Summary of Feedback – What's next for our water?

An overview of the key decision and options that were presented as part of the consultation.

Deliberations – 15th May 2025

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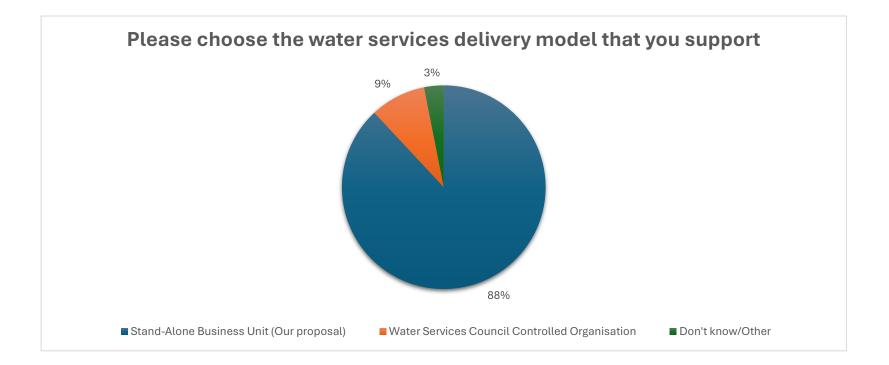
Feedback Overview

Please choose the water service delivery model that you support?

- **Option 1: Stand-Alone Business Unit** *(Our Proposal)* Ashburton District Council continues to deliver drinking water, wastewater, and stormwater services after making all necessary changes to meet new requirements.
- **Option 2:** Water Services Council Controlled Organisation Ashburton District Council establishes a new WSCCO which manages and delivers water services independently, with Council as shareholder.
- **Option 3:** Don't Know/Other.

Feedback Summary

Please choose the water service delivery model that you support	%	Count
Option 1 - Stand-Alone Business Unit (Our Proposal)	88	200
Option 2 – Water Services Council Controlled Organisation	9	20
Option 3 – Don't Know/Other	3	7
Skipped		7
Total	100.0	234



Comments Feedback Summary

This section provides an overall summary of the comments feedback.

Option 1: Stand-Alone Business Unit (SABU) – Our Proposal

88% of respondents supported this option. Below is the summary of arguments for supporting this option.

Here are the key recurring themes from the statements:

The overarching sentiment is a preference for maintaining the existing council-led approach to water service management while ensuring financial sustainability and community involvement.

- Strong Preference for Local Control Many want the Ashburton District Council (ADC) retaining full control over water services, believing that will ensure better transparency, accountability, and responsiveness.
- **Confidence in Council Management** Recognition that ADC has managed water services effectively in the past, with substantial investments in infrastructure, skilled staff, and responsiveness to issues.
- **Financial Prudence** Concerns about unnecessary spending, cost-effectiveness, affordability for ratepayers, and avoiding excessive costs associated with establishing an alternative model.
- **Uncertainty Toward New Models** Doubts about the reliability of external organisations and scepticism about government directives, including perception that new entities may add unnecessary bureaucracy.
- **Ratepayer Engagement** Desire for continued consultation with residents before major decisions are made and concerns about transparency in financial planning.
- **Concerns Toward Privatisation and External Entities** Many express distrust toward a WSCCO model, fearing a profit-driven approach, reduced community influence, and unnecessary governance layers.
- **Financial Concerns and Cost-Effectiveness** The Stand-Alone Business Unit (SABU) is widely supported as the more economic option, minimizing governance layers and less transitional cost. There is strong opposition to extra bureaucracy and higher costs associated with a Water Services Council Controlled Organisation (WSCCO).
- **Simplicity and Stability** Many prefer to "keep what works," avoiding unnecessary structural changes that may introduce inefficiencies and disruptions.

Option 2: Water Services Council Controlled Organisation (WSCCO)

9% of respondents supported this option. Below is the summary of arguments for supporting this option.

- **Governance & Expertise**: The belief that council governance lacks the necessary skills and expertise to effectively manage water services. A dedicated and independent board is seen as essential for long-term success.
- **Need for Change**: There is lack of satisfaction with the council's current approach to water governance, with arguments for transitioning to a Water Services Council-Controlled Organisation (WSCCO) or a similar independent model.
- Accountability & Transparency: The importance of measurable success, holding leadership accountable, and ensuring decisions are made transparently with expert oversight.
- Efficiency & Resource Management: Concerns about council inefficiencies, overstaffing, and the argument that external entities (such as ACL) have historically performed better.
- Water Quality & Environmental Issues: The need for proactive water management, including addressing contamination, extraction concerns, conservation orders, and responding effectively to freshwater challenges.
- **Government-Led Initiatives**: Support for initiatives like the LWDW to improve water governance and consultation processes.
- **Sustainability**: An underlying emphasis on securing a sustainable future for water services to ensure the best outcomes for residents and the environment.

Option 3: Don't Know/Other.

3% of respondents supported this option. Below is the summary of arguments for supporting this option.

- **Economic Concerns** There's concerns about financial instability, declining currency value, long-term economic projections, and the potential consequences of debt policies.
- **Rising Costs and Affordability** Concerns about increasing council rates, financial pressures on retirees, and affordability of essential services.
- Perceived over-reach of Water Services Authority Taumata Arowai
- **Public Health Considerations** Maintaining safe drinking water, wastewater management, and stormwater systems to prevent disease, citing past outbreaks as examples.
- Infrastructure Investment Supporting ongoing maintenance and renewal of water services to ensure long-term sustainability, particularly for growing populations.
- Environmental and Climate Resilience Considering climate change impacts and intergenerational fairness when planning water infrastructure.
- **Collaboration and Governance** Encouraging coordination with regional councils and exploring efficient management structures.
- **Cultural Inclusion** Recommending engagement with mana whenua to integrate cultural values and environmental sustainability into water services.

Full Comments by Submitter

Option 1 – Stand-Alone Business Unit (SABU)

1.1 Option 1 – feedback in support of SABU

Submitter name	Summary	Staff comments
Christine Widdowson	• I want our council, who we have a part in electing, to be able to work to protect and deliver our water.	Noted.
	• I don't see any point in establishing a new WSCCO, when we have our own competent council workers to do the job.	
	• Also it seems more cost effective to choose the Stand-Alone Business Unit.	
Philip Quaid	Option two just creates yet another layer of cost to the governments control over what are local assets and obligations of Council	
B Andrews	• Working with others always a mission. Do it alone.	
Gavin Young	• ADC has spent considerable money on the wastewater system to bring it up to a very high standard. This should be managed by the ADC, not a committee or board of directors, who will be likely made-up of accountants etc. who are just money men and will make services much more expensive in the future.	Irrespective of the service delivery model, water services will be subject to economic regulation (investment & charging) overseen by the Commerce Commission.
Fay Cuttriss	 Council represents the interests of the ratepayers. A WSCCO would represent the interests of it's shareholders - more profit driven. 	WSCCO will be accountable to the Council as its shareholder.

