITTED TO: Productivity Commission

Contact: Policy Advisor
rachel.thomas@adc.govt.nz

Introduction

1. Ashburton District Council (Council) welcomes the opportunity to submit on the Productivity Commission's issues paper *Immigration, productivity and wellbeing*.
2. Located an hour's drive south of Christchurch, more than 35,300¹ residents live in the district, with the main town of Ashburton accounting for over 50% of residents. The rest of our residents live rurally or in smaller towns or villages across the district.
3. Ashburton District has experienced moderate and sustained population increase since the mid-1990's, increasing by 23% between 2006 and 2013 (a 3.3% increase per year). This growth, however, is now slowing, with an average growth of 1.3% per year since 2013.
4. Migrants are highly valued and engaged members of our community, through their contribution to the social, cultural and economic well-being of the district.
5. International migration is an important economic driver in Ashburton District. The success of our industries relies on support from migrant workers. We are a district dominated by the primary industries sector, a sector where the future economic success is not guaranteed due to changing conditions, increasing compliance costs and workforce issues (such as the labour shortage).
6. The Council supports an approach to immigration which will enable greater migration to regional/rural New Zealand. However, it is important local communities are supported to ensure migrants are treated with manaakitanga (mutual care and respect²).
7. We are aware of many instances where the current immigration policy is impacting on the well-being of our migrants (who may have relatives stranded overseas) and our businesses (who are constrained by labour shortages). The labour shortage is disrupting productivity and hindering future growth of local businesses.

¹ Statistics New Zealand Population Estimates 30 June 2020

² NZ Productivity Commission (2021) Issues Paper: Immigration, productivity and wellbeing, available at: [Issues-paper_Immigration.pdf \(productivity.govt.nz\)](https://www.productivity.govt.nz/issues-paper-immigration)

8. Council notes and supports the inquiry into immigration policy and the submission provided by DairyNZ [An overview of the dairy sector](#).

A snapshot of Ashburton District

1. Our district is culturally and ethnically diverse. In 2018, 18.6% of our population were born overseas, with 3.7% born in the Phillipines ([Statistics New Zealand](#), 2018).
2. In 2020, our population grew 1.1% (compared with 2.1% for New Zealand as a whole) which was made up of 65.5% net migration and 34.5% natural increase.
3. Productivity growth has declined from 4.33% in 2019 to -0.61% in 2020.
4. In 2020, meat and meat product manufacturing contributed \$281.2m in export earnings (50% of total export earnings).
5. Ashburton District's economy is strongly reliant on the productivity of the primary sector. In 2020, Agriculture, Forestry, and Fishing accounted for 26.9% of the district's GDP, manufacturing (much of it related to primary production) accounted for 10.5%. The wealth generated flows through to other industries and employment in our community.
6. The Agriculture, Forestry and Fishing sector was the dominant industry in 2020 (23.6% of all jobs in the district were filled by this sector).
7. From 2010 to 2020, the Agriculture, Forestry and Fishing sector has been the largest single industry contributor to economic growth (at \$143m out of \$563m) and GDP growth (0.66%).
8. As at June 2021, 729 people (0.4%) are receiving jobseeker support in the district³. The number of people receiving job seeker support has risen by 33.8% in the past quarter, this is despite local businesses reporting that they have many open vacancies and are struggling to find staff.
9. Unemployment is around 3.2% for 2021 (compared with 2.7% in 2018 pre-pandemic).

General comments

10. Immigration plays, and will continue to play, a crucial role in promoting economic and cultural well-being of our district, most notably in the agricultural sector as the majority of employees in this sector are migrant workers.
11. Our low unemployment and underemployment rates signify the need for immigration policy which enables migration to Ashburton District.
12. Current immigration delays/freezes are impacting the productivity of businesses in our district and the well-being of migrants. We see this as a 'slow burn' where the true impacts of the labour shortage are yet to be fully realised. We predict the labour shortage will intensify and more businesses will be forced to close if the Government does not change the position on immigration.

³ Statistics New Zealand data, August 2021, [Benefit Fact Sheets - Ministry of Social Development \(msd.govt.nz\)](#)

13. There is a need to reform immigration policy to better support rural/regional New Zealand. A one-size fits all approach is not appropriate. We suggest:
- a. The Government determine a clear population policy for New Zealand which identifies the needs of both urban and regional/rural areas. This could include a model similar to that of Canada by working closely with local authorities to determine workforce needs, assessing infrastructure pressures through the Infrastructure Commission, and providing increased local support services for migrants when they arrive in New Zealand.
 - b. Clearing the backlog of applications currently in the system to enable migrant workers to stay and contribute to our communities, and to give migrants certainty over their future.
 - c. Providing incentives through immigration policy to settle in regional/rural areas.
 - d. If a points based system is the preferred policy approach when processing applications, more points should be awarded for migrating to regional/rural areas, for employment in the primary industries sector, and where it can be shown that the employment creates multiple jobs (e.g. a specialist role may create additional support roles).
 - e. Reducing visa costs and barriers for rural/regional locations.
 - f. Adopting a performance target to ensure a minimum percentage of migration goes to the regional/rural areas.
 - g. Enhancing general immigration programs for regional benefit to ensure manaakitanga. An example of this is the Welcoming Communities programme which has been rolled out to fifteen councils in New Zealand (including Ashburton District which was a pilot Council for the programme).
 - h. Publicly acknowledging that regional and rural connectivity must vastly improve for the agricultural sector to successfully transition the workforce. Limited connectivity impacts on well-being through enhancing feelings of isolation for those living rurally (as noted in the submission by Dairy NZ).

