



Infrastructure and Planning Committee

Te Komiti Whakarite Mahere

Thursday, 5 June 2025

Tāite, 5 Pipiri 2025

Tōtara Room, Whakatāne District Council
14 Commerce Street, Whakatāne
Commencing at 9:00 am



Chief Executive: Steven Perdia | Publication Date: 30 May 2025

whakatane.govt.nz



Live Streaming the Meeting - *Ka whakapāho mataora te hui***Live Streaming the Meeting - *Ka whakapāho mataora te hui*****PLEASE NOTE**

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A Membership - *Mematanga*

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Mayor Dr Victor Luca
Councillor John Pullar - Chairperson
Deputy Mayor Lesley Immink
Councillor Andrew Iles - Deputy Chairperson
Councillor Toni Boynton
Councillor Julie Jukes
Councillor Gavin Dennis
Councillor Wilson James
Councillor Tu O'Brien
Councillor Ngapera Rangiaho
Councillor Nándor Tánczos

B Delegations to the Infrastructure and Planning Standing Committee - *Tuku Mahi ki te Komiti***B Delegations to the Infrastructure and Planning Standing Committee - *Tuku Mahi ki te Komiti***

To monitor and advise on the implementation of Council's Infrastructure Strategy, capital works programme, operational service delivery, and related policy and bylaws.

Specific functions and delegations:

- a. Monitor the operational performance of Council's activities and services against approved levels of service.
- b. To monitor the progress of projects in Council's capital works programme and have input into and make decisions on the development of proposals, options and costs of projects.
- c. Approval of tenders and contracts that exceed the level of staff delegations.
- d. Consider and approve changes to service delivery arrangements arising from the service delivery reviews required under section 17A LGA 2002 that are referred to the Committee by the Chief Executive.
- e. Monitor the development and implementation of associated Central Government Reform programmes including the transition programme for Three Waters reform.
- f. Develop and review associated bylaws (Note: the Council cannot delegate to a Committee to "make" (adopt) a bylaw).
- g. Develop, review and approve strategies, policies and plans on matters related to the activities of this Committee (Note: the Council cannot delegate to a Committee the adoption of policies associated with the Long-term Plan).
- h. Approve Council submissions to Central Government, Councils and other organisations including submissions to any plan changes or policy statements on matters related to the activities of this Committee.

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1 Prayer - *Karakia*

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2 Meeting Notices - *Ngā Pānui o te hui*

1. Live Streaming

The Whakatāne District Council livestreams Council and Standing Committee meetings held in Tōtara Room, within the Council building. The webcast will live stream directly to Council's YouTube channel in real time. The purpose of streaming meetings live is to encourage transparency of Council meetings.

Welcome to members of the public who have joined online and to those within the public gallery.

By remaining in the public gallery, it is understood your consent has been given if your presence is inadvertently broadcast. Please be aware the microphones in Totara Room are sensitive to noise, so please remain quiet throughout the meeting unless asked to speak.

2. Health and Safety

In case of an emergency, please follow the building wardens or make your way to the nearest exit. The meeting point is located at Peace Park on Boon Street.

Bathroom facilities are located opposite the Chambers Foyer entrance (the entrance off Margaret Mahy Court).

3. Other

3 Apologies - *Te hunga kāore i tae*

At the time of compiling the agenda, an apology was received from Councillor O'Brien.

4 Acknowledgements / Tributes - *Ngā mihi mihi*

An opportunity for members to recognise achievements, to notify of events, or to pay tribute to an occasion of importance.

5 Conflicts of Interest - *Ngākau kōnatunatu***5 Conflicts of Interest - *Ngākau kōnatunatu***

Members are reminded of the need to stand aside from decision making when a conflict arises between their role as an elected member and any private or other external interests they might have. Elected Members are also reminded to update their register of interests when changes occur.

The [register](#) can be viewed on the Council website.

1. Financial Conflict

- Members present must declare any direct or indirect financial interest that they hold in any matter being discussed at the meeting, other than an interest that they hold in common with the public.
- Members cannot take part in the discussion, nor can they vote on any matter in which they have a direct or indirect financial interest, unless with an approved exception.
- Members with a financial interest should physically withdraw themselves from the table. If the meeting is public excluded, members should leave the room.

2. Non-Financial Conflict

- If a member considers that they have a non-financial conflict of interest in a matter they must not take part in the discussions about that matter or any subsequent vote.
- Members with a non-financial interest must leave the table when the matter is considered but are not required to leave the room.

6 Public Participation - *Wānanga Tūmatanui***6 Public Participation - *Wānanga Tūmatanui*****6.1 Public Forum - *Wānanga Tūmatanui***

The Council has set aside time for members of the public to speak in the public forum at the commencement of each meeting. Each speaker during the forum may speak for five minutes. Permission of the Chairperson is required for any person wishing to speak during the public forum.

With the permission of the Chairperson, Elected members may ask questions of speakers. Questions are to be confined to obtaining information or clarification on matters raised by a speaker.

6.2 Deputations - *Ngā Whakapuaki Whaitake*

A deputation enables a person, group or organisation to make a presentation to Community Board on a matter or matters covered by their terms of reference. Deputations should be approved by the Chairperson, or an official with delegated authority, five working days before the meeting. Deputations may be heard at the commencement of the meeting or at the time that the relevant agenda item is being considered. No more than two speakers can speak on behalf of an organisation's deputation. Speakers can speak for up to 5 minutes, or with the permission of the Chairperson, a longer timeframe may be allocated.

With the permission of the Chairperson, Elected members may ask questions of speakers. Questions are to be confined to obtaining information or clarification on matters raised by the deputation.

7 Reports - Ngā Pūrongo

7 Reports - Ngā Pūrongo

7.1 Hearings and submissions for future water service delivery options



To: **Infrastructure and Planning Committee**

Date: **Thursday, 5 June 2025**

Author: **W Vullings / Senior Advisor Strategy and Transformation**

Authoriser: **D Bewley / GM Planning, Regulatory and Infrastructure**

Reference: **A2896859**

1. Reason for the report - *Te Take mō tēnei rīpoata*

The Whakatāne District Council continues to work through the Local Water Done Well (LWDW) suite of reforms set out by Central Government. As part of the reform process Council is required to make a significant decision on the future delivery of three water services for the Whakatāne District. Community consultation is being undertaken to support this decision process.

The purpose of this report is to provide elected members with a full copy of submissions received through formal public consultation on future 'water service delivery options' and to support the hearings event for this consultation process.

Attached to this report is the full pack of all submissions received through formal consultation on future 'water service delivery options' and the programme for today's hearings event.

2. Recommendations - *Tohutohu akiaki*

1. THAT the Infrastructure and Planning Committee **receives** the Hearings and submissions for future water service delivery options report; and
2. THAT the Infrastructure and Planning Committee **receives** the written and oral submissions; and
3. THAT the Infrastructure and Planning Committee **notes** that following this meeting a deliberations meeting is set for 26 June 2025 to consider the submissions and provide direction for the development of the Water Services Delivery Plan.

3. Discussion – *Kōrerorero*

The Local Government (Water Services Preliminary Arrangements) Act 2024 was enacted in September 2024 and establishes the Local Water Done Well framework and the preliminary arrangements for the new water services system. This Act establishes the requirement for councils to develop Water Services Delivery Plans by 3 September 2025. The Act does not require Council to consult on its draft or final water services delivery plan, but does require consultation on the anticipated or proposed model or arrangement for delivering water services in its water services delivery plan.

7.1 Hearings and submissions for future water service delivery options(Cont.)

On 10 April 2025 the Infrastructure and Planning Committee reconfirmed two 'water service delivery model' options for public consultation, approved a consultation document, and received an overview of the consultation process.

The two options for public consultation included:

- the option of a Multi-Council CCO - being the preferred option, and
- the option of an Internal Council Business Unit.

The formal consultation period for submissions opened on 17 April 2025 and closed 18 May 2025. A dedicated communications and engagement plan was implemented delivering a multi-faceted campaign. The consultation process returned 84 submissions from a variety of organisations, iwi entities, groups, and individuals, with a number of these taking up the opportunity to present at a hearing. The Committee may be interested to note that the level of response has compared well against larger neighbouring councils.

4. Options Analysis - *Ngā Kōwhiringa*

There are no options being considered - this report is provided for the Committee's information and to support the hearings process.

5. Significance and Engagement Assessment - Aromatawai Pāhekoheko**5.1. Assessment of Significance**

The recommendations of the report are of low significance noting that this report is provided for the Committee's information and to support the hearings process. The report is acknowledged to be part of a process that will lead to decisions of high significance across multiple of Council's Significance and Engagement Policy criteria.

5.2. Engagement and Community Views

This report forms part of the engagement and consultation stage to enable consideration of community views on a decision of high significance.

6. Considerations - *Whai Whakaaro***6.1. Strategic Alignment**

This report is provided for informational purposes and to support the hearings process. As no specific decisions are being made there are no inconsistencies with any of the Council's policies or plans in relation to this report.

6.2. Legal

Legislation guiding the process for three water reforms sets out specific requirements for community consultation. Whakatāne District Council has a dedicated communications and engagement plan in place that meets requirements.

7.1.1 Appendix 1: Hearings schedule of speakers.pdf**6.3. Financial/Budget Considerations**

This report is provided for the Committee's information and to support the hearings process. There are no budget considerations associated with the recommendations of this report.

6.4. Climate Change Assessment

This report is provided for the Committee's information and to support the hearings process. There are no significant or notable climate change consideration associated with the recommendations of this report.

6.5. Risks

This report is provided for the Committee's information and to support the hearings process. There are no significant or notable risks associated with the matters of this report.

7. Next Steps – E whai ake nei

This stage of the process is to receive information only. A further 'deliberations' meeting is scheduled on 26 June. At that meeting elected members will be provided with analysis of the feedback, and be asked to discuss and provide guidance on the future water service delivery option to take forward in the Water Service Delivery Plan.

Date	Next steps
<i>Now closed</i>	<i>Formal public consultation period</i>
⇒ 5 June 2025	Hearings
26 June 2025	Summary of consultation feedback and deliberation on delivery model
14 August 2025	Adoption of final water services delivery plan
3 September 2025	Final date for water services delivery plan to be submitted to DIA
September 2025+	Implementation actions to commence - subject to finalised option
1 July 2028	Legislative timeframe for financially sustainable water services in place

Attached to this Report:

- Appendix 1: Hearings schedule of speakers.
- Appendix 2: LWDW Delivery Options - Full Submissions Pack

7.1.1 Appendix 1: Hearings schedule of speakers.pdf

Infrastructure and Planning Committee - AGENDA

7.1.1 Appendix 1: Hearings schedule of speakers.pdf(Cont.)

Appendix 1 Page Number	Speaking Block	Speaking Time	Duration (incl. 5 min Q&A)	Submitter Name
1				Infrastructure & Planning Committee
2	A	9.05am	15 mins	Councillor Kat Macmillan
3	A	9.20am	15 mins	Gerard van Beek
4	A	9.35am	10 mins	Reuben Cohen
5	A	9.45am	10 mins	Malcolm Whitaker
6	A	9.55am	10 mins	Chris Sides
7				BREAK
8	B	10.30am	15 mins	John Howard
9	B	10.45am	10 mins	John Howard
10	B	10.55am	10 mins	Peter Minten
11	B	11.05am	10 mins	Dianne Wood
12	B	11.15am	10 mins	David Dowd
13				
14				

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Whakatāne District Council consultation on future water service delivery options 2025

CONTENTS PAGE FOR SUBMISSIONS

Pg	Submitter	Hrg
1	Bay of Plenty Regional Council	✓
3	Federated Farmers	
6	Whakatāne-Ōhope Community Board	
8	Te Au o Te Awa Punga (Iarau Ltd)	
13	Whakatāne Action Group	✓
14	John Howard	✓
16	Catherine Dun	
18	David Dowd	✓
20	Loek Klaassen	
22	Maria Klaassen	
24	Malcolm Whitaker	✓
26	Reuben Cohen	✓
30	Tony Swansen	
32	Tui R Edwards	
34	Stephanie Smith	
35	Krystel Coppin	
36	Rose Langley	
37	Brian Persen	
38	Andy Bainbridge, Super Annuants	
39	Judith Hedges	
40	John Langley	
41	Cassidy Jobe	
42	Luke Ruiterman	
43	Prudence Rangi	
44	Simon Monti	
45	Anonymous	
46	Mawera Karetai	
47	Julia Searle	
48	David Ball	
49	Robyn Watchorn	
50	Graham Millar	
51	Toni Owen	
52	Rob van Rossen	
53	Loris Haastie	
54	Susan Marlow	
55	Matt McKevitt	
57	Philippa Branthwaite	
58	Nigel Dee, Hookup Mngt Services	
59	Andrew Broxholme	
60	Anonymous	
61	Colin Latham	
62	Peter Minten	✓

Pg	Submitter	Hrg
64	Barry Morgan	
65	Chris Bullen	
66	Dianne Wood	✓
68	Beth Finlayson	
69	Allan McDougall	
70	Michael Lamont	
71	Dave Hall	
72	Bruce Knight	
73	Maria Bavaro	
74	Jocelyn Coburn	
75	Christine Watkinson	
76	Bryan Vautier	
77	Nicholas Guffey	
78	Anonymous	
79	Rex Humpherson	
80	Lavinia Tanirau	
81	Anonymous	
82	Bill Raki	
83	Tamati Marr	
84	Nikita Tumarae, Ruatāhuna Farm Trust	
85	Rhonda Webb	
86	Alan Keeber	
87	Margaret Underwood	
88	Graeme Mollgaard	
89	Maxine Jury	
90	Philip Jacobs	
91	Stephanie Smith	
92	Helen Read	
93	Mark Sanderson	
94	Garry Rusden	
95	Anonymous	
96	Tony Ramson	
97	Linda Rowbotham, Matatā Residents Assoc	
98	Carley Sudlow	
99	Darryl and Melba Dawson	
100	Lynore Craig	
101	Gerard van Beek, Rubia Farm Ltd	✓
107	Chris Sides	✓
108	Te Mana o Ngāti Rangatihi	
114	Te Rūnanga o Ngāti Whare	
120	Te Rūnanga o Ngāti Manawa	
125	Te Rūnanga o Ngāti Awa	

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Page 1

Bay of Plenty Regional Council Toi Moana submission on Whakatāne District Council water services delivery options under Local Water Done Well.

Bay of Plenty Regional Council Toi Moana welcomes the opportunity to submit on Whakatāne District Council's water services delivery options under Local Water Done Well.

Strategic intent and guiding principles

Regional Council's approach is guided by the strategic intent and outcomes agreed by the Bay of Plenty Mayoral Forum on 3 May 2024, as highlighted in the *Delivery of Water Services in the Bay of Plenty* report (Martin Jenkins, 2023)¹.

Regional Council supports water services delivery options that will achieve the strategic intent of 'safe and clean water, for everyone, now and into the future'.

The May 2024 Mayoral Forum agreed outcomes have been considered and extended as guiding principles that inform Regional Council's approach:

- a) Acting in the best interests of consumers and communities.
- b) Protecting and promoting public health and the environment.
- c) Delivering efficient and financially sustainable services in a manner that complies with regulatory requirements.
- d) Managing water services in a sustainable and resilient manner, including through partnership and alliances with other entities.
- e) Give effect to Treaty of Waitangi settlement obligations.
- f) Recognise the importance and integrated nature of stormwater, the natural environment and flood management, and whole of catchment solutions.
- g) Support and enabling housing and urban development in alignment with the proposed introduction of regional spatial plans.
- h) Ensure transparency back to the community with future water service delivery decision-making and mechanisms.

¹ Martin Jenkins, 2023. *Delivery of Water Services in the Bay of Plenty: Shared challenges and opportunities*.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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BOPRC's Strategic Direction and Community Outcomes

Regional Council's approach is aligned with the Strategic Direction and several Community Outcomes of our Long Term Plan 2024-2034:

- **A Healthy Environment:**
 - Goal 1 - The region's diverse range of physical environments and natural ecosystems are in a healthy state.
 - Goal 2 - Enabling Te Mana o Te Wai through healthy and improving waterways and their ecosystems.
- **Future Ready Communities:**
 - Goal 7 - We seek to provide nature-based solutions as appropriate to enhance the environment and protect our communities.
- **Connected and enabled communities:**
 - Goal 9 - We foster strong communities through engagement in decisions that are important to them
- **Sustainable development:**
 - Goal 14 - Regional infrastructure is resilient, efficient and integrated
- **Te Ara Poutama-The Pursuit of Excellence:**
 - Goal 18 - Partner with Māori to enhance delivery and share decision making.

Regional Council looks to add value regionally and we will continue to work alongside our council partners, stakeholders and the community to enable positive outcomes for the region's environment and our local communities.

We wish to be heard.



Councillor Kat Macmillan

Chair, Strategy and Policy Committee

Bay of Plenty Regional Council | Toi Moana

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Submission

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ

To: Whakatane District Council

Submission on: Local Water Done Well

Date: 18 May 2025

Contact: **BAY OF PLENTY FEDERATED FARMERS**

BRENT MOUNTFORT
BAY OF PLENTY PROVINCIAL PRESIDENT
Federated Farmers of New Zealand
[REDACTED]
[REDACTED]

Address for Service: KELLY LANGTON
NORTH ISLAND POLICY MANAGER
Federated Farmers of New Zealand
[REDACTED]
[REDACTED]

1. INTRODUCTION

- 1.1. Federated Farmers values this opportunity to provide feedback on the Council's future water services journey and response to Local Water Done Well.
- 1.2. The Three Waters have been a source of controversy and uncertainty in recent years. Farmers have taken a close interest in what is happening on the service delivery side for local authorities.
- 1.3. Federated Farmers opposed the establishment of the regional water entities, preferring to see service delivery decision making remain in the hands of local authorities.
- 1.4. We are pleased to see the range of options availed to local authorities in the Local Government (Water Services) Bill, and the elevated status of water services in the scheme of the legislation.
- 1.5. Whichever delivery arrangement Council ultimately settles on (the Council, or a water organisation it joins), will have the status and obligations of a water service provider. This will

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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ensure compliance with financial principles including the ring fencing of water services revenue and, where the council forms a water organization, better access to capital at a lower cost.

- 1.6. Council's service delivery decisions should promote efficient use of the precious water resource. Where volumetric charging is not in place, it should be. Inefficient use of water impacts the whole community, with potential knock-on effects to rural and private schemes.
- 1.7. We hope that the Local Water Done Well program will help local government to close the infrastructure deficit and successfully comply with the elevated drinking water standards introduced in 2022.
- 1.8. While the greater part of our membership is supplied by private drinking water schemes, have on-site wastewater arrangements, and are not on urban stormwater networks, we have an interest as ratepayers in ensuring Council's service delivery is efficient, successful, and does not rely in any way on funding from general rates.
- 1.9. Where farms and rural residences rely on council drinking water schemes there should be prominence given to their needs in Council's Water Services Delivery Plan. Many rural schemes have limited capacity to meet elevated drinking water standards introduced in 2022 and need reassurance as to their financial sustainability.

2.

- 2.1. Federated Farmers is particularly concerned with the impact of any options on farmers in the Rangitāiki Plains water supply scheme. We request further information as follows:
- 2.2. Will costs for each water supply scheme be averaged / equalised so that all customers across all schemes pay the same price for water (or wastewater or stormwater services)?
- 2.3. Will customers not connected to one or more of water, wastewater or stormwater services be required to contribute financially to services they do not receive?
- 2.4. If the answer to these questions is yes, then Federated Farmers cannot support that option.
- 2.5. Federated Farmers notes that the Braemar Water Supply was set up by farmers for farmers with the intention of providing with those farmers with reliable water at reasonable cost. Water is a significant cost for most farms and farmers rely on this water supply for the operation of their business and welfare of their stock. To increase water prices to those of urban supplies would be uneconomical for farms, especially considering that these farms do not require water of drinking standard for most farm purposes.
- 2.6. In addition, most farms on the Braemar Water Supply only receive water services from Council. Most rural properties are self-contained for wastewater requirements and rural stormwater does not fit the Local Government (Water Services) Bill definition for stormwater:

stormwater service—

(a) means the collection, treatment, drainage, reuse, or discharge of stormwater in an urban area; but

(b) does not include a service relating to a transport corridor

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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- 2.7. As rural “stormwater services” do not meet the Bill’s definition of a stormwater service they cannot be transferred to the WS-CCO.
- 2.8. Farmers on the Braemar Water Supply generally only require water services from Council and the majority of that water is only required for farm-use. It would therefore be unjust to require farmers to pay for wastewater and stormwater services they do not use and water prices for a standard they do not need.

