

AGENDA

RĀRANGI TAKE

NOTICE OF AN EXTRAORDINARY MEETING OF

COUNCIL

LOCAL WATERS DONE WELL CONSULTATION

to be held on **Thursday, 26 June 2025** commencing at **9.00 am** in the Council Chambers,
36 Weld Street, Hokitika and via Zoom



Chairperson		Her Worship the Mayor
Deputy and Southern Ward Member:		Cr Cassin
Northern Ward Members:		Cr Neale, Cr Burden, Cr Phelps
Hokitika Ward Members:		Cr Baird, Cr Davidson, Cr Gillett
Southern Ward Members:		Cr Manera
Iwi Representatives:		Kw Madgwick, Kw Tumahai

In accordance with clause 25B of Schedule 7 of the Local Government Act 2002, members may attend the meeting by audio or audio-visual link.

Council Vision

By investing in our people, caring for the environment, respecting the Mana Whenua cultural heritage, and enabling investment, growth, and development we will enrich our district and the people that reside here.

Purpose

The Council is required to give effect to the purpose of local government as prescribed by section 10 of the Local Government Act 2002. That purpose is:

- (a) To enable democratic local decision-making and action by, and on behalf of, communities; and
- (b) To promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.

1. KARAKIA TĪMATANGA OPENING KARAKIA

<i>Kia hora te marino Kia whakapapa pounamu te moana Hei hurahai mā tātou I te rangi nei Aroha atu, aroha mai Tātou i a tātou katoa Hui e! Tāiki e!</i>	<i>May peace be widespread May the sea be like greenstone A pathway for us all this day Give love, received love Let us show respect for each other Bind us all together!</i>
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2. NGĀ WHAKAPAAHA APOLOGIES

3. WHAKAPUAKITANGA WHAIPĀNGA DECLARATIONS OF INTEREST

Members need to stand aside from decision-making when a conflict arises between their role as a Member of the Council and any private or other external interest they might have. This note is provided as a reminder to Members to review the matters on the agenda and assess and identify where they may have a pecuniary or other conflict of interest, or where there may be a perception of a conflict of interest.

If a member feels they do have a conflict of interest, they should publicly declare that at the start of the meeting or of the relevant item of business and refrain from participating in the discussion or voting on that item. If a member thinks they may have a conflict of interest, they can seek advice from the Chief Executive or the Group Manager Corporate Services Risk and Assurance (preferably before the meeting). It is noted that while members can seek advice the final decision as to whether a conflict exists rests with the member.

4. PŪRONGO KAIMAHI STAFF REPORTS

- **Submissions on the Local Water Done Well Consultation** (Pages 4 - 6)
A. Paulsen, Asset Strategy and Development Manager
- Appendix 1:** Table of Submitters & Table of Submissions to be Heard (Page 7)
- Appendix 2:** Submission Analysis (Pages 8 - 9)
- Appendix 3:** Submissions (Pages 10 - 42)

5. SUBMISSION HEARINGS

- Hearing the submissions and feedback to the Local Waters Done Well consultation will be in the open section of the meeting.
- Deliberations will be held in the open section of the meeting.
- Decisions will be made by Council in the open section of the meeting.

**DATE OF NEXT ORDINARY COUNCIL MEETING – THURSDAY 26 JUNE 2025 AT 1.00 PM
COUNCIL CHAMBERS, 36 WELD STREET, HOKITIKA AND VIA ZOOM**

Report to Council



DATE: 26 June 2025

TO: Mayor and Councillors

FROM: Asset Strategy and Development Manager

Submissions on the Local Water Done Well Consultation

1. Summary

- 1.1. The purpose of this report is to hear submissions on the Local Water Done Well Consultation.
- 1.2. This issue arises from the requirements of the Local Government (Water Services Preliminary Arrangements) Act that Council is required to consult on options for the future delivery of water services.
- 1.3. Council seeks to meet its obligations under the Local Government Act 2002 and the achievement of the District Vision adopted by the Council in June 2024, which are set out in the Enhanced Annual Plan 2024/2025. Refer page 2 of the agenda.
- 1.4. This report concludes by recommending that Council hear the verbal submissions, consider the written submissions, and deliberate on the Local Water Done Well Consultation.

2. Background

- 2.1 The reason the report has come before the Council is that Council agreed to conduct public consultation for the future delivery of water services under the Local Government (Water Service Preliminary Arrangements) Act 2024.
- 2.2 The consultation document provided three options:
 - i. Joint 3 Council CCO – A regional entity formed in partnership with Grey and Buller District Councils.
 - ii. Internal Business Unit – Water services remain within Council, with ring-fenced revenue and expenditure to meet financial and regulatory requirements.
 - iii. Westland + 1 other Council CCO – A shared entity with one other neighbouring district.
- 2.3 The submission form asked submitters three questions:
 - i. Do you support the proposed West Coast Council Controlled Organisation?
 - ii. Do you prefer that Westland District investigates setting up an internal business unit?
 - iii. Do you have any other comments on the proposed West Coast Council Controlled Organisation?
- 2.4 Public consultation commenced on Friday 16th May 2025 and closed Monday 16th June 2025 at 5pm (32 days).

3. Current Situation

3.1. Council received 13 submissions; these can be found in **Appendix 2** and **Appendix 3**. The submissions received were via email in through the submission form or a letter.

3.2. A summary of the submissions is provided below in Table 1.

Table 1. Summary of Submissions

Question	Response
Do you support the proposed West Coast Council Controlled Organisation?	<ul style="list-style-type: none">• 30.8% (4/13) of submitters prefer this option.• 5 submitters answered the question and 1 was somewhat supportive in their letter.• 4 submitters made no reference to a preference on a delivery model.
Do you prefer that Westland District Council investigates setting up an internal business unit?	<ul style="list-style-type: none">• 38.5% (5/13) of submitters prefer this option.• 5 submitters answered the question and 3 were somewhat supportive in their letters.• 4 submitters made no reference to a preference on a delivery model.
Do you have any other comments on the proposed West Coast Council Controlled Organisation?	All submitters provided comments, these are provided in Appendix 2 and Appendix 3 .

3.3. It is noted that seven submitters provided letters rather than filling in the submission form. These letters have been interpreted by staff to provide a summary in the table above.

4. Options

4.1. Option 1: Hear the verbal submissions, consider the written submissions, and deliberate on the Local Water Done Well Consultation.

4.2. Option 2: Do not hear and consider submissions on the Local Water Done Well Consultation.

5. Risk Analysis

5.1. Risk has been considered, and the following risks have been identified:

- i. Compliance and Regulatory Risk – Delaying or not holding the hearing risks not meeting the legislative timeframe of submitting a Water Services Delivery Plan to the Department of Internal Affairs by 3rd September.
- ii. Reputational Risk – If Council does not hold the hearing there is a risk of damage to Councils reputation as the public will perceive that Council does not take their views into account in making decisions.
- iii. Strategic Risk – Councils preferred option is joint with two other Councils, not holding the hearings risk our partnership Grey and Buller District Council.

6. Health and Safety

6.1. Health and Safety has been considered, and no items have been identified.

7. Significance and Engagement

7.1. The level of significance has been assessed as being high under Council's Significance and Engagement Policy.

7.2. Public consultation was undertaken from Friday 16th May to Monday 16th June. This was advertised through public notices in local newspapers, community meetings, through the Council website and Facebook page.

8. Assessment of Options (including Financial Considerations)

- 8.1. Option 1 – Hear the verbal submissions, consider the written submissions, and deliberate on the Local Water Done Well Consultation. Hearings are an important part of the community consultation and engagement. Council needs to understand the community views on the Local Water Done Well proposal.
- 8.2. Option 2 – Do not hear and consider submissions on the Local Water Done Well Consultation. Council has an obligation to hear and consider submissions. To not do so would breach Council's obligations under the Local Government Act.

