

Notice is given that an extraordinary meeting of the Tasman District Council will be held on:

Date: Wednesday 11 June 2025
Time: 9.30am
Meeting Room: Tasman Council Chamber
Venue: 189 Queen Street, Richmond
Zoom conference link: <https://us02web.zoom.us/j/82630438693?>
Meeting ID: 826 3043 8693
Meeting Passcode: 447686

Tasman District Council

Kaunihera Katoa

Local Water Done Well Submissions Hearing

AGENDA

MEMBERSHIP

Mayor	Mayor T King	
Deputy Mayor	Deputy Mayor S Bryant	
Councillors	Councillor C Butler	Councillor M Kininmonth
	Councillor G Daikee	Councillor C Mackenzie
	Councillor B Dowler	Councillor K Maling
	Councillor J Ellis	Councillor B Maru
	Councillor M Greening	Councillor D Shallcrass
	Councillor C Hill	Councillor T Walker

(Quorum 7 members)

Contact Telephone: 03 543 8400
Email: Robyn.Scherer@tasman.govt.nz
Website: www.tasman.govt.nz

AGENDA

1 OPENING, WELCOME, KARAKIA

2 APOLOGIES AND LEAVE OF ABSENCE

Recommendation

That the apologies be accepted.

3 DECLARATIONS OF INTEREST

4 LATE ITEMS

5 REPORTS

5.1 Local Waters Done Well - Hearing and Deliberations Report 4

6 CONFIDENTIAL SESSION

Nil

6 CLOSING KARAKIA

- 11 June 2025

5 REPORTS

5.1 LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

Decision Required

Report To:	Tasman District Council
Meeting Date:	11 June 2025
Report Author:	Alan Bywater, Team Leader - Community Policy; Michael Goldingham, Team Leader – Infrastructure Planning
Report Authorisers:	Dwayne Fletcher, Strategic Policy Manager
Report Number:	RCN25-06-5

1. Purpose of the Report / Te Take mō te Pūrongo

1.1 The purpose of this report is to:

- Accept the submissions on the Local Waters Done Well consultation and set out the schedule for speakers at the Hearings. Any changes to the submitter schedule will be advised at the beginning of the day; and
- Provide a summary of the submissions received and staff advice on these; and
- Enable elected members to decide on the Local Waters Done Well option(s) to pursue and include in the Water Services Delivery Plan.

2. Summary / Te Tuhinga Whakarāpoto

- 2.1 The consultation period for the Local Water Done Well preferred water services delivery option was open between 22 April and 23 May 2025. We received 16 submissions. The submissions and attachments to the submissions are included as **Attachments 1 and 2** to this report.
- 2.2 At the time of writing, no late submissions have been received. Five submitters indicated a desire to be heard but two of these are unable to attend the hearing. The schedule of speakers for this meeting is listed in this report. Subsequent changes to the schedule will be advised before the hearing commences. The entirety of submissions has been provided to the Hearings Panel on LG Hub and are also publicly available on the Council's [website](#).
- 2.3 Ten out of 15 submitters support the Council's proposal, but the number of submitters is low, making it hard to draw inferences about how the wider community view the Council's proposal to establish an internal business unit. Nor have the submissions brought to light new information that would lead staff to recommend a change to the Council's proposal. Consequently, staff recommend progressing with option 1, establish an internal business unit to manage water, wastewater and stormwater. As part of this option, staff recommend

- 11 June 2025

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

establishing an internal advisory board with at least some external members to help provide operational oversight of these activities and provide advice to the Council. If accepted, staff will provide subsequent advice about the make-up and role of this board for a Council decision.

- 2.4 Staff also recommend that the Council confirm its intention to continue discussions with other councils regarding the governance and management of the Councils' Water, Wastewater and Stormwater functions.
- 2.5 Once the Council has decided on the LWDW option to pursue, staff can use this information to develop the Water Services Delivery Plan required by the Government.

3. Recommendation/s / Ngā Tūtohunga

That the Tasman District Council

1. **receives the Local Waters Done Well - Hearing and Deliberations Report RCN25-06-5; and**
2. **accepts and considers all submissions received on Local Waters Done Well during the submission period of 22 April to 23 May 2025; and**
3. **confirms Option 1 – the Council establishes an internal business unit that manages Water, Wastewater and Stormwater; and**
4. **agrees to establish an internal advisory board with some external members to help provide operational oversight of three waters activities and provide advice to the Council; and**
5. **confirms its desire for staff to continue discussions with other councils regarding longer term governance and management of the Councils' Water, Wastewater and Stormwater functions.**

4. Background / Horopaki

- 4.1. The Council is obliged to consider and consult on new water service delivery options as part of the Government's local water done well programme.
- 4.2. On 27 March 2025, the Council confirmed public consultation on three options for future governance and management of Water, Wastewater and Stormwater, being:
 - a. **Option 1** - the Council establishes an internal business unit that manages Water, Wastewater and Stormwater; and
 - b. **Option 2** – the Council establishes a Council Controlled Organisation that governs and manages Water, Wastewater and Stormwater; and
 - c. **Option 2(a)** – the Council establishes a Council Controlled Organisation that governs and manages Water and Wastewater, with Stormwater governance and planning retained by the Council but operational management contracted to the Council Controlled Organisation.

- 11 June 2025

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

- 4.3 The Council confirmed that Option 1 was its preferred option for consultation and that the consultation would take place for one month commencing no later than 22 April 2025. The Council also approved continuing discussions with other councils regarding longer term governance and management of the Councils' Water, Wastewater and Stormwater functions.
- 4.4 The Project Governance Group (Mayor, Deputy Mayor, Councillors Mackenzie and Hill, and iwi representatives Corey Hebbard, Turi Hippolite and Hemi Sundgren) was delegated authority to give final approval of the consultation document and supporting material.
- 4.5 The Project Governance Group met on 15 April 2025 and provided feedback to staff on a draft consultation document. Staff carried out further work on the consultation document and the Project Governance Group subsequently approved the consultation document via email.
- 4.6 A Local Waters Done Well page was created on Shape Tasman which included the consultation document and a summary document. These documents were also made available at Council Service centres and libraries.
- 4.7 The Local Waters Done Well consultation was publicised via Newsline, social media and through the local media.
- 4.8 We received 16 submissions and at the time of writing, no late submissions have been received.
- 4.9 Five submitters have indicated they wish to speak to their submission. Speakers were contacted by email with their scheduled speaking time. As at 3 June 2025, not all speakers have yet confirmed attendance at the hearing. Subsequent changes to the submitter speaking order will be advised before the beginning of the hearing day.

5. Analysis and Advice / Tātaritanga me ngā tohutohu

The Hearing Process

- 5.1 The schedule of this hearing is listed in the table below:

Start Time	Duration	Submitter No.	Speaker (Submission ID)
09:30	5 minutes	34933	Mr Iain Sheves, Wakatu Incorporation
09:35	5 Minutes	34935	Mr Mathias Schaeffner
09:40	5 minutes	34990	Mr David Ogilvie

- 5.2 Each submitter has been allowed a maximum of five minutes to speak to their submission. This time includes any points of clarification from the Hearing Panel.
- 5.3 Staff have asked submitters to be available from the start of the half-hour that they have been assigned to, and staff have allocated up to five submitters per half-hour. This allows some flexibility if extra time is needed by the Hearing Panel for any points of clarification.

- 11 June 2025

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

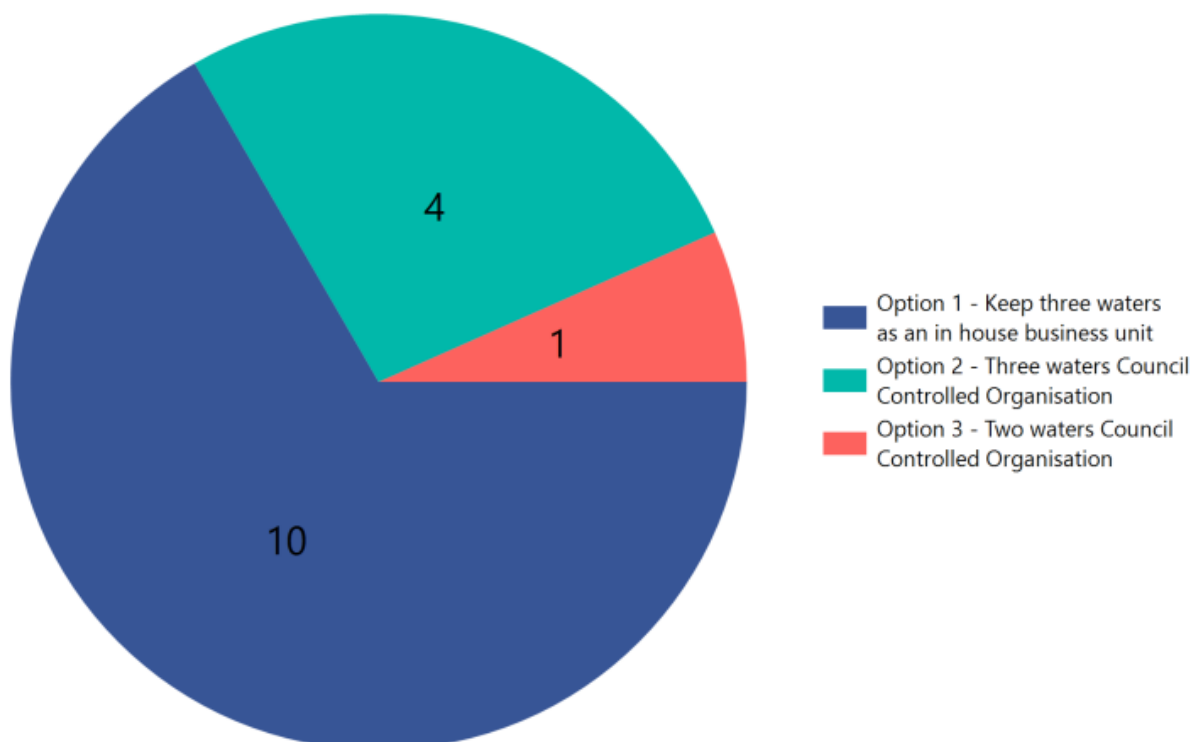
Feedback Received in Submissions

5.4 A total of 16 submissions were received. Of these, 10 submitters receive Council drinking water, eight submitters have a Council wastewater connection, and seven submitters have a Council stormwater pipe connection.