Recommendations:

1. ***That Council ensures that, regardless of the option it chooses, that farmers do not pay ‘urban’ prices for water.***
That Council ensures that, regardless of the option it chooses, that farmers are not required to contribute to wastewater and stormwater services they are not connected to.
3. ***That Council adopt a “wait and see” approach to joining other councils in a water services organisation. Cost benefits will not be seen for at least 10 years and in the meantime the Council would lose its autonomy in making decisions that best fit its community and ratepayers.***

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand’s farmers.



The Federation aims to add value to its members’ farming businesses. Our key strategic outcomes include the need for New Zealand to provide 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 the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that local government rating and spending policies impact on our member’s daily lives as farmers and members of local communities.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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WHAKATĀNE DISTRICT COUNCIL LOCAL WATER DONE WELL SUBMISSION FORM

This submission form is not a stand-alone document.

For more information find the Local Water Done Well Consultation Document at whakatane.govt.nz/wai-it-matters.



Wade in on the future of
our water services by 5pm,
Sunday 18 May 2025

Online: whakatane.govt.nz/wai-it-matters
Email: submissions@whakatane.govt.nz

Post: Whakatāne District Council,
Private Bag 1002, Whakatāne 3158

Deliver: 14 Commerce Street, Whakatāne;
or Service Centre, Pine Drive, Murupara

Would you like us to let you know about the final decisions?

If you'd like to know the final decisions following consultation, please provide your details below – we will only use this information to communicate with you about your submission. Information about the final decisions will also be available on our website.

First name: CAROLYN

Surname: HAMILL

Organisation (if on behalf): WHAKATĀNE - EHŌPE COMMUNITY BOARD

Email address: [REDACTED]

Postal address: [REDACTED]

Phone: [REDACTED]

☒ I acknowledge that I have read the privacy statement and am happy to proceed. I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☒ No ☐

Your privacy is important to us: All submissions (including names and contact details) may be provided in full to Elected Members. Submissions (including names but not contact details) may be made available to the public at our office and on our website. Your personal information may also be used for the administration of the consultation process, including informing you of the outcome of the consultation. All information collected will be held by Whakatāne District Council, 14 Commerce Street, Whakatāne with submitters having the right to access and correct personal information.



7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Question time - We want to hear what you think



Do you agree with our preferred option?

☐ Strongly disagree

☐ Disagree

☐ Neither agree or disagree

☐ Agree

☐ Strongly Agree

Do you have any other feedback you would like to share about our preferred option?

The Whakatane-Otara Community Board discussed the options presented by WDC. The majority (3/5) were in support of a standalone business unit, and 2/5 were in support of a multi-CCO.

Those who preferred a standalone business unit had concerns that aligning WDC with other councils in a multi-CCO would dilute our local voice. They also had concerns that the establishment costs for setting up the new water organisation may spiral and may not be recouped within a reasonable timeframe. There were also concerns about loss of local jobs for the water team.

Those who supported the multi-CCO proposal acknowledge the massive costs facing Whakatane District in water infrastructure upgrades, and realise these costs will be extremely challenging without linking with other councils to achieve economies of scale. This will be the most benefit to ratepayers in the long term (7-10 years).

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

If WDC do opt for a multi-CCO we would opt:

- That any establishment costs for the new water organisation would be minimised
- That the entire Whakatane District has a voice on the Independent Board
- our local iwi/hapū retain a voice in how local water is managed.

Need more space for your feedback?

Please add more pages and make sure your name and organisation (if relevant) are at the top of each page.



7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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MEMO**DATE** 14/04/25

TO: Whakatāne District Council
FROM: Te Au o Te Awa Punga (Iarau Ltd)
RE: Te Au o Te Awa Punga Initial Feedback on Local Water Done Well

PART 1: OPENING COMMENTS

This document outlines the initial collective feedback of the four iwi entities who make up Te Au o Te Awa Punga: Te Rūnanga o Ngāti Whare, Te Rūnanga o Ngāti Manawa, Te Mana o Ngāti Rangitahi, and Te Rūnanga o Ngāti Awa. It responds to early engagement on the proposed approaches to water service delivery under the Local Water Done Well (LWDW) reform.

This feedback draws on insights from the iwi engagement hui held on 18 March 2025 and the Whakatāne District Council (WDC) briefing on 26 March 2025. We also note recent correspondence confirming the Council's intention to proceed with a joint Council Controlled Organisation (CCO) model as its preferred approach, with a formal decision to be made ahead of public consultation on 7th April 2025.

We acknowledge the scale and complexity of the water services challenge and the significant work already underway by the Council. This feedback is offered in good faith and reflects early collective views. It should not be treated as final or conclusive, and each iwi reserves the right to express further and independent views throughout the engagement and consultation process. These independent views may come via Te Au o Te Awa Punga or directly. It is expected that iwi perspectives may differ across rohe and kaupapa.

PART 2: OVERVIEW

The Local Water Done Well policy was introduced following the repeal of the previous Three Waters Reform Programme. It returned responsibility for water infrastructure and service delivery to territorial authorities while establishing new regulatory and planning obligations.

Under the Local Government (Water Services Preliminary Arrangements) Act 2024, all councils must:

- 1) Prepare and submit a Water Services Delivery Plan to the Department of Internal Affairs by 30 September 2025.
- 2) Identify and consult on at least two delivery model options.
- 3) Provide evidence of financial sustainability, regulatory compliance, and engagement with iwi and communities.
- 4) Clearly outline the implications of each option for rates, debt levels, service levels, governance, and accountability.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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WDC has been progressing with this process, including an options assessment prepared by Martin Jenkins. At its 26 March 2025 briefing, the Council signaled a preference for a joint multi-council CCO model. This was considered alongside the alternative of retaining water services through an internal business unit model. The preferred option will be formally considered by elected members on 10 April 2025, followed by public consultation from 17 April to 18 May 2025.

At the hui held by Te Au o Te Awa Punga on 18 March 2025, iwi received an update on the reforms, including the two preferred delivery options under consideration. Council staff and advisers were present and outlined key drivers such as financial sustainability, investment scale, and long-term workforce planning.

PART 3: COLLECTIVE IWI PERSPECTIVE**3.1 General position on Local Water Done Well**

As Treaty partners and kaitiaki of our respective rohe, the iwi of Te Au o Te Awa Punga reaffirms the cultural and spiritual significance of wai, including our relationship to it.

The Waitangi Tribunal in WAI 2358 found that iwi and hapū have significant and enduring rights and interests in freshwater, including proprietary and governance rights derived from tino rangatiratanga and guaranteed under Te Tiriti o Waitangi. Water is a taonga and fundamental to the well-being of our people, whenua, and ecosystems. We have concerns overall for cultural and environmental integrity in the progression of LWDW. The concerns extend to the proposed standards and how they are implemented, considering that lowered standards will not meet iwi and/or hapū cultural or environmental expectations.

We acknowledge that LWDW presents both opportunities and risks. While we support the principle of locally led delivery models, this must be balanced with strong governance, environmental responsibility, and enduring relationships with iwi.

We are committed to constructive engagement and helping shape a delivery model that works for all communities. However, we are clear that any model must move beyond tokenism and enable iwi to influence decisions, participate in governance, and protect the mana and mauri of our waterways.

3.2 Impacts of Bill 3 and centralisation through Taumata Arowai

Recent legislative developments, mainly Bill 3, raise serious concerns about the diminishing role of Māori in national freshwater governance. Bill 3 reduces Māori involvement and increases centralised control within Taumata Arowai, significantly affecting how water standards will be developed and imposed across the motu.

Key concerns include:

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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- 1) The removal of requirements for Taumata Arowai board members to have knowledge of te Tiriti o Waitangi, tikanga, and Māori perspectives.
- 2) The downgrading of the Māori Advisory Group's role from leading the Te Mana o te Wai framework to providing advice under limited terms of reference.
- 3) The weakening of the Board's obligation to consider advice from the Māori Advisory Group.
- 4) The granting of new powers to Taumata Arowai to set national engineering and environmental performance standards that override regional plans, national policy statements, and even Treaty settlement instruments.

These changes reflect a broader shift from localised, partnership-based governance towards a centralised regime that risks undermining iwi authority, cultural values, and environmental protection. Te Au o Te Awa Punga supports the call from Te Rangapū and others that:

- National water standards must be co-designed with iwi and hapū.
- Centralisation of power must not come at the expense of kaitiakitanga or Treaty obligations.
- Local environmental and cultural protections must not be overridden for regulatory efficiency.

These concerns are especially relevant given that the proposed Joint CCO model under LWDW will be subject to these national standards without the ability to tailor responses to our awa, estuaries, and receiving environments unique needs. It reinforces our view that any delivery model must be grounded in robust, local decision-making with iwi as full partners.

3.3 Feedback on the Emerging Joint CCO Proposal**Governance and representation**

- Iwi hold concerns that a joint multi-council CCO could reduce the visibility and influence of mana whenua, particularly in smaller rohe.
- Governance models must embed iwi involvement from the outset, including in the development of Statements of Expectation and any joint oversight arrangements
- Generic or aggregated approaches will not work. We expect localised engagement and tailored structures that recognise the mana and distinct context of each iwi

Cultural and environmental integrity

- Iwi are vehemently opposed to the continued use of ocean outfalls and would expect that regardless of any outcomes in Wastewater Standards, the progression of water services where current Whakatāne District Council assets are involved will prioritise a shift away from ocean outfall.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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- Draft national wastewater standards currently under review may make low-cost options more attractive, but these risks undermine longstanding iwi aspirations for land-based treatment and restorative approaches.
- We support iwi-led analysis of the standards and request that this work is recognised and incorporated into local delivery planning.

Investment prioritisation and equity

- There is concern that a CCO model may concentrate investment in urban growth areas at the expense of smaller, rural, and Māori communities.
- Infrastructure planning must consider not only compliance and economic returns but also cultural values, environmental health, and historical underinvestment.

Partnership and participation

- Co-design approaches are supported but must evolve into genuine partnerships with shared decision-making authority.
- Iwi seek clarity on how they will participate in long-term planning, financing decisions, and ongoing oversight of water service delivery.
- There is also interest from iwi in exploring the potential for co-investment or technical partnerships where appropriate.

PART 4: NEXT STEPS AND EXPECTATIONS

Te Au o Te Awa Punga is currently progressing an analysis of the proposed wastewater standards and will provide cultural and environmental advice before the 24 April 2025 submission deadline

Te Au o Te Awa Punga will prepare further iwi-specific submissions into the public consultation process, which will consider the historical impact of current assets within iwi regions.

We request that the Council:

- 1) Confirm how iwi feedback will be reflected in the Water Services Delivery Plan.
- 2) Provide ongoing opportunities for iwi to contribute to the development of any joint CCO governance structures.
- 3) Ensure transparent access to financial models, prioritisation criteria, and potential partner council arrangements.

PART 5: CLOSING COMMENTS

This initial feedback represents a collective position from Te Au o Te Awa Punga based on current information and engagement. It is offered in the spirit of manaakitanga and

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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commitment to good faith partnership. We welcome continued kōrero and collaboration as the Council prepares to consult publicly and shape its final Water Services Delivery Plan.

We reiterate that each iwi reserves the right to provide further or independent feedback and will be supported to do so through Te Au o Te Awa Punga. While shared principles and concerns exist, we recognise that individual iwi may hold differing views on specific matters and delivery preferences.

We look forward to working with the Council and relevant agencies to ensure water services in our rohe are delivered in a way that upholds te mauri o ngā wai, respects mana whenua, and serves the needs of all communities.

Nā Te Au o Te Awa Punga,

Ngāti Whare | Ngāti Manawa | Ngāti Rangitihi | Ngāti Awa

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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John Howard

Whakatane Action Group Inc.

Email [REDACTED]
[REDACTED] [REDACTED]

Like to reserve the opportunity to be heard

Do You Agree with our preferred option? Strongly disagree**Do you have any other feedback you would like to share about our preferred options?**

- the consultants have said that there won't be any benefits for at least 10 years if any after that in option 1.
- there appears to be no economy of scale. (In fact, Wellington City Council pays double the price per kilometre of pipe than the national average).
- will we have good representation for our new system? (think of our current hospital or Regional council situation)
- it will create another level of Bureaucracy and management further removed from our district.
- will road resealing etc be coordinated with pipework between council and the new water entity?
- will we end up paying for other districts water infrastructure
- will our district's costs be ring fenced to our district
- will it lead to council amalgamations now councils have less to do?
- and the biggest question is.....will we see any reduction in our current district council rates with a separate entity? (probably NO and we will pay more for our water rates)

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

In the absence of another council wanting to connect to or be the obvious match to our district. We now have an opportunity to go it alone within our current structure. We can then sit back and watch how other councils can make it work or not.

The council needs to set some priorities on our current drinking water and consenting as the first step to moving forward.

Set up a balanced budget for the 3 waters department to be self-funded and not deeply indebted into intergenerational debt

In conclusion, council should not rush into a CCO or with another council. Instead set up its own unit within council.

Thank you, John Howard chairman of Whakatane Action Group Inc.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Page 14

Wai It matters**John Howard****Email** [REDACTED]
[REDACTED]

Wish to reserve the right to be heard.

Do you agree with our preferred option? Strongly disagree**Do you have any other feedback you would like to share about the preferred option?**

- there appears to be no economy of scale.
- will we have good representation for our new system? (think of our current hospital or regional council situation....NO we Won't)
- it will create another level of Bureaucracy and management. More Cost in setting up and future running costs.
- will road resealing etc be coordinated with pipework between council and the new water entity?
- will we end up paying for other districts water infrastructure
- will our district's costs be ring fenced to our district, and we will have to meet extra cost due to no co-ordination and local knowledge.

All of these say we should just go it alone and continue as we are and just prioritize the work to be done and set up a work plan to proceed. Currently it lacks direction and leadership and co-ordination and accountability. A restructure of the 3 waters to remain within the existing council structure.

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

Given the situation where there is not another council (ODC, KDC, or WBOPDC) who would like to engage with the WDC then **the Obvious choice is to proceed as we are and keep it in house. As it currently is but with a change in existing structure.**

The ability to increase debt levels is not always an advantage. We only need to look at councils' current expenditure to see how intergenerational debt can strangle the ability of good financial management.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Changes if not already in place would be a dedicated and informed 3 Waters manager directly under the WDC Chief executive.

That any equalisation of schemes needs to have a rule that the cost of Urban water (defined as where the council provides sewage disposal) is the cost of drinking water (a) plus the cost of grey water (given there must be a close correlation to water consumption and grey water) (b) equals the cost of water and that stormwater (c) is then added on. So urban water would be $(a+b)+c=d$.

This is because most rural water users have their own septic tank system and many of them contribute greatly to the Regional council Rating. So, unless a rural system runs directly into the urban system the cost for water for a rural water user would just be $a=d$.

The new water entity should be a genuine self-supporting business centre. Ie income less expenses equals working to a strictly balanced budget.

There is too much focus on who to join up with and nothing done on delivering the outcome. Please look at what we have and make a start there.

Thank you John Howard

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Whakatāne District Council
Private Bag 1002
Whakatāne 3158

WHAKATĀNE DISTRICT COUNCIL LOCAL WATER DONE WELL SUBMISSION FORM

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put in a postbox

This submission form is not a stand-alone document. For more information find the Local Water Done Well Consultation Document at whakatane.govt.nz/wai-it-matters.

Kōrero Mai
Let's talk

Wade in on the future of
our water services by 5pm,
Sunday 18 May 2025

Online: whakatane.govt.nz/wai-it-matters
Email: submissions@whakatane.govt.nz

Post: Whakatāne District Council,
Private Bag 1002, Whakatāne 3158

Deliver: 14 Commerce Street, Whakatāne;

Would you like us to let you know about the final decisions?

If you'd like to know the final decisions following consultation, please provide your details below – we will only use this information to communicate with you about your submission. Information about the final decisions will also be available on our website.

First name: Camryn

Surname: Dun

Organisation (if on behalf): —

Email address: [REDACTED]

Postal address: [REDACTED]

Phone: [REDACTED]

☐ I acknowledge that I have read the privacy statement and am happy to proceed. I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☐ No ☐

Your privacy is important to us: All submissions (including names and contact details) may be provided in full to Elected Members. Submissions (including names but not contact details) may be made available to the public at our office and on our website. Your personal information may also be used for the administration of the consultation process, including informing you of the outcome of the con-

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Question time – We want to hear what you think



Do you agree with our preferred option?

☐ Strongly disagree

☐ Disagree

☐ Neither agree or disagree

☒ Agree

☐ Strongly Agree

Do you have any other feedback you would like to share about our preferred option?

Is our water still metered and
charged accordingly, ie per household
usage?

I think this question is addressed on
P. 8 but wanted to be certain

Cityman

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

Need more space for your feedback?

Please add more pages and make sure your name and organisation (if relevant) are at the top of each page.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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WHAKATĀNE DISTRICT COUNCIL LOCAL WATER DONE WELL SUBMISSION FORM



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or Service Centre, Pine Drive, Murupara

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First name: David

Surname: Dowd

Organisation (if on behalf): _____

Email address: _____

Postal address: _____

Phone: _____

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Yes ☒ No ☐

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 **Kōrero mai**
SHAPING YOUR DISTRICT

 **WHAKATĀNE**
District Council
Kia Whakatāne au i ahau

Page 1

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Question time -
We want to hear what you think



Do you agree with our preferred option?		
<input type="checkbox"/> Strongly disagree	<input checked="" type="checkbox"/> Disagree	<input type="checkbox"/> Neither agree or disagree
<input type="checkbox"/> Agree	<input type="checkbox"/> Strongly Agree	
Do you have any other feedback you would like to share about our preferred option?		
<p>I prefer <u>Option 2</u>.</p> <p></p>		
Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?		


Need more space for your feedback?

Please add more pages and make sure your name and organisation (if relevant) are at the top of each page.

Page 2

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Whakatāne District Council
Private Bag 1002
Whakatāne 3158

**WHAKATĀNE DISTRICT COUNCIL
LOCAL WATER DONE WELL
SUBMISSION FORM**

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**Kōrero Mai
Let's talk**

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Post: Whakatāne District Council,
Private Bag 1002, Whakatāne 3158

Would you like us to let you know about the final decisions?

If you'd like to know the final decisions following consultation, please provide your details below – we will only use this information to communicate with you about your submission. Information about the final decisions will also be available on our website.

First name: Loek Klaassen

Surname: _____

Organisation (if on behalf): _____

Email address: _____

Postal address: _____

Phone: _____

☐ I acknowledge that I have read the privacy statement and am happy to proceed. I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☐ No ☐

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Question time -*We want to hear what you think*

Do you agree with our preferred option?



Strongly disagree



Disagree



Neither agree or disagree



Agree



Strongly Agree

Do you have any other feedback you would like to share about our preferred option?

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

At present the council is NOT delivering safe water by adding Fluoride.
There is plenty of evidence that adding Fluoride is harmful.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Whakatāne District Council
Private Bag 1002
Whakatāne 3158

WHAKATĀNE DISTRICT COUNCIL
**LOCAL WATER DONE WELL
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First name: MARIA

Surname: KLAASSEN

Organisation (if on behalf): _____

Email address: [REDACTED]

Postal address: _____

Phone: _____

☐ I acknowledge that I have read the privacy statement and am happy to proceed. I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☐ No ☐

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Question time -*We want to hear what you think**Do you agree with our preferred option?*

Strongly disagree



Disagree



Neither agree or disagree



Agree



Strongly Agree

*Do you have any other feedback you would like to share about our preferred option?**Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?*

I do not think the council is providing safe water for everyone. The addition of fluoride is harmful. There is plenty of evidence to support this stance.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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WHAKATĀNE DISTRICT COUNCIL LOCAL WATER DONE WELL SUBMISSION FORM

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Deliver: 14 Commerce Street, Whakatāne;
or Service Centre, Pine Drive, Murupara

Would you like us to let you know about the final decisions?