9. Preferred Option(s) and Reasons

- 9.1. The preferred option is Option 1 – Hear the verbal submissions, consider the written submissions, and deliberate on the Local Water Done Well Consultation.
- 9.2. The reason that Option 1 has been identified as the preferred option is that it enables Council to comply with legislation, be on track to meet legislative timelines and continue working in partnership with Grey and Buller District Council.

10. Recommendation(s)

- 10.1. That the report be received.
- 10.2. That Council hear the verbal submissions and consider the written submissions.
- 10.3. That Council deliberates on the submissions on the Local Water Done Well Consultation.

Alicia Paulsen
Asset Strategy and Development Manager

Appendix 1: Table of Submitters & Table of Submissions to be Heard

Appendix 2: Submission Analysis

Appendix 3: Submissions

Appendix 1: Table of Submitters

Submission Number	Name/Organisation	Verbal Submission at the Hearing	Page Number
1	Julie Madigan	No	10
2	Rex and Anthea Keenan	No	11
3	Maurice Sullivan	Yes	17
4	Maria Cunningham	No	18
5	Barry Beaton	No	19
6	Jacque Grant	Yes	20
7	Louise Morgan	No	25
8	Federated Farmers of New Zealand	Yes	27
9	Health New Zealand	No	31
10	Lez Morgan	No	34
11	Kevin Fewtrell	No	37
12	Inga Perkins	No	38
13	Greg Maitland	Yes	40

Table of Submissions to be heard

Submission Number	Name/Organisation	Time Allocated	Page Number
3	Maurice Sullivan	9.00	17
6	Jacque Grant	9.05	20
8	Federated Farmers of New Zealand	9.15	27
13	Greg Maitland	9.25	40

Appendix 2: Submission Analysis

Submission Number	Do you support the proposed West Coast Council Controlled Organisation?	Comments	Do you prefer that Westland District investigates setting up an internal business unit?	Comments	Do you have any other comments on the proposed West Coast Council Controlled Organisation?	Comments	Staff Comments
1	Yes	So long as no authority is lost from our Council, ie., WDC. If I need to ring & bitch at someone, I want them to know where Ross is, not someone behind a computer screen in Wellington or similar.	No		Yes	As above, I don't want to lose knowledge from local people. It might be sensible economically to join other Councils, but that saving/scale will be easily lost if the 'governing' body has no idea of local idiosyncrasies - one size will NOT fit all. Apparently we have a little bit of rain here. We do not need to be treated like the East Coast / drought-stricken areas.	
2							Please see attached letters. General objection to Local Water Done Well, no mention of a preferred delivery option.
3	No		Yes		Yes	Another bureaucracy	
4	Yes	Provision of clean drinking water is an absolute priority for council. I would like to see more rigorous examination of land use consents, as there is a clear coonnection between agricultural, industrial and mining land use and ground water pollution. I am also appalled by the lack of riparian planting. It's a great shame 3 waters was turned into a political issue. Councils need to work together with lwi and industry, and ignore racists.	No		Yes	See above	
5	No	The WDC has used a preferred contractor to maintain its water resources for some years, it has achieved the drinking water standards for some time now. Why would you want to set up a new system with the three councils and incur more cost to the rate payer? There seems to be some ignorance in the council regarding the fact that many of their rate payers are pensioners on a fixed income. If it (the system) is not broken, don't fix it.	No	As above. I feel that the council is getting involved in projects outside its core responsibilities. Keep the focus on infrastructure, and start reducing council debt.	Yes	My only question is, who has made this organization the 'preferred choice', and why?	
6							Please see attached letter. General objection to Local Water Done Well, no mention of a preferred delivery option.
7							Please see attached letter. General objection to Local Water Done Well, preferred delivery option of 'internal business unit'.
8							Please see attached letter. Not opposed to a multi council controlled organisation but have some concerns.
9							Please see attached letter. Provides general advice and states no view on a preferred delivery option.
10							Please see attached letter. General objection to Local Water Done Well, preferred delivery option of 'internal business unit'.

11	Yes	Given the Lending/Funding Criteria this appears to be the best option for all 3 Councils to have a shared Water Business Unit.	Yes	Yes on the condition that Option 1 (preferred option) does not go ahead.	Yes	There can be NO Fees added across the Rating District to those that cannot be Connected to the Water Infrastructure nor those on existing Tank/Septic systems whereby new Infrastructure becomes available. In short No sneaky Fees added across the Rating District should the Water Controlling Entity fail which is highly likely occurrence.	
12						<p>I think that working with the other two councils will create some savings and efficiencies. However, I wonder if there is a way to achieve this without establishing a CCO.</p> <p>I understand the benefit of shifting debt and perhaps a CCO is the best way but over the years there have been multiple reviews of our CCOs and a variety of changes to their set up and operation. It doesn't always appear to be the best, consistent, transparent or efficient way to achieve council functions.</p> <p>I am also concerned that the inhouse expertise and institutional knowledge could be lost.</p> <p>If those concerns can be managed I would be happier. Perhaps there is some half way house option of collaboration between the three councils while retaining control and using existing inhouse expertise.</p> <p>If we were to move to a single board, I would like to see one or two councillors from each district included on the board as well as relevant experts, and those experts to include water infrastructure experts.</p> <p>I would also like to support the need to invest in upgrading/replacing the Hokitika sewage ponds. A great deal of expensive work has gone into developing and narrowing down the options and WDC should accept the recommended way forward and get on with it without delay. The discharge from the current ponds is a disgrace. It relies on a method to manage sewage that was used some 40 years ago - we can and must do better quickly.</p>	
13							Please see attached letter. General objection to Local Water Done Well, preferred delivery option of 'internal business unit'.

Alicia Paulsen

From: noreply@westlanddc.govt.nz
Sent: Wednesday, 4 June 2025 3:21 pm
To: Infrastructure
Subject: LWDW submission

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

The following submission has been received:

First name

Julie

Last name

Madigan

Email

[REDACTED]

Contact number

[REDACTED]

Postal Address

[REDACTED]

Is your feedback on behalf of an organisation or business?

No

If yes, please state the name of the organisation**Do you wish to attend a hearing to present your submission?**

No

If yes, please choose**Do you support the proposed West Coast Council Controlled Organisation?**

Yes

Please add your comments

So long as no authority is lost from our Council, ie., WDC. If I need to ring & bitch at someone, I want them to know where Ross is, not someone behind a computer screen in Wellington or similar.

Do you prefer that Westland District Council investigates setting up an internal business unit?

No

Please add your comments**Do you have any comments on the proposed West Coast Council Controlled Organisation?**

Yes

Please add your comments

As above, I don't want to lose knowledge from local people. It might be sensible economically to join other Councils, but that saving/scale will be easily lost if the 'governing' body has no idea of local idiosyncrasies - one size will NOT fit all. Apparently we have a little bit of rain here. We do not need to be treated like the East Coast / drought-stricken areas.

Alicia Paulsen

From: Rex and Anthea Keenan <[REDACTED]>
Sent: Wednesday, 4 June 2025 3:55 pm
To: Infrastructure; Paul Davidson; Donna Baird; Steven Gillett; Patrick Phelps; Ashley Cassin; Reilly Burden; Brian Manera; Helen Lash; [REDACTED]
Cc: enquiries@taxpayers.org.nz
Subject: FW: Objection to LWDW Plans please file within your Submission Documentation and send further to Local Govt.

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

OBJECTION to all done so far: send back to Central Government over reach:

It's one thing for the Local Water Done Well reform to offer this choice for councils, but that doesn't mean just any CCO makes sense. DIA coerced Council/s to take three waters tranche funds to spend elsewhere. DIA also continued on spending when National Government were saying they would pull the three waters policy up!. Now to Westland/Grey/Buller WE have also witnessed CCOs / Directors and conflicts of interests within, while we always required core business function.

It's been 30 years here at Kaniere since we found coliforms within our own drain 20000 coliforms per mil which was straight sewerage! due to Council staff allowing building in nearby area without proper infrastructure but overflows to stormwater (through into our property before we bought it - no info on LIM). WE right here on this property have those files of when Kaniere went into the HOKitika Sewerage Scheme.