5.5 The location of submitters are as follows:

Town	Number Of Submissions
Richmond	7
Nelson	3
Upper Moutere	3
Motueka	1
Takaka	1
Wakefield	1

5.6 The number of submitters indicating a preference for each option are as follows:



5.7 Submitter #34865 Forest and Bird Protection Society of New Zealand Inc. indicated a merit in both Option 1 and 3, without expressing a preference between them.

5.8 The main reasons given by submitters for preferring Option 1 – keep three waters as an in-house business unit – and staff responses are summarised in the following table (Table 1).

Table 1

Reason	Staff Response
Retain local ownership/ratepayer ownership	The in-house option would retain ownership locally and by ratepayers. The CCO options would also retain ownership locally. This would only potentially be reduced in the future if the Council forms a Multi CCO in which other councils were shareholders. The in-house option is the only one that retains ownership of water services assets directly by ratepayers through the Council. However, as the Council is the owner and only shareholder of a CCO, ratepayers would indirectly remain as the owners.
Benefits from being local - local knowledge, local experts available, maintain local relationships	The in-house option would enable the benefits of local knowledge, experts etc. to be realised. However, many of these would be similarly realised in the two CCO options in the consultation document. Although the CCO Board could be partially or wholly made up of directors who were not local, some of the perceived benefits of a local organisation may be realised to a lower degree if in the future the Council forms a Multi CCO.
Closer relationship between governance and operational arms	The closeness of the relationship between the governance and operational arms is not directly related to the type of entity selected.
More responsive to changing conditions	The level of responsiveness of the future water services provider is not inherently linked to the entity structure selected.
Avoids duplication of functions	The in-house option may avoid the duplication of some functions. It is unclear at this point the mix for the business unit between it having agreements for service provision from other parts of the Council and having dedicated staff for some functions. The financial modelling took into account the establishment and ongoing operation of the CCO options, so the costs of these duplicated functions was considered in the financial estimates.

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

	If a CCO has a separate customer services function this could potentially be less convenient to water services users i.e. having to interact with Council customer services for some activities and the CCO's customer services for water services.
Avoids establishment costs of a CCO	As noted in the response above, the establishment costs for a CCO were included in the financial modelling. The financial modelling showed that the cost of establishing a CCO would be greater than an in-house option. However, in the longer term the potential efficiencies are less in an in-house option.
Certainty of costs/little cost benefits of the other options	The financial estimates for all the options were based on some broad assumptions and indicated that the differences in financial performance were modest over the first 10 years but with some potential efficiencies for the CCO options further into the future. There is a relatively high level of uncertainty about future three waters costs.

5.9 The main reasons given by submitters for preferring Option 2 - Three Waters Council Controlled Organisation – and staff responses are summarised in the following table (Table 2).

Table 2

Reason	Staff Response
Better governance	<p>The submitter may have considered that having a board made up of people with relevant water services and related experience would result in higher quality governance but was not explicit about this in their submission.</p> <p>The pros and cons of the different governance models was considered by the Council when considering its options. Such as the trade-off between directors appointed with experience and expertise in three water focused solely on three waters, vs the ability for the Council to take wider community consideration into account when making decisions.</p>

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

Attract more commercially focused employees	It is likely that a CCO option could attract staff that have a stronger commercial focus than the in-house business unit.
Council is unable to implement a large-scale water-related project in a cost-effective manner, evidenced by the cost increases for the Waimea Community Dam	The level of the Council's current and past performance is open to interpretation. The in-house option proposed is a step change from the current arrangements with the establishment of a business unit structure. A future business unit or CCO's ability to implement large-scale projects is untested at this point.

5.10 The main reasons given by submitter (Wakatū Incorporation) for preferring Option 3 - Two Waters Council Controlled Organisation – and staff responses are summarised in the following table (Table 3).

Table 3

Reason	Staff Response
It is insulated from political considerations	Under a CCO, Council elected members and staff cannot be part of the Board of Directors so there would be a level of insulation from political considerations. However, political considerations are likely to impact the setting of the Statement of Expectations for a CCO and input into the Water Services Strategy. As noted earlier, the ability for the Council to take wider community or priority considerations into account when making decisions may be an advantage.
Separation of water services operational functions from regulatory and planning functions	Under a CCO, the regulatory functions will be carried out by the Council (as well as the Commerce Commission and Taumata Arowai) so these would be separated from the CCO. The Council manages these conflicts adequately for all its activities. Staff do not see this as a compelling enough argument to change from the Council's proposed option.

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

<p>Three waters CCO with the stormwater water pipe network being owned by the CCO and the remaining stormwater assets being retained by the Council.</p>	<p>The option of the stormwater piped assets being owned, governed and managed by a CCO and the remaining stormwater assets remaining in Council control and ownership, would require some more detailed consideration. On the face of it, this could make the coordination of the piped and non-piped parts of the stormwater network, that often need to operate as a combined system, more difficult than one entity owning and controlling the whole stormwater network.</p>
<p>Iwi and Māori entities (including Wakatū) have a meaningful role in governance and planning embedded in the decision making of the new entity.</p>	<p>Whichever option is selected, the Council will make decisions about who makes up the governance group for the water services delivery model at a later stage.</p> <p>Under the in-house option, the Council could invite external members, including iwi representatives, to be part of a committee that provides governance for water services delivery.</p> <p>Under a CCO, the Council as shareholder will select the directors. The Local Government (Water Services) Bill includes a requirement that a director of a water organisation must be appointed on the basis of their competency to perform the role.</p>
<p>Planning reflects Māori relationships with the water and whenua, and any gains from scale also support cultural, environmental and community wellbeing.</p>	<p>Staff understand that whichever option is selected by the Council, Wakatū's desire for iwi entities to be closely involved, and that reflection of Māori relationships with water and whenua and support for cultural, environmental and community well-being to apply. Wakatū has expressed a view that this is more achievable in a two water CCO.</p> <p>In the case of a CCO, the Council can include how the CCO conducts its relationships with iwi and other Māori organisations, along with other requirements, in the Statement of Expectations.</p> <p>In the in-house option, these aspirations are likely to be progressed as part of the Council's partnership with Te Taihū Iwi.</p>

LOCAL WATERS DONE WELL - HEARING AND DELIBERATIONS REPORT

A streamlined planning system that has cultural integrity and meaningful engagement with iwi and Māori entities.	Whatever option is chosen, the Council will be striving for a streamlined planning process that includes suitable engagement with iwi and Māori entities.
The CCO would be charged with delivery of a 30-year infrastructure plans.	In the Local Government (Water Services) Bill the required Water Services Strategy includes the planning of assets, as well as capital and operational expenditure associated with managing water assets for 30 years. This applies to any of the water services options being considered.

- 5.11. Submitter #34865 Forest and Bird recommended several measures to be put in place in implementing Option 1 or Option 3. Staff will give these recommendations, for the option the Council decides on, further consideration in the Water Services Plan.

6. Financial or Budgetary Implications / Ngā Ritenga ā-Pūtea

- 6.1 The decision to accept submissions has no financial implication.
- 6.2 The financial implications and the results of the financial modelling undertaken on the options were detailed in the report to the 27 March 2025 Council meeting (RCN25-03-14).
- 6.3 Funding of \$250,000 has been budgeted to implement the internal business unit for 2025/2026. A placeholder of \$1.25 million has also been included in the budget for 2026/2027. Both amounts are loan funded as the nature of the work is still to be determined.
- 6.4 Once the Council selects its preferred option, staff will develop plans for giving effect to it and will update the Council as better cost information becomes available.

7. Options / Kōwhiringa

Hearing Options

- 7.1 The options are outlined in the following table.

Option		Advantage	Disadvantage
1.	Accepts and considers all submissions received during the consultation period, 22 April to 23 May 2025.	All submitters who wish to be heard can be heard, and submissions can be considered within the deliberations report.	Any late submissions may not feel they have been heard by the Council.
2.	Do not accept and consider all submissions received during the consultation period, 22 April to 23 May 2025.		This would damage the Council's reputation as the consultation material has already asked for submissions and speakers have been scheduled to speak at the Hearing.