If you'd like to know the final decisions following consultation, please provide your details below – we will only use this information to communicate with you about your submission. Information about the final decisions will also be available on our website.

First name:

Malcolm.

Surname:

Whitaker

Organisation (if on behalf):

Email address:

Postal address:

Phone:

☒ I acknowledge that I have read the privacy statement and am happy to proceed. I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☒ No ☐

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Whakatane District Council
09 MAY 2025

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Question time – We want to hear what you think

Wai
IT MATTERS

Do you agree with our preferred option?		
<input checked="" type="checkbox"/> Strongly disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Neither agree or disagree
<input type="checkbox"/> Agree	<input type="checkbox"/> Strongly Agree	

Do you have any other feedback you would like to share about our preferred option?

Water Services: are the Nuts & Bolts of Councils.
 You already have a "Ten Y Plan to accommodate services
 The only REASON For OPTION 1: is Council may!!!
 be able to obtain borrowings at a smaller interest
 rate.
 However where would Council Representatives meet.
 This will involve more travelling for STAFF.
 2/ Extra: Vehicle costs. Food costs. General Meeting Fees
 3/ Add: another 10% for contingencies over 10 Yrs.
 That's an extra. \$100 per household per year. //415/GST!!

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

No. I believe we are presently, Well served
 by Councils Water Service Operations.
 2/ Yes, we need to replace aging pipes, culverts
 pumps etc.
 3/ Council should Focus on these services
 and not get side tracked on wasting money
 on projects that are not needed.
 E.G. ~~the~~ "Mitchel Park" does not need \$200,000
 or more spent on an upgrade.

Need more space for your feedback?
 Please add more pages and make sure your name and organisation (if relevant) are at the top of each page.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Submission for Wai it matters from Reuben Cohen [REDACTED] Pg 1 of 4

My submission has only one part to it, that of affordability.

I agree that the Water requirements need to be met.

I am dismayed that all previous and present District Councils in Whakatane have kicked this issue down the road mostly in favour of piling up debt to ratepayers while in the process of undertaking, proceeding with and increasing debt for far less important projects.

This is an email from David Bewley (dated 16/5/2025) to me. I had asked Martin Jenkins how affordability had been calculated.

Kia ora Reuben,

Thank you for your email of 14 May to Martin Jenkins. As it relates to the Council's consultation on Local Water Done Well it was forwarded to the Council to respond.

Council provided both the capital programme forecasts and operating cost forecasts to Martin Jenkins. They then took these costs and divided them by the forecast number of connections (also provided by Council). Please note this is the average connection cost, so includes all users, including commercial and industrial users. The average connection cost allows the affordability of the options to be compared. Common international affordability benchmarks range between 2.5% and 3.0% of the median household income. The 2023 Census showed median total household income for the Whakatane District was \$83,000. Martin Jenkins modelling allows for increased productivity over and above projected inflation and predicts median household income in the district of \$96,680 in FY34. 3.4% of this gives \$3,330.

I hope that clarifies the point for you. We look forward to receiving your submission by 5pm on Sunday.

Ngā mihi

David Bewley

GENERAL MANAGER PLANNING, REGULATORY & INFRASTRUCTURE

KAIWHAKAHAERE MATUA - WHAKARITE MAHERE, WAETURE & HANGAROTO

The sticking point is this – Martin Jenkins modelling allows for increased productivity over and above projected inflation and predicts median household income in the district of \$96,680 in FY34. 3.4% of this gives \$3,330.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Submission for Wai it matters from Reuben Cohen [REDACTED] Pg 2 of 4

This modelling remains unexplained. Increased productivity? Of what? By how much? Above projected inflation? It's source and quantity?

I asked Statistics NZ for some 2023 Census information on Whakatane District and explained what I needed. By then it was 16May late afternoon and they indicated it was too late to help but that it could take three months and will have a cost as well. However they did supply me with one table of values.

Stats NZ Census 2023

Census year: 2023

Area: Whakatane District

Household composition by number of usual residents: Total - household composition by number of usual residents

Total household income		
\$20,000 or less		744
\$20,001-\$30,000		1,218
\$30,001-\$50,000		1,881
\$50,001-\$70,000		1,476
\$70,001-\$100,000		1,944
\$100,001-\$150,000		2,541
\$150,001-\$200,000		1,404
\$200,001 or more		1,110
Median (\$) - total household income		83,000

Remembering my submission is about affordability we can see that the median figure, of \$83,000 (total household income), from Martin came from. 2023 is not as good as 2025 but it is the best from a reliable source ie Stats NZ.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Submission for Wai it matters from Reuben Cohen [REDACTED] Pg 3 of 4

Median just means the middle when the data set is seen in order as in smallest to largest.

You will note that falls in the range of \$70,000 - \$100,000 in the table.
So Martin says that is affordable as 3.4% of FY2034 when the projected income will be \$96,680.

What is wrong with this is the application of the process to affordability. A total income from a household such as the median cannot be a standard from which to apply it to all households. The extra money needed to afford higher bills is proportional to the total income. For example: if the total income is \$40,000 it will be harder to afford extra payments than if the total income was \$80,000 (even when that extra is the same percentage applied throughout all households).

Look at it another way. There are 5310 households below the \$70,000 to \$100,000 range. Of these there are 744 households at less than or equal to \$20,000. It is impossible for my two person household to run at \$43,000 (State Pensions) without a deficit. Goodness knows how the lower incomes will cope and there are thousands of them.

Unfortunately Council Rates are not the only ones to increase. Increases come in concert to each other and soon any adjustment for inflation is way too little to even stand still. My Home Contents Insurance premiums have increased by over 200% for the same monetary level of contents.

The Government has forced this onto Councils but who kicked the can down the street repeatedly over the decades. Not the Central Government alone.
Whakatane has had a poor source of drinking water for as long as I can remember but other legacy and cosmetic projects were deemed to be more important.
Now all Councils are facing this problem
<https://www.rnz.co.nz/news/national/561054/this-is-another-insult-water-rates-to-triple-in-central-hawke-s-bay>

Old info on next link to Treasury but not that old so we can't see the trend.
<https://www.treasury.govt.nz/publications/media-advisory/new-analytical-note-trends-income-inequality>

Another problem that Martin's figures bring is that there is a reluctance to see any slowdown in Growth. This is a common enough reluctance of many countries. It shows wishful thinking while the reality is all around us. Political instabilities, Governments reneging on their responsibilities and privatising or passing them on, a complete practical blank on our Climate Crisis which WHK Dist Council has a lot of paper work on but scant real movement.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Submission for Wai it matters from Reuben Cohen [REDACTED] Pg 4 of 4

Continual Growth has no place in reality. It has to be shorn up by subterfuge.

Only looking at the past in order to predict the future is like being in a car journey with the navigator only able to look out of the back window. It has a high probability of going wrong. I would like to see how these figures of affordability from Martin are realistic.

What I am asking for is that the Council get real and find another way to improve our water supply, treatment and delivery. Central Government has not given you a magic wand but will allow you to keep borrowing up to 500% of your income so the boat doesn't rock too much.

Alternatives to Central Government's plan is for another day. For now, please get realistic about affordability and only then come up with a plan otherwise you will always have a shortfall and will keep borrowing till we default.

Meanwhile, part of what you propose is missing; how you will cope with the proportion of 5310 households, ie with the people in them, who will not find Martin's figures realistic.

There are alternatives but you need to start with an open mind and not approach the residents of Whakatane District only with two (or three) options of what you want.

Thank you,
Reuben Cohen

[REDACTED]
[REDACTED]

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

Page 30

First name: Tony

Surname: Swanson

Email address: [REDACTED]

Postal address: [REDACTED]

Phone: [REDACTED]

✓ I acknowledge that I have read the privacy statement and am happy to proceed.

I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☐ No ☒

Do you agree with our preferred option? **Strongly disagree**

Do you have any other feedback you would like to share about our preferred option?

The premise that our water quality is poor is not valid. Supporting information which was stopped from collection to enable to 3 waters propaganda in 2021 shows our area has good water standards (or did back then).



The issue in Hastings regard the 2016 Havelock North campylobacter outbreak, as much as it was a council issue, I believe that the greater responsibility belongs to Taumata Arowai as they failed to sufficiently audit and ensure compliance to standards.

I believe that water quality and services are currently up to standard and are being maintained and upgraded well by the local council services.

I do not support the council preferred option on all aspects of the proposal regarding the shortlist comments:

1. Unnecessary admin overhead - \$8-\$10 million. This is of no value to householders. We don't need more administration.

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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2. May be more expensive? You don't know. I do. It will be more expensive. All these options are as we will be funding more administration and get less service.
3. You are not sure how many councils are in yet you predict that the cost for services under option 1 is at best \$200 cheaper per year than option 2. Yet there are considerable unknowns.
- 4.
5. The structure of the board is unclear. Any decisions made by the board would come down to voting. As I have seen in many other instances the larger cities have greater voting rights, hence smaller areas miss out.

Option 2 is the most viable option

1. Saving \$8-\$10 million.
2. Local control to provide service as needed by the local community.
3. Cost/service comparisons are questionable at best.
4. "Economies of scale" is a term used a lot however I have not seen benefits of that actually realised in other ventures.
5. Consistent investment is required. Local control gives best return on investment in the areas most needed.
6. Limitations on borrowing. That's a good thing.

Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

Looking through asset condition average remaining life, it appears the majority has many years of useful life left, notwithstanding much of the infrastructure will exceed the life expectancy. I expect that there are active replacement and maintenance plans underway, and provided these are not restrained significantly service and supply will continue to be of high standard.

My concern is regard the refence to ringfencing. Within Whakatane we are water metered and pay well for meter provision as well as usage. All the funds from this should be going into the supply and maintenance of the water services and infrastructure. Is this the case?

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Whakatāne 3158

WHAKATANE DISTRICT COUNCIL

13 MAY 2025

WHAKATĀNE DISTRICT COUNCIL LOCAL WATER DONE WELL SUBMISSION FORM

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This submission form is not a stand-alone document. For more information find the Local Water Done Well Consultation Document at whakatane.govt.nz/wai-it-matters.

**Kōrero Mai
Let's talk**

**Wade in on the future of
our water services by 5pm,
Sunday 18 May 2025**

Online: whakatane.govt.nz/wai-it-matters
Email: submissions@whakatane.govt.nz

Post: Whakatāne District Council,
Private Bag 1002, Whakatāne 3158

Deliver: 14 Commerce Street, Whakatāne,
or Service Centre, Pine Drive, Murupara

Would you like us to let you know about the final decisions?

If you'd like to know the final decisions following consultation, please provide your details below – we will only use this information to communicate with you about your submission. Information about the final decisions will also be available on our website.

First name: Tui R.
Surname: Edwards

Organisation (if on behalf): —

Email address: [REDACTED]

Postal address: [REDACTED]

Phone: [REDACTED]

☒ I acknowledge that I have read the privacy statement and am happy to proceed. I wish to present my submission verbally to a public Council hearing on 5 June. If required, due to the number of requests to make an oral submission, Council will schedule an additional day for hearings on 6 June 2025.

Yes ☐ No ☒

Your privacy is important to us: All submissions (including names and contact details) may be provided in full to Elected Members. Submissions (including names but not contact details) may be made available to the public at our office and on our website. Your personal information may also be used for the administration of the consultation process, including informing you of the outcome of the consultation. All information collected will be held by Whakatāne District Council, 14 Commerce Street, Whakatāne with submitters having the right to access and correct personal information.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Question time - We want to hear what you think



Do you agree with our preferred option?		
<input type="checkbox"/> Strongly disagree	<input type="checkbox"/> Disagree	<input type="checkbox"/> Neither agree or disagree
<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Strongly Agree	
Do you have any other feedback you would like to share about our preferred option?		
<p>Option 1 Multi-Council Organisation (Multi-CCO) module though preferred comes with risks, the unknowns. I prefer to partner up with the Eastern Bay Councils Otago & Kawerau rather than the bigger Western Bay Councils (Tairāroa or Rotorua) as they are much bigger and Whakatane may become less priority. The 3 Eastern Bay Councils have always supported one another</p>		
Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?		
<p>Yes if the choice is to go with Western Bay councils Whakatane needs maybe less priority, this is a severe risk.</p>		


Need more space for your feedback?

Please add more pages and make sure your name and organisation (if relevant) are at the top of each page.

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 1	Responded At: Apr 23, 2025 16:58:06 pm
	Login: Anonymous	Last Seen: Apr 23, 2025 16:58:06 pm
	Email: n/a	IP Address: n/a

Q1. First name	Stephanie
Q2. Surname	Smith
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Neither agree or disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>There are an awful lot of unknowns. not sure if we have a large infrastructure but small population why any other council would want to partner with us. Just seems like you want to distance your self from the responsibility as we all know there will never be a reduction in cost once an organization is up and running. The cost will just keep going up as they, like the Whakatane District Council & ENVBOP will just keep spending our money on what ever they want knowing there is nothing we the rate payers can do about.</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>I worry how we are all expected to endlessly keep finding the money to pay for all of this. I don't see anything wrong with the water we currently have. We currently have to pay Whakatane District Council rates and water separately to make it seem more palatable and then Environment BOP if we add all those together the cost is terrifying. Now you are suggesting yet another organization to add to the list.</p>
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 2	Responded At: Apr 23, 2025 21:00:55 pm
	Login: Anonymous	Last Seen: Apr 23, 2025 21:00:55 pm
	Email: n/a	IP Address: n/a

Q1. First name	Krystel
Q2. Surname	Coppin
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	I think it is in the whakatane, ohope, edgumbe districts best interests to look at Option 2 (alternative option) A standalone business unit that will deliver water services from within the Council.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	I think the WDC need to stand alone in protecting and monitoring the water service delivery.
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 3	Responded At: Apr 23, 2025 21:05:22 pm
	Login: Anonymous	Last Seen: Apr 23, 2025 21:05:22 pm
	Email: n/a	IP Address: n/a

Q1. First name	Rose
Q2. Surname	Langley
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Option 2 is the best option. Join up with other Councils to purchase replacement goods as required.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 4	Responded At: Apr 24, 2025 10:48:30 am
	Login: Anonymous	Last Seen: Apr 24, 2025 10:48:30 am
	Email: n/a	IP Address: n/a

Q1. First name	Brian
Q2. Surname	Persen
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>Dont join up with other councils especially Whakatane as the are really screwing their ratepayers. Just look at Aucklands water. It is so expensive and we will end up with meters and the bigger councils taking control. It will happen if you go with option 1. KDC have got on with the job so far without others. We have our own water supply and wastewater so don't need anyone else. Don't do it or you will live to regret it. It is such a great council who look after the town without others.</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>The water system will end up being run by bigger councils and we will end up having minimal say in how we get our water</p>
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 5	Responded At: Apr 25, 2025 10:40:04 am
	Login: Anonymous	Last Seen: Apr 25, 2025 10:40:04 am
	Email: n/a	IP Address: n/a

Q1. First name	Andy
Q2. Surname	Bainbridge
Q3. Organisation (if on behalf)	Super Annuants
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Bring back Ministry of Works type organisation's, publically owned, encompassing delivery; construction, forward planning; training...personal development, accountability.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 6 Login: Anonymous Email: n/a	Responded At: Apr 27, 2025 09:33:04 am Last Seen: Apr 27, 2025 09:33:04 am IP Address: n/a
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Q1. First name	Judith
Q2. Surname	Hedges
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 7	Responded At: Apr 28, 2025 17:29:39 pm
	Login: Anonymous	Last Seen: Apr 28, 2025 17:29:39 pm
	Email: n/a	IP Address: n/a

Q1. First name	John
Q2. Surname	Langley
Q3. Organisation (if on behalf)	N/A
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	Yes
Q7. Phone	
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>We don't need to join up with anyone else, as we know kawerau/opotiki I believe will do there own so that leaves Tauranga and Western Bay of Plenty personally I believe we will get lost and end up like the D H B becoming only getting small percentage. My thinking is to build an in House model because we know where our pipes are .</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>If we keep it in house we will be able to manage things better.</p>
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 8	Responded At: Apr 28, 2025 22:03:13 pm
	Login: Anonymous	Last Seen: Apr 28, 2025 22:03:13 pm
	Email: n/a	IP Address: n/a

Q1. First name	Cassidy
Q2. Surname	Jobe
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	I am concerned that Iwi involvement will be lost, the report says this is still to be confirmed.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	I would like to see our council follow the lead of other big councils and look to utilizing smart water meters, these are already on the market and can be installed easily. If you can monitor end user water meters + the water main supply flow rate in real time you would be able to detect leaks alot quicker. Although costly at the start, it will pay of big time in the end. Please get in touch if you would like more information on smart meter installation. Nga Mihi Cassidy Jobe
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 9	Responded At: Apr 29, 2025 10:42:31 am
	Login: Anonymous	Last Seen: Apr 29, 2025 10:42:31 am
	Email: n/a	IP Address: n/a

Q1. First name	Luke
Q2. Surname	Ruiterman
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Option 2 is a better option for the district. counsel will have better control of the costs of services. Other districts will have different requirements and more risk of blowouts
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 10	Responded At: Apr 29, 2025 11:38:03 am
	Login: Anonymous	Last Seen: Apr 29, 2025 11:38:03 am
	Email: n/a	IP Address: n/a

Q1. First name	PRUDENCE
Q2. Surname	RANGI
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	I feel that the other councils involved in a multi controlled organisation will not be keen to fund our water infrastructure especially with our Council's high debt levels. We will be out voted on the issues needed for our region. We should be going with Option 2 which is the status quo, so that we have complete control of our water services as we do now.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	I feel the water service delivery our district currently receives is at a very high quality.. There are definitely challenges that are going to need to be planned for, as in the Matata waste water problems which needs attention ASAP. I feel this should be done by piping their waste water to the Whakatane treatment plant and extending this plant's capacity in the future. Pipes are a far cheaper option than the land acquisition and plant needed to for a standalone treatment plant at Matata. Selling the farm bought for the treatment of waste for Matata will help provide the funding , or would possibly fund the piping to Whakatane's treatment plant.
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 13	Responded At: May 05, 2025 07:09:06 am
	Login: Anonymous	Last Seen: May 05, 2025 07:09:06 am
	Email: n/a	IP Address: n/a

Q1. First name	Simon
Q2. Surname	Monti
Q3. Organisation (if on behalf)	Na
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>Let's get what we have right and move forward, and keep rates affordable for the ratepayers, concentrate on infrastructure and future development to attract more ratepayers to our region to boost our funds, not keep flogging the ones we have.</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>Preventative and routine maintenance as we have had in the past. Hiring more in house staff rather than contractors. Education of our infrastructure to the workers/contractors again as in the past. Listen to and use the people and knowledge offered in the past sometimes for free as they are passionate about the results and not money driven (yes I am one of those people who have offered free advice learnt from smarter people than myself and contracted to the council and been on the coal face of multiple floods and part of keeping not only water but stormwater and wastewater going through those times with a team of knowledgeable people)too many other suggestions list for now.</p>
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 14	Responded At: May 05, 2025 09:50:47 am
	Login: Anonymous	Last Seen: May 05, 2025 09:50:47 am
	Email: n/a	IP Address: n/a

Q1. First name	not answered
Q2. Surname	not answered
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Would like to see it remain within local Council
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Rather than using river water would like to see a better Quality water utilised and the river only used as a backup! As far as storm water is concerned, better clearing of screens and drains whenever a weather event is forecast would be advisable along with the tools i.e. rakes etc being available and serviceable at all pump stations.
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 15	Responded At: May 06, 2025 09:45:14 am
	Login: Anonymous	Last Seen: May 06, 2025 09:45:14 am
	Email: n/a	IP Address: n/a