Have Council since kept good Asset Management Plans and how on earth to budget if those plans not in place!? Waiho River sewerage ponds were left at risk 2012/13 when Council staff especially and CEO emails confirm the known risks of the river. Infiltration galleries washing out. All while the Council (CCOs) i.e. Property Company and Westroads monies spent down on the Haast Hollyford Roding proposal (I have those transaction details).

Now in the most torrential rain weathers that we get here i.e. Rivers, Creeks, in high rainfalls. Let's take a look at Westland and not the rest of the Country (perhaps Westland provincial even) and realise that we have had the Local Government Commission here who sanctioned the One West Coast Plan. Since then there has been still wasted monies and including lwi representation. So come back to Directors of Companies - who can we rely on as in Trust for local waters done well being drinking, storm, waste waters. No one better than those with the local knowledge here and that doesn't have to be CCO directors or lwi directors or any other company director but those with the most skill base.

So Westland, Grey, Buller and West Coast Regional Council - you must all go back to Local Government Commission and too the Local Government Fix It we had here and paid for in 2012/14. Go back to ex Mayor Pugh Council time and her staffing who have let us down and at our expense. Go to Sir John Key and his cycletrail - did he really ask for a Wilderness Trail in the most risk rainfall area

causing liability. No and neither did he expect \$1 mil clip on bridge cycletrails to be wasted at Teramakau.

Bridges, roading, rivers, lakes, water supplies and sewerage schemes is all we require of a network within that of District Councils and we already have Westroads and Westreef who surely must have the plans (Asset Management). So to get back to unification then too we must rid at least two Council/s so that affordability and accountability is paramount for a low rating base (Westland 7400) and where there is also DOC!! (see our application 2015 to LGC).

Show our people the correct information like the underground pipeworks, the pond facilities, drinking water pipelines instead of playing games with fairylights, fanciful nonsense. You have wasted on playgrounds! and giveaways.

Paying CEOs up near \$278k and we have four, plus the CEOs of CCOs is ludicrous enough! without another lot of CCO's CEOs.

I don't have to say much more = it's a 'get back to Central Government and tell them they've overreached and coming out with ludicrous decisions" (and you are all acting like puppets including our MPs) while monies are going to deep pockets.

We shall form our own waters committees in Westland and it won't cost the elderly or our health care facilities... it will be based on skill factor and intelligence.

So here it is an objection to New Zealand government workings, from Westland long term Pioneer descendants who brought the waterlines out from lakes. This is an objection to overly administrative overheads, government overreaches while our infrastructure needs & health care were always necessary. It comes back to being well informed and not to be ridden roughshod over by those who should know better..... let's apply the Magna Carta and our Common Sense.

Without prejudice.

:Anthea-Rose : Keenan

Alicia Paulsen

From: Rex and Anthea Keenan <[REDACTED]>
Sent: Thursday, 5 June 2025 11:08 am
To: Infrastructure; Paul Davidson; Donna Baird; Steven Gillett; Patrick Phelps; Ashley Cassin; Reilly Burden; Brian Manera; Helen Lash; [REDACTED]
Cc: enquiries@taxpayers.org.nz
Subject: RE: Objection to LWDW Plans please file within your Submission Documentation and send further to Local Govt.

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Copy of letter sent to OAG this day 12 mths ago: it is well evident that the duty of those paid highly have not upheld their responsibilities for New Zealand : yet now our MP Pugh giving events funding (wildfoods festival \$50k & street racing \$24k) when even local councillors are asking for figures (not yet given) : -

From: Rex and Anthea Keenan <[REDACTED]>
Sent: Wednesday, 5 June 2024 9:05 am
To: 'enquiry@oag.govt.nz' <enquiry@oag.govt.nz>
Subject: CALL UPON OAG TO INVESTIGATE WESTLAND DISTRICT COUNCIL

Office of the Auditor-General
PO Box 3928
Wellington 6140

Further to previous correspondences please find herewith call of “No Confidence” in Council due to continuous misspending, lacking fiscal responsibility. It is your duty to ensure the Law is complied to by Oath.

You must check Council : for its high cost projected leadership \$7.8 mil budget when there is eye glaring wasted time, near 8 or 9 staff sitting at each meeting, behind closed door workshops 33 in 11 mths, inappropriate changes to long term plans (when those long term plans haven't been planned property in the first place):-

1. Hokitika Pool Project - \$5.6 million incl. high cost consultant fee not included in their budget having to be funded by MBIE and or switching funds
2. Hokitika Cass Square Playground \$1.1 million change of Long Term Plan and taken over by a community group (lottery funded or fundraising from community) encouraged by Mayor, without special consultation and also a \$600k new toilet block which is overly electronic and costing \$100k to clean p.a.
3. Pakiwaitara Building (already named before consultation) \$1.2 million and \$950,000 to water proof no proper initial plan – you have been alerted before to this.
4. Carnegie Building and museum costs while the Museum closed six years and meddling with our Pioneer Heritage – a list has been given to Police
5. The turning of a two way street, into a one way with fixtures now built out onto streets when parking is required especially wet days
6. Sewerage Pond issues budgeted but then finance staff convince austerity depreciation to give rates and now having to claw back high toilet pan rates \$515 per pan – some rates now proposed increase over 100%.
7. Quoteable Value and Council Staff co signing land valuation objections
8. Hokitika Racecourse gifted to Council who've taken up planning for Housing Development via Kianga Ora much time taken up by planning – staff have left meantime.

9. Westland Wilderness Trail – continued high cost additions and maintenance = not supposed to cost ratepayers
10. Council Controlled Organisations included = overly excessive administration costs and lack of transparency

Council staff now say it will cost **\$80,000** in consultants fees to undo / sell that Pakiwaitara Building as they don't have the time to do Special Consultation – when they haven't carried out Special Consultation for other high cost projects they've delved into i.e. \$5.6 mil pool sheds.

Government and Department of Internal Affairs have created some of the complexity due to their Three Waters changes, coercing Council into taking Tranche monies, grants – spent without special consultation/obligations to Significance and Engagement. All along while sewerage infrastructure issues and need for protection of land/health & well being. However this Council have made no changes to reduce their staffing or overhead costings. WE have four Council/s on the West Coast doing similar with high rates increases, for no extra service.

With only 6600 rateable properties (from Teramakau to Haast) some receiving very little for their rates being demanded, and continued excessive time in trying to do an Annual Plan which over reaches the Long Term Plan 21-31 by causing contentions changes. It is well obvious and has been alerted to you before, there is no room for complacency or for Council to be delving into projects which have started off at one amount and then led to \$millions more. It is our duty as it is yours to restore fiscal responsibility., as while infrastructure not done and or necessary works not carried out. Your accountability of such Council is required urgently as has been called for in attached signatures/cover letter.

Yours faithfully

Rex Keenan and David Barnes

On behalf of signatories to hold Council to account

From: Rex and Anthea Keenan <[REDACTED]>

Sent: Wednesday, 4 June 2025 3:55 pm

To: [REDACTED]

Cc: 'enquiries@taxpayers.org.nz' <enquiries@taxpayers.org.nz>

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Now in the most torrential rain weathers that we get here i.e. Rivers, Creeks, in high rainfalls. Let's take a look at Westland and not the rest of the Country (perhaps Westland provincial even) and realise that we have had the Local Government Commission here who sanctioned the One West Coast Plan. Since then there has been still wasted monies and including Iwi representation. So come back to Directors of Companies - who can we rely on as in Trust for local waters done well being drinking, storm, waste waters. No one better than those with the local knowledge here and that doesn't have to be CCO directors or Iwi directors or any other company director but those with the most skill base.

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Bridges, roading, rivers, lakes, water supplies and sewerage schemes is all we require of a network within that of District Councils and we already have Westroads and Westreef who surely must have the plans (Asset Management). So to get back to unification then too we must rid at least two Council/s so that affordability and accountability is paramount for a low rating base (Westland 7400) and where there is also DOC!! (see our application 2015 to LGC).