Submitter name	Summary	Staff comments
Andrew Yao	 The highest degree of local control and community accountability Builds on existing systems and stakeholder relationships Maintains integration with broader Council services Strong alignment with community preference 	Noted
Richard Swain	 Retain control by the council by implementing a SABU. There is too much cost and lack of true control by establishing a WSCCO. Too many extra executives who will want to do things their way that we as ratepayers do not vote on or have any control over. Keep control and transparency within the council where we can have a say. 	
Pete King	• Need to keep it in council control as opposed to setting up a separate organisation as being a retiree we can't afford prices to get out of control and the council does a good job as it is now.	
Richard Owen	 Current assets and infrastructure in good condition and ADC have proven they can manage water well. 	
Gavin Hunt	Local ControlNo corporation to hide behind	
Emily Adams	• "but ruled out a single-CCO model involving a shared arrangement with EA Networks in March 2025, instead emphasising the need to retain strong control and oversight" this, alongside financial projections, and the fact that an essentially private organization would set the water rates if we proceed with WSCCO, has convinced me we must stay with existing SABU.	Under LWDW, the Government has committed to keeping water services in public ownership prohibiting councils and water organisations from privatising them. Key protections include:

Submitter name	Summary	Staff comments
	• Privatisation has no place for essential services. I am satisfied with council approach to date.	• Water assets cannot be used as security, sold, or transferred except to another water provider for specific purposes.
		• Only local authorities or consumer trust trustees can own water organisation shares, which cannot be sold or transferred for profit.
		• Franchise or concession agreements with third parties are not allowed.
		These measures aim to safeguard public ownership and control of water services.
Robin Burton	• I wish to see the Council retain total control of water services as elected representatives of the community.	Noted
	• It would be against community interest to have another level of expensive bureaucracy, which if human nature runs true to form, may have a discreet and slightly different agenda to that proposed by or to the ADC.	
Jennifer Danielson	Keep it local its working so far	Noted
Jennie & Ray Swan	• Our thinking is 'Council know what they are doing' and 'Stand Alone Business Unit' is best.	
	Re General matters –	
	• we have great confidence in terms of our council staff.	
	We are well served overall.	
	• One concern is vision at stop signs due to e.g. trees/vehicles parked too close to corners in our town.	

Submitter name	Summary	Staff comments
	• Please contact if further comment required. Keep up fine work and service.	
KW & RF Stirling	 Prefer one account for all local services. Council appeared to have managed water services satisfactorily to date. SABU likely to be more economic with overhead cost, for example, administration, management. 	Noted
Anton Daish	I support the SABU option.	
B. W. Bone	• We must support the local council who work with local ratepayers to ensure costs and residence in the area are the centre of their business management plan/works.	
John Hoogweg	 Happy with Council operating current system. Would prefer to keep it in house as Council retains control of it. Slightly cheaper. Council is keeping system maintained. 	
M J Egleton	Local accountability.	
Bruce Horton	 Good for Ashburton & its residents to have local control & accountability. 	
Kim Bishop & Murray Green	 Because we have already been upgrading infrastructure and as ratepayers have paid for it. Always been locally monitored and locally upkeeped. 	For any water service requests, if not an inhouse model, these would be managed by the new service provider. How this would

Submitter name	Summary	Staff comments
	• We do not need to have carryover debt from other areas where they have not invested in upkeep of their infrastructure.	occur would be determined when the provider was established.
	• No need to mess with what works, has always worked and will always work as long as we keep it in house and Ashburton looks after Ashburton.	
	• No need for outside input. We have had this. We have got this. We know our water.	
	• PS. When have ring in regard to leaks found whilst walking dog they have been fixed promptly. If not in house will this be the case?	
Sheree Mackenzie	• I like the proposed option because there is more accountability.	
Mackenzie	• I wanted to comment on drinking water in Ashburton, the water here seems very hard, we have problems with scale build on appliances and in pipes causing damage, a filtration system that reduces hardness would be nice.	The Ashburton water supply meets the DWS as they relate to the aesthetic parameters associated with water hardness.
	• I also wanted to comment on the stormwater in Tinwald. It would be great if all the open drains could be converted to underground with grass berms added along paths to reduce run off (We get a lot of surface flooding anytime it rains)	Noted. This may be best addressed as a submission to a future annual or long term plan.
	• I wouldn't mind increases for water rates if these issues were addressed.	
Timothy J Sheehan	• Our council has done an excellent job of keeping the community safe and delivering clean water.	Noted
Murray Dalton	• Important the place we pay our rates to is still in full control.	
	• If not happy, we can vote them out next term.	
	Low running cost in SABU option.	

Submitter name	Summary	Staff comments
Mike Kely	• This proposal has worked very well in the past and under new requirements should be stronger in the future.	
Roy R. Keeling	I prefer that our Council makes the decision.	
John Hartnett	To keep control of our local services.	
lan & Karin Hooker	• We believe we would be better served with our water supply under local control under the standalone business unit.	
A.M. Perkins	 As long as infrastructure stays in local hands is directly controllable by locals for locals. That local input is available to decide important issues, public to be consulted on any changes and additions of chemicals i.e. fluoride to the water and be rejected if public votes against its introduction. 	 The decision to add fluoride to drinking water can either be made voluntarily by local authorities or at the direction of the Director-General of Health under the Health Act. If an order is received, a local authority is required to take all practicable steps to meet this requirement. ADC has not yet received a direction, but this does not rule out it receiving one in future. More information can be found here - Implementation of Community Water Fluoridation. The only drinking water in our district that is fluoridated is the Methven supply, and the Council has no current plans to add fluoride to other supplies, unless directed to do so. The type of water services delivery model we use in the future is unlikely to affect whether drinking water is fluoridated or not, as under any option, the water services provider would need to comply

Submitter name	Summary	Staff comments
		with a directive from the Director-General of Health.
David & Marion Oakley	• A Water Services Council controlled organisation could be expected to make decisions based only on a business case. This could adversely affect residents on a low to medium income as they would not be eligible for rates relief.	Noted.
Rhys & Kaye	• Stay with the tried & true - works well so far. Thank you.	
Evan Waters	Seems the best option.	
lan Bead	Best modelCheapest	
Jos Everest	 Council should retain control of all water activities in its district and be the ones making decisions on spending their ratepayer's money. I think attention needs to be paid to the difference between infrastructure costs and volume charges and ensuring that money is going back to ADC and being ring fenced for water. My concern is there is a separate volume charge being touted either through ECan or Central Government directive - where will this money go and what will it be used for? ADC council needs to maintain its integrity and transparency on handling ratepayers money. 	 Under the new economic regulation overseen by Commerce Commission financial ringfencing will be enforced meaning water revenue is spent on water services. Water meters are installed on all connections (except Ashburton, Rakaia, and Montalto) to assist with leak detection, demand management, and water use education. There are no current plans to use water meters for charging. This is the current Council policy. The LWDW legislation does not require
		 The LWDW tegistration does not require council's through an inhouse model to use water meters for charging purposes. If a WSCCO was established, it would be