Q1. First name	Mawera
Q2. Surname	Karetai
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	I think the water organisation should have included the wider BOP. The proposed organisation is still too small to have enough buying/borrowing power to sort out our 3 waters problems..
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	A much bigger organisation would have better access to people, knowledge and innovation.
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 16 Login: Anonymous Email: n/a	Responded At: May 06, 2025 09:51:04 am Last Seen: May 06, 2025 09:51:04 am IP Address: n/a
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Q1. First name	Julia
Q2. Surname	Searle
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 17 Login: Anonymous Email: n/a	Responded At: May 06, 2025 09:52:46 am Last Seen: May 06, 2025 09:52:46 am IP Address: n/a
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Q1. First name	David
Q2. Surname	Ball
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Local control of local resources.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Water tastes rubbish during summer due to algae.
Q11. Need more space for your feedback?	not answered

Infrastructure and Planning Committee - AGENDA

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 18 Login: Anonymous Email: n/a	Responded At: May 06, 2025 10:01:31 am Last Seen: May 06, 2025 10:01:31 am IP Address: n/a
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Q1. First name	Robyn
Q2. Surname	Watchorn
Q3. Organisation (if on behalf)	not answered
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 19	Responded At: May 06, 2025 10:11:02 am
	Login: Anonymous	Last Seen: May 06, 2025 10:11:02 am
	Email: n/a	IP Address: n/a

Q1. First name	Graham
Q2. Surname	Millar
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	Council should have supported 3 waters
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	More money needs to be spent on water services in the future to provide a reliable service. The council should be more aggressive in determining (1) what is really needed for the future and what is nice and (2) what is the council's responsibility and what is private business
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 20	Responded At: May 06, 2025 11:05:41 am
	Login: Anonymous	Last Seen: May 06, 2025 11:05:41 am
	Email: n/a	IP Address: n/a

Q1. First name	Toni
Q2. Surname	Owen
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	I agree that having a co shareholder such as RDC or TCC is preferable. I have concerns that if we partner with the Western Bay our voice will be lost. There are still synergies with an EBOP grouping, but not as great. Therefore my preference is a grouping of the EBOP with Rotorua. However I am not adverse to a greater BOP grouping. It is just that we need to be more vigilant at making our voice heard.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	I am concerned that if we do nothing, then costs will become too high.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 21	Responded At: May 06, 2025 12:28:16 pm
	Login: Anonymous	Last Seen: May 06, 2025 12:28:16 pm
	Email: n/a	IP Address: n/a

Q1. First name	Rob
Q2. Surname	van Rossen
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	I think shared services makes a lot of sense for services where scale has benefits. Maintaining autonomy just becomes a political football and three waters needs long term funding and long term planning and strategy by professionals who are separate from politics
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 22	Responded At: May 06, 2025 12:59:04 pm
	Login: Anonymous	Last Seen: May 06, 2025 12:59:04 pm
	Email: n/a	IP Address: n/a

Q1. First name	Loris
Q2. Surname	Haastie
Q3. Organisation (if on behalf)	individual
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	I think it's important that if this option is taken up that the business model is to ensure efficiency and effectiveness and to having staffing at a level with productivity to the core and no excesses.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 23 Login: Anonymous Email: n/a	Responded At: May 06, 2025 13:52:58 pm Last Seen: May 06, 2025 13:52:58 pm IP Address: n/a
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Q1. First name	Susan
Q2. Surname	Marlow
Q3. Organisation (if on behalf)	not answered
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 24	Responded At: May 06, 2025 14:18:31 pm
	Login: Anonymous	Last Seen: May 06, 2025 14:18:31 pm
	Email: n/a	IP Address: n/a

Q1. First name	Matt
Q2. Surname	McKevitt
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>I strongly support the preferred Option 1 (Multi-CCO), recognising that this approach strategically positions Whakatāne District to manage our water resources sustainably and efficiently in the long term. This option demonstrates clear foresight, aligning well with critical challenges we face, notably the rising impacts of climate change and the necessity of substantial infrastructure investments to secure our water future. My primary concern in community submissions is the recurring pattern where short-term financial relief (like immediate rate reductions) is favoured at the expense of long-term sustainability and prosperity. Such short-sighted decisions inevitably escalate costs in the future, transferring the financial burden to upcoming generations. Option 1 mitigates these concerns by creating economies of scale and greater borrowing flexibility, enabling proactive infrastructure maintenance and upgrades at significantly reduced long-term costs. Additionally, as the climate crisis accelerates, intensifying extreme weather events pose significant risks to the district's water infrastructure, increasing both stormwater management demands and pressure on wastewater and drinking water systems. The Multi-CCO model is better suited to respond to these challenges due to its increased financial flexibility, larger scale of operations, and the pooling of expertise and resources across multiple councils. This collaborative model is critical to delivering robust and climate-resilient water services sustainably and affordably. The initial higher establishment costs associated with Option 1 are justified by the long-term operational efficiencies and cost savings that become increasingly evident over time. By contrast, maintaining a stand-alone business unit (Option 2) limits borrowing capability and economies of scale, inevitably resulting in higher long-term costs and potential service risks.</p>	

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

While understanding concerns about current affordability, my main concern is the district making short-sighted decisions that defer essential upgrades and compliance investments. Historically, prioritising immediate cost savings over long-term strategic planning often leads to greater financial burdens and service disruptions later. The previous Three Waters initiative, despite initial unwarranted controversy and concerns over local control, highlighted significant infrastructure deficits and the urgent need for coordinated investment and management at scale. Though politically contentious, the intent behind Three Waters—to improve compliance, sustainability, and efficiency—remains valid. It is therefore deeply disappointing that local councils are now left managing the consequences of its repeal, with some already facing substantial rates increases and financial uncertainty. Councils are being forced to revise long-term plans under significant pressure, and many smaller communities are at risk of being left behind without collaborative support. In this context, Whakatāne District Council is clearly doing its best to move forward in a constrained and politically charged environment—choosing a pragmatic, future-focused path in Option 1 despite the broader setbacks. Something I very much appreciate. I urge the Council to prioritise clear, ongoing communication and community education regarding the long-term benefits and necessities of investing now rather than facing substantially greater costs and risks in the future.


Q11. Need more space for your feedback?

not answered

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	Respondent No: 25	Responded At: May 06, 2025 18:54:54 pm
	Login: Anonymous	Last Seen: May 06, 2025 18:54:54 pm
	Email: n/a	IP Address: n/a

Q1. First name	Philippa
Q2. Surname	Branthwaite
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	We should have gone with Labour 3 waters. It would have been much cheaper in the long run. But the egos and racism got in the way
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	How can we afford it under this govt when they are not paying anything like what we were offered under the Labour Govt
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 26	Responded At: May 06, 2025 19:33:03 pm
	Login: Anonymous	Last Seen: May 06, 2025 19:33:03 pm
	Email: n/a	IP Address: n/a

Q1. First name	Nigel
Q2. Surname	Dee
Q3. Organisation (if on behalf)	HOOKUP MANAGEMENT SERVICES 2000 LIMITED
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>There is only vague mention as to why a whole new department (and yet more employees) would be required to run a service that already exists and isn't broken. Is this change even necessary? Neither is there any mention of the relative costs of running each of the proposed entities versus a 'status quo' approach. I can't see why the existing council resources could not continue to run this service and I would like to see the WDC more focused on containing or reducing costs to ratepayers.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>I have no concerns about the reliability or quality of the existing water supply service here at Ohope. I have serious concerns as to Council's blase attitude towards promoting and adopting policies that continue to add more cost to the services we receive. It is time Council focused on improving it's efficiency and productivity. We want to see costs go down.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 27 Login: Anonymous Email: n/a	Responded At: May 06, 2025 20:04:41 pm Last Seen: May 06, 2025 20:04:41 pm IP Address: n/a
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Q1. First name	Andrew
Q2. Surname	Broxholme
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Neither agree or disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	I don't feel that I have been provided with enough information at this time
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	I am not convinced that that we have enough competent people within staff and am uncertain as to who will staff this new entity, it seems like a great opportunity to create high paying jobs with little accountability.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 28	Responded At: May 07, 2025 08:53:18 am
	Login: Anonymous	Last Seen: May 07, 2025 08:53:18 am
	Email: n/a	IP Address: n/a

Q1. First name	not answered
Q2. Surname	not answered
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	I think it would be a benefit for Whakatane to join up with other local councils who have managed their water resources better than we have. A larger water entity will have more 'clout' than just a Whakatane one.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 29	Responded At: May 07, 2025 08:57:50 am
	Login: Anonymous	Last Seen: May 07, 2025 08:57:50 am
	Email: n/a	IP Address: n/a

Q1. First name	Colin
Q2. Surname	Latham
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>In practically every situation in New Zealand where small operations have amalgamated with others to form a large operation all the cost and management benefits promised have failed. Whakatane district council have the staff and equipment to continue providing 3 water services. If elected counsellors instructed council to concentrate on essential services (as requested by Central Government) rather than nice to haves and unnecessary round-a-bouts and road humps we would have ample funding for 3 waters.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>Whakatane District Council has provided and managed 3 water services for about the last 100 years. I don't see why we need to suggest a separate stand alone and managed unit when our current 3 waters team operate efficiently as part of council. If over the last 30 odd years council had concentrated on providing and maintaining essential services our 3 waters system would still be world class.</p>	
Q11. Need more space for your feedback?	not answered

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	Respondent No: 30	Responded At: May 07, 2025 10:38:05 am
	Login: Anonymous	Last Seen: May 07, 2025 10:38:05 am
	Email: n/a	IP Address: n/a

Q1. First name	Peter
Q2. Surname	Minten
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	Yes
Q7. Phone	[REDACTED]
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Go for Option 2. see attached file
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>Equalise the Whakatane/Ohope drinking water scheme with the Plains Scheme. This will rationalize the WDC drinking water system, will make it simpler with easier to operate and maintain. It will reduce treatment costs and by shutting down all the other systems compliance and consenting costs will be significant lower. Finally it improves the security of supply for the Whakatane/Ohope drinking water scheme because is not depending on river flows anymore.</p>
Q11. Need more space for your feedback?	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/cd94dfaf65c3a2a35bed7a54a3687ac1b834eff4/original/1746571073/859eeff8797294a0d4f9b8ca5bcb5a0b_Submission%20to%20water%20delivery%20plan%20Whakatane%20District%20Council.docx?1746571073

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Submission to water delivery plan Whakatane District Council.


I strongly believe that the WDC should retain full control over its 3 waters and not transfer any of its assets and responsibilities to a Multi Council controlled organisation (MC CCO). My reasoning is as follows:

- Retaining local skills and knowledge! What will be left if you transfer your assets!
- Fully embedded within the current council organization. Consenting; revenue collection; water billing; synergy with the road transport group. It all sits within one organisation and the interfaces are there!
- There is no -love on first sight- from other councils because why would WDC need a DIA facilitator to moderate the process?
- There is a lot unknown and uncertain about how to set up a MC CCO. There need to be a plan B how to get out of it again if it proves it doesn't work.
- Avoiding contributing to MC CCO set up and running costs! The MartinJenkins report assumes a MC CCO is only clearly cheaper after 10 years but refused to share during the latest IPC meeting where those assumptions were based on (Question from Mayor Victor Luca at Nick Davies from MJ)
- We will most likely have a minority stake in any MC CCO. The Western version gives us 15% max (1 board member of of 7) So how would you guarantee that all the required improvements from the WDC LTP 2024-2034 would be executed in exchange of our assets? How would be influence a board when the Tauranga influence will be more than 50%?
- We haven't had a look at how the WDC can lower the future water rate increases as full inhouse department. Rationalize and simplify the drinking water and waste water schemes will open up opportunities in reducing future operating and maintenance costs. Equalizing the Plains water scheme with the Whakatane/Ohope scheme will improve the security of supply for the latter and will phase out water being taken from the river (with all its limitations). The Plains Scheme has a massive overcapacity and could provide the whole district of drinking water.
-
- What has not been explored in the whole process is setting up a New Zealand wide agency to support all the different councils with services like purchasing treatment chemicals and 3 waters process engineering. This will reduce also the future increases in water rates. Hereby is a link to how it was organized in The Netherlands 97 years ago.
<https://www.tauw.com/about-us/our-story/>
 The Water Boards as mentioned in the link as behind the English Parliament the oldest democratic institutions. They were created in the 17th/18th Century to make sure people kept their feet dry after the Dutch drained their swamps and lakes to create new land.

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	Respondent No: 31	Responded At: May 07, 2025 13:37:14 pm
	Login: Anonymous	Last Seen: May 07, 2025 13:37:14 pm
	Email: n/a	IP Address: n/a

Q1. First name	Barry
Q2. Surname	Morgan
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	Go for mulkti CCC, spread the risk and the responsibility but put in place independent directors, not councillors or staff with commercial responsibilities.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	You need long term strategy to support farming/horticulture/other land uses accross the District - eg access to Upper Tarawera River to supply all area not just one council.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 32 Login: Anonymous Email: n/a	Responded At: May 07, 2025 13:43:39 pm Last Seen: May 07, 2025 13:43:39 pm IP Address: n/a
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Q1. First name	Chris
Q2. Surname	Bullen
Q3. Organisation (if on behalf)	not answered
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	Ownership of asseWts must be held by an entity formed of councils, and no other organisations or individuals
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Whakatane/Ohope urban area needs a backup or more reliable fresh water source than the Whakatane River, which is vulnerable to dry weather conditions.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 33	Responded At: May 07, 2025 16:44:46 pm
	Login: Anonymous	Last Seen: May 07, 2025 16:44:46 pm
	Email: n/a	IP Address: n/a

Q1. First name	Dianne
Q2. Surname	Wood
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	Yes
Q7. Phone	[REDACTED]
Q8. Do you agree with our preferred option?	Strongly disagree

Q9. Do you have any other feedback you would like to share about our preferred option?

Do not devolve responsibility for your inaction over 30+ years to another party, either as part of a wider council entity or with a new council entity. Any new organisation or business unit is going to cost money, be riddled with bureaucracy, top heavy, inert and non responsive to improving all our water quality - drinking water, waste water and storm water. Keep control within our current council and run it from within without another person being employed. We already have three waters staffing so no need for further officials. Less hui more do ey! Being able to borrow double if we are part of a Multi-CCO (page 5) is a hardly a positive selling point. Whakatane District Council could be left paying the debt on 500% borrowing and only get 20% of the funds allocated to Whakatane District Council projects. Please specify what economies of scales can be achieved by being part of a Multi-CCO? The only ones I can think of are bureaucracy related and we need less of that not more! Each water treatment station, wastewater scheme and stormwater drain will need to be individually designed for the specific environment – it is not like you are repeating things in bulk to get economies of scale. What transitional challenges are you talking about on page 23? You already run the water (albeit badly) so there is nothing to transition to - just move the people into the same area and hey presto there is a business unit from existing staff. Stop building empires of bureaucracy. How much did you pay Martin Jenkins to create a report when you have so many highly paid experts already employed by Council? It is this outsourcing that is so out of control at Council. I have been having dealings with the council regarding the new universal stormwater consent and I can tell you there are a lot of employees who attend these meetings and the information they provide is light on fact, detail, and accountability. Nothing tangible gets achieved, it feels like sitting in an office pushing paper around is about the best thing that is happening to our water services right now.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?

It is going to be expensive but it needs to be done. It should have been done for the past 30 years but we can no longer ignore the infrastructure deficit that afflicts water supply and water quality. We only get this resource once, and we have done a neglectful job on it for decades, and our reckoning is here. Stop all other unnecessary spend at the council until you get the drinking water, waste water and storm water infrastructure in place, and improved. Not only do we need to stop the rot, we need to reverse the degradation that has occurred over the last 30+ years. Without water there is no life - no need for beautiful gardens, fancy halls, lighting, roads, subsidising local airlines etc. if we don't have life! Look after our most valuable asset first. We owe it to the future generations to get this sorted. The council can not be trusted presently to undertake these tasks, and the water quality has diminished significantly. The council needs to pay more heed to the water - measure, test and remediate, to maintain and improve the quality of the water. There is no reporting done of the state of the water and both the council and the regional council have been inept at managing the water resources, particularly stormwater (which becomes your future drinking water supply as stormwater drains empty into the river), with it appearing to the layman that neither thinks they are responsible and have used this to their advantage over the years. The current ratepayers need to pay for the actual cost of providing these three water supplies, and it is obvious the current rating level has not been adequate to do this, although as I earlier stated I am sure there are funds at the council if they prioritised this unglamorous, expensive, non vote catching task. Passing the problem on to the next generations cannot keep happening. We need to live within our means which means we either change our lifestyle or pay more for the required services. The current situation is theft of the future generations! You, the council, have to sell the cost rise to the ratepayers. I do not see a 67% rates rise (\$3,330 from \$1,990) in 9 years (page 24) as a huge price to pay for better water. We are currently paying over 10% a year in rate rises for degrading water services. It just needs to be ringfenced and actually spent on actual water improvement, not paperwork and planning. Also the 10 year plan budgeted expenditure can get changed each year in the annual plan process so there is actually no commitment to spend \$249m in the next nine years. And do you really think you can replace the treatment statement, improve and remediate all the stormwater site, and provide clean drinking water by only spending \$249m? There is also an issue on page 29 of your document - stormwater does not go down the sink and toilet (I hope). No doubt a lot of money was spent making this pretty booklet – maybe some checking would have been useful. Sadly there is nothing about this report that leads me to believe that the council is just after MONEY! They see it being easier to get it from a multi -CCO (risky to assume we will get any and no control over where the borrowed money is spent) than to have an honest conversation with themselves and the ratepayers that water spend (and doing not planning) is the only priority for the council for the next 10 years and all other projects will need to be deferred. Either way the cost to the ratepayer for the next 10 years is the same, and history shows us that Multi region anything end up costing more as bureaucrats end up eating all the money and nothing gets done. Stand up for us residents Council, and do what we all employed you to do through our rates.