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So here it is an objection to New Zealand government workings, from Westland long term Pioneer descendants who brought the waterlines out from lakes. This is an objection to overly administrative overheads, government overreaches while our infrastructure needs & health care were always necessary. It comes back to being well informed and not to be ridden roughshod over by those who should know better..... let's apply the Magna Carta and our Common Sense.

Without prejudice.
:Anthea-Rose : Keenan

Alicia Paulsen

From: noreply@westlanddc.govt.nz
Sent: Thursday, 5 June 2025 8:15 pm
To: Infrastructure
Subject: LWDW submission

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

The following submission has been received:

First name

Maurice

Last name

Sullivan

Email

[REDACTED]

Contact number

[REDACTED]

Postal Address

[REDACTED]

Is your feedback on behalf of an organisation or business?

No

If yes, please state the name of the organisation

Do you wish to attend a hearing to present your submission?

Yes

If yes, please choose

Do you support the proposed West Coast Council Controlled Organisation?

No

Please add your comments

Do you prefer that Westland District Council investigates setting up an internal business unit?

Yes

Please add your comments

Do you have any comments on the proposed West Coast Council Controlled Organisation?

Yes

Please add your comments

Another bureaucracy

Alicia Paulsen

From: noreply@westlanddc.govt.nz
Sent: Saturday, 7 June 2025 4:07 pm
To: Infrastructure
Subject: LWDW submission

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

The following submission has been received:

First name

Maria

Last name

Cunningham

Email

[REDACTED]

Contact number

[REDACTED]

Postal Address

[REDACTED]

Is your feedback on behalf of an organisation or business?

No

If yes, please state the name of the organisation

Do you wish to attend a hearing to present your submission?

No

If yes, please choose

Do you support the proposed West Coast Council Controlled Organisation?

Yes

Please add your comments

Provision of clean drinking water is an absolute priority for council. I would like to see more rigorous examination of land use consents, as there is a clear connection between agricultural, industrial and mining land use and ground water pollution. I am also appalled by the lack of riparian planting. It's a great shame 3 waters was turned into a political issue. Councils need to work together with Iwi and industry, and ignore racists.

Do you prefer that Westland District Council investigates setting up an internal business unit?

No

Please add your comments

Do you have any comments on the proposed West Coast Council Controlled Organisation?

Yes

Please add your comments

See above.

Alicia Paulsen

From: noreply@westlanddc.govt.nz
Sent: Monday, 9 June 2025 5:23 pm
To: Infrastructure
Subject: LWDW submission

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

The following submission has been received:

First name

Barry

Last name

Beaton

Email

[REDACTED]

Contact number

[REDACTED]

Postal Address

[REDACTED]

Is your feedback on behalf of an organisation or business?

No

If yes, please state the name of the organisation

Do you wish to attend a hearing to present your submission?

No

If yes, please choose

Do you support the proposed West Coast Council Controlled Organisation?

No

Please add your comments

The WDC has used a preferred contractor to maintain its water resources for some years, it has achieved the drinking water standards for some time now. Why would you want to set up a new system with the three councils and incur more cost to the rate payer? There seems to be some ignorance in the council regarding the fact that many of their rate payers are pensioners on a fixed income. If it (the system) is not broken, don't fix it.

Do you prefer that Westland District Council investigates setting up an internal business unit?

No

Please add your comments

As above. I feel that the council is getting involved in projects outside its core responsibilities. Keep the focus on infrastructure, and start reducing council debt.

Do you have any comments on the proposed West Coast Council Controlled Organisation?

Yes

Please add your comments

My only question is, who has made this organization the 'preferred choice', and why?

Alicia Paulsen

From: Council
Sent: Tuesday, 10 June 2025 4:06 pm
To: Infrastructure
Subject: FW: Submission on water service

From: Jacquie Grant <[REDACTED]>
Sent: Tuesday, 10 June 2025 3:50 pm
To: Council <Council.Inbox@westlanddc.govt.nz>
Subject: Submission on water service

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To: Westland District Council **From:** Jacquie Grant ONZM **Date:** June 10, 2025

Subject: Feedback on Proposed Water Services Delivery Models – Highlighting Grave and Unacceptable Pitfalls.

Dear Mayor Lash and Councilors,

Thank you for the opportunity to provide feedback on the proposed water service delivery models for Westland under the Local Water Done Well program. While I recognize the complex legislative environment and the urgent need to address New Zealand's water infrastructure challenges, I feel it is essential to express my grave concerns and highlight several significant issues within each proposed option. These concerns require more thorough consideration, clear mitigation strategies, and real accountability than are currently presented.

It is crucial that any chosen model genuinely supports the long-term financial sustainability, democratic accountability, and service quality for Westland's ratepayers, rather than simply endorsing central government mandates or pursuing perceived "economies of scale" at a considerable local cost.

Here are my detailed observations on the key issues with each option:

Option One:

“The Three” (Joint Council Controlled Organization with Westland, Grey, and Buller District Councils)

While presented as the Council's preferred option, aiming for affordability through scale, this model carries **fundamental flaws and substantial risks that appear inadequately addressed.**

Potentially Crippling Transition Costs and Opaque Establishment Complexity

The document's vague reference to "high implementation costs for legal and establishment requirements" and "additional resourcing, time, and costs" is deeply concerning. These potentially **crippling initial expenditures, largely unquantified**, represent a direct and unjustifiable

■

burden on already strained ratepayers, threatening to negate any long-term "savings" before they even materialize. This lack of transparency on upfront costs is alarming.

Profound Erosion of Local Democratic Control

The explicit admission that the Council "would not maintain control over the decision-making processes" is an **unacceptable assault on local democracy**. Essential decision-making power over critical water services, funded by our rates, would be ceded to an autonomous board, appointed based on skills rather than direct local representation. A mere "statement of expectations" and "consultation" on strategy are woefully insufficient safeguards against decisions that may fundamentally diverge from Westland's unique community needs and priorities. This constitutes a fundamental betrayal of local accountability.

Inherent Geographic and Operational Impracticalities

The notion of efficiently managing a single entity across the vast, challenging, and geographically diverse West Coast region promises **untenable operational inefficiencies**. "Additional location costs" and "long travel distances for staff and contractors" are understated; this will inevitably lead to delayed responses for maintenance and emergencies, service degradation in remote areas, and ultimately, higher, not lower, overall operational costs for service delivery. The logistical challenges appear to be severely underestimated.

Avoidable Financial Waste Through Stranded Council Costs

The separation of water services will inevitably leave the Council with significant "stranded costs"—overheads such as leadership, IT systems, and administrative functions previously shared across all services. This avoidable financial waste will inevitably force an unacceptable rate increase for other vital Council services, punishing ratepayers for an organizational restructuring that fails to account for its actual costs fully.

Illusory Long-Term Financial Projections

Despite being touted as the most affordable, the financial figures for this option are described as "very high-level because of those assumptions" and "more difficult to forecast due to changing needs, legislation, population, etc." The 20-year projection is noted as having "more uncertainty." This pervasive lack of firm certainty renders this option's proclaimed "affordability" nothing short of **illusory**, resting on a foundation of alarming ambiguity and speculative assumptions that risk future financial shock.

Option Two

“Internal Business Unit” (Council Continues In-House Delivery)

Despite offering continuity, this option is presented with **crippling financial and regulatory hurdles that render it deeply problematic**:

Concerning Economic & Regulatory Compliance Failures

The candid admission that "Achieving the Government's requirements for financial sustainability, governance and financial ring-fencing will be difficult under this option" reveals a **concerning lack of preparedness and a potentially unrealistic expectation of the Council's current capacity**. This

implies a substantial internal administrative burden and a high, unmitigated risk of non-compliance. This could lead to severe central government intervention or mandated actions that strip Westland of any remaining autonomy, or has it been presented in this manner to satisfy DIA wishes?