7.2 Option 1 is recommended.

Deliberations Options

Option		Advantage	Disadvantage
1.	Option 1 Keep three waters as an in-house business unit. Staff recommended option includes an internal advisory board.	<ul style="list-style-type: none"> • Ease of implementation – least disruption to current organisational and operational arrangements. • Lowest establishment costs. • Helps ensure consistency and alignment with broader initiatives like growth planning, land drainage, flood management and environmental protection. • The Council has greatest ability to borrow, even when income is leveraged at a lower rate compared a CCO could. • No need for separate customer services. • Similar costs for users as other options. • Maintains greater funding flexibility through the ability to charge for water through rates and/or charges. • Could use competent and technical expertise on a Council committee to guide three water management without cost of setting up WCCO. 	<ul style="list-style-type: none"> • Long term efficiencies unlikely to be as substantial as for the other options. • The Council is not able to benefit from the higher borrowing capacity from LGFA for water services compared to what a WCCO could borrow. • Council decisions about the overall priorities for the District and resourcing for other activities could compromise spending on water services. • Borrowing capacity relies on income from all Council activities. • There are uncertainties about the requirements for an internal business unit that may add costs.

Option		Advantage	Disadvantage
2.	Option 2 Three Waters Council Controlled Organisation	<ul style="list-style-type: none"> • Financial benefits over the first 7 – 10 years help partially offset establishment costs and deliver long term efficiencies. • Access to enough borrowing for investment in infrastructure for water supply, wastewater and stormwater until 2034 that is not dependent on income from other activities • Independent decision making through a Board of competent Directors with technical skills for water services. • This structural independence and single focus ensure a consistent focus on water services management and operational delivery, facilitating long term planning and investment strategies. • Better placed to join with other Council's WCCOs to form a Multi CCO where substantial benefits have been identified as being possible. 	<ul style="list-style-type: none"> • Additional establishment and ongoing operating costs to manage WCCO arrangements, relationship with shareholders (i.e. the Council) and operating a board. • At the end of 2034, there is little to no residual borrowing capacity. • Disrupts the existing governance, operations, assets and systems in the Council, that will need to continue to operate for remaining functions. • Likely to need substantial change to the Nelson Regional Sewerage Business Unit arrangements. • Coordination with other functions in the Council will require more formal communication and processes. There is a risk that planning between stormwater and related Council functions such as transport and natural hazard management may become disjointed. • A WCCO will have separate customer service systems, customer relationships, billing etc. that potentially duplicate the existing systems within the Council.

3.	Option 3 Two Waters Council Controlled Organisation	<ul style="list-style-type: none"> • Financial benefits over the first 7 – 10 years will help partially offset establishment costs and deliver long term efficiencies. • Access to borrowing capacity for water services and wastewater that is not dependent on income from other activities. • Healthy ability to borrow more from 2034 on. • Independent decision making through a Board of Directors with technical skills for water supply and wastewater. • The structural independence and single focus of the WCCO ensures a consistent focus on water services management, facilitating long term planning and investment. • More coordinated governance and planning for stormwater and related activities e.g. roads and parks by the Council. • Better placed (than Option 1) to join with other councils WCCOs to form a Multi CCO where substantial benefits have been identified as being possible. 	<ul style="list-style-type: none"> • Additional establishment and ongoing operating costs to manage WCCO arrangements, relationship with shareholders (i.e. the Council) and operating a board. • Disrupts existing governance, operations, assets and systems in the Council, that will need to continue to operate for remaining functions. • Coordination with other functions in the Council will require more formal communication and processes. • WCCO will have separate customer service systems, customer relationships, billing etc. that duplicate these systems within the councils. • Debt capacity for the WCCO is less than for Option 2 because revenue from stormwater cannot be leveraged for borrowing capacity. As a result it only has enough borrowing capacity until 2034 without further increasing charges.
----	---	---	--

Option		Advantage	Disadvantage
4.	Delay deciding on the Local Water Done Well options	Provides further time for elected members to consider the options and receive any further advice.	Reduces the time available for the preparation of the Water Services Delivery Plan to meet the Government's deadline.

- 7.3 Staff do not consider that the information received in submissions is of sufficient volume or sufficiently persuasive to motivate a change from the Council's proposed option. Therefore, recommend the Council progress with an in-house business unit – option 1. This was supported by the majority of the relatively few people that made submissions. As part of this option, staff also recommend establishing an internal advisory board.

8. Legal / Ngā ture

- 8.1 The enacted LWDW legislation and the Local Government (Water Services) Bill (currently under select committee review) require territorial authorities to:
- a) approve a preferred service delivery model for consultation purposes; and
 - b) consult on that preferred service delivery model, comparing it to at least one other service delivery model; and
 - c) confirm the service delivery model; and
 - d) complete a Water Services Delivery Plan and Implementation Plan by 3 September 2025.
- 8.2 Staff have to date obtained specialist advice/input on:
- a) infrastructure modelling;
 - b) consultation methods;
 - c) options around including the Waimea Community Dam into a Water CCO; and
 - d) LWDW from the Department of Internal Affairs via its webinars.
- 8.3 The Council has submitted on all three LWDW bills and where we have the opportunity on other associated parts of the legislation.
- 8.4 The Local Government (Water Services Preliminary Arrangements) Act 2024 modified selected parts of the consultation requirements of the Local Government Act 2002 but the remaining requirements of s81 and s82 of the Local Government Act 2002 continue to apply.
- 8.5 Having assessed the Local Waters Done Well decision for significance the Council decided to receive written submissions and to carry out hearings and deliberations. This process has now been carried out.

Nelson Regional Sewage Business Unit (NRSBU)

- 8.6 There are no material implications for option 1.
- 8.7 The NRSBU is jointly owned by Nelson City Council and Tasman District Council. It is noted that a CCO cannot be a member of a joint Committee. Further work will be required to determine how a CCO could work with Nelson City Council for the joint delivery of the NRSBU functions to enable further consideration of the implications of forming a Multi CCO with other districts in the future.

Waimea Water Limited

- 8.8 There are no material implications for option 1.
- 8.9 While considering the future of our water service delivery options, staff have also considered the potential efficiencies that could be gained if the governance, management and operations of the Waimea Community Dam were transferred to a Water CCO.
- 8.10 The Council's interest in Waimea Water Ltd (WWL) along with its rights and responsibilities (except for its obligations regarding amending the TRMP and funding economic losses) can be transferred to a CCO including a Water Entity CCO. This will require some work to prepare the legal arrangements and seek approval from irrigators, lenders and other stakeholders in WWL. Moving the Waimea Community Dam in its entirety including the irrigator capacity and responsibilities is neither considered nor recommended.
- 8.11 Staff note that further legal input will be required on the establishment of any form of Water CCO.

9. Iwi Engagement / Whakawhitiwhiti ā-Hapori Māori

- 9.1 The LWDW reform legislation has placed less emphasis on input from iwi compared to the previous Affordable Waters Reform legislation.
- 9.2 The Council is committed to partnering with iwi to shape the future of water services across the District. Kia Kotahi Te Taihu Together Te Taihu – A Partnership Agreement for a stronger Te Taihu was signed in December 2023 by Ngā Iwi o Te Taihu (the Top of the South Iwi) and Ngā Kaunihera o Te Taihu (Nelson City Council, and Tasman and Marlborough District Councils).
- 9.3 The partners under the agreement are driven by a shared desire to realise the full potential of Te Taihu o Te Waka-a-Māui, to protect and enhance the taonga of Te Taihu and give effect to principles and practices of Te Tiriti o Waitangi within the region.
- 9.4 We have partnered with iwi in appointing iwi representatives on the Project Governance Group (PGG). It is our intention to continue this partnership.
- 9.5 Iwi representatives: Corey Hebbard, Rangitāne, Turi Hippolite Ngāti Koata and Hemi Sundgren (Ngāti Tama), attended and participated in the Project Governance Group meetings.
- 9.6 Iwi had a similar opportunity as the public to make a submission during the consultation period. A submission was received from Wakatū Incorporation on behalf of its iwi/hapu owners.

10. Significance and Engagement / Hiranga me te Whakawhitiwhiti ā-Hapori Whānui

- 10.1 The overall significance of the decision on the option to deliver water services is high. Consultation was a requirement of LWDW in the Local Government (Water Services Preliminary Arrangements Act) 2024. In keeping the Council's general practice with other significant issues, we undertook a process of seeking written submissions with hearings, as an opportunity for submitters to share their views verbally with the Council.
- 10.2 A modest number of submissions were received, either written or verbal. This meeting provides the opportunity for the Council to consider the content of those submissions in making its decision on a Local Water Done Well option.