Q11. Need more space for your feedback?

not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 34	Responded At: May 07, 2025 16:49:48 pm
	Login: Anonymous	Last Seen: May 07, 2025 16:49:48 pm
	Email: n/a	IP Address: n/a

Q1. First name	Beth
Q2. Surname	Finlayson
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	This option supports all smaller communities
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Yes. Will it fix our current water quality issues ie, current tidal infrastructure? Will The Rating system be forever impacted with increases, and not at a sustainable level.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 35	Responded At: May 08, 2025 10:25:33 am
	Login: Anonymous	Last Seen: May 08, 2025 10:25:33 am
	Email: n/a	IP Address: n/a

Q1. First name	allan
Q2. Surname	mcdougall
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>Whakatane council has shown disregard for resilience of our fresh water supply over decades. (eg - salt water incursions at whakatane and sewage problems at Matata) Their record at managing 3 waters by themselves is hardly encouraging.</p>
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 36	Responded At: May 08, 2025 22:44:08 pm
	Login: Anonymous	Last Seen: May 08, 2025 22:44:08 pm
	Email: n/a	IP Address: n/a

Q1. First name	Michael
Q2. Surname	Lamont
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	Council needs to share costs and expertise and plant. And a bigger entity allows better loan/finance deals.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	No. But Council should NOT be discharging road stormwater onto the beach. The beach is not the place to get rid of filthy water (oils, rubber and everything that goes onto the road). Shellfish are unlikely to be happy - toxic influences.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 37	Responded At: May 09, 2025 06:15:10 am
	Login: Anonymous	Last Seen: May 09, 2025 06:15:10 am
	Email: n/a	IP Address: n/a

Q1. First name	Dave
Q2. Surname	Hall
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Neither agree or disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>Im my opinion as a former Council Engineer, whether ot not you have a shared company running the "three waters " depends on the size of the asset and if it is big enough to support a viable skilled team to manage the network . Shared services runs the risk of "dilution" of services and greater separation between organization and the ratepayers it ultimately serves. Kawerau is geographically closely linked and would appear to be a sensible team member. Opotiki, while the town is closer than Murupara, the more remote townships are further away and , with its problems a link up may be of much more benefit to Opotiki than Whakatane. Linking up with the larger centres like Rotirua or Tauranga risks losing control and downgrading of services.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
not answered	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 38	Responded At: May 09, 2025 08:21:36 am
	Login: Anonymous	Last Seen: May 09, 2025 08:21:36 am
	Email: n/a	IP Address: n/a

Q1. First name	Bruce
Q2. Surname	Knight
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>I believe that by going into a Multi CCO we will end up as the little fish in the pond. Rural users will be propping up the urban communities to an unfair extent, the lumping in of all waters must be separated out with just potable water being charged to rural and urban picking up the higher cost of sewerage, storm water and drinking water by means of a targeted rate. Keep the status quo and proceed with upgrades bearing in mind that the Plains Water was implemented and paid for by the Plains community some 40 years ago, they should not have to pay again.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>David Bewley made a comment that the "Plains Water was too cheap and that it was wasted by feeding good potable water to cows" while in discussion at the Edgecumbe pop up meeting. This scheme was implemented by plains people for all plains people and directly associated needs. Farmers pay huge rates and water charges that keep the council going. To date there have been some poorly thought out decisions with incorporating additional water sources into the scheme, Paul road is one example where undersized reticulation piping was laid and now has to be re-dressed. David confirmed that the plains water is going into Whakatane in the near future, commenting that this will be a hundred million dollar project. Who will pay for this? The Edgecumbe sewerage ponds are a disgrace and have been for decades, David said this was a 30 year problem and resource consent runs out 2026, this is forcing the council to look at a fix now, they have bought a property out at Awakaponga, at a cost way higher than valued, to site waste water treatment for initially Matata only to find it is too small and are now in negotiation with another land owner to get an elevated site as well, more mismanagement and free use of ratepayer money with no consequence. Who is accountable for these decisions and when will it stop???</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 39	Responded At: May 10, 2025 09:24:17 am
	Login: Anonymous	Last Seen: May 10, 2025 09:24:17 am
	Email: n/a	IP Address: n/a

Q1. First name	Maria
Q2. Surname	Bavaro
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>Your favorite option is the worst solution. Why? Because more control and less accountability. Also, are you all immune to fluoridation? Are your nerves made out of steel? Your brains? Judging by this type of solutions, certainly something is not functioning properly from your end. Doing what you are told, is not our preferred solution.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>Water is an essential natural resource that must be made accessible to EVERYONE. You must minimize the costs by cutting out frivolous expenses and extra gravy train opportunities for people who take absolutely unnecessary roles. I.e. Climate change minister etc We must access to fresh, clean, potable water at all times, and whoever chooses to take responsibility to manage our water system, must remain available for consultation. Unlikely what you are doing at the moment, ignoring queries on water fluoridation. As if you are immune to that... you're dreaming. Be careful to what you wish for. Eventually you'll be the first ones to perish.</p>	
Q11. Need more space for your feedback?	not answered

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	Respondent No: 40	Responded At: May 12, 2025 11:45:27 am
	Login: Anonymous	Last Seen: May 12, 2025 11:45:27 am
	Email: n/a	IP Address: n/a

Q1. First name	Jocelyn
Q2. Surname	Coburn
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	I feel that we are very well set up here(thanks to a pro active council) and would be subsidising other councils .However I realize you- Council,are much better informed than I and will accept the final decision.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 41	Responded At: May 13, 2025 11:04:31 am
	Login: Anonymous	Last Seen: May 13, 2025 11:04:31 am
	Email: n/a	IP Address: n/a

Q1. First name	Christine
Q2. Surname	Watkinson
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	Safe guards should be put in place, to prevent, us not having a loud enough say, assuming the the Council we join with is Tauranga
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Yes re the affordability and reliability given the location water treatment plant.
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 42	Responded At: May 14, 2025 15:11:26 pm
	Login: Anonymous	Last Seen: May 14, 2025 15:11:26 pm
	Email: n/a	IP Address: n/a

Q1. First name	Bryan
Q2. Surname	Vautier
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Neither agree or disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>I think it will be a matter that no one wants to partner up with as the cost of supplying water in the Whakatane district will always be a lot higher due to having to operate a large number of plants (12), rather than 1 or two plants like the immediate partners may have. The plants are also getting older too. Each plant will have a basic cost to run and multiply by the number of plants you need to maintain and operate 12x more of everything. pumps online monitoring equipment consents maintenance monitoring etc. Saying that it would be good to keep it in house within the WDC so they can borrow and it is an income for the council to maintain control.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>WDC needs to seriously look at why the need to treat the water to the highest for more log credits , and not to a minimum standard. Most of the supplies have/are reasonably so why go for UV (only active at the source) over and above Chlorine, the issue is more that the reservoirs and pipes are getting older and the problem lies there and UV has no input. One solution is to actually reduce the number of plants in the district, and this could be 1 Connect Awakaponga to Breamar 2 Connect Te Mahoe to Paul rd 3 the upgrade at Ruatoki could include connecting to Taneatua or add Taneatua to the plans upgrade 4 Buy the Otakeri bottling plant and add it to Jrd and only use the higher bore why has lower arsenic hence no need to install arsenic removal plant like Breamar 5 Pipe plans water into Whakatane from Paul rd/Jrd and add Taneatua to the scheme 6 Mothball TeTeko and add it to Paul rd/J rd 7 That's reducing by 5 plants within the district and could be easily done obviously initial cost but long term it will save money i believe. 8 Break down the annual cost of each plant before 1m3 is delivered and see here the costs are going 9 mothball WDC plant and use the plains water.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 43	Responded At: May 14, 2025 17:33:56 pm
	Login: Anonymous	Last Seen: May 14, 2025 17:33:56 pm
	Email: n/a	IP Address: n/a

Q1. First name	Nicholas
Q2. Surname	Guffey
Q3. Organisation (if on behalf)	not answered
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>I believe the previous Government(Labours) 3 Waters Reform was on point. Economy of scale was acheivable with the proposed 4 Entity model; A District like Whakatane would have benifited greatly with the likes of Tauranga and Hamilton sharing their reasorces and the financial requirements our Three Waters assets. A voluntary amalgation is NOT suited for the Whakatane District. I do not believe our district is in any position to negotiate our way to a desireable coalition. The risk of loosing control of our essential infrastructure outways any percieved benefits of amalgamating.</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>A stand alone Business unit for 3 Waters Services or outsourcing to a company like Watercare/Citycare is the best option in my opinion. Efficiencies will be gained in "a for profit" service model, leaving the delivery of which more affordable for the user. In the current economic climate, WDC needs to focus rate payer dollars on it's CORE services; Three Waters and Transportation with everything else on hold.</p>
Q11. Need more space for your feedback?	not answered

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	Respondent No: 44	Responded At: May 14, 2025 18:32:39 pm
	Login: Anonymous	Last Seen: May 14, 2025 18:32:39 pm
	Email: n/a	IP Address: n/a

Q1. First name	not answered
Q2. Surname	not answered
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 45	Responded At: May 14, 2025 20:58:45 pm
	Login: Anonymous	Last Seen: May 14, 2025 20:58:45 pm
	Email: n/a	IP Address: n/a

Q1. First name	Rex
Q2. Surname	HUMPHERSON
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 46 Login: Anonymous Email: n/a	Responded At: May 14, 2025 22:12:08 pm Last Seen: May 14, 2025 22:12:08 pm IP Address: n/a
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Q1. First name	Lavinia
Q2. Surname	Tanirau
Q3. Organisation (if on behalf)	not answered
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	I don't think these options will benefit us at all. It will increase our rates which is currently excessive for our town.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	I believe we need to go back to our own Borough councils and our rates will take care of our own community
Q11. Need more space for your feedback?	not answered

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	Respondent No: 47	Responded At: May 15, 2025 05:19:46 am
	Login: Anonymous	Last Seen: May 15, 2025 05:19:46 am
	Email: n/a	IP Address: n/a

Q1. First name	not answered
Q2. Surname	not answered
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>The two neighbouring council have the same issue as the WDC in as far as the land mass vs population. If this is the councils first option then council should have discussed this with other the other councils so they could give ratepayers an indication of who we would be partnering with.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>Many ratepayers are already struggling with the cost of rates and your preferred option is only an indication of the costs as without knowing which councils you intend to work with how can this be costed out? We already have a dedicated team within the council who currently looks after this work - why can't this continue?</p>	
Q11. Need more space for your feedback?	not answered

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	Respondent No: 48 Login: Anonymous Email: n/a	Responded At: May 15, 2025 10:00:21 am Last Seen: May 15, 2025 10:00:21 am IP Address: n/a
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Q1. First name	Bill
Q2. Surname	Raki
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Not at this moment
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	All concerns
Q11. Need more space for your feedback?	not answered

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	Respondent No: 49	Responded At: May 15, 2025 10:21:45 am
	Login: Anonymous	Last Seen: May 15, 2025 10:21:45 am
	Email: n/a	IP Address: n/a

Q1. First name	Tamati
Q2. Surname	Marr
Q3. Organisation (if on behalf)	Kawerau resident
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	Strongly agree with option 1
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Not sure on this Prices on water should be on usage of water just like power the more you use the more you pay because not every house is using the same amount just a thought.
Q11. Need more space for your feedback?	not answered

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	Respondent No: 50 Login: Anonymous Email: n/a	Responded At: May 15, 2025 19:27:41 pm Last Seen: May 15, 2025 19:27:41 pm IP Address: n/a
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Q1. First name	Nikita Atamira
Q2. Surname	Tumarae
Q3. Organisation (if on behalf)	Ruatahuna Farm Trust
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 51 Login: Anonymous Email: n/a	Responded At: May 16, 2025 10:32:37 am Last Seen: May 16, 2025 10:32:37 am IP Address: n/a
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Q1. First name	Rhonda
Q2. Surname	Webb
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 52	Responded At: May 16, 2025 10:42:58 am
	Login: Anonymous	Last Seen: May 16, 2025 10:42:58 am
	Email: n/a	IP Address: n/a

Q1. First name	Alan
Q2. Surname	Keeber
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	Keep it within the council as separate unit.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	The preferred option will inherit other councils water issues and costs.
Q11. Need more space for your feedback?	not answered

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	Respondent No: 53	Responded At: May 16, 2025 13:06:12 pm
	Login: Anonymous	Last Seen: May 16, 2025 13:06:12 pm
	Email: n/a	IP Address: n/a

Q1. First name	Margaret
Q2. Surname	Underwood
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Neither agree or disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>As a ratepayer I need to know more / all ratepayers to know more before saying that I / we agree or disagree with the preferred option. We need more information with regards to who WDC will team up with i.e Opotiki, Tauranga. Where will we stand in the bigger picture if we do go with Tauranga? Will the available funds be equally distributed as per the population of each town / city? Will we get value for the dollars we contribute? Or will we just be the poor cousin sitting in the whoop, whoops in the eyes of Tauranga District Council?</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>I have great concerns with regards to the potential cost for ratepayers. The council has stated that water could cost up \$3330.00 per annum by 2034. While this is on a website it is not seen and read by so many. This needs to be made public in a way that everyone is aware of what this means for them, for their pocket. Come on Whakatane District Council before making such a huge decision get out there and educate the public in a way that those who don't have access to or don't use the internet understand. There are still a lot these people out there. While I know that Iwi will have a huge part to play tell us this what this means, will they have all the say, make all the decisions and if so what will the extra cost be? I say this with no bias at all, just concern as a ratepayer who is aware that we have very competent Maori representation on the council, people who could surely make these decisions.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 54	Responded At: May 16, 2025 13:16:20 pm
	Login: Anonymous	Last Seen: May 16, 2025 13:16:20 pm
	Email: n/a	IP Address: n/a

Q1. First name	Graeme
Q2. Surname	Mollgaard
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Neither agree or disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>More information is needed to enable me to make an informed decision e.g. Who are we actually going to partner with. How will the board be elected. What safeguards will there be to protect our interests.what happens if a partner withdraws. How will Iwi be represented.</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 55	Responded At: May 16, 2025 13:55:16 pm
	Login: Anonymous	Last Seen: May 16, 2025 13:55:16 pm
	Email: n/a	IP Address: n/a

Q1. First name	Maxine
Q2. Surname	Jury
Q3. Organisation (if on behalf)	N/A
Q4. Email address	[REDACTED]
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	No
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>Yes, I feel traditionally The Whakatane District Council representatives; being Councilors/Mayor have a bad record for not being able to prioritise spending/'funding' of vital infrastructures & necessities -being rather distracted far too much by 'frivolous ' wants. This has been a long running concern by a large! percentage of the community....this coming situation will no doubt, be of concern to many !</p>
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 56	Responded At: May 16, 2025 15:13:45 pm
	Login: Anonymous	Last Seen: May 16, 2025 15:13:45 pm
	Email: n/a	IP Address: n/a

Q1. First name	Philip
Q2. Surname	Jacobs
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	<p>No benefits for ten years! Why try to jump early into a dance when nobody wants to partner with us. Let CCO water organisations prove themselves before going down that track. Wellington councils are only paying three times the cost for water services vis-a-vis other main city in-house water services operations in New Zealand. We do not need another ill considered boat harbour style decision because someone gave a slick presentation.</p>
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	<p>Solve all these problems by hiring more outdoor works, save money by not using contractors, build up a loyal work force of workers knowledgable about of OUR water services, give jobs to young families who are committed to this town and have mortgages to pay off, be prepared to manage staff instead of managing contractors.</p>
Q11. Need more space for your feedback?	not answered

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	Respondent No: 57	Responded At: May 16, 2025 17:32:48 pm
	Login: Anonymous	Last Seen: May 16, 2025 17:32:48 pm
	Email: n/a	IP Address: n/a

Q1. First name	Stephanie
Q2. Surname	Smith
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>No benefits for ten years! Why try to jump early into a dance when nobody wants to partner with us. Let CCO water organisations prove themselves before going down that track. Wellington councils are only paying three times the cost for water services vis-a-vis other main city in-house water services operations in New Zealand. We do not need another ill considered boat harbour style decision because someone gave a slick presentation.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>Solve all these problems by hiring more outdoor works, save money by not using contractors, build up a loyal work force of workers knowledgeable about OUR water services, give jobs to young families who are committed to this town and have mortgages to pay off, be prepared to manage staff instead of managing contractors.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 58 Login: Anonymous Email: n/a	Responded At: May 16, 2025 20:09:08 pm Last Seen: May 16, 2025 20:09:08 pm IP Address: n/a
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Q1. First name	Helen
Q2. Surname	Read
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 59	Responded At: May 16, 2025 20:18:36 pm
	Login: Anonymous	Last Seen: May 16, 2025 20:18:36 pm
	Email: n/a	IP Address: n/a

Q1. First name	Mark
Q2. Surname	Sanderson
Q3. Organisation (if on behalf)	Ratepayer
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
Progressive councils have totally ruined the infrastructure by so called savings made by want Abe management we had a great renewal system that you lot [REDACTED] updo you honestly think the two other neighbouring councils want your balls up?	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
Get rid of the paper flippers and get back to basics	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 60	Responded At: May 16, 2025 20:58:35 pm
	Login: Anonymous	Last Seen: May 16, 2025 20:58:35 pm
	Email: n/a	IP Address: n/a

Q1. First name	Garry
Q2. Surname	Rusden
Q3. Organisation (if on behalf)	Personal submission
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>It talks about potential benefits (financial) after 10 years if any. I suspect that this is "consultant speak" to help justify their report. Highly suspicious that any benefits would be realised as time seems to find new issues. If Whakatane partnered with Tauranga/Western Bay I am suspicious that as we are a smaller region we will be forgotten about with preference going to the larger partners. I think that a multi CCO will create another layer of management and bureaucracy which will add cost. Wellington is an example where costs are 2-3 times the costs of water services of other main city in-house operations. If a multi CCO says we need to dig up Road A&B for pipe repairs how will this be co-coordinated with the local council who I assume will be responsible for re-installing the road surface. Or will the Multi CCO be responsible for these costs?</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>I believe we should keep the services within WDC control. We have knowledgeable competent people who are local and know our local network well. Will we have this with a multi CCO? It is stated that WDC 's water infrastructure is in poor shape and in need of significant investment. Surely if our infrastructure has deteriorated so significantly it is poor maintenance/planning/prioritising by council managers who should be held accountable. This gets back to the basic services for the community that council should be providing. If we engaged with a Multi CCO surely our council staff will be diluted and even the role and function of councillors will be impacted. Economies of scale for councils NZ wide could be supported/realised if govt centralized purchasing of water pipes, valves on behalf of councils.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 61	Responded At: May 16, 2025 21:41:19 pm
	Login: Anonymous	Last Seen: May 16, 2025 21:41:19 pm
	Email: n/a	IP Address: n/a

Q1. First name	not answered
Q2. Surname	not answered
Q3. Organisation (if on behalf)	not answered
Q4. Email address	not answered
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	We should manage our own water service delivery rather than deal within another faceless committee
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 62	Responded At: May 17, 2025 09:45:45 am
	Login: Anonymous	Last Seen: May 17, 2025 09:45:45 am
	Email: n/a	IP Address: n/a

Q1. First name	Tony
Q2. Surname	Ramson
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>I am concerned that your preferred option will end up like the local hospital where Tauranga hospital takes all the funds to improve thier service and Whakatane is suffering as a result..I assume you would partner up with Tauranga and / or Rotorua, much bigger areas than ours so I would tend to think they would control and out vote Whakatane and take our funding etc.fir their betterment first! I would also think that on going maintenance , management would be centralised in the bigger places ie Tauranga Whakatane will always become second and serviced from there instead of local.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>No not really as standards are set, engineering practices etc are well developed so providing the provider is following the rules and adopted good maintenance and design procedures there will not be problems.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 63	Responded At: May 18, 2025 07:43:12 am
	Login: Anonymous	Last Seen: May 18, 2025 07:43:12 am
	Email: n/a	IP Address: n/a

Q1. First name	Linda
Q2. Surname	Rowbotham
Q3. Organisation (if on behalf)	Matata Residents Association
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>I would be concerned regarding who WDC would partner with, and would prefer it to be smaller Council's, ie. Kawerau, Opotiki. I would be concerned if you decided to partner with Rotorua or Tauranga, as they have bigger areas to cover, and appear to already have alot of spending issues. WDC need to be aware of their current forecast spending before making any decision to join with them. Rates are already unaffordable for many and we don't need their debt as well.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>I would be concerned regarding who WDC would partner with, and would prefer it to be smaller Council's, ie. Kawerau, Opotiki. I would be concerned if you decided to partner with Rotorua or Tauranga, as they have bigger areas to cover, and appear to already have alot of spending issues, and our little down may be bumped down the line, behind their planned and unplanned upgrades / maintenance. The people in Matata can't afford to have this happen, as we pay big rates already for the services we have and we need to keep pushing forward with the projects which have been going on for way too long already. The government need to assist with this by softening some of the regulations around rural properties and drinking water standards throughout the entire country. People are being told they need to have water meters installed for Council's to monitor how much they're taking, and the Council's allow overseas companies to take our water for selling overseas. You need to stop this from happening, as water is a necessary commodity that all NZer's deserve to have.</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 64 Login: Anonymous Email: n/a	Responded At: May 18, 2025 07:57:01 am Last Seen: May 18, 2025 07:57:01 am IP Address: n/a
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Q1. First name	Carley
Q2. Surname	Sudlow
Q3. Organisation (if on behalf)	not answered
Q4. Email address	
Q5. Postal address	
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	not answered
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	not answered
Q11. Need more space for your feedback?	not answered

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	Respondent No: 65	Responded At: May 18, 2025 11:40:13 am
	Login: Anonymous	Last Seen: May 18, 2025 11:40:13 am
	Email: n/a	IP Address: n/a

Q1. First name	darryl and melba
Q2. Surname	dawson
Q3. Organisation (if on behalf)	ratepayer
Q4. Email address	not answered
Q5. Postal address	not answered
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Strongly Agree
Q9. Do you have any other feedback you would like to share about our preferred option?	we strongly agree with option 2
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	yes stop wasteing on money on nice to haves nothing is more important than fresh water your submisson form is missleading as we do not know what is the councils favorite option
Q11. Need more space for your feedback?	not answered