Unacceptable Consumer Costs and Stifling Borrowing Restrictions:

This option is explicitly forecast to result in the "potential for higher costs to residents compared to the other options," reaching an **unacceptable annual burden** of \$3,740 within ten years. The "new legislation won't allow us to borrow additional money for water projects if we keep water services in-house." This **severely restricts the Council's ability to invest in necessary infrastructure upgrades**, condemning Westland to a cycle of reactive repairs and crisis management rather than proactive, strategic development, ultimately ensuring future service degradation.

Self-Imposed Isolation and Jeopardized Future Resilience

By opting for isolation, Westland risks **self-imposing a significant disadvantage**, jeopardizing access to crucial government funding and regional partnerships essential for long-term resilience, shared expertise, and considerable investment in water infrastructure. This path appears to deliberately forego opportunities for collective strength deliberately.

Inevitable Sacrifice of Critical Water Infrastructure:

In an environment of competing priorities for limited Council funds, the critical needs of water infrastructure will **inevitably be sacrificed** to other activities such as Land Transport. This scenario perpetuates the challenges this reform aims to solve, ensuring that Westland's water assets continue to age without adequate, timely investment.

Option Three

“The Two” (Joint Council Controlled Organization with Westland and One Other Council)

This option appears to be the **least viable, most irresponsible, and fundamentally flawed** of all proposals.

Demonstrable Lack of Feasibility and Partner Buy-in

The Council's admission that this option is "less likely to occur, and it is not a preferred option for Grey or Buller District Council" undermines its credibility. Proposing an option that **lacks any genuine buy-in from prospective partners** demonstrates a flawed planning process that risks unacceptable time and resource wastage for the Council and the community. It is disingenuous to present it as a serious contender.

Failure to Achieve Necessary Scale and Sub-optimal Benefits

While Option One shares some nominal advantages, the Council's own modelling "shows there are greater benefits for our whole region to work together." This option, therefore, explicitly **fails to deliver the necessary economies of scale**, rendering it a compromise that avoids the most pressing challenges of other models without delivering genuinely transformative benefits or significant cost relief.

Gross Financial Uncertainty and Irresponsibility

The document's admission, "We are unsure what it would be with two councils as it would depend on what Council we work with," highlights a **gross lack of due diligence**. Proposing a model where the core cost burden for ratepayers is declared "unsure" is **fundamentally irresponsible** and makes it impossible for the public to make an informed decision.

Fragmentation of Regional Water Management:

Far from offering a cohesive solution, this approach would only **fragment regional water management**, creating a less efficient, more complex, and potentially more adversarial landscape, undermining any efforts towards a truly integrated regional approach.

Overall and Unacceptable Pitfalls Across All Options

The universally projected and significant increase in water charges for ratepayers is a most pressing and unconscionable concern that permeates all three options. The statement that costs "could perhaps double over the next 20 years, no matter what model we go with" represents a **catastrophic failure to guarantee affordability** for Westland ratepayers. This is not a mere "challenge" but a direct and severe financial threat to every household.

Furthermore, the pervasive lack of transparency regarding future charging structures (e.g., "if government regulators require change") adds an **intolerable layer of financial anxiety** for every household, fundamentally undermining trust in the long-term planning and the Council's ability to protect its citizens.

Additional Critical Concerns

Beyond the structural models, I must also voice grave concerns regarding specific aspects of water management that impact our community:

Rejection of Government-Mandated Fluoridation

I strongly oppose any government-mandated fluoridation of Westland's water supplies. Such an intervention is a matter of personal health and choice, not a collective imposition via local or central government directives. The Westland District Council must vehemently oppose any attempts to compel fluoridation, upholding its residents' autonomy and health freedoms. It is unconscionable to force medical treatment upon an entire population through the public water system.

Urgent and Cost-Effective Solution for Hokitika Wastewater Treatment Plant

The projected \$27 million for the Hokitika Wastewater Treatment Plant is alarming and exemplifies the risk of exorbitant, ill-conceived projects. The Council must prioritize **an immediate, cost-effective, and environmentally sound solution**. This must involve thoroughly reassessing options, including continuing and enhancing **existing treatment ponds**, rather than automatically defaulting to a costly mechanical plant that could cost "upwards of 30 million." Such a colossal expenditure, primarily when less invasive and more natural solutions exist, would be an unbearable and unnecessary burden on ratepayers, and potentially a grave economic misstep. The decision-making process for this vital infrastructure must be transparent and financially prudent, and all viable, less impactful alternatives must be explored.

Conclusion:

The Council faces significant challenges due to central government mandates and the urgent need for infrastructure investment. We must recognize the serious issues of each proposed delivery model and address them thoroughly and effectively. These issues include potentially high transition costs, a significant loss of local democratic control, inherent operational inefficiencies, the burden of stranded costs, severe financial impacts on ratepayers in all scenarios, and specific concerns regarding health autonomy and responsible infrastructure development.

I urge the Westland District Council to **cease simply acknowledging these grave pitfalls and instead present concrete, actionable, and verifiable plans to mitigate them genuinely**. A truly sustainable, acceptable, and democratically accountable solution for Westland's water services must ensure high-quality infrastructure, genuine and guaranteed affordability, and robust local accountability. The current proposals, laden with these critical flaws, fall far short of inspiring confidence or ensuring the best outcome for Westland.

I would suggest that the Council initiate a targeted, tactical, public pushback against this draconian initiative mandated by the Central Government, rather than just taking the easy way out. The Westland Ratepayers must see their Council as a true advocate on their behalf.

The government must be made to see that this issue is far beyond the means of the average ratepayer to sustain, and it is apparent that the local Government funding model is already broken. This initiative will make it all the worse.

I appreciate your consideration of these vital and urgent points.

Sincerely,

Jacquie Grant ONZM

Alicia Paulsen

From: Louise Morgan <[REDACTED]>
Sent: Friday, 13 June 2025 12:58 pm
To: Infrastructure
Subject: Submission from Louise Morgan Hokitika

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

Local Water Done Well (LWDW) is hardly a correct description for what is literally theft by stealth of council owned assets by the Government.

When asking relevant questions at Westland District council (WDC) drop in session to hear that WDC has a preferred option yet central Government has decided for them that their option isn't the Governments option does not bode well for our future.

This despite the Dept. of Internal Affairs (DIA) website still promoting the option WDC preferred.

[Water Services Policy and Legislation - dia.govt.nz](https://dia.govt.nz/Water-Services-Policy-and-Legislation)

That WDC could still form its own Internal Business Unit [lwdw-consultation-document-final.pdf](#) (Page 20) the legal firm MinterEllisonRuddWatts website also ["Local Water Done Well" unlocking further financing and delivery models for water services](#) again showing singular council models as keeping the status quo. With Tasman council now stating that their model will be "inhouse" [Tasman Goes In-House For Local Water Done Well Implementation | Scoop News](#) this was signalled in an earlier statement also [Nelson App](#) So WDC should also tell the central Government that LWDW is best done well by locals, not by central Government ideology or bullying.

This would see WDC within its structure still retain the \$180m of assets which the central Government would rather see placed in the hands of a separate entity outside the control of either WDC or the end users, the ratepayers.

Reading the consultation documents of WDC, Grey and Buller councils, it seems that these documents are long on wishful thinking and fluffy statements yet short of actual factual content around the outcomes for future generations. Buller council even highlighted in red ink the option it thinks is best, nothing more than gaslighting its ratepayers into a decision based on a colour not facts. [Local Water Done Well Consultation Document](#) (Page 16)

There are no facts around the future of water delivery because the new entity does not exist in any shape or form. Future water bills are baseless numbers based on wishful thinking and very little else.