	Issue	Level of Significance	Explanation of Assessment
1.	Is there a high level of public interest, or is decision likely to be controversial?	Low	It will be expected that the Council will accept the submissions received within the consultation period.
2.	Are there impacts on the social, economic, environmental or cultural aspects of well-being of the community in the present or future?	Low	
3.	Is there a significant impact arising from duration of the effects from the decision?	No	
4.	Does the decision relate to a strategic asset? (refer Significance and Engagement Policy for list of strategic assets)	No	
5.	Does the decision create a substantial change in the level of service provided by Council?	No	
6.	Does the proposal, activity or decision substantially affect debt, rates or Council finances in any one year or more of the LTP?	No	
7.	Does the decision involve the sale of a substantial proportion or controlling interest in a CCO or CCTO?	No	
8.	Does the proposal or decision involve entry into a private sector partnership or contract to carry out the deliver on any Council group of activities?	No	
9.	Does the proposal or decision involve Council exiting from or entering into a group of activities?	No	
10.	Does the proposal require particular consideration of the obligations of Te Mana O Te Wai (TMOTW) relating to freshwater or particular consideration of current legislation relating to water supply, wastewater and stormwater infrastructure and services?	No	

11. Communication / Whakawhitiwhiti Kōrero

- 11.1 Staff shared information about the LWDW programme through an in-depth series in Newsline and other social media platforms prior to and during the consultation.
- 11.2 The consultation material was communicated in the usual Council channels (Shape Tasman, Newsline, social media) and by close cooperation with local media
- 11.3 All submitters have had the opportunity to indicate whether they would like to speak to their submission at a hearing. Those who indicated that they wished to speak have been contacted to arrange a time during the hearing.
- 11.4 The Council's decision on the Local Water Done Well option chosen will be communicated through a media release and in a future edition of Newsline. In addition, submitters will be contacted to inform them of the Council's decision.

12. Risks / Ngā Tūraru

- 12.1 The Indicative Business Case includes several risks and opportunities which were identified at the beginning of the LWDW project.
- 12.2 With the preferred service delivery model for consultation being an in-house water business unit a number of these risks may be removed from the risk register. For example, the risks (and perceptions) associated with a multi council water CCO are no longer valid for the current proposed solution.
- 12.3 The balance of the project risk register will be regularly reviewed and include the following risks:
 - any significant changes when the Local Government (Water Services) Bill is enacted (due June 2025)
 - uncertainty of the implications of the new economic regulation and consumer protection regime.
- 12.4 These ongoing opportunities are also included to:
 - continue talking to our neighbouring councils seeking opportunities to share resources etc.
 - maximise the benefits offered in the LWDW legislation.

13. Climate Change Considerations / Whakaaro Whakaaweawe Āhuarangi

- 13.1 The predicted impacts of climate change remain relevant to all the service delivery options under consideration therefore, the decision in this report does not change the Council's climate change responses.

14. Alignment with Policy and Strategic Plans / Te Hangai ki ngā aupapa Here me ngā Mahere Rautaki Tūraru

- 14.1 Local Water Done Well legislation will have a significant impact on the Council's policy and strategic plans and regulatory responsibilities. Proposed changes include:
 - 14.1.1 Removal of the respective water services functions from the Council's Long-Term Plan 2027-2037. It is intended that the new water services arrangements will

commence on 1 July 2027 which aligns with the timing of the Long-Term Plan 2027-2037.

- 14.1.2 Removal of the respective water services financials from the Council's combined accounts to comply with the financial ring-fencing requirements.
- 14.1.3 A change in how customers are charged. This will vary depending on the chosen service delivery option and how stormwater is treated.
- 14.1.4 A revision of our regulatory and compliance requirements associated with the three waters.

15. Conclusion / Kupu Whakatepe

- 15.1 This report recommends that the Hearing Panel accept and hear submissions received during the consultation period of 22 April to 23 May 2025. The report also provides information of the submissions received and staff advice on the points raised in those submissions.
- 15.2 Ten out of 15 submitters support the Council's proposal, but the number of submitters is low, making it hard to draw inferences about how the wider community view the Council's proposal to establish an internal business unit. Nor have submission brought to light new information that would lead staff to recommend a change to the Council's proposal.
- 15.3 Consequently, staff recommend progressing with option 1, establish an internal business unit to manage water, wastewater and stormwater. As part of this option, staff recommend establishing an internal advisory board with at least some external members to help provide operational oversight of these activities and provide advice to Council. If accepted, staff will provide subsequent advice about the make-up and role of this board for a Council decision.
- 15.4 Staff also recommend that the Council confirm its intention to continue discussions with other councils regarding the governance and management of the Councils' Water, Wastewater and Stormwater functions.
- 15.5 Once the Council has decided on the LWDW option to pursue, staff can use this information to develop the Water Services Delivery Plan required by the Government.

16. Next Steps and Timeline / Ngā Mahi Whai Ake

- 16.1 The decision on the LWDW option chosen will inform the preparation of the Water Services Delivery Plan which will be discussed with elected members in July 2025.
- 16.2 At the Tasman District Council meeting on 12 August 2025 the Water Services Delivery Plan and the associated Implementation Plan will be presented for adoption.
- 16.3 The Council submits the Final Water Services Delivery Plan to DIA before 3 September 2025.

17. Attachments / Tuhinga tāpiri

- | | | |
|--|--|----|
| 1.  | Local Water Done Well Submissions | 22 |
| 2.  | Local Water Done Well - Submission Attachments | 37 |



Submissions Summarised for Council Local Water Done Well Delivery Model

Submission Responses, listed by Subject

ID	Submitter	Opinion	Summary
01 Does Tasman District Council provide your drinking water?			
34935	Mr Mathias Schaeffner	Don't know	
34833	Mr Peter John Wilks	No	
34836	Michaela Markert	No	
34841	Mr Rob Grant	No	
34865	Mr Scott Burnett	No	
34918	Ms Lis Pedersen	No	
34990	David Ogilvie	No	
34801	Anette Becher	Yes	
34845	Dr Peter Ross	Yes	
34865	Mr Scott Burnett	Yes	
34867	Ms Monique Ireland	Yes	
34868	Mrs Gael Beattie	Yes	
34871	Mrs Christine Clark	Yes	

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
 189 Queen Street
 Private Bag 4
 Richmond 7050
 New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
 92 Fairfax Street
 Murchison 7007
 New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
 7 Hickmott Place
 PO Box 123
 Motueka 7143
 New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
 78 Commercial Street
 PO Box 74
 Takaka 7142
 New Zealand
Phone 03 525 0020
Fax 03 525 9972

34901 Mr Graeme Galey	Yes
34904 Mr Phil Allan	Yes
34912 Mr Trevor Gately	Yes
34933 Mr Iain Sheves	Yes

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

02 Does Tasman District Council provide your wastewater?

34935 Mr Mathias Schaeffner	Don't know
34833 Mr Peter John Wilks	No
34836 Michaela Markert	No
34841 Mr Rob Grant	No
34865 Mr Scott Burnett	No
34871 Mrs Christine Clark	No
34918 Ms Lis Pedersen	No
34801 Anette Becher	Yes
34845 Dr Peter Ross	Yes
34867 Ms Monique Ireland	Yes
34868 Mrs Gael Beattie	Yes
34901 Mr Graeme Galey	Yes
34904 Mr Phil Allan	Yes
34912 Mr Trevor Gately	Yes
34990 David Ogilvie	Yes

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
 189 Queen Street
 Private Bag 4
 Richmond 7050
 New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
 92 Fairfax Street
 Murchison 7007
 New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
 7 Hickmott Place
 PO Box 123
 Motueka 7143
 New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
 14 Junction Street
 PO Box 74
 Takaka 7142
 New Zealand
Phone 03 525 0020
Fax 03 525 9972

03 Does Tasman District Council provide you a stormwater pipe connection?

34935 Mr Mathias Schaeffner	Don't know
34833 Mr Peter John Wilks	No
34836 Michaela Markert	No
34841 Mr Rob Grant	No
34865 Mr Scott Burnett	No
34871 Mrs Christine Clark	No
34901 Mr Graeme Galey	No
34918 Ms Lis Pedersen	No
34801 Anette Becher	Yes
34845 Dr Peter Ross	Yes
34867 Ms Monique Ireland	Yes
34868 Mrs Gael Beattie	Yes
34904 Mr Phil Allan	Yes
34912 Mr Trevor Gately	Yes
34990 David Ogilvie	Yes

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

04 Gender

34801	Anette Becher	Female
34836	Michaela Markert	Female
34867	Ms Monique Ireland	Female
34868	Mrs Gael Beattie	Female
34871	Mrs Christine Clark	Female
34918	Ms Lis Pedersen	Female
34833	Mr Peter John Wilks	Male
34841	Mr Rob Grant	Male
34845	Dr Peter Ross	Male
34865	Mr Scott Burnett	Male
34901	Mr Graeme Galey	Male
34904	Mr Phil Allan	Male
34990	David Ogilvie	Male
34935	Mr Mathias Schaeffner	Prefer not to say

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
 189 Queen Street
 Private Bag 4
 Richmond 7050
 New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
 92 Fairfax Street
 Murchison 7007
 New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
 7 Hickmott Place
 PO Box 123
 Motueka 7143
 New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
 14 Junction Street
 PO Box 74
 Takaka 7142
 New Zealand
Phone 03 525 0020
Fax 03 525 9972

05 Age

34867 Ms Monique Ireland	30-45
34935 Mr Mathias Schaeffner	30-45
34801 Anette Becher	46-65
34836 Michaela Markert	46-65
34865 Mr Scott Burnett	46-65
34871 Mrs Christine Clark	46-65
34918 Ms Lis Pedersen	46-65
34833 Mr Peter John Wilks	66+
34841 Mr Rob Grant	66+
34845 Dr Peter Ross	66+
34868 Mrs Gael Beattie	66+
34901 Mr Graeme Galey	66+
34904 Mr Phil Allan	66+
34990 David Ogilvie	66+