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	Respondent No: 66	Responded At: May 18, 2025 13:28:50 pm
	Login: Anonymous	Last Seen: May 18, 2025 13:28:50 pm
	Email: n/a	IP Address: n/a

Q1. First name	Lynore
Q2. Surname	Craig
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	No
Q7. Phone	not answered
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>My primary concern with the preferred option is the possibility of losing control of the decision making in meeting our district's needs for water services. We do not know who we would partner with. A real concern is how well would our voice be heard joining larger councils eg Rotorua Lakes, Tauranga? The advantage of Option 1 is that over time there may be small savings for ratepayers by being able to combine /share services. Those longer term savings are important for our communities, most of which are not affluent, but would the potential loss of control or our needs not being given fair attention be to high a price to pay? I think so. Our natural partners are Opotiki and Kawerau and from my reading they favour stand alone entities. Would there not be opportunities for stand alone entities to share skills, knowledge and expertise? We already have structures, skilled staff with local knowledge to provide and manage our water services. Would a larger bureaucratic entity ensure a more efficient delivery? It has the potential for becoming a wieldy machine top heavy with decision makers and consultants increasing the costs to ratepayers and becoming more distanced from the communities it is there to serve.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>Sadly our water infrastructure has been neglected for many years and now this generation and future generations must face the reality if we want safe drinking water, functioning waste and stormwater services as well as infrastructure that meets a growing population the price must be paid. Please ensure it is put into the staff who deliver the services. As David Attenborough stated on his 99th birthday last month the most important asset on our planet is water-life cannot be sustained without it. Those who have the obligation to ensure it is done well do so by providing the services to the communities they serve and with respect for our taonga, our natural environment</p>	
Q11. Need more space for your feedback?	not answered

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 67	Responded At: May 18, 2025 16:15:56 pm
	Login: Anonymous	Last Seen: May 18, 2025 16:15:56 pm
	Email: n/a	IP Address: n/a

Q1. First name	Gerard
Q2. Surname	van Beek
Q3. Organisation (if on behalf)	Rubia Farm Ltd
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	Yes
Q7. Phone	[REDACTED]
Q8. Do you agree with our preferred option?	Disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	There is a need to remove many services from Councilor control and leave it to the professionals. Too many poor decisions have been made to appease the electorate rather than best business.
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	Major concern over the proposal to equalize the Plains water scheme with the Whakatāne urbans equalized Schemes. See attached
Q11. Need more space for your feedback?	https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/ead94a122d4c57cb90a5a549728b1b5d1a03c1bc/original/1747541748/63c27f1b6f87afadbd6054a391ee5412_WDC%202025%20Annual%20Plan%20Submission%20GF%20van%20Beek.pdf?1747541748

Whakatane District Council 2025-26 Annual Plan Submission

Subject Equalisation of Urban water schemes with the Plains Water Scheme

Submitter GF van Beek

I wish to speak to my submission.

Summary:

Whakatane District Council should not or delay any plan to equalise/harmonise charges between the Plains water scheme and the currently equalised Urban water schemes. Especially for the Plains high user group this needs to be forward signalled and phased in over 2-3 years allowing time to accommodate these changes in budgets or make changes to their business activity.

The cost to produce Plain's Scheme water is considerably less that in the urban schemes and those users should benefit from that.

More transparency is needed in assigning the fixed charge and volumetric rate. It should not be subjective and be based on the true costs to produce water (volumetric rate) and to distribute water (fixed charge).

Interpreting WDC 30/04/2025 Briefing paper.

Taken from annual plans we see that there has been a modest increase in cost to Urban consumers lifting 105-128% from 2021-22 to 2024-25. The proposed increase outlined in WDC staff briefing paper 30/04/2025 would decrease the average urban water cost by 10%.

Whakatane/Ohope and others equalised scheme						
	Volumetric Revenue	Fixed Charge	Average Volumetric Charge	Average Total Cost	Annual Increase	Increase from 2021-22
2021-22	3,306,152	550	300	850		
2022-23	3,481,980	577	316	893	105%	
2023-24	3,743,408	618	340	958	107%	
2024-25	4,722,107	798	429	1,227	128%	
2025-26	3,352,561	798	305	1,103	90%	130%

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Using the information provided in that briefing (and deriving base units from the 2024-25 Annual Plan) there is a roughly 50/50 split in water consumption between the urban schemes (2,012,000m³/year) and the Plains Scheme (1,681,000m³/year plus 270,000m³/year penalty consumption). Assuming that 60 of the Plains' consumers use 50% of the water I have derived the following tables.

Plains Scheme (top 60 consumers)						
	Volumetric Revenue	Fixed Charge	Average Charge	Average Total Cost	Annual Increase	Increase from 2021-22
2021-22	702,403	249	5,853	6,102		
2022-23	689,429	302	5,745	6,047	99%	
2023-24	932,429	330	7,770	8,100	134%	
2024-25	1,083,767	295	9,031	9,326	115%	
2025-26	2,829,725	286	23,581	23,867	256%	391%
Plains Scheme (balance 1824 consumers)						
	Volumetric Revenue	Fixed Charge	Average Volumetric Charge	Average Total Cost	Annual Increase	Increase from 2021-22
2021-22	702,403	249	193	441		
2022-23	860,560	166	236	402	91%	
2023-24	932,429	194	256	450	112%	
2024-25	1,083,767	258	297	555	123%	
2025-26	2,829,725	286	776	1,062	191%	241%

For the average Plains low user (1824 consumers) the proposal will see their water charge increase by 191% from 2024-25 AP and fall in-line with those of the other urban areas, Urban \$1,103 and Plains \$1,062 respectfully.

For the Plains high user (60 consumers) their costs rise dramatically, 256% from the 2024-25 AP. That is a rise from an estimated \$9,326 to \$23,867. This \$14,541 increase is an order of magnitude greater than the other plains uses \$507. Contrast that with the \$124 decline in the urban schemes.

It is unlikely that these high use consumers can substitute Plain's water in the near term. It is a cost threshold where farmers will consider alternative water sources. Losing any or all these consumers will transfer significant costs to those that remain and in all schemes.

It is unlikely that these high use consumers will be using plains water for irrigation, milk cooling or yard washing. Consumption will be confined to watering stock, household use and dairy plant cleaning.

Background

Councillors have been briefed on the development of the Plains water scheme which was originally managed by its original participants and its primary purpose to deliver high quality water to farmers and residents on the Plains.

In the 1980's the Awakeri extension was built utilising a large reservoir built above Awakeri to balance demand against the limited excess supply available from the original scheme. Subscribers to the extension supply were required to reenergize water by having their own on-site balance tanks and pumps. However, most consumers have ditched their pumps and have become on-demand users. Consequently, many experience low pressure issues and they called for scheme upgrades to deliver at the same level of service enjoyed in urban communities.

Edgecumbe was added to the scheme when the Dairy Factory could not maintain supply during its off season where its own water treatment plant is shut down. Edgecumbe was bulk charged for water and residents paid a simple non-metered water fee. When meters were introduced, overall consumption dropped dramatically as water leaks were identified and fixed.

When the original Braemar scheme was introduced the World Health Organisation (WHO) Maximum Allowable Value (MAV) for arsenic was 50µg/L (circa 1963). At roughly 11-16µg/L the scheme was considered compliant. In 1993 the WHO MAV was changed to 10 µg/L and the scheme became non-compliant. No action was taken for many years deferring any action due to most of the water was being used on farm for dairy plant cleaning and stock watering and the high cost needed to treat water.

A new water source was identified at Paul Rd with very low arsenic contamination. WDC attempted to obtain a water consent of about 140L/s intending for this water to be piped to Whakatane township to either completely replace the output of the Valley Rd water treatment plant or a smaller amount to supplement summer demand. Despite a strong recommendation from the Plains Advisory Committee to Council to commence building that pipe, internal financial advice suggested that Whakatane/Ohope water scheme should not invest in an asset primarily owned by the Plains scheme. Without a clear water use plan, BOPRC reduced the allocation to 61L/s sufficient to meet the needs of Edgecumbe and subsequently Te Teko. WDC cannot increase this allocation because the BOPRC claims water in that allocation area is fully subscribed.

Ridiculously, WDC can look for additional water at Paul Rd and has established a 3rd bore about 1km to the north and just outside the original ground water allocation zone. (Weird considering the target aquifer is 100m down and connected to the one we are using.)

With water being sourced from deep bores and the Braemar surface spring, there is little need for treatment lowering the cost of water to consumers considerably. Even with the new arsenic treatment plant at the Braemar spring, costs are significantly less than Whakatane's water. Plains consumers should derive some benefit from the lower cost of the water to produce.

Cost Allocations

The following table illustrates the shift in costs between the Urban schemes and the Plains schemes. Until this proposal, revenue was roughly divided Plains 16.4-18.8%, Murupara 4.4-5.1% and the Urban schemes 76.5-79.8%. This proposal will see the Plains contribution virtually double from \$1.66m to \$3.37m and the Urban contribution drop from \$7.93m to \$6.23. This is a substantial transfer of funds between schemes without any appreciable change in levels of service.

Government's Three Waters Reform proposal has brought into sharp focus the lack of investment in water. WDC LTP signals major investments of \$103m over the next 10 years. It is unclear as to where this expenditure is being directed within the item identified as "Equalised".

There is a significant portion of the piping network comprising Asbestos Cement piping. While it does not present a health risk now, due to the asbestos not being an aerosol, those pipes are close to their "end of life". These pipes exist in all our schemes. With the current equalisation proposal, a significant portion of the renewal's capital costs will be collected through the volumetric charge. Thus, Plains consumers will be contributing a larger share of renewals funding through having a disproportionately higher consumption.

Annual Plan Water fees and distribution of costs


	Annual Plan 2021- 22	Total Revenue	Annual Plan 2022- 23	Total Revenue	Annual Plan 2023- 24	Total Revenue	Underlying units (2023-24)	Annual Plan 2024- 25	Total Revenue	AP Proposal 2025-26	Total Revenue	Increase 2025-26 /2024-25
Plains Water												
Fixed Charge	248.55	468,269	301.63	573,707	329.95	621,619	1,884	294.79	573,062	286.00	538,818	
Water Rate (m3)	0.27	459,403	0.36	609,414	0.41	689,429	1,681,534	0.50	840,767	1.45	2,438,225	
Excess Water Rate (m3)	0.90	243,000	0.93	251,146	0.90	243,000	270,000	0.90	243,000	1.45	391,500	
		1,170,672	16.6%	1,434,267	18.8%	1,554,048	1,951,534		1,656,829	16.4%	3,368,543	203.3%
Murapara Water												
Fixed Charge	156.78	5,801	166.33	6,164	194.34	7,190	37	257.84	9,539	286.00	10,581	
Fixed Charge Non-metered	384.09	256,189	406.88	271,386	474.35	316,391	667	625.85	417,441	572.00	381,523	
Fixed Charge Not Connected	156.78	16,305	166.33	16,965	194.34	19,239	99	257.84	25,525	286.00	28,313	
Water Rate (m3)	1.03	38,407	1.09	40,644	1.27	47,312	37,254	1.60	59,606	1.45	54,018	
		316,702	4.5%	335,159	4.4%	390,132	4.7%		512,112	5.1%	474,435	92.6%
All other schemes												
Fixed Charge	206.68	2,032,468	215.46	2,143,780	229.58	2,312,812	10,074	285.85	2,879,682	286.00	2,881,193	
Fixed Charge Non-metered	549.51	324,212	576.59	340,188	617.93	363,960	589	798.34	470,221	572.00	336,907	
Fixed Charge Not Connected	206.68	76,471	215.35	79,072	229.58	78,747	343	285.85	98,048	286.00	98,099	
Water Rate (m3)	1.56	3,144,046	1.64	3,311,886	1.77	3,561,428	2,012,106	2.23	4,486,997	1.45	2,917,554	
		5,577,197	78.9%	5,874,926	76.9%	6,316,947	76.5%		7,934,948	78.5%	6,233,753	78.6%

The table shows that there is a significant change in the proportion of revenue gathers from the Plains scheme and the urban schemes in the equalising proposal.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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	Respondent No: 68	Responded At: May 18, 2025 16:50:33 pm
	Login: Anonymous	Last Seen: May 18, 2025 16:50:33 pm
	Email: n/a	IP Address: n/a

Q1. First name	VChris
Q2. Surname	Sides
Q3. Organisation (if on behalf)	not answered
Q4. Email address	[REDACTED]
Q5. Postal address	[REDACTED]
Q6. Would you like to present your submission verbally to a public Council hearing on 5 June?	Yes
Q7. Phone	[REDACTED]
Q8. Do you agree with our preferred option?	Strongly disagree
Q9. Do you have any other feedback you would like to share about our preferred option?	
<p>MultiCC0 has been disastrous in Auckland and Wgtn. The efficiencies of scale could also be achieved by a purchasing coop , of Pharmac. The concentration on an eventual marginal and theoretical cost saving is folly, do not let it dominate decision. Greatest risk is privatisation by a future govt, of savings banks and electricity companies. Note the shambles in UK where private companies suck out huge dividends and management salaries, and claim emergency to dump vast quantites of pollution into rivers almost daily.</p>	
Q10. Do you have any suggestions or concerns about the reliability, affordability, or quality of future water service delivery?	
<p>A smaller, more agile agency with superior local knowledge would be expected to outdo a cumbersome secretive "we know best" bureaucracy. Safeguarding ownership and control is far more important than a possible marginal cost saving. Capacity for the Council to take on more debt is not a positive but a liability No mention anywhere of resilience in major natural disasters, which are a near certainty over decades.... locals need to have c0ntrol in first days and weeks of disasters.</p>	
Q11. Need more space for your feedback?	not answered

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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SUBMISSION

DATE 21/05/25

TO: Whakatāne District Council
FROM: Te Au o Te Awa Punga on behalf of Te Mana o Ngāti Rangitihī
RE: Submission on Local Water Done Well

PART 1: OPENING COMMENTS

This document outlines the submission of Te Mana o Ngāti Rangitihī. It responds to the Whakatāne District Council's (WDC) proposed approaches to water service delivery under the Local Water Done Well (LWDW) reform.

We acknowledge the scale and complexity of the water services challenge and the significant work already underway by WDC. This submission should be considered in conjunction with the initial feedback provided to WDC by Te Au o Te Awa Punga on 14/04/2025.

The document takes the following format:

1. Opening Comments
2. Overview
 - 1.1 Overarching Positions
3. Option One – Joint CCO (Sub-Regional)
 - 1.1 Option One Key Positions
 - 1.2 Option One Recommendations
4. Option Two - Internal Business Unit
 - 1.1 Option Two Key Positions
 - 1.2 Options Two Recommendations
5. Closing Comments

PART 2: OVERVIEW

Our rohe encompasses the Tarawera River, Matatā, and Te Awa o te Atua. These are culturally and spiritually significant waterways, and their protection is a priority for Te Mana o Ngāti Rangitihī.

The LWDW reforms must address historical inequities by ensuring uri of Ngāti Rangitihī and Matatā residents have access to essential services, including safe and reliable water supply, effective stormwater and wastewater systems, and sustainable water allocations. Matatā currently lacks a reticulated wastewater scheme, leaving landowners dependent on on-site septic systems. The community's drinking water, sourced from Jennings Spring, is affected by frequent pipe bursts and unreliable supply. Stormwater infrastructure is also inadequate, with residents reporting poor drainage and flooding around homes, roads, and footpaths, often requiring personal intervention to prevent property damage.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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We are also concerned that fiscal constraints may lead to the deprioritisation of environmental protection, particularly in rural and coastal areas. From an iwi perspective, the direct discharge of treated or untreated water into any waterway, including ocean outfall, is fundamentally opposed. Infrastructure solutions must reflect this stance and uphold te mana o te wai in both design and implementation.

2.1 OVERARCHING POSITIONS

- i. Te Mana o Ngāti Rangitahi Trust expects direct and ongoing involvement in the preparation of the Water Services Delivery Plan through Te Au o Te Awa Punga (TAoTAP).
- ii. Te Mana o Ngāti Rangitahi must be recognised and included as a critical decision-maker in all processes concerning water services in our rohe, including managing our awa and moana.
- iii. Te Mana o Ngāti Rangitahi oppose any service delivery structure that limits the ability of Ngāti Rangitahi to monitor, influence, or restrict discharges into waterways.
- iv. Te Mana o Ngāti Rangitahi must be guaranteed a seat at the governance table of any water entity operating in or affecting the Tarawera catchment.
- v. Te Nīotanga o Mataatua o Te Arawa Matatā (Te Nīotanga) must maintain its position in the reform process to uphold its purpose of a co-design approach to wastewater management in Matatā. The land-based discharge method being progressed by Te Nīotanga must remain a priority while moving forward in the LWDW reform process.
- vi. Infrastructure developments in Matatā or surrounding wetlands must be subject to cultural impact assessments endorsed by hapū/iwi.
- vii. Funding and technical support should be allocated to enable iwi-led monitoring of water infrastructure performance.
- viii. Flood protection infrastructure and climate change considerations must be integrated into planning to safeguard people, businesses, and infrastructure, ensuring a stronger, more resilient community.
- ix. Engagement processes must foster trust, inclusivity, and transparency. Ensuring the community is well informed on proposed changes and how they will affect them.
- x. Water management strategies must include provisions for cultural flows, ensuring sufficient water remains in waterways to sustain the mauri and cultural practices of Ngāti Rangitahi. This consists of performing key cultural rituals, accessing clean water, and protecting the spiritual and ecological integrity of the awa.
- xi. Issues of water overallocation within parts of the rohe must be urgently addressed. Existing water allocations should be reviewed, with reductions applied where overallocation compromises the mauri of waterways or the ability of Te Mana o Ngāti Rangitahi to exercise kaitiakitanga.
- xii. Future water allocation frameworks must prioritise Te Mana o Ngāti Rangitahi rights and interests, ensuring equitable access for cultural, environmental, and economic purposes, including sustainable water use for papakāinga housing, restoration projects, and iwi-led developments.
- xiii. Any options should introduce robust monitoring and enforcement mechanisms to ensure compliance with water use limits, prioritising the protection of cultural and environmental values over commercial and extractive uses.

7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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PART 3: OPTION ONE - JOINT CCO (SUB-REGIONAL)

Whakatāne District Council has indicated a preference to form a Multi-Council Controlled Organisation (Multi-CCO) to deliver water services in partnership with other councils.

While it is acknowledged that Option One offers the potential for increased capital investment and long-term infrastructure planning, this positioning requires further ground-truthing. For communities like Matatā, it is essential that any proposed benefits are tested against local realities, including environmental risk and historic underinvestment.

We expect to be directly involved in this process, particularly in validating the potential impacts and benefits of Option One, and in any future developments involving those seeking to operate within the Whakatāne District. Ensuring that local voices shape the model is critical to achieving fair, durable, and culturally appropriate outcomes.

3.1 OPTION ONE KEY POSITIONS**Governance and Representation**

- i. A joint CCO model risks diluting the voice and influence of Te Mana o Ngāti Rangitahi.
- ii. Regionalised governance may not reflect or uphold existing relationship frameworks or Treaty obligations specific to Te Mana o Ngāti Rangitahi.
- iii. Generic, aggregated governance approaches are inappropriate; Te Mana o Ngāti Rangitahi require a localised, tailored model.
- iv. Governance models must embed Te Mana o Ngāti Rangitahi participation from the outset, including in the development of Statements of Expectation and oversight structures.
- v. A multi-council CCO must include a specific Statement of Expectation developed by the Tarawera Restoration Strategy Group, addressing the re-channelling and critical restoration of Te Awa o te Atua and the wider Tarawera catchment.