WDC would be very wise to consider the consequences of "gifting": \$180m in assets to a business model that's going to rely on a funding model that's solely based on largess not actual infrastructure requirement. [Ruapehu District Council seeks views on water services supergroup - NZ Herald](#)

So the Local Government Funding Agency (LGFA) is already playing favorites with entities that really are figments of those councils imagination. Councils willing to lose hundreds of millions in assets and leaving their ratepayers with no real voice over water delivery because the Commerce Commission and the LGFA suggested that's best. That does not really meet public consultation when decisions are made by faceless bureaucrats in Wellington on ratepayer behalf. Is that what WDC favours for its communities? Faceless bureaucrats dictating our future? [Councils worry that 'local water' autonomy is illusory, liability is costly - Newsroom](#)

Then of course there is the extra ticket clipping associated with building infrastructure [Watercare spends \\$11m on consultants for delayed Huia treatment plant project - NZ Herald](#) Less on the end user product, more in a third parties pocket.

WDC knows what's best for the affected ratepayers as the preferred choice is the Internal Business Unit. Already delivering for Westland, putting Westland first, not a three headed entity whose focus would be split, funding that would be decided by Wellington and setting water taxation rates based on location and usage dedicated through Smart Meters and users fear of use due to outlandish costs per unit consumed. Sounds dystopian yet that's the reality of the future of water. [Smart meter alert: Households may need to install two units under new Labour plans](#) Is this the future WDC wants for communities.

The ongoing costs to ratepayers for basic life preserving utilities is becoming a real issue. If, as your "guestimate" costs based on wishful thinking the ongoing issues over Electricity pricing [The End of the Low-User Electricity Tariff | Canstar Blue](#) and rates increasing by an average of 7% a year (because no council will ever have rate increases below inflation [adopted-cd-2025.pdf](#) Page 24) then a Hokitika superannuant household could be facing utilities and rates bills totalling \$30,737 per annum in ten years time.

Water (Inhouse model) \$3,749 + 10% per annum increase over ten years \$9,720

Electricity 7,000 kwh average use (national) x \$2.50 per kw \$15,400

Rates \$2,855.51 (2025/26 minus water and sewerage) plus 7% per annum \$5,617

So a single superannuation pensioner at today's rate plus inflation (2.5%) linked increases could in ten years time have AFTER rates and utilities a sum of \$5,100 for the year, or \$14 A DAY to live on!

A couple would have \$25,000 a year to live on using these figures. That's \$69 A DAY to cover every other expense!

Is this sustainable for households to face crippling utilities and rate demands in future years? This is not anything done well this is a pathway to misery and extreme poverty, especially for those on superannuation.

WDC should also consider despite the current mayor stating that NO rural household would pay, how can this be factual as the water entity could bill whomever it wants, there's no charter, no rules, no exceptions as this entity does not exist therefore neither does the fiscal and commercial statement over who pays for what. To say rural ratepayers are exempt is pure speculation based on nothing more than unfounded fanciful dreams.

LWDW can only be described as a complete financial and regulatory disaster for small councils and an even smaller rating base. It's an assault on our rights to live rurally and exist as human beings. Central Government despite the Prime Minister declaring that councils should have more "localism" [Christopher Luxon loves localism, until locals have the wrong opinions | The Spinoff](#) until we actually want it! [So much for Localism and Devolution « The Standard](#) Our region, Westland, along with other smaller councils could still work together around LWDW without the actual need to form entirely unnessercery overreaching complicated management by just doing the basics well and talking to each other around projects and costings. Keeping it simple and focused is a better way.

Perhaps we need to return to the golden era of the West Coast when we rattled the Prime Ministers cage [Helen Clark Insults West Coasters - Again | Scoop News](#) Time to stand up for your "feral" region and put US first.

The Prime Minister, the Hon. Simeon Brown minister for LWDW and the Commerce Commision minister, Andrew Bayly, they do not care one jot about me, you, WDC or Westland. Asset stripping and overreaching Government control pure and simple. That's why you've been bullied into a three headed snake you don't want.

As a very concerned ratepayer I am requesting that WDC revisit its original choice and use the in house model. Far far better to work together with the ratepayers for all of Westland than a fractured business model where there's never certainty or input into Westlands future. Please do the right thing for todays and tomorrow's generations.

Louise Morgan Hokitika

F



Federated Farmers of New Zealand

Local Water Done Well

13 June 2025

SUBMISSION TO WESTLAND DISTRICT COUNCIL, GREY DISTRICT COUNCIL AND BULLER DISTRICT COUNCIL

To: Via email: infrastructure@westlanddc.govt.nz

Submission on: **Local Water Done Well**

Date: 13 June 2025

Submission by: Federated Farmers of New Zealand

Simon Cameron

WEST COAST PROVINCIAL PRESIDENT

Federated Farmers of New Zealand

E [REDACTED]

Address for service: Hemi Bedggood

SENIOR REGIONAL POLICY ADVISOR

Federated Farmers of New Zealand

M [REDACTED]

E [REDACTED]

We wish to be heard in support of our submission.

ABOUT FEDERATED FARMERS

Federated Farmers of New Zealand is a membership organisation, which is mandated by its members to advocate on their behalf and ensure representation of their views. Federated Farmers does not collect a compulsory levy under the commodities levy act and is funded from voluntary membership.

Federated Farmers represents rural and farming businesses throughout New Zealand. We have a long and proud history of representing the needs and interests of New Zealand's farmers.

Federated Farmers aims to empower farmers to excel in farming. Our key strategic outcomes include provision for an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of a vibrant rural community; and
- Our members adopt responsible management and sustainable food production practices.

1. SUBMISSION

- 1.1 Federated Farmers welcomes the opportunity to submit on Local Water Done Well (LWDW); a proposed partnership between three councils: Westland District Council, Grey District Council and Buller District Council. Federated Farmers appreciates the genuine commitment to community consultation by the council collective.
- 1.2 The council collective have identified three options:
- a) A jointly owned Council Controlled Organisation (CCO) owned by Westland, Grey and Buller District Councils:
 - b) An internal business unit; or
 - c) A water organisation jointly owned between two councils.
- 1.3 It is important to note, agriculture, forestry and fishing contributes: \$143.5m (15% of GDP) in Buller, \$167.5m in Westland (20% of GDP) and \$94.9m (8% of GDP) in Grey. These are significant contributions to the national economy and regional productivity.
- 1.4 Rural communities depend on quality human drinking water and generally organise their supply themselves. New Zealand's rural landscape is characterised by many and varied drinking water schemes, with ground, surface, and roof water configurations. These schemes may be specific to individual farms or be small networks of households and buildings in a locality, and are run by farmers, other volunteers, trusts, or committees.
- 1.5 For the farming community, water services are a deeply local issue. The governance structure is critical for Federated Farmers. For our purpose, bigger is not necessarily better. We wonder how rural communities will interact with an independent board, with expertise in business, but not the locality. For the farming community, we feel that the creation of an arm's length council water company could precipitously reduce our input into local decision making.
- 1.6 The importance of rural water infrastructure cannot be understated. And historically, rural water has been managed locally. Whether this has been as a collective, or individually, farmers have invested significant personal and financial efforts into district water infrastructure. Our submission is informed by the view that more information should be provided to rural communities regarding the proposal, particularly the governance and management structures.
- 1.7 LWDW impacts smaller, remote rural communities. This is a key concern and reinforces the need for councils to implement careful and responsible financial planning. As part of the Three Waters Better Off proposal, central government made \$2B available to councils. This was a significant investment which was not well utilised.
- 1.8 Given this, coupled with the significant community benefit agriculture provides, Federated Farmers considers investment from central government can and should be examined. Greater investment would be best placed assisting thriving rural communities and developing talented professionals in the regions. Central government should be promoting rural industries as a key employer of the future, rather than creating social and economic uncertainty via tough regulation.

2. Westland District Council, Grey District Council and Buller District Council

- 2.1 Federated Farmers acknowledge the interest in local government reorganisation. There are

proposals to consider where all four West Coast councils will merge. This would include all the functions of regional and district council. We wonder if councils had thought about discussing this matter before decisions on LWDW are made.

- 2.2 In general, Federated Farmers is concerned about existing levels of spending by local government. Where overspending is an issue, further increasing debt is not necessarily supported. Federated Farmers advocacy position is for careful and responsible budgeting to be implemented.

Submission: Federated Farmers are not opposed to a multi council-controlled organisation; however, we would appreciate reassurance from the councils on the matters below.