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

06 What ethnicities do you identify as?

34833	Mr Peter John Wilks	N/A	Pakeha
34836	Michaela Markert	N/A	European
34841	Mr Rob Grant	N/A	NZ European
34845	Dr Peter Ross	N/A	NZ European
34865	Mr Scott Burnett	N/A	Pakeha
34867	Ms Monique Ireland	N/A	Pakeha
34868	Mrs Gael Beattie	N/A	European NZ
34901	Mr Graeme Galey	N/A	European new Zealander
34904	Mr Phil Allan	N/A	New Zealander
34918	Ms Lis Pedersen	N/A	European kiwi
34990	David Ogilvie	N/A	New Zealand European

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
 189 Queen Street
 Private Bag 4
 Richmond 7050
 New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
 92 Fairfax Street
 Murchison 7007
 New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
 7 Hickmott Place
 PO Box 123
 Motueka 7143
 New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
 14 Junction Street
 PO Box 74
 Takaka 7142
 New Zealand
Phone 03 525 0020
Fax 03 525 9972

07 Which is your preferred option?

34801 Anette Becher	Option 1 - Keep three waters as an in house business unit
34836 Michaela Markert	Option 1 - Keep three waters as an in house business unit
34841 Mr Rob Grant	Option 1 - Keep three waters as an in house business unit
34845 Dr Peter Ross	Option 1 - Keep three waters as an in house business unit
34868 Mrs Gael Beattie	Option 1 - Keep three waters as an in house business unit
34901 Mr Graeme Galey	Option 1 - Keep three waters as an in house business unit
34904 Mr Phil Allan	Option 1 - Keep three waters as an in house business unit
34912 Mr Trevor Gately	Option 1 - Keep three waters as an in house business unit
34918 Ms Lis Pedersen	Option 1 - Keep three waters as an in house business unit
34990 David Ogilvie	Option 1 - Keep three waters as an in house business unit
34833 Mr Peter John Wilks	Option 2 - Three waters Council Controlled Organisation
34867 Ms Monique Ireland	Option 2 - Three waters Council Controlled Organisation
34871 Mrs Christine Clark	Option 2 - Three waters Council Controlled Organisation

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
 189 Queen Street
 Private Bag 4
 Richmond 7050
 New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
 92 Fairfax Street
 Murchison 7007
 New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
 7 Hickmott Place
 PO Box 123
 Motueka 7143
 New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
 14 Junction Street
 PO Box 74
 Takaka 7142
 New Zealand
Phone 03 525 0020
Fax 03 525 9972

34935 Mr Mathias Schaeffner	Option 2 - Three waters Council Controlled Organisation
34933 Mr Iain Sheves	Option 3 - Two waters Council Controlled Organisation

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

08 Why is this your preferred option?

34801	Anette Becher	N/A	I am very disappointed by the policy in general and believe this is the least likely to waste ratepayer money when it fails to achieve actual change
34833	Mr Peter John Wilks	N/A	Better governance
34836	Michaela Markert	N/A	because I am living rurally and have specific land and soil conditions and invested time and money in trying to find the best solution for our particular conditions
34841	Mr Rob Grant	N/A	Southwaters registered office is in Richmond. We are a specialist dredging and water treatment company. I firmly believe in 'Local users pay, provide and control'. Why? (A) it keeps the oversight, ownership, operation and control of the 3 waters, local. (B) Local ratepayers fund the build and servicing of their own facilities. (C) Local Councillors and managers know their patch, are more easily accessible and more aware of rate payers views and concerns. (D) There are able, professional and experienced contractors based locally that are cost effective candidates for each of the three waters design, build and operation of TDCs facilities needs. They obviously must still meet standard tender requirements but have the potential to deliver as well if not better than non-locals. (E) The practical experience and different viewpoints of local contractors can be leveraged to complement the technical but office-based skills of consulting engineers, to give smarter, innovative and faster solutions. (F) Local service providers have to live what they create. (G) Relationships are central to any gathering of minds for build or operation projects. Locals generally stay local and develop better and more enduring working relationships. (H) Cost savings, BU margins, employment increases, technical knowhow/IP accrue back to local entities. Building wealth and improvement in our area, not another distant centre. (I) Being a business unit, Option #1 is a commercial model. It is more likely to be output driven, more productive, less bureaucratic (Responsive and faster) and, less political.
34845	Dr Peter Ross	N/A	I pursued an engineering and management career for 42 years, 38 of them in local authorities in a variety of positions including periods in senior executive positions in smaller local authorities where I was responsible for the delivery of water services in-house. In the middle I spent 4 years firstly as the General Manager of a LATE which contracted to the owning Council for all its water services, then as a manager providing the same services for a contractor which purchased the LATE. The latter half of my secular career was spent working part-time for a Council (the original LATE owner), most of which was focussed on water services which the Council contracted out. I had the experience of both providing the service then later writing the contract and managing its delivery as the client. In short, I have experience on both sides of the contracting coin but not experience of a CCO as envisaged by the two unfavoured options.

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

I am therefore commenting from a not entirely uninformed, although out of date (I have been retired now for five years), position. I firmly support the option of in-house provision.

My reasons for doing so are:

1. The option retains a much closer relationship between Council and the operational arm which should ensure a better control on level of service and a "friendlier" relationship between the two.
2. An in-house organisation can be more responsive to changing conditions or needs as its incentives are closely tied to service delivery and not other potentially competing targets like profitability.
3. The option avoids duplication of management and administration organisations. In particular, part, at least, of the revenue can be rated for in lieu of invoicing (which I assume a CCO would use for revenue from customers rather than being paid by the Council) which I think gives greater security of revenue.
4. I think there will be more stability in costs and therefore water services pricing for in-house provision. This occurs because once the resources of the organisation (labour and plant) are established the costs of running it are effectively established within reasonably narrow bounds so the risk of large over-runs is much less than for CCOs. In the latter case there is a freedom to charge more, particularly if the services are defined by contract and variations occur.

34871 Mrs Christine Clark	N/A	Might attract more commercial minded employees
34901 Mr Graeme Galey	N/A	councils don't always get good outcomes from separate business units. option 3 can surely lead to awkward issues with priority of practical works and funding.
34904 Mr Phil Allan	N/A	I see creating a new Organisation as just an increasing cost.
34912 Mr Trevor Gately	N/A	I believe that, as ratepayers, we need to retain ownership of our assets and infrastructure. And to set things in place, legally, so that our assets and infrastructure can't be bought, or taken off us in any other way, by any sort of independent identity. We cannot allow our assets to be taken off us and monetised so that someone else profits from our assets.
34918 Ms Lis Pedersen	N/A	because of your statement that in the short to medium term it is cost neutral and the other plans MAY offer savings in the future. When Labour gets back into power it may well all change again!
34933 Mr Iain Sheves	N/A	1. Water and wastewater infrastructure to be owned and operated by a new WCCO. 2. Any WCCO being combined to operate across Te Taihū (Nelson, Tasman & Marlborough).

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

		<div><div><div>3. The WCCO owning and operating any piped stormwater infrastructure.</div><div>4. The Councils retaining responsibility for:</div><div><div>1. Water quality</div><div>2. Rivers, open water courses & stop bank management</div><div>3. Flood risk management</div><div>4. Planning.</div></div><div>5. Council contracting the WCCO to manage open water courses, river and flood management to ensure joined up decision making.</div><div>6. A streamlined planning process is required to ensure efficient service delivery.</div><div>7. The WCCO being charged with delivery of 30 year infrastructure plans.</div><div>8. Ensuring iwi and Māori entities (including Wakatū) have a meaningful role in governance and planning, particularly where water quality, catchment health, and intergenerational infrastructure outcomes are concerned.</div></div></div>	
34935	Mr Mathias Schaeffner	N/A	My preferred option is that the Tasman District Council provides water services together with other councils, meaning multi-Council CCO with Marlborough, Nelson and/or Buller. Local Water Done Well is intended to ensure people pay cost-reflective prices for water services. The Tasman District Council has shown with the Waimea Community Dam that it was not able to implement a large-scale water-related project in a cost-effective manner, instead there was a blowout of more \$100mio for the Waimea Community Dam.
34990	David Ogilvie	N/A	<div>I consider there are those qualified within the staff and management of the 'three waters' infrastructure within Tasman District. Their knowledge and experience is invaluable, and could be lost should either of the other options be decided. Besides the various consultancies available can be contacted on matters where and when the Council information is limited.</div> <div>Option 1 as an 'in-house' business unit becomes more important when the size of the District is considered and recognised. The District's diversity geographically; geologically; multitude of settlements and demands; coastal factors, rivers, valleys and mountains - underline the value of 'local' knowledge and experience.</div>