Submitter name	Summary	Staff comments
		required to transition to a water charging regime within five years, which could involve either a water charge or volumetric charging.
D I Hanham	Local control	Noted
	Local accountability	
	Local responsibility	
	• Current local knowledge and understanding of requirements, and potential problems.	
	Action required to address these.	
Thomas and Helen Eccleston	• We support this choice as the council are in total control, without interference or consultation with anyone else.	
Owen Sykes	Keep it local	
McIntosh	• I trust the council to know what is best for our town & country.	
A Thompson	• The water situation needs to be delivered from our council so we all have say.	
W Thompson	Council needs to be in control of decision making.	Noted
Stuart & Jillian	We retain ownership of water supply.	
Mitchell	Debt is under control.	
	• Council has done a good job to date.	
Beverley Blair	• I want our water services to be serviced by our local council.	

Submitter name	Summary	Staff comments
	• They know our area and where and when water needs are and it is our place!!!	
Deanne Smeaton	• Living in Auckland for many years I don't believe CCOs give as much accountability to the public and also adds cost layers.	
Andy Joseph McManus	• The cost to establish and governance cost associated with another ACL doesn't seem feasible.	
	• Also, if ACL where a private company they would be more profitable, leaner and more efficient as complacency has set in by allowing a CEO to site at the helm for so long.	
	• For that reason, I feel the SABU route needs to be explored.	
	• Also, the SABU option allows for greater borrowing levels, which will allow works to be completed at scale, which should be cheaper.	
Bevan W Clark	• I prefer that the Council retains close control of water services.	
	 There is a risk that an alternative structure may result in decisions being made that are not necessarily in the best interests of the ratepayers. 	
	• Although clearly a different model, I would not want to see a situation similar to what happened when the Electricity sector was split up - this can lead to a focus on profit over the needs of the customers.	
Andrew Wells	• This will keep control and accountability with the council and the ratepayers.	Noted
Keith Cox	We want clean water.	
	Build some dams.	

Submitter name	Summary	Staff comment
	• Do not wish to drink water out of someone's toilet.	
Edgar W.	Trained staff are already managing this.	
Smith	Trained staff are available in council officers	
	Why interfere with something that is going well	
	• We are fortunate to have such good staff.	
Jenny E	Keeps accountability fully in Council hands.	
Sanders	• No extra setup costs and cheaper overall in your projections. Why change when council is doing it now.	
Peter Murray	• SABU is the closest to the status quo and the status quo is working well already.	
Barrie Hill	• You know how it works. Will be better in the long run.	
Gav Hickey	• The council appears to be looking after our needs, more of the same with council control seems the way to go.	
Contributor 2621	Council will have better control and transparency for ratepayer	
2021	on where money is spent and wasted which we don't currently get from ACL that has become increasingly complacent over his 18 year tenure.	
	• This is something to look at going forward and having set terms	
	for CEOs to gauge change and more innovation. ACL may have contributed financially over the years, but that contribution could	
	have been greater through better management, leadership and	
	attention to market trends.	

Submitter name	Summary	Staff comments
Contributor 2616	 Council have always done water management and hopefully it will be affordable for people. Who is WSCCO? Never heard of them? Why do you abbreviate? We do not need fluoride in our water. 	 WSCCO stands for Water Services Council Controlled Organisation. The terms refers to an independent water focused Council Controlled Organisation. The decision to add fluoride to drinking water can either be made voluntarily by local authorities or at the direction of the Director-General of Health under the Health Act. If an order is received, a local authority is required to take all practicable steps to meet this requirement. ADC has not yet received a direction, but this does not rule out it receiving one in future. More information can be found here - Implementation of Community Water Fluoridation. The only drinking water in our district that is fluoridated is the Methven supply, and the Council has no current plans to add fluoride to other supplies, unless directed to do so. The type of water services delivery model we use in the future is unlikely to affect whether drinking water is fluoridated or not, as under any option, the water services provider would need to comply with a directive from the Director-General of Health.
Jason Smith	• The current system provides a good service so would prefer to keep to a similar system.	Noted
Carolyn Cumming	Less costly, lower financial risk and stronger resident input.	

Submitter name	Summary	Staff comments
Dave Turner	• Too much uncertainty over future pricing increases.	
Sue Connolly	• I would like to keep this in council. If delivered by outside organisation even though controlled by council less control over water rates. Council currently doing great job with water services.	
Janice Nicholls	• I prefer SABU because it gives certainty of pricing and supply. WSCCO has the potential to become a money spinner at the expense of Ashburton ratepayers and with that comes the risk of ever-increasing water rates, at least in the short to medium term.	Irrespective of service delivery model, water services will be subject to economic regulation (investment & pricing) overseen by the Commerce Commission.
	• This is not a new strategy, it's become prevalent in many places overseas, and to my knowledge, it has generally been to the advantage of the few at the expense of the many.	
P Hendry	• Cost	Noted
Brian Walters	 Flat structure, keep local control, no need for new board wish must be cost saving for rate payers. 	See response on page 8&9
	• Second option could potentially lead to easier privatisation in the future.	
	• Talking about water, what's cause a drop off in our water pressure. I'm considered a senior citizen over 70yrs of age. Frankly at times I believe my stream has better pressure than the local water supply.	
Rod Jenner	Think council should have full control of water and waste services.	Noted
Shane Beauchamp	I think this would cost less.	

Submitter name	Summary	Staff comments
Audrey Leath	• We require the best water we can have, and the Commerce Commission will be there to make sure that Council isn't charging too much!	
Les. Vincent	• Seems to me to be the best option.	
David T Watson	• I see this as the least problematic option and the least expensive. Also I feel inclined to follow the Council's advice.	
Paul Dixey	Use of existing staff a bonus under standalone business unit.We don't need another bureaucracy.	
R.H. Rodgers	• Keep it in council control. You owes to the system. Others don't.	
Judith Mary Roulston	Makes sense.	Noted
В. Роре	• ADC up to this point has done an ok job and I want a plan that has publicly voted representatives.	
Marshall	• I do not see the need to start up a whole separate independent unit - there will be a duplicate of service/administration that council can provide.	
	• Extra costs.	
	• Council are doing an excellent job presently.	
J & E Morrison	• We have spent a lot of money on infrastructure over the years so it would be better to have the council controlling the water.	
Rosalie Macpherson	• I believe ADC has the ability to run a successful SABU. Our district rates should be spent in our district.	