Consultation questions

14. This section provides responses to the specific consultation questions. We have not responded to every question.

The Treaty of Waitangi and Te Ao Māori

15. **Q1: In what ways should the Crown honour the Treaty of Waitangi in developing and applying immigration policy? What changes are needed to policy or implementation?**
- a. The approach to immigration should reflect that New Zealand is a country founded on a treaty partnership and thus the approach should embrace Te Ao Māori concepts.

16. Q9: Which concepts within Te Ao Māori, or Māori perspectives or values, are most applicable to immigration policy and why? What would or should including these concepts, perspectives or values mean for immigration policy?

- a. Manaakitanga is a value often used in relation to hosting responsibilities of mana whenua and of protecting natural resources. We see manaakitanga as an important value to represent our responsibility for hosting migrants, and their contribution to our communities – the relationship is reciprocal.

Immigration, productivity and wellbeing

17. Q2: Is the Commission's proposed framework a useful way of thinking about the immigration system for this inquiry? What changes would you make?

- a. We support the general approach of the Commission, however, we request specific recommendations are made to support regional immigration. We would also like to see industry specific strategies to address labour shortages.

18. Q3: What should the overall objectives for the immigration system be?

- a. We agree with the Commission's view that the primary objective should be focused on raising productivity to support well-being. There should be a specific focus on promoting higher productivity in regional/rural areas of New Zealand to support economic well-being in these areas. In turn, encouraging migration to the regions will relieve some of the pressure migrants place on urban areas (such as infrastructure pressure and demand for social services).

19. Q4: How should the Commission consider trade-offs between the different factors that contribute to wellbeing? Should there be some bottom-lines that cannot be traded off at all?

- a. Trade-offs are inevitable in any policy decision, however, regional/rural areas face different trade-offs to urban. An example of this in Ashburton District is pressure on infrastructure. The majority of migrant workers are employed in agricultural jobs which are likely to provide onsite living, and thus place minimal extra demand on housing or infrastructure assets. Yet the trade-off is that these migrants do require additional social support, which we see as a crucial bottom-line to ensure their well-being.

20. Q5: Through which channels has immigration contributed to New Zealand's productivity growth? What evidence is there of this impact?

- a. The contribution migrants make to our local workforce enables businesses to grow. Specific correlating evidence is difficult to provide although observing the decline in our productivity growth (from 4.33% in 2019 to -0.61% in 2020) pre and post COVID-19 could be used as indicator to show the positive impact migrants have on our local economy (note – there are clearly many other factors which have led to this decline in productivity).

21. Q6: Are there other channels for immigration to impact productivity growth that the Commission should consider?

- a. The discussion in the Issues Paper does not acknowledge that specialised migrants can improve productivity by creating more jobs. The presence of migrants in the labour market of Ashburton District allows businesses to expand and grow. Many migrants bring additional skills as they are often not able to transfer their specialist skills to the New Zealand workforce. This improves productivity of businesses but the extent is difficult to measure and we have come to this conclusion through discussion with some of our local businesses.
- b. Our local businesses often require technical experts – many of which cannot be found in New Zealand. A recent example we discussed with one local business is where a factory owner is looking to buy a new machine commonly used overseas but not in New Zealand. People with experience using this machine live overseas. If the business was able to recruit a migrant for this role, additional low skilled staff would be required to support the expert position. Therefore, if the role is filled by a migrant then migration is helping to increase productivity for the business, and grow the workforce/local economy.

22. Q7: Are there barriers to migrants fully contributing to New Zealand’s productivity growth?

- a. Underemployment is a major barrier to migrants’ contribution to productivity growth and also impacts on their well-being. There are many migrants in the district who are working in low skilled work yet are fully qualified high skilled workers in their home country. While there are clear skill translation issues, there is an opportunity for immigration policy to maximise the skills of migrants. There are obvious well-being issues if migrants are not fully recognised for their skills as this can lead to psychological stress.

23. Q8: Which factors matter most for assessing the impact of immigration on wellbeing? How can they best be measured?

- a. Migrants should have access to support services which allow them to integrate, be protected from exploitation, and not be treated purely in terms of economic productivity. Access to employment, business opportunities, community services, health, housing and education are all important factors for measuring migrants’ well-being.

Immigration policy design

24. Q13: Would there be benefit in requiring the Government to publicly announce its policy objectives for the immigration system? How often should the Government be required to make such a statement?

- a. Yes, announcing the policy objectives would ensure accountability. We note the current strategy (The New Zealand Migrant Settlement and Integration Strategy) was approved by Cabinet in 2014. We suggest an initial three year review period for any new policy.