Investment Prioritisation and Equity

- i. Investment decisions may favour areas of growth and industrial demand over rural communities such as Matatā and its surrounds.
- ii. Smaller communities risk marginalisation and reduced certainty of adequate infrastructure investment.
- iii. Historical underinvestment, catchment restoration needs, and mātauranga Māori must be integrated into capital planning and prioritisation.
- iv. Te Mana o Ngāti Rangitahi seeks transparency on investment decisions and how equity will be embedded in the service model.

Accountability and Oversight

- i. Accountability dispersed across multiple councils and governance layers may reduce transparency and responsiveness.
- ii. There is no assurance that Te Mana o Ngāti Rangitahi perspectives will be prioritised in decisions regarding pricing, infrastructure, or source water protection.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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- iii. While Statements of Expectation and Water Services Strategies enable council-level input, Te Mana o Ngāti Rangitahi may have limited influence on final decisions.
- iv. Te Awa o te Atua and the Tarawera catchment risk poor management under regional or generic frameworks.

Partnership and Participation

- i. There is a lack of clarity on how Te Mana o Ngāti Rangitahi will be involved in long-term planning, funding decisions, and operational oversight.
- ii. Existing work and relationships with Whakatāne District Council could be undermined by transitioning to a new service entity without a clear partnership framework.

3.2 OPTION ONE RECOMMENDATIONS

Concerning Option One, Te Mana o Ngāti Rangitahi recommends that Whakatāne District Council:

- i. Consider an Eastern Bay of Plenty-based Multi-CCO as the preferred Multi-council option;
- ii. Confirm how Te Mana o Ngāti Rangitahi perspectives will be incorporated into the Water Services Delivery Plan;
- iii. Provide ongoing opportunities for Te Mana o Ngāti Rangitahi to co-develop any joint CCO governance structures, including appointments and the Statement of Expectations.
- iv. Ensure that water entity performance metrics include cultural health indicators developed jointly with iwi and hapū;
- v. Include equity assessments in all pricing models and protect vulnerable communities from disproportionate cost burdens;
- vi. Guarantee transparent access to financial modelling, investment prioritisation criteria, and partnership arrangements with other councils; and
- vii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders in relation to taonga (natural resources), and particularly freshwater as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 4: OPTION TWO - INTERNAL BUSINESS UNIT

Whakatāne District Council is also considering establishing a standalone business unit to manage water services internally. This approach can potentially support closer alignment with iwi and hapū responsibilities and may enable the delivery of more integrated, efficient, and equitable water services and infrastructure.

4.1 OPTION TWO KEY POSITIONS**Governance and Representation**

- i. This model enables more direct engagement with Te Mana o Ngāti Rangitahi, allowing for stronger representation and influence in local decision-making processes.
- ii. It aligns with existing governance and Treaty-based frameworks, supporting continuity in established relationships and obligations.
- iii. WDC are already familiar with Te Mana o Ngāti Rangitahi tikanga, values, and aspirations, which supports more culturally responsive governance.
- iv. A locally-led model enables place-based approaches that reflect Te Mana o Ngāti Rangitahi priorities.

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Investment Prioritisation and Equity

- i. While financial constraints exist, the consultation documents acknowledge that in-house service delivery remains a viable option.
- ii. Retaining local service delivery provides greater opportunity to advocate for equitable investment in under-served communities such as Matatā.
- iii. A locally governed model is more likely to maintain focus on catchment-specific restoration needs and historical patterns of underinvestment.

Accountability

- i. Local service delivery offers clearer accountability pathways, allowing iwi to identify and engage with WDC directly.
- ii. Maintaining a local model strengthens the ability of Te Mana o Ngāti Rangitahi to monitor progress, raise concerns, and seek resolutions on service delivery issues.
- iii. The risks associated with historical deferral of upgrades can be better addressed if Te Mana o Ngāti Rangitahi oversight mechanisms are formally embedded into the governance structure.

Partnership and Participation

- i. Greater potential for direct engagement and relationship management with Te Mana o Ngāti Rangitahi through familiar and direct channels.
- ii. Local delivery provides Te Mana o Ngāti Rangitahi with opportunities to co-design services tailored to community and cultural needs.
- iii. We believe this model may strengthen the ability of Te Mana o Ngāti Rangitahi to meaningfully participate in water service planning, implementation, and monitoring on terms that reflect tikanga and mātauranga Māori.

4.2 OPTION TWO RECOMMENDATIONS

Concerning Option Two, Te Mana o Ngāti Rangitahi recommends that Whakatāne District Council:

- i. Confirm how Te Mana o Ngāti Rangitahi perspectives will be reflected in the Water Services Delivery Plan;
- ii. Confirm how the standalone business unit will create better partnership approaches that reflect the role of Te Mana o Ngāti Rangitahi; and
- iii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders concerning taonga (natural resources), particularly freshwater, as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 5: CLOSING COMMENTS

As this submission clearly shows, Te Mana o Ngāti Rangitahi has considered both options in our context, providing relative positions and concerns. We appreciate the opportunity to provide a submission on the proposed approaches to water service delivery under the LWDW reform. As mana whenua of Matatā, we assert our unwavering commitment to ensuring that proposals within our rohe align with our cultural values, environmental stewardship, and aspirations for sustainable growth.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Te Mana o Ngāti Rangitahi must continue to be able to influence decisions, whether WDC or a Multi-CCO delivers water services. We look forward to working with the Council and relevant agencies to ensure water services in our rohe are delivered in a way that upholds te mauri o ngā wai, respects mana whenua, and serves the needs of all communities.

We expect to receive feedback on this submission and direct involvement via Te Au o Te Awa Punga in the work programme to develop the Water Service Delivery Plan until September 2025.

Nāku iti noa nā,
Leith Comer,
Te Mana o Ngāti Rangitahi

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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SUBMISSION**DATE** 23/05/25

TO: Whakatāne District Council
FROM: Te Au o Te Awa Punga on behalf of Te Rūnanga o Ngāti Whare
RE: Submission on Local Water Done Well

PART 1: OPENING COMMENTS

This document outlines the submission of Te Rūnanga o Ngāti Whare. It responds to the Whakatāne District Council's (WDC) proposed approaches to water service delivery under the Local Water Done Well (LWDW) reform.

We acknowledge the scale and complexity of the water services challenge and the significant work already underway by the WDC. This submission should be considered in conjunction with the initial feedback provided to the WDC by Te Au o Te Awa Punga on 14/04/2025.

The document takes the following format:

1. Opening Comments
2. Overview
 - 1.1 Overarching Positions
3. Option One – Joint CCO (Sub-Regional)
 - 1.1 Option One Key Positions and Concerns
 - 1.2 Option One Recommendations
4. Option Two - Internal Business Unit
 - 1.1 Option Two Key Positions and Concerns
 - 1.2 Options Two Recommendations
5. Closing Comments

PART 2: OVERVIEW

Our interests are centred around the Whirinaki, Minginui, Te Whaiti, Horomanga Rivers, and related water systems. Our ngahere and rivers are fragile ecosystems supporting taonga species and cultural identity. The mauri of these systems must not be compromised.

Ngāti Whare holds a unique and enduring relationship with the Whirinaki Te Pua-a-Tāne forest, a forest and water system of international ecological and cultural significance. This must be reflected in any service delivery model through bespoke governance and investment provisions.

Te Rūnanga o Ngāti Whare have a vision for the rohe and Minginui that supports a thriving, sustainable, and connected community. Building capability to be a self-sustaining community is at the centre of growth and development aspirations for the community and will be an important factor in considering the future of water infrastructure in the rohe.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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Minginui and Te Whāiti are small, rural communities with limited water infrastructure. In Minginui, drinking water is supplied through a neighbourhood bore system managed by the Ngāti Whare Trust, with a second bore added in 2014 to improve reliability. Te Whāiti residents rely on a combination of bore and pumped surface water supply to meet household needs. Neither community has a reticulated wastewater system; residents use on-site wastewater treatment such as septic tanks, which are managed under regional council regulations.

The Minginui Masterplan identifies an opportunity to develop a botanical wastewater system that treats household wastewater and redirects it to support the Ngāti Whare Nursery, creating a closed-loop system that enhances sustainability. The plan also prioritises the implementation of a grey water collection system for non-drinking water uses, such as irrigation and cleaning, to conserve water and reduce pressure on existing bore and surface water sources.

2.1 OVERARCHING POSITIONS

- i. Te Rūnanga o Ngāti Whare expects direct and ongoing involvement in preparing the Water Services Delivery Plan through Te Au o Te Awa Punga (TAoTAP).
- ii. Water infrastructure investment must prioritise the protection of Whirinaki aquifers and springs. Service models must reflect the hydrological significance of Whirinaki Te Pua-a-Tāne.
- iii. Infrastructure development must avoid disturbing ecosystems that sustain taonga species and ngāhere-based cultural practices.
- iv. We support delivery models that ensure small-scale schemes in Minginui and surrounds are not marginalised.
- v. We support investment in iwi technical capability and training to enable equal partnership in water governance.
- vi. Ngāti Whare must be actively included as a critical decision-maker in all development and implementation processes concerning our rohe, including our āwa and ngāhere, to uphold our rights and ensure outcomes reflect the aspirations of our iwi.
- vii. Water services must deliver access to essential infrastructure such as water reticulation, wastewater systems, sustainable water allocations, and waste management.
- viii. We seek equitable access to water and wastewater services and other critical infrastructure.
- ix. Water management strategies must include provisions for cultural flows, ensuring sufficient water remains in waterways to sustain the mauri and cultural practices of Ngāti Whare. This includes performing key rituals, accessing clean water, and protecting the ecological integrity of the Whirinaki āwa.
- x. Water allocation frameworks must prioritise Ngāti Whare rights and interests, ensuring equitable access for cultural, environmental, and economic purposes including papakāinga housing, restoration projects, and iwi-led development.
- xi. We call for robust monitoring and enforcement mechanisms to ensure compliance with water use limits, with a priority on cultural and environmental protection over extractive use.
- xii. Engagement processes must foster trust, inclusivity, and transparency, ensuring Ngāti Whare's voice is central and historical grievances are acknowledged and addressed.
- xiii. Infrastructure planning must be future-focused and climate-resilient, particularly as forested catchments are vulnerable to both flooding and drought. Any service model

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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must ensure that water infrastructure can withstand changing environmental conditions without compromising the integrity of our taiao.

PART 3: OPTION ONE - JOINT CCO (SUB-REGIONAL)

Whakatāne District Council has indicated a preference for forming a Multi-Council Controlled Organisation (multi-CCO) to deliver water services in partnership with other councils.

Ngāti Whare and the rural communities of Te Whāiti and Minginui have long faced systemic underinvestment in core infrastructure, including water services. This often happens when the urban development and population are not at a scale that demands service provision. These remote communities require targeted support and tailored solutions that recognise the unique challenges of rural service delivery, including low population density, geographic isolation, and historical exclusion from infrastructure planning.

Any proposed Council Controlled Organisation (CCO) must include specific mechanisms to address rural equity and ensure investment in alternative infrastructure models suited to these communities. The previous Affordable Water Reform Programme acknowledged this need through the proposed establishment of a Rural Services Advisory Group, a precedent that remains relevant.

Te Whāiti and Minginui must not be left behind in favour of urban growth centres. Ngāti Whare expects the CCO structure to explicitly prioritise rural infrastructure resilience and innovation, including off-grid or hybrid solutions where appropriate. A dedicated rural services workstream, with iwi partnership and decision-making embedded, should be established to ensure that rural water supply, wastewater, and stormwater needs are met in ways that uphold mana, protect te taiao, and reflect mātauranga a iwi.

3.1 OPTION ONE KEY POSITIONS AND CONCERNS**Governance and Representation**

- i. A joint CCO model will likely dilute the Ngāti Whare voice and influence.
- ii. Regionalised governance may not reflect or respect the existing relationship framework where there is potential disconnection from Whirinaki-specific knowledge and values.
- iii. Governance models must embed Ngāti Whare participation from the outset, including in Statements of Expectation and oversight arrangements.
- iv. Generic, aggregated governance approaches are inappropriate; Te Rūnanga o Ngāti Whare expect a localised, tailored model. In particular, forest aquifers and sensitive habitats in Whirinaki may not receive tailored protection under a generic service model.
- v. There is no assurance that Ngāti Whare perspectives will be prioritised in pricing, infrastructure, or water source protection decisions.
- vi. While “Statements of Expectation” and “Water Services Strategies” allow councils to set expectations, Te Rūnanga o Ngāti Whare may have limited influence on final decisions made.

Investment Prioritisation and Equity

- i. Investment decisions may favour areas of growth and industrial needs over rural, remote communities such as Minginui and Te Whaiti.

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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- ii. A board with urban-majority representation could exclude low-population areas like Minginui and Te Whaiti from investment priorities or planning.
- iii. Historical underinvestment, catchment restoration needs, and mātauranga Māori must be factored into planning and capital works prioritisation.
- iv. Te Rūnanga o Ngāti Whare seek transparency in how investment decisions are made and how equity will be embedded across the service model.

Fragmented Accountability

- i. Accountability across multiple councils and governance layers may reduce responsiveness and transparency.
- ii. Whirinaki aquifers and springs could be poorly managed under regionalised or generic frameworks.

Partnership and Participation

- i. There is a lack of clarity on how Te Rūnanga o Ngāti Whare will be involved in long-term planning, funding decisions, and operational oversight.
- ii. Current work with WDC could be undermined by shifting to a new organisation without a partnership framework

3.2 Recommendations on Option One: Joint CCO – Sub-regional

Concerning Option One, Te Rūnanga o Ngāti Whare recommends that Whakatāne District Council:

- i. Consider an Eastern Bay of Plenty-based Multi-CCO as the preferred Multi-council option;
- ii. Confirm how Ngāti Whare perspectives will be incorporated into the Water Services Delivery Plan;
- iii. Provide ongoing opportunities for Ngāti Whare to co-develop any joint CCO governance structures, including appointments and the Statement of Expectations.
- iv. Ensure that water entity performance metrics include cultural health indicators developed jointly with iwi and hapū;
- v. Include equity assessments in all pricing models and protect vulnerable communities from disproportionate cost burdens;
- vi. Guarantee transparent access to financial modelling, investment prioritisation criteria, and partnership arrangements with other councils; and
- vii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders in relation to taonga (natural resources), and particularly freshwater as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 4: OPTION TWO - INTERNAL BUSINESS UNIT

Whakatāne District Council is also considering establishing a standalone business unit to manage water services internally. This approach can potentially support closer alignment with iwi and hapū responsibilities and may enable the delivery of more integrated, efficient, and equitable water services and infrastructure.

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4.1 OPTION TWO KEY POSITIONS AND CONCERNS**Governance and Representation**

- i. This model enables more direct engagement with Te Rūnanga o Ngāti Whare, allowing for stronger representation and influence in local decision-making processes.
- ii. It aligns with existing governance, supporting continuity in established relationships and obligations.
- iii. WDC are already familiar with Ngāti Whare tikanga, values, and aspirations, which supports more culturally responsive governance.
- iv. A locally-led model enables place-based approaches that reflect Te Rūnanga o Ngāti Whare priorities.

Investment Prioritisation and Equity

- i. While financial constraints exist, the consultation documents acknowledge that in-house service delivery remains a viable option.
- ii. Retaining local service delivery provides greater opportunity to advocate for equitable investment in under-served communities such as Minginui.
- iii. A locally governed model is more likely to maintain focus on catchment-specific restoration needs and historical patterns of underinvestment.

Accountability

- i. Local service delivery offers clearer accountability pathways, allowing iwi to identify and engage with WDC directly.
- ii. Maintaining a local model strengthens Ngāti Whare ability to monitor progress, raise concerns, and seek resolutions on service delivery issues.
- iii. The risks associated with historical deferral of upgrades can be better addressed if Ngāti Whare oversight mechanisms are formally embedded into the governance structure.

Partnership and Participation

- i. Greater potential for direct engagement and relationship management with Ngāti Whare through familiar and direct channels.
- ii. Local delivery provides Te Rūnanga o Ngāti Whare with opportunities to co-design services tailored to community and cultural needs.
- iii. This model strengthens the ability of Ngāti Whare to participate meaningfully in water service planning, implementation, and monitoring on terms that reflect tikanga and mātauranga Māori.

4.2 OPTION TWO RECOMMENDATIONS

Concerning Option Two, Te Rūnanga o Ngāti Whare recommends that Whakatāne District Council:

- i. Confirm how Ngāti Whare perspectives will be reflected in the Water Services Delivery Plan;
- ii. Confirm how the standalone business unit will create better partnership approaches that reflect the role of Ngāti Whare; and

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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- iii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders concerning taonga (natural resources), particularly freshwater, as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 5: CLOSING COMMENTS

Te Rūnanga o Ngāti Whare appreciates the opportunity to provide a submission on the proposed approaches to water service delivery under the Local Water Done Well (LWDW) reform. As mana whenua of Minginui, we assert our unwavering commitment to ensuring that development within our rohe aligns with our cultural values, environmental stewardship, and aspirations for sustainable growth.

Te Rūnanga o Ngāti Whare supports Option Two; however, regardless of this support, we maintain that we must be able to influence decisions about whether WDC or a Multi-CCO delivers water services. We look forward to working with the Council and relevant agencies to ensure that water services in our rohe are delivered in a way that upholds te mauri o ngā wai, respects mana whenua, and serves the needs of all communities.

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SUBMISSION**DATE** 21/05/25

TO: Whakatāne District Council
FROM: Te Au o Te Awa Punga on behalf of Te Rūnanga o Ngāti Manawa
RE: Submission on Local Water Done Well

PART 1: OPENING COMMENTS

This document outlines the submission of Te Rūnanga o Ngāti Manawa. It responds to the Whakatāne District Councils (WDC) proposed approaches to water service delivery under the Local Water Done Well (LWDW) reform.

We acknowledge the scale and complexity of the water services challenge and the significant work already underway by the WDC. This submission should be considered in conjunction with the initial feedback provided to the WDC by Te Au o Te Awa Punga on 14/04/2025.

The document takes the following format:

1. Opening Comments
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4. Option Two - Internal Business Unit
 - 1.1 Option Two Key Positions
 - 1.2 Options Two Recommendations
5. Closing Comments

PART 2: OVERVIEW

Our focus is on the Rangitāiki River headwaters, Murupara, and Kaingaroa - areas with deep ecological, spiritual, and cultural significance. These areas have long been underserved in terms of infrastructure, and the impacts of historic underinvestment are evident in both health outcomes and environmental degradation.

Te Rūnanga o Ngāti Manawa have a vision for Murupara that uplifts health and wellbeing and supports a thriving community. Water reticulation, stormwater and wastewater infrastructure play a key role in servicing communities and contribute significantly to health and wellbeing. Ngāti Manawa communities are among the most vulnerable to infrastructure failure and historic underinvestment has impacted both health and environmental outcomes, highlighting why these reforms are so important.

Murupara's drinking water is sourced from two free flowing bores and is currently untreated. While the water is of high natural quality, it is acidic, and its untreated status may raise concerns

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7.1.2 Appendix 2: LWDW Delivery Options - Full Submissions Pack(Cont.)

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in relation to compliance with New Zealand's drinking water standards. Established in the 1950s, the supply system involves pumped water from a suction tank to reservoirs and then distributed to the community through a gravity-fed network. In recent years, Whakatāne District Council has undertaken sanitising efforts in response to recurring contamination risks, highlighting both the age of the system and the need for infrastructure upgrades.

The wastewater system in Murupara is gravity-based, carrying sewage through a network of pipes to oxidation ponds for treatment. This treatment process includes screening and grit removal, followed by aeration and maturation before the treated effluent is discharged. In 2020, approximately 1.2 kilometres of the network were rehabilitated using trenchless technology, reflecting efforts to maintain and extend the life of existing infrastructure.

Both services reflect long-standing underinvestment in Murupara's water infrastructure. Given the untreated status of the water supply and the age of both systems, there is a need for continued investment and reform. Ensuring that future upgrades incorporate cultural values and enable direct iwi involvement, particularly from Ngāti Manawa, is critical to addressing historical inequities and improving long-term health and environmental outcomes.