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

09 Please share any other feedback you have about water services delivery in the future.

34801 Anette Becher	N/A	What was an attempt at genuine institutional reform has been watered down (ha!) to a re-arrangement of the deck chairs. In my opinion this is unlikely to resolve any of the real issues the District faces. We may no longer be driven by political short term thinking, but we have the same lack of funding (this has not redistributed the true costs and the District has insufficient rate payers to afford the necessary upgrades to meet the standards), we have the same dated systems, the same people running this future unit, and there is still no co-governance. This whole change is meh, and I am truly agnostic about how it is implemented
34833 Mr Peter John Wilks	N/A	Forget joining with Buller. No community of interest and they are cash strapped. Merge the water functions with Nelson City and Marlborough.
34836 Michaela Markert	N/A	I suggest that it is always good to cut water out of the septic system. Therefore, I recommend having greywater systems in place for garden irrigation where possible. If not possible, the greywater could maybe go in the stormwater?
34841 Mr Rob Grant	N/A	As above. TDC is well aware of the professionalism, capabilities of the many civil contractors already working for them. There are also locally based specialists in water treatment such as Process Flow in Lower Queens Street for potable water treatment and ourselves, Southwater who are the only South Island based WWTP dredging company. [Possible Conflict of interest declaration? We are in year 3 of a 10 year contract with TDC to provide survey, dredging and dewatering services at all the Councils waste water treatment ponds]. Just two examples of local expertise that already have a working relationship with TDC.
34845 Dr Peter Ross	N/A	I am mystified by the claim that a CCO will be able to borrow more. I am not familiar with current statutory provisions around local authority borrowing so can only comment in general terms. I would have thought that any potential lender would look upon the Council and the CCO as a group and determine its lending limits accordingly. If this is so, then I cannot see how the borrowing limits would differ between the options, provided that the Council refrained from using water services income to pay loan costs for other services. This hardly seems an unreasonable expectation.
34868 Mrs Gael Beattie	N/A	I'd love to see better use of the natural resource of water coming out of the sky. Stormwater is just running out to sea and so much wastage is terrible when it could be collected and stored on individual properties for irrigating gardens and also treated for household use. Please look at making water storage mandatory on every property. It doesn't need to be above ground. In ground storage with buildings on top is just as good a solution. It's time to think ahead about individuals being more responsible for their own water creating less wasted water and less strain on the storm water systems. All these properties which have to provide water storage to feed stormwater more slowly into the system is just ridiculous when that water could be used by those property

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

		owners. At the moment it seems that is not allowed. Why? It's beyond comprehension. I have lived in an area where we had no option but to collect our own rainwater and that is apparently ok for those people but not town people. Why? I'd far rather filter and ultraviolet treat my own water than have my supply filled with chlorine and fluoride and whatever else is deemed necessary for "my own good". Instead it costs us extra money to install whole house filters to remove all that from our water.
34871 Mrs Christine Clark	N/A	Learning from other regions who are ahead of you in progress would be beneficial to our region.
34901 Mr Graeme Galey	N/A	Given that the cost of loans and admin produce nothing practical,keeping these to a minimum by borrowing less and not duplicating overheads seems obvious.
34904 Mr Phil Allan	N/A	I believe council needs to investigate, the possibility of installing good household filter and UV light systems in homes whic exclude outside taps and toilets. It seems ludicrous to spend millions on providing potable water to flush it down the toilet.
34912 Mr Trevor Gately	N/A	I believe council should push back on central government and oppose the additional water testing costs. We have managed just fine. If central government wants to impose additional water testing regimes, they should pay for it.
34918 Ms Lis Pedersen	N/A	I strongly believe in building climate resilience and that is best achieved by properties being as self sufficient as possible. For example all new suburban builds required to have a rain tank under the garage floor. New subdivisions having their own septic systems....less maintenance for the council and less stress on existing two waters infrastructure.

Tasman District Council
Email info@tasman.govt.nz
Website www.tasman.govt.nz
24 hour assistance

Richmond
189 Queen Street
Private Bag 4
Richmond 7050
New Zealand
Phone 03 543 8400
Fax 03 543 9524

Murchison
92 Fairfax Street
Murchison 7007
New Zealand
Phone 03 523 1013
Fax 03 523 1012

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
14 Junction Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972



New Zealand

IPWEA

INSTITUTE OF PUBLIC WORKS
ENGINEERING AUSTRALASIA

IPWEA NZ Excellence Awards 2019

ENVIRONMENT AND SUSTAINABILITY AWARD WINNER

Cromwell Waste Water Treatment Plant Upgrade

CLIENTS:

Central Otago District Council

CONSULTANTS:

Harrison Grierson, CH2M Beca

CONTRACTOR:

Fulton Hogan, Downer, Southwater



Samantha Gain
President

DATE:
26 JUNE 2019



Southwater Ltd. Company details. March 2024

- Southwater Ltd. (Name changed from Dredging Solutions NZ Ltd in late 2015)
- Certificate of Incorporation; # 3167928
- Date of Incorporation; 1 November 2010.
- Directors;
 - Robert L Grant. Nelson. New Zealand
- Managing Director. Rob Grant
 - Business address.
 - Redacted personal information
 -
- Website; www.southwater.co.nz
- Accountants. Brown & Associates. Nelson. Phone. 03-546 9871
- Lawyers. C & F Legal. Nelson. Phone. 03-545 8080
- ACC # PN228458E
- IRD# & GST# 105-760-779
- Confirmation of Insurance Cover.
 - NZI. Policy # 15-8422076-BPK. Limit of Indemnity.
 - Public Liability. \$2,000,000
 - Statutory Liability. \$500,000
 - Employers Liability. \$500,000
 - Plant insurance – All NZI; - Via 'Vision' Insurance brokers. Nelson.
 - Three dredges.
 - One lightweight auger suction dredge - 1.7 t.
 - One 'Taymac' auger suction dredge – 6.7t.
 - One pontoon mounted – 500kg.
 - Tandem trailer X 3. Single axel trailer.
 - Siltbusters; Two HB50s. Two HB60s. One HB20. 20 foot dosing container.
 - Dosing units. 10 units.
 - General gear. Pipes. Valves. Tools. Three 20 foot and 2 8 foot containers for projects.
 - Vehicles insured. Two Isuzu 4X4 Utes. I Holden station wagon. All AA insured.
- References;
 - Auckland Int Airport. Ian Kerr. Redacted personal information
 - Geofabrics. Peter Finlay.
 - NRSBU. Alan Jones.

2/3/24



Southwater Ltd. Dredging & Water Treatment

We specialise in the dredging and dewatering of sludge, fine grain silts and hydrocarbon contaminated materials plus, water treatment and water recycling.

Southwater Ltd is a South Island based family owned business. We are set up for rapid deployment NZ wide. A safe and environmentally responsible workplace is a key priority. We work closely with Sydney based CRS Industrial Water Treatment Pty Ltd and Dredging Solutions Pty Ltd. If the scale and complexity of specific NZ projects better suit either of these companies we provide local sales and operational support on an agency basis.

Dredging; We have our own dredges, associated pipe work and chemical dosing units. Our gear is mobile and sized to deploy at difficult access and/or remote sites. We dredge and pump a wide variety of materials from retention ponds, municipal lagoons, mine basins, service station tank excavations, ski field ponds, animal waste ponds and small marinas.



Dewatering. Geotube® Dewatering Containers are central to our dewatering operation. They are a unique, simple and cost effective option to dewater sludge, silts, coal tailings and slurries. The bag capacity and shape is determined by the footprint available and volume and solids % to be treated. The result is clean filtrate and greatly reduced solids volumes to dispose from a site - a material saving on disposal costs plus less site traffic.



An aerial photograph of a large, irregularly shaped pond. The pond's surface is covered with numerous red location pins, each accompanied by a numerical depth value in meters (e.g., .85m, .70m, .80m, .75m, .55m, .45m, .43m, .60m, .58m, .65m, .45m, .50m, .57m, .45m, .50m, .40m, .63m, .52m, .53m, .55m, .75m, .58m, .82m, .60m, .59m, .50m, .55m, .73m, .70m, .85m, .90m). The pond is surrounded by a dirt or gravel embankment. To the right of the pond, there is a small cluster of white buildings and a parking area. The surrounding landscape is a mix of green vegetation and brownish soil.

Pond name (eg)	Apex
Survey date	18/9/12
Pond surface area (m2)	16200
Average pond depth (m)	1.41
Average sludge depth (m)	0.62
Est sludge volume (m3)	10044
Sample sludge solids (%)	4.5
Est solids mass (dry tonne)	452
Sludge as % of pond volume	44
Pond level - below pier (m)	0.65

Redacted for privacy

Links

- Page 40

Southwater Ltd. Company details. March 2024

- Southwater Ltd. (Name changed from Dredging Solutions NZ Ltd in late 2015)
- Certificate of Incorporation; # 3167928
- Date of Incorporation; 1 November 2010.
- Directors;
 - Robert L Grant. Nelson. New Zealand
- Managing Director. Rob Grant
 - Business address.
 - Redacted personal information
 -
- Website; www.southwater.co.nz
- Accountants. Brown & Associates. Nelson. Phone. 03-546 9871
- Lawyers. C & F Legal. Nelson. Phone. 03-545 8080
- ACC # PN228458E
- IRD# & GST# 105-760-779
- Confirmation of Insurance Cover.
 - NZI. Policy # 15-8422076-BPK. Limit of Indemnity.
 - Public Liability. \$2,000,000
 - Statutory Liability. \$500,000
 - Employers Liability. \$500,000
 - Plant insurance – All NZI; - Via 'Vision' Insurance brokers. Nelson.
 - Three dredges.
 - One lightweight auger suction dredge - 1.7 t.
 - One 'Taymac' auger suction dredge – 6.7t.
 - One pontoon mounted – 500kg.
 - Tandem trailer X 3. Single axel trailer.
 - Siltbusters; Two HB50s. Two HB60s. One HB20. 20 foot dosing container.
 - Dosing units. 10 units.
 - General gear. Pipes. Valves. Tools. Three 20 foot and 2 8 foot containers for projects.
 - Vehicles insured. Two Isuzu 4X4 Utes. I Holden station wagon. All AA insured.
- References;
 - Auckland Int Airport. Ian Kerr. Redacted personal information
 - Geofabrics. Peter Finlay.
 - NRSBU. Alan Jones.