- 2.3 Federated Farmers note that drinking water supplies for the following communities is chlorinated: Kumara, Arahura, Harihari, Whataroa and Haast. Federated Farmers believe more local consultation on this issue should have been had before it was run by the Parliamentary Health Select Committee in March 2021. Federated Farmers wonder if LWDW presents an opportunity to revisit and reconsider the matter with rural communities.
- 2.4 Without fully understanding the proposed governance structure of a CCO, Federated Farmers is concerned about how targeted rating zones will be applied. Rural properties on the outskirts of urban settlements could be subjected to rates increases for services they are not accessing, either because it is not economical, or their private connection is sufficient. Federated Farmers prefer to see targeted rates applied only to those who are connected to the mains service. Our strong preference is to ensure rural ratepayers are not unintentionally captured by proposed targeted rating zones.
- 2.5 Federated Farmers acknowledges council aspirations for cost effective drinking water projects. Were a CCO established, for smaller schemes, Federated Farmers anticipates that the potential to adopt a lower cost Acceptable Solution as a pathway to compliance would be investigated. Federated Farmers also encourage councils to take the most sustainable and cost-effective approaches to meeting regulator expectations possible.

3. General Comments

- 3.1 In general, water services are becoming increasingly expensive due to continuously increasing regulatory pressure. Aspirational community wastewater management practices such as disposal to land under future regional consent requirements are expensive. Federated Farmers support continued use of existing water infrastructure and the most cost-effective resource management possible.
- 3.2 Federated Farmers thank local government for being able to engage in West Coast Water Done Well. We look forward to future collaboration.

ENDS

11 June 2025

Local Water Done Well
Westland District Council
36 Weld Street
Hokitika

Tēnā koutou

Public health advice on Local Water Done Well

1. We are providing advice on Westland District Council's proposal for Local Water Done Well. Health New Zealand – Te Whatu Ora has statutory obligations under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956 to improve, promote and protect the health of people and communities. This advice has been prepared by the National Public Health Service (NPHS) Te Waipounamu of Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu provides public health services to the Waitaha region including the Westland district.
2. NPHS Te Waipounamu does not have a view on the preferred option for the delivery of water services in the Westland district. We acknowledge that these plans are intended to encourage councils to examine how they can sustainably fund three waters infrastructure long into the future, including meeting regulatory requirements in terms of quantity and quality of water and supporting growth.
3. Westland District Council's proposal for Local Water Done Well may have significant implications for public health.
4. The following outlines our technical advice on Westland 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.

Specific Advice

5. NPHS Te Waipounamu encourages Council to ensure that the maintenance and strengthening of the 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.
6. 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.

7. The safe collection, treatment and disposal of sewage and wastewater also protects public 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.
8. NPHS Te Waipounamu supports Council's proposal to invest in water services to meet regulatory requirements.
9. NPHS Te Waipounamu supports Council's proposal to invest in the renewal and maintenance of infrastructure to maintain levels of service in the medium and long term.
10. NPHS Te Waipounamu notes that Council's preferred delivery model acknowledges the importance of a cost-effective approach that will help keep costs more manageable for users. NPHS Te Waipounamu supports keeping costs manageable, whilst at the same time protecting people's health by ensuring access to safe drinking water, stormwater and wastewater disposal.
11. NPHS Te Waipounamu encourages Council to ensure adequate resources are allocated to higher risk communities, including those that are currently under-serviced or not serviced.
12. 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.
13. NPHS Te Waipounamu encourages Council to ensure there is provision for equitable and adequate water to be provided to meet health and sanitation requirements.
14. NPHS Te Waipounamu encourages Council to acknowledge the importance of their relationship with the regional council. This relationship should include discussions on 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.
15. NPHS Te Waipounamu supports Council's exploration of the potential efficiencies that could be achieved through a joint West Coast councils water services organisation.
16. 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 closely with mana whenua to ensure water services reflect cultural values, promote environmental sustainability and support their needs.

17. NPHS Te Waipounamu does not wish to be heard with respect to this technical advice.

Ngā mihi



Vince Barry

Regional Director
National Public Health Service
Te Waipounamu



Dr Cheryl Brunton

Medical Officer of Health
National Public Health Service
Te Waipounamu

Contact details

NPHS Te Waipounamu

Email: TWP-NPHS-Submissions@TeWhatuOra.govt.nz

Alicia Paulsen

From: Lez Morgan <[REDACTED]>
Sent: Sunday, 15 June 2025 3:44 pm
To: Alicia Paulsen; Infrastructure
Subject: Fwd: Local Water Done Well

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Here is my submission. Please confirm received. Many thanks. Lez Morgan

----- Forwarded message -----

From: **Lez Morgan** <[REDACTED]>
Date: Fri, Jun 13, 2025 at 12:47 PM
Subject: Local Water Done Well
To: <infrastructure@westlanddc.govt>

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There are no facts around the future of water delivery because the new entity does not exist in any shape or form. Future water bills are baseless numbers based on wishful thinking and very little else.

WDC would be very wise to consider the consequences of "gifting": \$180m in assets to a business model that's going to rely on a funding model that's solely based on largess not actual infrastructure requirement. [Ruapehu District Council seeks views on water services supergroup - NZ Herald](#)

So the Local Government Funding Agency (LGFA) is already playing favorites with entities that really are figments of those councils imagination. Councils willing to lose hundreds of millions in assets and leaving their ratepayers with no real voice over water delivery because the Commerce Commission and the LGFA suggested that's best. That does not really meet public consultation when decisions are made by faceless bureaucrats in Wellington on ratepayer behalf. Is that what WDC favours for its communities? Faceless bureaucrats dictating our future? [.Councils worry that 'local water' autonomy is illusory, liability is costly - Newsroom](#)

Then of course there is the extra ticket clipping associated with building infrastructure [Watercare spends \\$11m on consultants for delayed Huia treatment plant project - NZ Herald](#) Less on the end user product, more in a third parties pocket.

WDC knows what's best for the affected ratepayers as the preferred choice is the Internal Business Unit. Already delivering for Westland, putting Westland first, not a three headed entity whose focus would be split, funding that would be decided by Wellington and setting water taxation rates based on location and usage dedicated through Smart Meters and users fear of use due to outlandish costs per unit consumed. Sounds dystopian yet that's the reality of the future of water. [Smart meter alert: Households may need to install two units under new Labour plans](#) Is this the future WDC wants for communities.

The ongoing costs to ratepayers for basic life preserving utilities is becoming a real issue. If, as your "guestimate" costs based on wishful thinking the ongoing issues over Electricity pricing [The End of the Low-User Electricity Tariff | Canstar Blue](#) and rates increasing by an average of 7% a year (because no council will ever have rate increases below inflation [adopted-cd-2025.pdf](#) Page 24) then a Hokitika superannuant household could be facing utilities and rates bills totalling \$30,737 per annum in ten years time.

Water (Inhouse model) \$3,749 + 10% per annum increase over ten years \$9,720

Electricity 7,000 kwh average use (national) x \$2.50 per kw \$15,400

Rates \$2,855.51 (2025/26 minus water and sewerage) plus 7% per annum \$5,617

So a single superannuation pensioner at today's rate plus inflation (2.5%) linked increases could in ten years time have AFTER rates and utilities a sum of \$5,100 for the year, or \$14 A DAY to live on!

A couple would have \$25,000 a year to live on using these figures. That's \$69 A DAY to cover every other expense!

Is this sustainable for households to face crippling utilities and rate demands in future years? This is not anything done well this is a pathway to misery and extreme poverty, especially for those on superannuation.

WDC should also consider despite the current mayor stating that NO rural household would pay, how can this be factual as the water entity could bill whomever it wants, there's no charter, no rules, no exceptions as this entity does not exist therefore neither does the fiscal and commercial statement over who pays for what. To say rural ratepayers are exempt is pure speculation based on nothing more than unfounded fanciful dreams.