2.1 OVERARCHING POSITIONS

- i. Te Rūnanga o Ngāti Manawa expects direct and ongoing involvement in preparing the Water Services Delivery Plan through Te Au o Te Awa Punga (TAoTAP).
- ii. Ngāti Manawa strongly opposes any model that deprioritises infrastructure investment in small or rural communities like Murupara. Equity in delivery is non-negotiable.
- iii. The spiritual and ecological importance of the Rangitāiki headwaters must be recognised in governance frameworks. Service standards, particularly for wastewater, must be co-designed with Ngāti Manawa.
- iv. We must be recognised as a critical decision-maker in all water service design, governance, and delivery processes across our rohe.
- v. Reform must resolve the historical infrastructure inequities experienced by Ngāti Manawa communities by ensuring access to:
 - a. Water reticulation
 - b. Wastewater systems
 - c. Sustainable water allocations
- vi. Water strategies must include provisions for cultural flows, protecting the mauri of waterways and enabling customary practices, including healing and spiritual rituals.

PART 3: OPTION ONE - JOINT CCO (SUB-REGIONAL)

Whakatāne District Council has indicated a preference to form a Multi-Council Controlled Organisation (Multi-CCO) to deliver water services in partnership with other councils.

3.1 OPTION ONE KEY POSITIONS**Governance and Representation**

- i. A joint CCO model may dilute the Ngāti Manawa voice and influence, especially for smaller communities and significant waterways.
- ii. Regional boards risk eroding local decision-making and displacing existing relationships with WDC and Treaty-based frameworks.
- iii. Governance models must embed Ngāti Manawa participation from the outset, including in Statements of Expectation and oversight arrangements.

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- iv. Generic, aggregated governance approaches are inappropriate; Ngāti Manawa expect a localised, tailored model.
- v. There is no assurance that Ngāti Manawa perspectives will be prioritised in decisions about pricing, infrastructure, or water source protection.
- vi. While “Statements of Expectation” and “Water Services Strategies” allow councils to set expectations, Ngāti Manawa may have limited influence on final decisions made.

Investment Prioritisation and Equity

- i. Upper catchment areas like Murupara could be deprioritised within a larger entity focused on higher-density towns.
- ii. Historical underinvestment, catchment restoration needs, and mātauranga Māori must be factored into planning and capital works prioritisation.
- iii. Ngāti Manawa seek transparency in how investment decisions are made and how equity will be embedded across the service model.

Fragmented Accountability

- i. Accountability across multiple councils and governance layers may reduce responsiveness and transparency.
- ii. Sensitive environments, including Rangitāiki River, could be overlooked or poorly managed under regionalised or generic frameworks.

Partnership and Participation

- i. There is a lack of clarity on how Ngāti Manawa will be involved in long-term planning, funding decisions, and operational oversight.
- ii. Current work with WDC could be undermined by shifting to a new organisation without a partnership framework.

3.2 OPTION ONE RECOMMENDATIONS

Concerning Option One, Te Rūnanga o Ngāti Manawa recommends that Whakatāne District Council:

- i. Consider an Eastern Bay of Plenty-based Multi-CCO as the preferred Multi-council option;
- ii. Confirm how Ngāti Manawa perspectives will be incorporated into the Water Services Delivery Plan;
- iii. Provide ongoing opportunities for Ngāti Manawa to co-develop any joint CCO governance structures, including appointments and the Statement of Expectations.
- iv. Ensure that water entity performance metrics include cultural health indicators developed jointly with iwi and hapū;
- v. Include equity assessments in all pricing models and protect vulnerable communities from disproportionate cost burdens;
- vi. Guarantee transparent access to financial modelling, investment prioritisation criteria, and partnership arrangements with other councils; and
- vii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders in relation to taonga (natural resources), and particularly freshwater as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

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PART 4: OPTION TWO - INTERNAL BUSINESS UNIT

Whakatāne District Council is also considering establishing a standalone business unit to manage water services internally. This approach has the potential to support closer alignment with iwi and hapū responsibilities and may enable the delivery of more integrated, efficient, and equitable water services and infrastructure.

4.1 OPTION TWO KEY POSITIONS**Governance and Representation**

- i. This model enables more direct engagement with Ngāti Manawa allowing for stronger representation and influence in local decision-making processes.
- ii. It aligns with existing governance, supporting continuity in established relationships and obligations.
- iii. WDC are already familiar with Ngāti Manawa tikanga, values, and aspirations, which supports more culturally responsive governance.
- iv. A locally-led model enables place-based approaches that reflect Ngāti Manawa priorities.

Investment Prioritisation and Equity

- i. While financial constraints exist, the consultation documents acknowledge that in-house service delivery remains a viable option.
- ii. Retaining local service delivery provides greater opportunity to advocate for equitable investment in under-served communities such as Murupara and Minginui.
- iii. A locally governed model is more likely to maintain focus on catchment-specific restoration needs and historical patterns of underinvestment.

Accountability

- i. Local service delivery offers clearer accountability pathways, allowing iwi to identify and engage with WDC directly.
- ii. Maintaining a local model strengthens Ngāti Manawa ability to monitor progress, raise concerns, and seek resolutions on service delivery issues.
- iii. The risks associated with historical deferral of upgrades can be better addressed if Ngāti Manawa oversight mechanisms are formally embedded into the governance structure.

Partnership and Participation

- i. Greater potential for direct engagement and relationship management with Ngāti Manawa through familiar and direct channels.
- ii. Local delivery provides Ngāti Manawa with opportunities to co-design services tailored to community and cultural needs.
- iii. This model strengthens the ability of Ngāti Manawa to participate meaningfully in water service planning, implementation, and monitoring on terms that reflect tikanga and mātauranga Māori.

4.2 OPTION TWO RECOMMENDATIONS

Concerning Option Two, Te Rūnanga o Ngāti Manawa recommends that Whakatāne District Council:

- i. Confirm how Ngāti Manawa perspectives will be reflected in the Water Services Delivery Plan;

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- ii. Confirm how the standalone business unit will create better partnership approaches that reflect the role of Ngāti Manawa; and
- iii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders concerning taonga (natural resources), particularly freshwater, as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 5: CLOSING COMMENTS

Te Rūnanga o Ngāti Manawa appreciates the opportunity to provide a submission on the proposed approaches to water service delivery under the LWDW reform. As mana whenua, we assert our commitment to ensuring that development within our rohe aligns with our cultural values, environmental stewardship, and aspirations for sustainable growth.

Te Rūnanga o Ngāti Manawa must continue to be able to influence decisions, whether WDC Business Unit or a Multi-CCO delivers water services. We look forward to working with the Council and relevant agencies to ensure water services in our rohe are delivered in a way that protects, preserves, and restores our wai, respects mana whenua, and serves the needs of all communities. We equally look forward to receiving a response to the positions and concerns raised in this submission.

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SUBMISSION**DATE** 21/05/25

TO: Whakatāne District Council
FROM: Te Au o Te Awa Punga on behalf of Te Rūnanga o Ngāti Awa
RE: Submission on Local Water Done Well

PART 1: OPENING COMMENTS

This document outlines the submission of Te Rūnanga o Ngāti Awa. It responds to the Whakatāne District Councils (WDC) proposed approaches to water service delivery under the Local Water Done Well (LWDW) reform.

We acknowledge the scale and complexity of the water services challenge and the significant work already underway by the WDC. This submission should be considered with the initial feedback provided to WDC by Te Au o Te Awa Punga on 14/04/2025.

The document takes the following format:

1. Opening Comments
2. Overview
 - 2.1 Overarching Positions
3. Option One – Joint CCO (Sub-Regional)
 - 3.1 Option One Key Positions
 - 3.2 Option One Recommendations
4. Option Two - Internal Business Unit
 - 4.1 Option Two Key Positions
 - 4.2 Options Two Recommendations
5. Closing Comments

PART 2: OVERVIEW

Our rohe spans Matatā, Whakatāne, Awakeri, Te Teko, Orini River, Ōhiwa Harbour and surrounding catchments. We hold significant customary and commercial water-related interests.

It is widely acknowledged that the Whakatāne District Council does not have the capital required to deliver water services at a level that matches current and future growth. Unlike other districts rich in natural resources, Whakatāne lacks both the financial capacity and environmental resilience needed to meet these demands. This creates significant risk, where funding limitations dictate decision-making and financial prioritisation often takes precedence over the prevention of environmental harm.

Such an approach unfairly advantages wealthier communities, while those already experiencing deprivation, such as Te Teko and Taiwhakaea, continue to be overlooked. This not only maintains

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inequity but actively compounds deprivation, deepening the social and environmental consequences faced by underserved communities.

The hapū of Ngāti Awa have long faced historical grievances tied to poor water services management across the rohe. Freshwater bodies like the Orini Awa have suffered ongoing degradation from pollution, flooding, and wastewater overflows. Communities have had limited access to reliable Three Waters infrastructure, resulting in persistent inequities in providing safe drinking water and effective stormwater and wastewater systems.

Compounding these issues is the over-allocation of water in the rohe, where large businesses and agricultural operations are routinely prioritised over iwi and hapū aspirations. Ngāti Awa has paid dearly for the development of Whakatāne through the degradation of our natural environment. This legacy cannot continue.

Te Rūnanga o Ngāti Awa will not accept a future that repeats the failings of the past. Better service delivery must begin with a long-term vision and meaningful investment, upfront and unapologetic. We must overhaul substandard infrastructure and replace it with environmentally sound systems that reflect our responsibilities to te taiao. This cannot be achieved by directing investment solely towards new greenfield developments and high-growth suburbs.

An equitable delivery model is essential, one that addresses the historic shortfalls in service and proactively upgrades outdated systems that have failed our people and our waterways. The Local Water Done Well reforms must enable a new path forward, grounded in environmental integrity, social equity, and iwi partnership.

2.1 OVERARCHING POSITIONS

- i. Te Rūnanga o Ngāti Awa expects direct and ongoing involvement in the preparation of the Water Services Delivery Plan through Te Au o Te Awa Punga (TAoTAP).
- ii. We must be recognised as a critical decision-maker in both the development and implementation of all water services that affect our rohe. This includes participation in governance arrangements that reflect our responsibilities to the whenua, awa, and moana.
- iii. Water governance models must safeguard both our cultural and commercial interests. This includes ensuring appropriate support for marae, enabling aquaculture developments, and prioritising water access for papakāinga housing.
- iv. Infrastructure investment must be equitable. Small and rural communities such as Taiwhakaea, Te Teko, and Edgecumbe must not be deprioritised in favour of larger urban centres.
- v. Water service standards and planning processes must embed tikanga and mātauranga-a-iwi and uphold, rather than override, local values.
- vi. Formal data-sharing agreements are essential to enable iwi-led monitoring of water quality and infrastructure performance.
- vii. The LWDW reforms must explicitly address historic underinvestment by ensuring Ngāti Awa uri have equitable access to safe drinking water, effective wastewater systems, and sustainable water allocations.
- viii. Planning must be inclusive and transparent, with Te Rūnanga o Ngāti Awa centrally involved. Past grievances must be acknowledged and addressed through genuine partnership.

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- ix. Water strategies must recognise and uphold the importance of cultural flows to maintain the mauri of waterways and support customary practices such as cleansing, ritual, and water gathering.
- x. The issue of overallocation must be urgently reviewed. Water permits that diminish the mauri of waterways or impede iwi access must be reduced or retired.
- xi. Future allocation frameworks must prioritise Ngāti Awa access for cultural, environmental, and economic purposes, including papakāinga development, restoration initiatives, and iwi-led enterprise.
- xii. Compliance and enforcement mechanisms must be strengthened to ensure that the protection of environmental and cultural values takes precedence over extractive uses.

PART 3: OPTION ONE - JOINT CCO (SUB-REGIONAL)

Whakatāne District Council has indicated a preference to form a Multi-Council Controlled Organisation (Multi-CCO) to deliver water services in partnership with other councils.

Te Rūnanga o Ngāti Awa supports the establishment of a Council-Controlled Organisation based in the Eastern Bay of Plenty, involving Kawerau and Ōpōtiki District Councils. This encapsulates the Mataatua Rohe “mai ngā kuri a Whārei ki Tihirau”, it also aligns with the Eastern Bay of Plenty Spatial Plan and enables a more balanced financial approach.

Kawerau District is currently in a strong position in terms of water services capacity, which presents an opportunity to direct investment toward Whakatāne District’s infrastructure and growth. This investment would generate flow-on benefits for the wider region, including job creation and economic development within a 25-minute travel catchment for Kawerau residents.

Ōpōtiki District currently faces significant challenges in the provision of water services, particularly for rural communities. This presents an opportunity for a potential Council-Controlled Organisation (CCO) to explore alternative models for the management of stormwater, wastewater, and drinking water. Under the previous Affordable Water Reform Programme, the importance of supporting rural communities was recognised through the proposal of a Rural Services Advisory Group, designed to ensure dedicated infrastructure investment and service delivery in rural areas. A similar approach should be considered within any new CCO structure. This approach would equally benefit rural Ngāti Awa communities who suffer from the same challenge in relation to the provision of rural communities creating natural alignment.

3.1 OPTION ONE KEY POSITIONS**Governance and Representation**

- i. A joint CCO model risks diluting Ngāti Awa’s voice and influence, particularly for smaller communities and significant waterways.
- ii. Regional boards may erode localised decision-making and displace existing relationships with Whakatāne District Council.
- iii. Governance structures must embed Ngāti Awa participation from the outset, including within Statements of Expectation and oversight arrangements.
- iv. Generic, aggregated governance approaches are inappropriate. Ngāti Awa expects a localised and tailored governance model.
- v. There are no guarantees that Ngāti Awa priorities will be reflected in decisions around pricing, infrastructure, or protection of water sources.

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- vi. While councils can set expectations through “Statements of Expectation” and “Water Services Strategies,” Ngāti Awa may have limited influence on final decisions.

Investment Prioritisation and Equity

- i. Investment may disproportionately favour high-growth and industrial areas, sidelining rural and remote communities.
- ii. Smaller communities face reduced certainty of receiving sufficient infrastructure investment.
- iii. Planning and capital works prioritisation must account for historical underinvestment, catchment restoration needs, and mātauranga Māori.
- iv. Ngāti Awa seeks clear transparency in how investment decisions are made and how equity will be embedded within the service delivery model.

Fragmented Accountability

- i. Accountability spread across multiple councils and governance layers may reduce responsiveness and transparency.
- ii. Sensitive environments, including the Ōrini Awa, Ōhiwa Harbour and the Whakatāne River, may be poorly managed under regional or generic frameworks.

Partnership and Participation

- i. There is a lack of clarity on how Ngāti Awa will participate in long-term planning, funding decisions, and operational oversight.
- ii. The progress made with WDC may be undermined if a new organisation is formed without a clear iwi partnership framework.

3.2 OPTION ONE RECOMMENDATIONS

Concerning Option One, Te Rūnanga o Ngāti Awa recommends that Whakatāne District Council:

- i. Consider an Eastern Bay of Plenty-based Multi-CCO as the preferred Multi-council option;
- ii. Confirm how Ngāti Awa perspectives will be incorporated into the Water Services Delivery Plan;
- iii. Provide ongoing opportunities for Ngāti Awa to co-develop any joint CCO governance structures, including appointments and the Statement of Expectations.
- iv. Ensure that water entity performance metrics include cultural health indicators developed jointly with iwi and hapū;
- v. Include equity assessments in all pricing models and protect vulnerable communities from disproportionate cost burdens;
- vi. Guarantee transparent access to financial modelling, investment prioritisation criteria, and partnership arrangements with other councils; and
- vii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders in relation to taonga (natural resources), and particularly freshwater as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 4: OPTION TWO - INTERNAL BUSINESS UNIT

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Whakatāne District Council is also considering establishing a standalone business unit to manage water services internally. This approach has the potential to support closer alignment with iwi and hapū responsibilities and may enable the delivery of more integrated, efficient, and equitable water services and infrastructure.

For Te Rūnanga o Ngāti Awa, this model offers a more straightforward pathway to maintaining direct relationships with Council, which is actively improving its approach to working with iwi and hapū to deliver water services. It avoids being placed in a broader regional structure where the Ngāti Awa voice may be diluted among multiple iwi and allows for greater responsiveness to the specific needs and priorities of our rohe.

However, it is acknowledged that these benefits could also be achieved within a Council-Controlled Organisation (CCO) if, **and only if**, a Te Tiriti-consistent framework is embedded from the outset. Ngāti Awa has a natural and established alignment with the Eastern Bay of Plenty, reflected in Part Three of this submission. The region's strong hapū presence, large Māori population, and the enduring mana of iwi and hapū provide a strong basis for a well-designed collective approach.

To ensure success, the CCO must be underpinned by robust constitutional arrangements, including a tailored Constitution and Shareholders Agreement. These arrangements embed iwi and hapū roles, create clear expectations for partnership in the management of taonga (natural resources), and provide operational safeguards. They must also ensure meaningful participation and decision-making and uphold the protection of cultural and environmental values.

In summary, while the standalone model may currently offer the most direct mechanism for iwi engagement, a carefully structured Eastern Bay of Plenty CCO, grounded in Te Tiriti o Waitangi and strengthened by existing relationships, can deliver equivalent or enhanced outcomes if designed and implemented appropriately.

4.1 OPTION TWO KEY POSITIONS

Governance and Representation

- i. This model may enable more direct engagement with Ngāti Awa, allowing for stronger representation and influence in local decision-making.
- ii. It aligns with existing governance arrangements, supporting continuity in established relationships and obligations.
- iii. WDC is already familiar with Ngāti Awa tikanga, values, and aspirations, which supports a more culturally responsive approach, while not always perfect.
- iv. A locally led model enables place-based approaches that reflect Ngāti Awa priorities.

Investment Prioritisation and Equity

- i. While financial constraints exist, the consultation documents acknowledge that in-house service delivery remains viable.
- ii. Retaining local service delivery may create greater opportunity for advocating equitable investment in underserved communities.
- iii. A locally governed model is more likely to maintain focus on catchment-specific restoration needs and address historical patterns of underinvestment.

Accountability

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- i. Local service delivery offers clearer accountability pathways, enabling iwi to engage directly with WDC.
- ii. Maintaining a local model may strengthen Ngāti Awa's ability to monitor progress, raise concerns, and seek resolution on service delivery matters.
- iii. The risks associated with the historical deferral of upgrades can be more effectively addressed if Ngāti Awa oversight mechanisms are formally embedded within the governance structure.

Partnership and Participation

- i. This model presents greater potential for direct engagement and relationship management with Ngāti Awa through established channels.
- ii. Local delivery may enable Ngāti Awa to co-design services tailored to community and cultural needs.
- iii. It may strengthen Ngāti Awa's ability to meaningfully participate in the planning, implementing, and monitoring of water services on terms that reflect tikanga and mātauranga Māori.

4.2 OPTION TWO RECOMMENDATIONS

Concerning Option Two, Te Rūnanga o Ngāti Awa recommends that Whakatāne District Council:

- i. Confirm how Ngāti Awa perspectives will be reflected in the Water Services Delivery Plan;
- ii. Confirm how the standalone business unit will create better partnership approaches that reflect the role of Ngāti Awa; and
- iii. Embed governance and management approaches that acknowledge the role of iwi and hapū as significant rights holders concerning taonga (natural resources), particularly freshwater, as identified through Wai 2358. Any governance structure must move beyond limited engagement to genuine partnership.

PART 5: CLOSING COMMENTS

Te Rūnanga o Ngāti Awa appreciates the opportunity to provide a submission on the proposed approaches to water service delivery under the LWDW reform. As mana whenua in Whakatāne, Awakeri, Edgecumbe, Ōhope and Matatā, we assert our unwavering commitment to ensuring that development within our rohe aligns with our cultural values, environmental stewardship, and aspirations for sustainable growth.

Te Rūnanga o Ngāti Awa must continue to be able to influence decisions whether WDC or a Multi-CCO delivers water services. We look forward to working with the Council and relevant agencies to ensure water services in our rohe are delivered in a way that protects, preserves, and restores our wai, respects mana whenua, and serves the needs of all communities.