2/3/24



Southwater Ltd. Dredging & Water Treatment

We specialise in the dredging and dewatering of sludge, fine grain silts and hydrocarbon contaminated materials plus, water treatment and water recycling.

Southwater Ltd is a South Island based family owned business. We are set up for rapid deployment NZ wide. A safe and environmentally responsible workplace is a key priority. We work closely with Sydney based CRS Industrial Water Treatment Pty Ltd and Dredging Solutions Pty Ltd. If the scale and complexity of specific NZ projects better suit either of these companies we provide local sales and operational support on an agency basis.

Dredging; We have our own dredges, associated pipe work and chemical dosing units. Our gear is mobile and sized to deploy at difficult access and/or remote sites. We dredge and pump a wide variety of materials from retention ponds, municipal lagoons, mine basins, service station tank excavations, ski field ponds, animal waste ponds and small marinas.



Dewatering. Geotube® Dewatering Containers are central to our dewatering operation. They are a unique, simple and cost effective option to dewater sludge, silts, coal tailings and slurries. The bag capacity and shape is determined by the footprint available and volume and solids % to be treated. The result is clean filtrate and greatly reduced solids volumes to dispose from a site - a material saving on disposal costs plus less site traffic.



The top row of images illustrates the Siltbuster system components and application. From left to right: a red skip bin with a white liner installed; a blue Siltbuster machine with the company name and contact details (01600 772266, www.siltbuster.co.uk); and a close-up of the blue liner being laid out in a trench, with a black hose connected to a pump.

An aerial photograph of a large, irregularly shaped pond. The pond's surface is covered with numerous red location pins, each accompanied by a numerical depth value in meters (e.g., .85m, .70m, .90m). The values range from approximately .40m to .90m. The pond is surrounded by a dirt or gravel embankment. To the right of the pond, there are some small structures and vehicles parked on a paved area. The surrounding landscape appears to be a mix of grass and bare earth.

Pond name (eg)	Apex
Survey date	18/9/12
Pond surface area (m2)	16200
Average pond depth (m)	1.41
Average sludge depth (m)	0.62
Est sludge volume (m3)	10044
Sample sludge solids (%)	4.5
Est solids mass (dry tonne)	452
Sludge as % of pond volume	44
Pond level - below pier (m)	0.65

Redacted for privacy

Links

- Page 43



To Tasman District Council

From Royal Forest & Bird Protection Society of New Zealand Inc. (Forest & Bird)

Contact Redacted for privacy

Date 19 May 2025

Submission on Local Water Done Well – Ensuring a Healthy Future for Tasman’s Waters and Ecosystems

1. Introduction

Forest & Bird is New Zealand’s leading independent conservation organisation. We have been a voice for nature for over a century, advocating for the protection of our unique indigenous biodiversity and the sustainable management of Aotearoa’s environment across terrestrial, freshwater, and marine ecosystems.

This submission addresses the Tasman District Council’s "Local Water Done Well" Community Consultation Document. Our focus is on ensuring that the chosen water services delivery model for the Tasman District prioritises the health of our waters (te mana o te awa, te mana o te roto, te mana o te repo, te mana o te moana), protects and restores aquatic biodiversity, embeds the principles of Te Mana o te Wai, promotes integrated catchment management (ki uta ki tai), and builds resilience to climate change. We note the preceding Council staff report (RCN25-03-14, 27 March 2025) and its analysis, which has informed this submission.

2. General Principles for Water Services Delivery

Forest & Bird advocates for a water services delivery model that unequivocally commits to and delivers on the following principles:

- **Upholding Te Mana o te Wai:** The chosen model must be structured to give full effect to Te Mana o te Wai and its hierarchy of obligations as defined in the National Policy Statement for Freshwater Management (NPS-FM).
- **Integrated Catchment Management (Ki Uta Ki Tai):** The delivery model must facilitate integrated management. Stormwater management, in particular, must be closely integrated with land-use planning, biodiversity strategies, and broader environmental management – a point also underscored in Council staff's analysis regarding the interconnectedness of stormwater planning with other Council functions.
- **Robust Environmental Outcomes and Accountability:** The model must aim for and be accountable for achieving excellent environmental outcomes, going beyond minimum compliance, with transparent monitoring and public reporting.
- **Climate Resilience and Adaptation:** The model must ensure water infrastructure and management practices are resilient and adaptable to climate change impacts, consistent with Council's Climate Response and Resilience Strategy.
- **Meaningful Iwi/Māori Partnership:** The model must provide for genuine and effective partnership with mana whenua in governance, planning, and operational oversight, honouring Te Tiriti o Waitangi and reflecting the "Together Te Taihu agreement".
- **Sufficient and Dedicated Funding for Environmental Protection:** The model must guarantee secure and adequate funding for environmental protection, mitigation, and enhancement.
- **Precautionary Approach:** The precautionary principle must guide decision-making where environmental risks exist.

3. Analysis of Proposed Options (as per Public Consultation Document)

Forest & Bird has assessed the three options presented in the public consultation document:

Option 1: Keep three waters as an in-house business unit (Council's public proposal)

- **Environmental Pros:**
 - Offers a strong pathway for **integrated management**, particularly for stormwater, aligning its governance with Council's broader land-use planning (RMA responsibilities), biodiversity strategy implementation, and hazard management functions.
 - Maintains direct democratic accountability through elected members.
 - Allows for continuation of existing iwi partnership arrangements within the Council framework.
- **Environmental Cons & Concerns:**
 - A key risk, acknowledged indirectly by Council staff analysis (which scored this option lowest in MCA and noted potential medium to long-term struggles), is that investment in essential water services, particularly for environmental protection, could be compromised by competing Council priorities if the business unit is not genuinely financially ring-fenced and its environmental obligations strongly mandated.
 - The success of this model hinges on unwavering Council commitment to robustly fund and prioritise environmental outcomes.

- The option for an internal governance board/committee needs to guarantee sufficient independence and inclusion of strong environmental/ecological and Te Ao Māori expertise.

Option 2: Three waters Council Controlled Organisation (WCCO)

- **Environmental Pros:**
 - An independent, competency-based board *could* bring focused technical expertise to the operation of water services.
- **Environmental Cons & Concerns:**
 - The complete separation of stormwater governance and planning from the Council is a major flaw. This fragmentation severely hinders integrated management (ki uta ki tai), making holistic environmental outcomes difficult, a concern also implicitly raised by the challenges of coordinating stormwater with other council functions under this model.
 - Establishing a new iwi partnership with the WCCO could be complex and resource-intensive for iwi.
 - Accountability for environmental performance becomes less direct, relying on the Statement of Expectations and the WCCO constitution.

Option 3: Two waters Council Controlled Organisation (WCCO for drinking water and wastewater; Stormwater ownership and governance retained by Council) *(This model aligns closely with Council staff's initially recommended Option 2(a) in report RCN25-03-14)*

- **Environmental Pros:**
 - A significant advantage is that stormwater governance and planning remain with the Council. This aligns with Council staff's reasoning that such integration is crucial for coordination with land-use planning, biodiversity, transport, reserves, and hazard management.
 - Maintains direct democratic accountability and existing iwi partnership structures for stormwater management.
- **Environmental Cons & Concerns:**
 - For drinking water and wastewater, concerns regarding WCCOs (iwi partnership complexity with the WCCO, accountability, and ensuring primary focus on environmental outcomes within the WCCO) remain.
 - The noted lesser WCCO borrowing capacity by 2034 under this model could potentially constrain investment in wastewater treatment upgrades necessary for protecting receiving environments, unless charges are increased.

4. The Importance of Regional Alignment with Nelson City Council

Tasman District Council and Nelson City Council are intrinsically linked, sharing a geographical region, interconnected ecosystems, and cross-boundary catchments. This close relationship is already recognised through collaborative efforts such as the Nelson Regional Sewerage Business Unit (NRSBU).

From an environmental perspective, greater alignment and collaboration between the two Councils on water services management is highly desirable. It offers opportunities for:

- More effective integrated catchment management across the shared regional landscape.
- Consistent environmental standards and protection measures.
- Enhanced ecological connectivity and biodiversity outcomes.
- Potential operational efficiencies that could free up resources for environmental initiatives.

While we note that Nelson City Council is currently pursuing its own in-house delivery options for the Local Water Done Well reforms, the long-term ecological and operational logic for close collaboration remains. The potential for future amalgamation of the two councils further underscores the wisdom of seeking strategic alignment in critical service areas like water management now.

Forest & Bird urges Tasman District Council, irrespective of the specific water service delivery model chosen through this current process, to continue to proactively seek and strengthen opportunities for collaboration, shared services, and strategic alignment with Nelson City Council on all aspects of water and environmental management. This commitment will be vital for achieving the best possible environmental outcomes for the entire Te Taihū region.