Submitter name	Summary	Staff comments
Contributor 2779	 My concern is everyone is clipping the ticket and increasing the cost of everything, for pensioners it's becoming an epidemic of greed. Even the rates rebate is unobtainable. 	
	• I am not an expert on very much these days so one goes for what looks like the best option.	
	• Just don't get greedy that's all we ask.	
John & Carol	Don't change for sake of change.	
Williams	• Not all change is good.	
	Why change if working/going well.	
	• Do not need extra finance to get new system up and running.	
Contributor 2776	• It is vital the council keeps control of the water services. We do not need a separate model. It would be far more expensive.	Noted
	• The council has done a good job with water services.	
	• My family have lived in Ashburton since 1908.	
V. J. Snook	• I think this one is the best plan.	
Maree	• Think it should be under the council.	
Karen Pollard	• Prefer waters to remain in hands of Ashburton District Council.	
Robert Arnel	Future costs and setup cost of WSCCO.	
Payne	I choose this option because the council is answerable to the community.	

Submitter name	Summary	Staff comments
Laura Kennedy	SABU sounds the best option to me.	
John & Penny Rowe	• We would rather Ashburton Council look after our water. Other organisations won't get the job done and our money should stay in Ashburton District.	
Gavin Begg	 Better accountability More economic I don't believe we need any additional organisations when this can be looked after by existing system. 	
Adrian Ellis	• I trust in the opinion of those that have the experience of managing our infrastructure to this point and have had the foresight to consider our requirements in the future knowing that this change is regulation was on the horizon.	Noted
Alexander Armstrong	Maintains regional control over the assets.	
Taylor Foster	• Our communities are becoming reliant on too many different branches. This is causing a less direct accountability and communication. Delaying time to amend challenges and problems with an essential service.	
Glenys Anne Stace	 This is why we pay rates! It is the primary reason why a local Council exists; Water and road infrastructure. I do not want it seen as becoming a 'for profit' organisation in any way, but user pays agreements with farmers and industry may be necessary. 	

Submitter name	Summary	Staff comments
	• Electricity is a prime example of why we don't want any kind of privatisation.	
Amanda Dawn Watson	• Keep it as simple as possible.	
Ronald and Josina de Vos van Steenwijk	• This way it's fully controlled direct by the council, instead having it contracted out to an independent water service.	
Jill Watson	• I think it's important that residents still have contact with water service provision and have a say through their elected members.	Noted
Mick Hydes	• Don't want to see water rates rise any more than they have to.	
Andrew and Maria Allen	• A separate entity from the council could generate division and skewed projection costs over the next decade/s.	
	• Keeping the essential services within the ratepayer sphere of influence seems a better option.	
Janet Gardiner	• Other option has not worked in other places, would be a disaster for RATEPAYERS to lose control.	
R L Gardiner	Keep local control.	
Doug Taggart	Best option in my opinion	
David Matthews	• Based on current experience, the Council has demonstrated its ability to deliver on its water requirements so why would you risk this by changing to a more independent model.	
Dean Smith	• Keeping the services within the existing Council should keep the costs down.	

Submitter name	Summary	Staff comments
	• A separate entity has to have separate staff, which costs more.	
	• Every organisation in central and local government should be trying to minimise costs and extra expenditure wherever possible.	
	• You already have Council staff doing this work, so nothing should really change.	
Ruth Clucas	Council needs to hold control.	Noted
Karl Rolling- Sun	Locally controlled.	
John Wards	• Under local control and avoiding another layer of cost. Council preference after the study of alternatives.	
Judy Chisholm	• To keep local services under local control.	
Ed Eason	• As ratepayers we must keep local control of what we have all paid for and owned. I don't trust an independent model in this water issue.	
Chris Bell	• It's in the best interests of the ratepayers to minimise council expenditure and also the ratepayer has a more direct influence on how the water is managed in a Stand-Alone Business Unit.	
Sandra	• I prefer it that Council continue to manage the water services in a prudent fiscal fashion for the benefit of ratepayers.	Re fluoride, please see officer comments on page 13
	• I will take this opportunity to mention that I hope Council NEVER adds fluoride to the drinking water.	

Submitter name	Summary	Staff comments
Sophie Beugnot	• I fully support your decision of opting for a Stand Alone Business unit.	Noted
	• Water is a vital resource that needs to stay in the hands of our community.	
	• For so many families life is already a struggle financially, sharing the cost through our taxes I feel is an important part of being a supportive community.	
	• I think Ashburton District Council have done a fantastic job looking after the delivery and maintenance of our water system and I fully trust they will do a great job going forward.	
Lynn Bellew	• Ashburton's concerns should stay within the Ashburton Community. We do not want outsiders taking our money for our facilities. Of which will happen in due time, if we let them take over.	
David Folley	• Keep it in house to better control outcomes required for the community & district, also better for ratepayers as council control costs going forward.	
Murray	 I only support this option because it retains most of the control locally. The downside is that with a SAB it will adds another layer of costs in the form of payment to outside directors etc. I absolutely do not support adding fluoride to our water!!! 	A SABU will not involve an appointed board of directors. If agreed to, Council may choose to include expertise to supplement the existing governance. Re fluoride, please see officer comments on page 13
Sofia Marilla	• Council won't have all the control when it comes to repairs and much needed upgrades in the network.	Noted
	• As a stand- alone business, whoever is in charge will be able to make the call on whether the job needs to be done more for the	

Submitter name	Summary	Staff comments
	interest of the client rather than the amount of votes one gets during election. They will be able to weigh in the necessary risks to spend a big amount for repairs now instead of a quick fix that will end up costing heaps more down the line.	
Roger Scott	Happy to go with Council recommendation.	
Lal Mulligan	• I want people who understand our district to solve our water issues. Not 'experts' brought in that have grandiose ideas for our important infrastructure.	Water meters are installed on all connections (except Ashburton, Rakaia, and Montalto) to assist with leak detection, demand management, and water use education.
	• Our District that requires potable water is growing – XX - all the new subdivisions underway. All should be reticulated and have water meters.	There are no plans to use them for charging. This is the current Council policy.
	• I believe ALL residential areas should have a reticulated water supply. That includes NE Ashburton. We cannot wait any longer. You have seen my water test results!!! They are dire.	Water extensions to the NE of Ashburton will be advanced progressively and subject to
	• Please put meters on all households soon as water is a precious resource not to be wasted.	landowner support. The first area includes the submitter's property and it is anticipated they will receive the information within the
	• Good luck. Lal Mulligan PS Great news for Keenans Rd. residents in today's Guardian.	next few weeks.
Kelvin Holmes (Chairperson – Methven Community Board)	• Methven Community Board supports the favoured option.	Noted
Richard Sampson	• Better value for money and control with smaller set up costs per say.	