LWDW can only be described as a complete financial and regulatory disaster for small councils and an even smaller rating base. It's an assault on our rights to live rurally and exist as human beings.

Central Government despite the Prime Minister declaring that councils should have more "localism" [Christopher Luxon loves localism, until locals have the wrong opinions | The Spinoff](#) until we actually want it! [So much for Localism and Devolution « The Standard](#) Our region, Westland, along with other smaller councils could still work together around LWDW without the actual need to form entirely unnessercery overreaching complicated management by just doing the basics well and talking to each other around projects and costings. Keeping it simple and focused is a better way.

Perhaps we need to return to the golden era of the West Coast when we rattled the Prime Ministers cage [Helen Clark Insults West Coasters - Again | Scoop News](#) Time to stand up for your "feral" region and put US first.

The Prime Minister, the Hon. Simeon Brown minister for LWDW and the Commerce Commision minister, Andrew Bayly, they do not care one jot about me, you, WDC or Westland. Asset stripping and overreaching Government control pure and simple. That's why you've been bullied into a three headed snake you don't want.

As a very concerned ratepayer I am requesting that WDC revisit its original choice and use the in house model. Far far better to work together with the ratepayers for all of Westland than a fractured business model where there's never certainty or input into Westlands future. Please do the right thing for todays and tomorrow's generations.

Lez Morgan

[REDACTED]

Alicia Paulsen

From: noreply@westlanddc.govt.nz
Sent: Monday, 16 June 2025 6:16 am
To: Infrastructure
Subject: LWDW submission

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

The following submission has been received:

First name

Kevin

Last name

Fewtrell

Email

[REDACTED]

Contact number

[REDACTED]

Postal Address

[REDACTED]

Is your feedback on behalf of an organisation or business?

No

If yes, please state the name of the organisation

Do you wish to attend a hearing to present your submission?

No

If yes, please choose

Do you support the proposed West Coast Council Controlled Organisation?

Yes

Please add your comments

Given the Lending/Funding Criteria this appears to be the best option for all 3 Councils to have a shared Water Business Unit.

Do you prefer that Westland District Council investigates setting up an internal business unit?

Yes

Please add your comments

Yes on the condition that Option 1 (preferred option) does not go ahead.

Do you have any comments on the proposed West Coast Council Controlled Organisation?

Yes

Please add your comments

There can be NO Fees added across the Rating District to those that cannot be Connected to the Water Infrastructure nor those on existing Tank/Septic systems whereby new Infrastructure becomes available. In short No sneaky Fees added across the Rating District should the Water Controlling Entity fail which is highly likely occurrence.

Alicia Paulsen

From: noreply@westlanddc.govt.nz
Sent: Monday, 16 June 2025 1:10 pm
To: Infrastructure
Subject: LWDW submission

This email is from an external sender. Be careful when opening any links or attachments. If you are unsure, please contact IT for assistance.

The following submission has been received:

First name

Inger

Last name

Perkins

Email

[REDACTED]

Contact number

[REDACTED]

Postal Address

[REDACTED]

Is your feedback on behalf of an organisation or business?

No

If yes, please state the name of the organisation

Do you wish to attend a hearing to present your submission?

No

If yes, please choose

Do you support the proposed West Coast Council Controlled Organisation?

Please add your comments

Do you prefer that Westland District Council investigates setting up an internal business unit?

Please add your comments

Do you have any comments on the proposed West Coast Council Controlled Organisation?

Please add your comments

I think that working with the other two councils will create some savings and efficiencies.

However, I wonder if there is a way to achieve this without establishing a CCO.

I understand the benefit of shifting debt and perhaps a CCO is the best way but over the years there have been multiple reviews of our CCOs and a variety of changes to their set up and operation. It doesn't always appear to be the best, consistent, transparent or efficient way to achieve council functions.

I am also concerned that the inhouse expertise and institutional knowledge could be lost.

If those concerns can be managed I would be happier. Perhaps there is some half way house option of collaboration between the three councils while retaining control and using existing inhouse expertise.

If we were to move to a single board, I would like to see one or two councillors from each

district included on the board as well as relevant experts, and those experts to include water infrastructure experts.

I would also like to support the need to invest in upgrading/replacing the Hokitika sewage ponds.

A great deal of expensive work has gone into developing and narrowing down the options and WDC should accept the recommended way forward and get on with it without delay. The discharge from the current ponds is a disgrace. It relies on a method to manage sewage that was used some 40 years ago - we can and must do better quickly.

Submission to Westland District Council

Local Water done well.

Greg Maitland

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

June 16 2025

I wish to speak to my submission

Often I find that in these discussion documents that the first few lines reveal the hooks . In this case " The Local Water Done Well legislation is aimed at addressing NZs water infrastructure challenges and places EMPHASIS on achieving financial sustainability."

It's been proposed that Council will spend \$90mill in the next 9 years then in the next 20 years \$208mill on water services

Im not sure how that equates to placing emphasis on achieving Financial sustainability for Westland ratepayers considering the large number already struggling with costs .

I'm also concerned with the fact that Govt dictates to, and in many respects micro manages local Councils as to what they must spend. Rather than ratepayers deciding what to construct and spend considering it's ratepayers private property that is on the line if any ratepayer cannot afford the costs.

If I were to go to a financial institution for a loan I don't use someone else's asset as security let alone without their written approval.

Yet what is being proposed is that a "Board of Directors" will be able to do just that. Really.

Normally when changes are made for betterment they rely on past evidence of failure in order to create a better system . To date I have seen no evidence. that our way of progressive maintenance wasn't working. A recent public statement by a WDC water infrastructure manager that " Westlands water infrastructure is not too bad. should not rest on deaf ears.

I see this new proposal as simply another blanket of suppressive Govt bureaucracy micro managing the West Coast which will essentially create a 4th " Council" entity for the coast.

To me The options considered by Council are not clear and do not disclose the nitty gritty financials or systems to be used that would ensure a fair distribution of costs between the three councils.

I don't think , and it was in a way mentioned in the document , whether anyone has the ability to crystal ball costs over 20 years of \$300 million plus for water in Westland especially when the proposed system will place it outside the control of WDC.

If the last 20 years of skyrocketing bureaucracy cost are anything to go by it would probably be safer to predict \$600m.

Preferably I would like to see all Councils in NZ unite and reject the GOVTS water legislation, and simply manage water as each council can afford by sticking to 1990's water legislation that has proven to be fit for purpose in OUR region.

The one size fits all legislation needs to change as does the excessive water testing requirement if we truly wish to achieve real economic sustainability. The Haast water supply and the associated red tape that binds it is a case in point.

I disagree with model one allowing an essentially un elected water organisation take on our water related debt and becoming responsible for funding by charging customers. There are far too many unknowns here

I definitely do not agree to the transfer of Council/Ratepayer assets to the new organisation.

What will be in place in regards to the assets if the new organisation defaults on it's loans?

The suggestion that ratepayers could be paying \$2,549 per year just for water services in ten years time will push many already struggling ratepayers over the abyss.

Personally I do not trust the costing expressed in the discussion document in regards to Option 2. I lost that trust after Council Paid \$630,000 for 6 toilet pans at Cass Square.

I do believe that even if option 2 did cost more at least ratepayers would have some control over their asset which essentially defines what a democracy is .

Option one is as if Council are washing their hands of their responsibilities to ratepayers who essentially own the assets and removing water costs off their books. and giving the assets to an unelected board.

In a similar way that Govt imposes legislation on councils to deliver services that Govt once did. Yet the burden on rate payers remains.

There is no clear understanding in option one around whether the new water organisation will run at cost and pay dividends to ratepayers in the event of a profit similar to West Power.

Just a few of a possible hundred questions to be asked.

Would they have control over the water supplies and associated consents?

Would they have the power to force a resident to become a consumer?

Would they have the power to foreclose on a persons private property over unpaid debts?

What would the unpaid debt penalty rate be for consumers?.

In summary I see nothing wrong with the way the system works at present and believe Govt must be challenged on this one.

If anything I opt for option 2

Best regards

Greg Maitland