5. Forest & Bird's Position and Recommendations

Given the critical importance of integrated catchment management, particularly for stormwater:

- **Forest & Bird opposes Option 2 (Three Waters CCO)** due to the risks of fragmenting stormwater governance from Council's essential land use and environmental planning functions.
- **Forest & Bird sees merit in both Option 1 (Council's public proposal) and Option 3 (Two Waters CCO, Stormwater with Council)**, as both ensure stormwater planning and governance remain integrated with Council. This integrated approach for stormwater was also a key feature of the model (Option 2(a)) recommended by Council staff in their report RCN25-03-14.
 - If **Option 1 (In-house business unit)** is pursued, acknowledging Council staff's assessment of potential long-term challenges for this model, Forest & Bird strongly recommends the following to ensure its environmental integrity and long-term viability:
 1. **Robustly Ring-Fenced Finances and Operations:** Establish the business unit with unequivocal financial separation and dedicated operational capacity so funding for water services, especially for environmental protection and infrastructure upgrades (e.g., wastewater treatment), is not compromised.
 2. **Mandated Expert Environmental and Te Ao Māori Advisory Panel:** Establish a formal, well-resourced advisory panel for the water services business unit. This panel must include independent members with strong expertise in freshwater ecology, coastal ecology, environmental science, mātauranga Māori, and public health to provide guidance and oversight on environmental performance and adherence to Te Mana o te Wai.
 3. **Explicit Mandate for Te Mana o te Wai:** The business unit's founding documents and operational plans must explicitly embed Te Mana o te Wai and its hierarchy of obligations as its primary guiding framework.
 4. **Transparent Environmental Reporting:** Implement comprehensive public reporting on key environmental performance indicators.

- If **Option 3 (Two Waters CCO, Stormwater with Council)** is considered further (aligning with the principles of the staff-recommended Option 2(a)):
 1. **Strong Environmental Mandate for WCCO:** The WCCO's Statement of Expectations and constitution must unequivocally prioritise environmental outcomes and Te Mana o te Wai for drinking water and wastewater services.
 2. **Expertise on WCCO Board:** The WCCO Board must include directors with proven expertise in environmental management and Te Ao Māori perspectives relevant to water.
 3. **Seamless Integration:** Develop clear protocols for operational integration and planning between Council's stormwater functions and the WCCO's wastewater functions.
 4. **Sufficient Funding for Wastewater:** Address potential WCCO borrowing constraints to ensure necessary investment in wastewater infrastructure for environmental protection is not compromised.

6. Overarching Recommendations for Any Chosen Model:

- **Prioritise Te Mana o te Wai:** The chosen model must actively implement and report on how it gives effect to its hierarchy of obligations.
- **Strengthen Iwi Partnership:** Actively explore opportunities for co-governance or enhanced partnership models with iwi mana whenua. The Council Report RCN25-03-14 notes the LWDW reform legislation has placed less emphasis on iwi input compared to previous reforms; Tasman Council must ensure its approach bucks this trend and builds on the existing "Together Te Taihū agreement".
- **Invest in Environmental Enhancement:** Enable investment beyond compliance in projects that proactively restore and enhance the health of freshwater and coastal ecosystems impacted by water and wastewater infrastructure.
- **Climate Change Integration:** Ensure the chosen model has a clear strategy and dedicated resources to implement climate change adaptation measures for all water infrastructure, consistent with Council's Climate Response and Resilience Strategy. This includes planning for more extreme weather events and ensuring infrastructure does not exacerbate climate risks.

7. Conclusion

The delivery model for Tasman's water services will have profound environmental impacts. Forest & Bird urges the Council to prioritise a model that ensures integrated management (especially for stormwater, as supported by Council's own staff analysis), upholds Te Mana o te Wai, fosters genuine iwi partnership, and is fully committed to protecting and enhancing our aquatic ecosystems. Furthermore, we encourage an ongoing commitment to seeking greater collaboration and alignment with Nelson City Council to achieve the best environmental outcomes for the wider Te Taihū region.

We thank the Council for the opportunity to submit.

Ngā mihi,

redacted for privacy
Regional Conservation Manager
Forest & Bird

Summary

Wakatū supports:

1. Water and wastewater infrastructure to be owned and operated by a new WCCO.
2. Any WCCO being combined to operate across Te Taihupo (Nelson, Tasman & Marlborough).
3. The WCCO owning and operating any piped stormwater infrastructure.
4. The Councils retaining responsibility for:
 1. Water quality
 2. Rivers, open water courses & stop bank management
 3. Flood risk management
 4. Planning.
5. Council contracting the WCCO to manage open water courses, river and flood management to ensure joined up decision making.
6. A streamlined planning process is required to ensure efficient service delivery.
7. The WCCO being charged with delivery of 30 year infrastructure plans.
8. Ensuring iwi and Māori entities (including Wakatū) have a meaningful role in governance and planning, particularly where water quality, catchment health, and intergenerational infrastructure outcomes are concerned.

Planning, Delivery & Governance

The planning and delivery of water infrastructure in the district is driven by the LTP process. Although it is a 10-year plan (with outline planning to 30 years) it is reviewed by the Council every three years, meaning that each intake of Councillors have an opportunity to amend the plan. This can lead to significant changes to the timing of projects or even completely dropping them, which introduces uncertainty into the planning of water infrastructure. It has the potential to favour short-term thinking where important infrastructure projects can be allocated into the latter stages of a LTP, with rates and DCs calculated accordingly, but which may never be delivered – albeit often for good reason.

Many commentators note that this political element to infrastructure planning and delivery is a significant contributing factor to deteriorating water infrastructure in New Zealand today. While this is likely a factor in Tasman, a raft of unfunded legislation from Central Government around water and climate change has significantly exacerbated the issue, particularly in those Councils which cover a large and varied geographic range.

An entity which is solely focused on managing water and water services for the benefit of the environment and community, insulated from political considerations has merit.

However, any new water entity must also focus on intergenerational wellbeing, mātauranga Māori, and connection to whenua and wai. It should also plan for future generations, embed iwi and Māori entities (including Wakatū) in decision making, and measure success with cultural and ecological indicators not just costs. A water services entity has potential, but only if it's built on relationships and shared responsibility, not just technical design (e.g., jointly developing plans with iwi and Māori entities).

Combined Approach

Wakatū is of the view that a combined approach across Te Taihū is preferable with drinking and wastewater managed by a specialist entity. This would separate out the Council's regulatory function from delivery and would ensure that the entity responsible for water services delivery could manage the assets for the benefit of the water resource, the community and the environment.

We also see great advantages in a combined approach across the Nelson, Tasman and Marlborough Councils, through pooling expertise and resources, combined with good governance, clear outcomes and a focused approach. Wakatū is of the opinion that this could present an opportunity to benefit from economies of scale and improve water services delivery in the region.

This approach would be also strengthened by ensuring:

- Iwi and Māori entities (including Wakatū) are embedded in governance of any new entity, not just consulted;
- Planning reflects Māori relationships with the water and whenua; and
- Any gains from scale also support cultural, environmental and community wellbeing.

A regional model is a good approach, but again only if it is built on shared values and place based partnerships, not just operational alignment.

Stormwater

Drinking water and wastewater systems rely on man-made structures to perform specialised functions. By contrast, stormwater systems use a mixture of man-made and natural features to manage the effects of precipitation – a natural and changeable phenomenon. One of the key challenges in the management of stormwater is predicting future rainfall patterns to allow for the efficient design of systems – this is highly specialised work particularly in light of a changing climate.

Stormwater systems can also create a wider range of benefits to the environment and community, noting that the majority of the capacity in many systems is redundant almost all of the time by design, there is scope to use open space for biodiversity, wildlife habitat, recreation or as transport corridors. Although this is encouraged through the planning process, Wakatū would like to see a more joined up approach through the vesting of multi-use reserves in developments which would promote the management of stormwater management areas for a range of community benefits rather than creating distinct stormwater and recreation reserves.

In order to be effective, stormwater management has to take a whole catchment approach. Any new entity charged with this task would have to take on a significant range of powers to effectively manage flood risk and water quality within the catchment, including rivers and stop bank management, discharge permits, reserve management etc. The alternative would be to have some form of delineation between any stormwater entity and the Council.

On balance, Wakatū feels that overall catchment management should remain a Council function with TDC being responsible for water quality and maintaining open water courses and any new entity being responsible for the management of any piped or other hard infrastructure. However, this would require a clear service level agreement setting out that the Council would maintain natural water courses to accommodate upstream flows.

It is also important that iwi and Māori entities (including Wakatū) are included in the design and governance of both built and natural systems.

Ownership of Infrastructure

Wakatū does not have concerns about piped water infrastructure being owned by a WCCO, provided the entities remain owned and controlled by Councils, and iwi and Māori entities (including Wakatū) have authority and a sustained role in governance and planning. The ownership of these assets comes with significant liabilities and a legal requirement to provide services to the approved standard – so any “asset value” they hold must be weighed against the liabilities they carry. It is key that the entity holding the liability and the asset has the ability and resources to efficiently provide the necessary services to the end user.

Council’s Responsibility

Wakatū is of the view that the Councils currently have to navigate significant conflicts of interest as a service provider, asset owner, regulatory entity and planning authority. By retaining the regulatory and planning functions and passing the service provision to a WCCO the Councils can be more objective in the execution of their regulatory duties.

A hugely important element in the efficient delivery of services will be a streamlined planning process for the WCCO. Although, streamlined planning must still uphold cultural integrity and intergenerational outcomes. Efficiency should not come at the cost of meaningful engagement with iwi and Māori entities (including Wakatū) or reduce planning to purely technical or short-term decisions.