25. Q12: How should New Zealand’s special relationship with Pacific Island nations be reflected in immigration policy?

- a. Pacific migrants contribute to communities in many ways beyond economic means. In July 2021, the Ministry for Pacific Peoples released a report [Pacific Economy Research Report on Unpaid Work and Volunteering in Aotearoa](#) which details the contribution Pacific people make

to unpaid and volunteer work. This contribution can affect their employment outcomes due to time commitments. An example of this work is the logistical support provided by Pacific peoples to other Pacific migrants arriving in New Zealand which can include visa support, organising housing and applying for social services. The non-monetary value of Pacific migrants should therefore be acknowledged through immigration policy and measures of success beyond economic productivity should be considered.

Migrants and settlement

26. Q10: What does the “successful settlement” of migrants mean to you, and what are the barriers to achieving it?

- a. The entire family must be ‘settled’ not just the individual. Often settlement is left to the employer and existing migrant communities – both of which have limited capability or capacity to support settlement. If not properly settled, there can be productivity and well-being concerns. Another issue is when one family member settles well, but other family members do not. This can cause disillusionment with settlement, family tension and effect employment outcomes.
- b. When considering refugee resettlement, Ministry of Business, Innovation and Employment (MBIE) put out contracts to agencies to orientate refugees based on the refugee resettlement strategy. Whilst there is a migrant settlement strategy there is no orientation programme for migrants and it falls to employers, or existing members of the migrant community – which also put a strain on them. Migrant settlement contracts could help local agencies take the lead in ensuring every migrant family is well orientated and that businesses and services are appropriate for migrants.

27. Q11: Do you think prospective migrants are given enough information to make long-term decisions and settle successfully? What other information could help, and how could their access to this information be improved?

- a. Other information that could help migrants settle successfully is looking at what their family goals are and how they might all achieve those goals when they get to New Zealand. Ensuring that all member of the family are settled into education, employment and able to achieve other important goals will help them make good long-term decisions.

Obligations on employers

28. Q14: Currently, most employers have an obligation to prioritise the New Zealand labour force before recruiting temporary migrants. Do you agree with this obligation? Why or why not?

- a. We do not agree with this requirement. When discussing this matter with our agricultural population the consensus is that often migrants are more likely to be interested in this type of work than New Zealanders. This is most prominent in the dairy sector which employs the majority of migrant workers, and particularly evident in Ashburton District where the unemployment rate remains low.
- b. The ability to obtain a temporary visa for work is mutually beneficial for migrants and agricultural (dairy and arable) employers as much of the work is seasonal. Farmers have had

difficulty this year employing staff for the calving season and many have had to offer longer term contracts to meet visa requirements.

- c. Acknowledging the temporary nature of some agricultural work through immigration policy, as horticulture is acknowledged, would support the industry to hire staff on a temporary basis as required.

Skills shortages

29. Q18: What is the best way to identify workforce or skills shortages?

- a. Working with local authorities and key stakeholders/interest groups who have industry specific knowledge (such as Dairy NZ and Federated Farmers).

Partners, parents and families of migrants

30. Q31: What are the barriers that partners of migrants face in finding work?

- a. With the majority of our migrants living rurally, driving is a major barrier which impacts not only on the ability to work but also causes feelings of isolation.
- b. Differences in cultural expectations – for example there may be a cultural expectation that the partner is solely responsible for childcare or housekeeping therefore will not seek employment.
- c. Lack of belonging and social inclusion – social isolation can have psychological social impacts which leads to poor employment outcomes.

31. Q33: Do immigration settings for family visas (eg, parents, dependent children) have a material impact on a migrant's decisions to come to and stay in New Zealand?

- a. Yes – migrants will be more likely to stay if their families reside with them and are supported. If living in fear of deportation they may choose to return to their home country.

Other ways for New Zealand to source skills and talent

32. Q34: What more can immigration policy do to attract specialist “high-impact” people? What other complementary policy changes might be needed?

- a. Measures to recognise transferable skills could be implemented (i.e. we are aware of many migrants working in agricultural positions which are highly skilled in professional positions but unable to work in those roles due to skill/qualification translation issues).

Population growth and migration volumes

33. Q40: Could or should the Government use immigration policy (eg, visa conditions to settle in specific places) to ease pressures in some regions? If so, what would be the best way?

- a. The Council supports policy which enables regional settlement. Immigration policy is currently directed at a national level and this fails to identify unique local level factors. Different regions and different industries face different pressures, and offer different working conditions. The

pressure faced by the agricultural industry due to a labour workforce shortage threatens productivity.

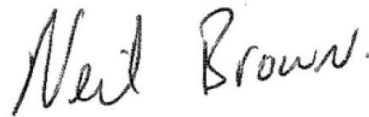
- b. In Australia and Canada immigration policies are tailored to specific regions or states. We suggest a similar approach is used in New Zealand which accounts for both place based and industry specific needs. The current emphasis on horticulture workers must be extended to include agriculture as well.

Ngā mihi



Hamish Riach

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Neil Brown

Mayor