Submitter name	Summary	Staff comments
Keith Townshend	Current system works perfectly well. No need to change.	
John Hunt	 From past performance of both government and other national authorities I am not convinced that they can be trusted on the best work in our interest. If good local council (like present) will best serve our needs and at less expense. 	
Brian & Doreen Wilson	 I believe that the community needs to have control over our main basic requirements. I also believe that so far our water requirements have been up to date with local control, so why change it. It is up to the Ashburton residence make sure our council do this. If ain't broke why change it. 	
John Skevington & Joanne Ruane	• ADC has a proven record of water service. Infrastructure is modern so best that SABU is adopted to keep control in-house.	
Wim Melchers	 If no. 1 is the one your recommendation, who am I to go against this proposal. Barking dogs - current law too fluffy. 	
Anne Wilding	 Council proven past performance. More economic over long term Already in place & operational. 	

Submitter name	Summary	Staff comments
	• Stormwater : Clearance of stormwater needs modernising all those huge gutters in the roads! my soakaway is 35 years old and must be full as it overflows up the pipe.	Noted. On property stormwater systems such as "soakaways" are the responsibility of the landowner.
Contributor 2866	• We need to keep our water in Ashburton hands as the ratepayers have paid for what we have which is a real good water system.	Noted.
Kevin Taylor	Mainly due to accountability. Can I comment on a parallel issue.	Council is currently working through the Stockwater Exit Transition Plan. Details of this work can be found here - Stockwater Exit
	• I see via the Courier that Council provides water to 70% of the population here. That means 30% get it other ways.	<u>Transition Plan</u> . The Local Water Done Well reform does not affect this process.
	• Where does that leave those outside the Council?	Council is not responsible for privately owned or provided supplies.
	• With the proposal to close water races, many are going to be left with no water for anything. Where do the new government requirement leave the council regarding them. A total new infrastructure is needed. If races are closed. So do the figures given account for that. who pays the bill.	
	Water Provision:	
	• Is whatever being in place part of the part of the Council oversight?	
	• New reticulation to replace races here will probably cost half a million, a major thing for us and we won't be alone with that.	
	• What happens to the consents used for the water races. They need to be still used for the new system and given to other uses.	

Submitter name	Summary	Staff comments
	• I note that the consultation process underway seems to be stalled with issues even with the first intake looked at still not answered.	
	• I hope we don't end up with no water or something that does not work or is not affordable as Council seems to have made its closure decision without a viable replacement already thought through.	
	• Water provision to residents is Council's responsibility. That central government needing to pass new laws telling councils that is a sad day for all NZ.	
Edward J	Responsibility rests with one council employee – CEO	Noted
Wood	• Council repeatedly tells ratepayers that they are managing water well and planning to comply with all government regulations.	
	• Council is already employing staff with experience + knowledge. Why lose it?	
	• WSCCO is a misleading title - the Council's control is one step weaker than with SABU.	
Richard Scott	• Don't decide to fix what is not broken. Always successful approach.	
	• Don't want to restrict council borrowing because of low income.	
	• CCO - doubling administration mechanisations is inefficient.	
	• Directors always expect exorbitant compensation, usually without any responsibility for failing overall.	
	• No direct control over the quality of contractors employed & carry out the major service works.	

Submitter name	Summary	Staff comments
	NZ had once, an electrical system that was recognized as great model. It was sold off, now a shambles.	
	• Ratepayers can complain directly to Mayor when services are not being done correctly. Much harder with CCO not public servant!	
Mike & Sue Conaghan	• Ratepayers through Council have a say in how things should be run and services delivered.	Noted
	Have a separate organisation would be more expensive and would be more inefficient.	
Jon Everist	• I agree with your proposal. However, I understand one reason the nation has reached this unenviable situation, where the government is forced to instruct us to take the actions necessary so clean and safe drinking water flows from council supplied taps, is because elected councillors have rather preferred to delay required capital expenditure in favour of keeping rates low, so deferring required maintenance of infrastructure.	Correct. Under the new economic regulation overseen by Commerce Commission financial ringfencing will be enforced meaning water services revenue is only spent on water services.
	• So if we do adopt your proposed solution, the monies must be ring fenced and not to be siphoned off to fund other unrelated projects?	
Nigel Hosking	 Local accountability for safe drinking water. Revenue spent on water services only. Water quality across the Ashburton District needs to be key focus of SABU. Nitrates need to be below levels set by water services authority. 	Noted
Peter Vincent	All water services must be retained by the council.Charges for excess water usages.	

Submitter name	Summary	Staff comments
	All new homes should save rainwater for garden usage.	
	 Lots of home have lots of people live in use more water than most. 	
	I live in an ecofriendly St.	
Contributor 2857	• I support the stand alone business unit, as we as ratepayers will have the say on the personnel who will administer.	
Bob & Sandra Holdom	• Council in our opinion is doing an excellent job for all our services.	
Helen Sankey	• If this be council best proposal. I will agree to it.	
Katie Collins	Lower costs.	
Megan Allott	Prefer council control over our water systems.	
Harley Gundry	• It is more beneficial to public that water management is continued by the council staff, administration as it is now.	
	• They know what they are dealing with already. Plus, there should be minimal extra cost. To employ another board & administration group would be financially wasteful.	
Peter G Wilson	• Keep it in Ashburton District Council control. Keep costs down.	
Contributor 2850	• Prefer to stick with what works well, as well as meeting all new requirements. No two areas are the same so all needs would be different.	
	• One standard plan will never work in all areas.	

Submitter name	Summary	Staff comments
Richard Durie	• SABU protects council's investment in water services keeping it inhouse.	Noted
Dorothy Morris	 If its working - leave it as is. Hope you are thinking of all extra houses that are being built in our district. 	Growth is required to be considered as part of Local Water Done Well and any Council future planning.
Robert William & Jacqueline Mary Girvan	Retaining local control directly.	
Contributor 2842	• I support this option as I feel the council do a good job with water overall. Anything that relates to government or Ecan is too unreliable at the moment and a new entity set up will probably be unreliable.	Noted
Roger Lake	 Stay with the status quo. The council doing a good job regards our water supplies and service. 	
Sheryl Gower	 I am no expert. I trust you've considered everything & made a good decision. It also seems the least disruptive to the status quo. 	
Phillip Rodgers	As per your proposals.	
Maree O' Reilly	• Probably makes sense to keep our water in local hands.	

Submitter name	Summary	Staff comments
Peter & Judith Poulsen	• We believe this is the right way.	Noted
lan Loftus	 Maintains the highest level of direct control and accountability with council. Ensures financial sustainability. 	
	• Allows ratepayers and residents to stay engaged with the delivery of water services.	
Kelly MacDonald	Better to have local control.	
Grahame Kelly	• I am a pensioner.	
	The option we have selected cost less.	
	• Keeping water delivery in local ADC administration seems the best option to us.	
D. RJ. Prendergast	 It is the best option of the two. Both do not explain the high cost in years 27 to 29. 	Council commissioned financial modelling for both service delivery models which considered factors like required investment, improving levels of service, meeting additional demand, and depreciation.
		The cost under both models is a projection of water services charges on an annual basis over a 30-year span.
Barry Vessey	Keep our assets local.	Noted
	Avoid empire building.	

Submitter name	Summary	Staff comments
Diane Rawlinson	• I prefer this option due to the depth of local and governance knowledge within ADC.	
	• However, I do see a CCO as a potential option (possibly at a greater cost) if the Stand Alone business Unit fails to establish itself as an effective, capable unit.	
Karen Miller	Better to have Council experience on board.	
Simon Nikoloff	• Tighter control and better interface to council, i.e. less friction.	
S J Scott	• I have concern about the set up costs of the other water service delivery choice and also there will be less ratepayer input available.	
	• We need to have good quality water at the best possible price.	
	• I am very concerned though about the affordability for many ratepayers with the projected increases of water delivery and services. The suggestion of possible water delivery charges concerns me. Council needs to prioritise other expenses; good quality water is important.	
Annand	• The council has spent a lot on upgrading infrastructure in the district and needs to maintain control of it. It will also give the council more control over to keep this as a local enterprise financial side.	Regarding your question on the difference in charges between the consultation document and the online presentation, the consultation document mentions what an average Ashburton residential ratepayer is paying for
	A few comments re the water reforms I realise water reform is now a legal requirement.	water services for the year 2024/2025. However, the online presentation used for community meetings refers to our proposed charge for coming year 2025/2026, which was the most up to date information but not available at the time of preparing the
	• In the councils brochure on or about the second page in there is a statement regarding consultation with ratepayers before major work is carried out.	

Submitter name	Summary	Staff comments
	• We live in Mt Somers and don't remember any public meeting or consultation re the new treatment plant up here, the first thing we knew was when the machinery moved in. It is too late now but it seems to me to be a huge overkill for the number of connections, and I think it opened somewhere in the vicinity of 25% over budget. Each connection could have been supplied with a Rolls Royce system for a fraction of the cost! I have said before that it seems ridiculous to me to have to pay for drinking quality water to bathe in, wash clothes and dishes in.	consultation document. Therefore, the difference in price.
	• Under the fresh water heading in the brochure, the price was \$720.00 whereas in the online presentation the price was \$745.00. I am semi retired and finding the rates an ever- increasing burden! I was looking forward to retiring completely but that is rapidly becoming a dream that is never going to be a reality!	
	• On the council's website I see in places it states that "we have lots more planned", do councillors sit around the table and think "what can we spend money on next." The council needs to think of everybody when setting rates and stick to the necessities not the "nice to haves".	
	• I hope that our part of the second bridge is not going to have a cost overrun like most of the recent projects i.e. the new admin building, and somebody oversees the project with regard to the time taken to do the job as the Mt Somers plant seemed to take an inordinate amount of time to complete.	
Keith Holmes	• To keep this as a local enterprise.	Noted
Ursula Kitchen	Affordability, Integrated Services.	

Submitter name	Summary	Staff comments
Onesi Ngahe	• I trust proposal has already assess the situation and the outcome in the next 25years.	
Jacqui & Murray Bonnington	 Council controlled with professional leadership & restructure with capable people is the best model for Ashburton District. Need a business model focused on our community's needs. Ashburton is fortunate to have had in the past & now a forward thinking council, Governance & Management, to deliver drinking water, wastewater & stormwater services. They have kept up to date with resources resulting in our water services planned for the present & future. Therefore, the Stand-Alone Business Unit is the water service delivery we support. 	
Dafydd Rhys Roberts	 ADC currently manages the districts water services well particularly when compared to other parts of the country. Establishing another organisation within Council will surely only come at an additional expense. 	
Janice Sewell	They will do the upkeep.	
Sue Stratford	This is by far the best option for Ashburton.	
Brian Geoffrey Collins	• This appears to be the more cost effective proposal and keeps the current systems, structures and services in place under Council control.	Noted
Bruce Rolston	Possibly the best option.	

Submitter name	Summary	Staff comments
Marilyn Ellis	• It is always better to be in control locally than trying to work with outside entities.	
Bruce and Helen Mitchell	 We are very concerned about council spending on water which increases rates considerably. Is the council following government instructions blindly, or does it think there is a genuine need for the changes coming? We are happy with the present delivery of water and think that the council should continue with it. The council is answerable to its ratepayers, not the government. 	Local Water Done Well is a government reform programme which Council is required to implement.
Mark Morrow	I support a stand-alone Business unit because I want total control by the council.	
Stuart Wilson	• I fully support the Stand-Alone Business Unit. It is important elected Councillors are directly involved in major decisions of financial spending, and the area where major development is undertaken.	
	• Infrastructure that has been built in the past for the three waters, has meant the Ashburton District Council will be able to comply with the new Government legislation by continuing to implement the strategy already outlined in the Long-Term Plan.	
	• However, the Stand-Alone Business Unit must be financially independent of other Council finances. It must be a truly user pays Business Unit, no cross subsidisation from other ratepayers in the district.	
	• It will be inevitable water meters will be needed sooner than later, so those who use more water pay accordingly.	
	• Another low nitrate well is needed on the south side of the Ashburton River, the present well in the Tinwald reserve is	Planning for improving the security of supply for Tinwald and Lake Hood is well in hand.

Submitter name	Summary	Staff comments
	 marginally acceptable for nitrate levels for potable water. With the increased demand in the future from Tinwald and Lake Hood, it is foolhardy to rely on supply from pipes across the river. A Water Services Council Controlled Organisation as the council report outlined, would cost ratepayers considerably more than the Stand-Alone Business Unit. 	This includes planning for a potential upgrade or replacement of the existing Tinwald bore and an additional pipeline across to Tinwald as part of the second urban bridge project.
	• Having a completely separate group of Directors, an expensive CEO, all the infrastructure such as administration staff, separate vehicles, and obliged to make sure the end of year report finished in credit.	
	• With a CCO Organisation taking a large part of present administration costs away from council, it would make recouping overheads in the council building difficult.	
	• Really congratulations Councillors, I support your first proposal of a Stand-Alone Business Unit.	
Leanne Gichard	• Firstly we, as ratepayers, have paid for years for these assets and I feel that the ADC has managed/renewed these resources well, especially compared to many other areas of NZ, where reinvestment has been sadly lacking.	Noted
	• I would not be comfortable with handing over the assets which the past councils have adequately run to others or be under the control of outsiders.	
	• I have also read the brochure that the ADC put out, and it stacks up economically to be a stand-alone business unit. We need to be autonomous and make decisions for our community, not be dictated to by those outside of our community or region.	

Submitter name	Summary	Staff comments
	• If it isn't broke, don't fix it! (An old saying) I feel that the ADC have the skills and vision to continue to invest in adequate water reticulation etc.	
Chris Fowles	 The staff structure is already in place and has the necessary experience to deliver. Consideration should be given to long term reductions in wastage of treated water for non-potable use e.g. garden 	
	 irrigation/washwater etc. Appropriate charging for trade waste disposal may warrant review e.g. volumetric and qualitative monitoring of wastewater parameters reflecting the ability of the infrastructure to treat these wastes. 	
Robert Price	 I don't like the idea of a separate organisation which would not be big enough to justify the costs of employing professional managers and administrators. There would be less accountability to the community. Better to keep water services within Council control. 	
Wendy Matthews	Prefer to keep control in-house.	
Jennifer Danielson	• Keep it local.	Noted
Shane Blampied	• I think it should be integrated rather than an independent company that could be sold later and take more money to set up.	
Lynnea Roach	• I like the idea so the ratepayers can stay engaged and that there is more local control and accountability.	

Submitter name	Summary	Staff comments
	• I trust that this service will be run professionally by good people.	

Option 2 – Water Services Council Controlled Organisation

2.1 Option 2 – feedback in support of WSCCO

Where no specific comment has been made, the submission is noted.

Submitter name	Summary	Staff comments
Anon	• Council has not done a good enough job, time to let the experts in.	Noted
A Smithies	 Council management have done a solid job with the resources they have to deliver water services to date. This is in spite of, not because of, the council governance. An independent and competent board would enable water services to be truly ready for the challenges ahead. Council is too close to make this decision as egos dictate that they believe it is about them, when it's not, it's about what is right to deliver the service. Multi-council CCOs are the only way forward and this council wouldn't even contemplate the idea - says it all 	
Peter Heney	• ACL works very well, so water could be the same and would get rid of some of the council staff that are not needed because council is a bit over staffed the way it is.	
Levi Edwards	• ACL is the go-to company and always delivers best results quite fast and their care of the treat plants for the region is perfect.	
Jim Lischner	• It has worked for years, and the representation of the people involved have a wide diversity of skills to ensure the best result for the user.	

Submitter name	Summary	Staff comments
Keeva Haslam	 This council has a proven record of a complete lack ability to do any regarding water. When a conservation order was placed on the Rangitata river, 	Local Water Done Well is concerned with the future delivery of water supply, wastewater and stormwater services.
	many extraction applications have been approved.	Water consenting is the responsibility of the Regional Council, Environment Canterbury.
	• Consent given under the guise of a similarly used Australian model for the failed Murray Darling Basin Plan known as "flood plain harvesting" which is nothing more than a cash grab.	
	• Never-ending examples of ignoring water quality in wells, contamination of waterways and of recent times ground work causing contamination of water with effluent and as of last week the failure to inform community of toxic algae blooms. How can such a unity be trusted to do right by the community going forward?	
Sandi	• Government is asking for change and the SBU equates to BAU. Financially SBU is ok for now, but long term CCO is better.	Noted
Contributor 2742	Dedicated governance and management of water related issues.	
	• Success will be far easier to be measured and ability to hold to account if not.	
Gary R Leech	• ADC can seek the very best people and have them accountable and replace them after a term.	
	• Not so easy with internal staff nor may it get the most experienced and efficient team.	
	• No reflection on ADC current staff but do believe in my choice.	
Stacy	• So ACL are no longer responsible.	

Submitter name	Summary	Staff comments
Contributor 2732	• Council does not have the governance skills or expertise to continue to lead water services into the future.	Noted
Grant Withers	• I firmly support the WSCCO option because I believe it represents the best path forward for the residents of Ashburton. Entrusting our water services to a professional board specifically dedicated to managing and overseeing water governance ensures that these critical resources are handled with the expertise and focus they deserve.	
	• Water is a vital resource, and its management requires specialised knowledge and a long-term vision that I feel our democratically elected council, despite their efforts, may no longer possess.	
	• This lack of expertise is not a reflection of their commitment but rather an acknowledgment of the increasing complexity and technical demands of water governance. The challenges of maintaining sustainable water services, addressing infrastructure needs, and planning for future demands require a level of specialisation that goes beyond the scope of a general council's responsibilities.	
	• This is precisely why the current government has introduced the LWDW initiative. It aims to address the growing concern that too many decisions, particularly those impacting essential services like water, are being made without adequate public consultation. By shifting governance to a dedicated board, we can ensure that decisions are made transparently, with the input of experts and stakeholders, and in the best interest of our community's future.	
Edith and Peter Smith	WSCCO option has advantages. A cross section of expertise outside of council selected/elected for their knowledge and	

Submitter name	Summary	Staff comments
	 skills related to water services will benefit the independent WSCCO. WSCCO as a new entity will be established to respond to without parochial bias. 	
	• It will include wide representation to deliver water done well services while responding to freshwater quality/quantity requirements. This will include impacts of services related to climate and land use change, for example, ground and surface water, aquatic and terrestrial biodiversity.	
Jennifer Dearborn	• The most important thing is to look after our water resources, and this is the best way to do that.	Noted

Option 3 – Don't Know/Other

3.1 Option 3 – feedback related to Other Ideas

Where no specific comment has been made, the submission is noted.

Submitter name	Summary	Staff comments
Maurice McGrath	• There appears insufficient information to form a constructive view. There appears no model adjustment to account for a predicted and obvious decline in the value and purchasing power of the fiat \$NZ, or perhaps the potential demise of the flat \$NZ and its replacement with digital flat currency possessing literally no worth, as aspired to by the NZ Reserve Bank.	Noted
	 Invalid crystal ball gazing with modelled projection for 20 years or more appears little more than preposterous, over-paid hand waving. 	
	• Suggesting that 'debt' is a useful tool appears to exemplify the ingrained wrong think now permeating most institutions is a route to the continuation of the escalating debt facing this country and the dreadful consequences it will impose.	
	• There is nothing intelligent and "fair" arguing that a mechanism to place debt burdens on future generations is a smart move, creative fiscal or social investment.	
	• There appears no allowance for population growth and the increasing crippling civic assault of rising rates, together with the consequences of unseen Council policies predicated on the unvoted for diktat from unelected/unelectable UNEP/WEF centric entities with their UN Urban Agenda Habitat 3 policies and the 2030	

Submitter name	Summary	Staff comments
	UN sustainable agenda, both of which are profoundly and intentionally toxic toward individual liberty and freedom of movement, and lead us all (perhaps with the exception of those rigging the ideology in play) toward destitution and de-industrialisation, the latter as evidenced by the assault on the agricultural sector that will eventually destroy the regional economy.	
	• The effect of these policies is not represented in the modelling scenarios, nor is it desired by the populace.	
	• There seems little information that may be construed as helpful, other than what appears evidently planned, namely that we the rate payers will be required to provide for another escalating unpayable bill and consequently, dwelling in ever increasing destitution?	
Nicholas Fagan	 Stop farming poisoning us with nitrogen and don't listen so much to bleating. 	Noted
Hazel and Damian Gawne	Please can you tell me which option does not hand over water ownership lwi?	The LWDW reform focuses on future delivery of water services while ensuring infrastructure remains in public ownership and protection from privatisation.
Richard Tucker	Thank you for this, I appreciate it.	
	 My water comes from a community bore which I am mostly happy with! 	
	• But I would like to have a filter fitted to my home (but not at the pump/bore); So, I can personally control the water that ends up in my sink and even worse in my bath, because I have run a bath which was BROWN more than once!	Unclear if this is a council operated community supply, but residents are encouraged to contact Council to report any concerns with water quality.

Submitter name	Summary	Staff comments
Hilary Arnold	• I'm really keen for people to be encouragedor at least given the optionto have tank water, particularly on larger sections such as the new builds at Mt Somers and other life-style blocks around Ashburton.	Noted Residents may wish to incorporate water storage practices at their properties.
	• We're always hearing that there's a water shortage and we need to be careful, but in reality, there's only a storage shortage.	
	• Plenty of water falls from the sky on a very regular basis and runs off our rooves and into the storm water drains or soil.	
Haitelenisia Tuiniua	 I'm Tongan and don't speak English very well, and I don't really understand which one is good and affordable for me and my family. 	Officers will get in touch with the submitter to offer interpretation service in explaining Council's proposal and the broader LWDW topic.
Theo Spengler	 It was with great disappointment that I have read through this new water proposal. I mistakenly has thought that 3 waters had been done away with, now I realize it has become law. Taumata Arowai is essentially a Māori board with oversight on all NZ water. With a \$25.3 million dollar budget that will be funded by the taxpayers. 	Noted. Taumata Arowai or the Water Services Authority is a Crown entity. It was set up as a dedicated water services regulator by government following the Havelock North water contamination incident which affected an estimated 5,500 residents.
	 The people of NZ can't afford to retire anymore because council rates are too high. Now this gets forced onto residents without having asked the citizens if they need or want this. 	
	Therefore, my suggestion:	
	• All councils through NZ should ask their ratepayers if they want Taumata oversight and pay for it, or are they content with the water services of their council.	

Submitter name	Summary	Staff comments
	• If people don't want this new expense, government must do what they should have done in the first place and ask the people in a referendum what they want.	
	• We are still a democracy and something as important as this must come to a vote. What will be next, our property rights.	
	• Thanks for your time and I hope for the sake of all people in NZ that we will move in the right direction.	
Vince Barry (Regional Director)	• NPHS Te Waipounamu does not have a view on the preferred option for the delivery of water services in the Ashburton district.	Noted.
National Public Health Service Te Waipounamu	• Ashburton District Council's proposal for Local Water Done Well may have significant implications for public health.	
	Advice	
	• The following outlines our technical advice on Ashburton District Council's proposal for Local Water Done Well to protect communities from waterborne diseases, through the provision of drinking water supplies, sewerage and stormwater systems.	
	• NPHS Te Waipounamu encourages Council to ensure that the maintenance and strengthening of three waters service delivery allows for population growth. We support the continued operation of the three waters infrastructure so that services are not reduced or withdrawn. The provision of safe and adequate supplies of drinking water and the collection, treatment and disposal of sewage and wastewater protects public health.	

Submitter name	Summary	Staff comments
	• Safe drinking water is crucial to public health. The well-known outbreak of gastroenteritis in Havelock North in August 2016, which was caused by contaminated drinking water, resulted in an estimated 5,500 of the town's 14,000 residents becoming ill with campylobacteriosis, and of these, 45 people required hospital treatment. It is possible that the outbreak contributed to three deaths, and an unknown number of residents developed long-term health complications.	
	• The safe collection, treatment and disposal of sewage and wastewater also protects health. Human waste carries a wide range of pathogenic micro-organisms, and many are still viable and virulent, even if sewage has been in the environment for some time. Sewage and wastewater may also contain toxic chemicals, particularly from industrial and trade waste sources. NPHS Te Waipounamu supports Council's proposal to invest in water services to meet regulatory requirements which protect public health.	
	• NPHS Te Waipounamu supports Council's proposal to invest in water services to meet regulatory requirements.	
	• NPHS Te Waipounamu encourages Council to ensure that there is ongoing investment in the renewal and maintenance of infrastructure to maintain levels of service in the medium and long term.	
	• NPHS Te Waipounamu notes Council's preferred delivery model appears cost-effective and will keep costs manageable for users. NPHS Te Waipounamu supports the need to keep costs manageable, whilst at the same time protecting people's health by ensuring	

Submitter name	Summary	Staff comments
	access to safe drinking water, stormwater and wastewater disposal is affordable.	
	• NPHS Te Waipounamu encourages Council to ensure adequate resources are allocated to higher risk communities, including those that are currently underserviced or not serviced.	
	• NPHS Te Waipounamu supports Council's consideration of intergenerational equity, and the impacts of climate change to ensure that this essential public health infrastructure is protected from extreme weather events.	
	• NPHS Te Waipounamu encourages Council to ensure that there is equitable provision of adequate water supplies to meet health and sanitation requirements.	
	• NPHS Te Waipounamu supports Council's acknowledgement of the importance of relationships with the regional council. These discissions should include the interaction between the stormwater and flood protection systems so that stormwater ingress to sewers is managed, and will reduce the risk of sewage overflows, but also that flood risk from stormwater ponding is not increased.	
	• NPHS Te Waipounamu acknowledges Council's exploration of the potential efficiencies that could be achieved through an independently managed structure such as a Water Services Council Controlled Organisation.	
	• While there is no specific requirement in the Local Government (Water Services Preliminary Arrangements) Act 2024 for iwi Māori to be consulted, NPHS Te Waipounamu encourages Council to work	

Submitter name	Summary	Staff comments
	closely with mana whenua to ensure water services reflect cultural values, promote environmental sustainability and support their needs.	