

Significance and Engagement Policy

Community Feedback Analysis

Purpose of this document

This document summarises the community feedback received on the draft Significance and Engagement Policy and identifies the key themes for consideration when revising the Policy prior to Board review and Council approval.

- Part 1 summarises the feedback received, synthesising survey responses, free-text comments, and written submissions into recurring themes rather than restating individual submissions
- Part 2 maps those themes against specific sections of the draft Policy and outlines changes to be considered in response to feedback

Mana whenua feedback

Selwyn Water undertook early engagement with mana whenua on the draft Policy. Feedback generally supported the overall direction of the Policy, with suggested refinements focused on improving clarity and consistency in specific areas.

Feedback primarily focused on:

- Clarifying how cultural impact is assessed, including who makes these determinations and the basis for those assessments
- Providing clearer expectations for meaningful engagement with mana whenua, including enabling informed participation
- Clarifying when and how consultation is required for decisions involving land and water

Part 2 of this report outlines the suggested refinements in response to this feedback, alongside wider community input.

Summary of community feedback

- Total submitters: 58
- Overall sentiment: Mixed, with broad support for having a Significance and Engagement Policy in principle, alongside concerns about discretion, transparency, and accountability
- A significant proportion of submitters accepted the need for a formal policy but expressed low confidence that the draft, as written, would consistently result in meaningful engagement on decisions they considered important

Question overview

1. Clarity of when and how engagement will occur

Submitters were asked whether the Policy was clear about when and how community engagement would take place.

- 32% considered the Policy very clear
- 48% considered it somewhat clear
- 20% considered it not clear

Submitters who found the Policy clear generally described it as well-structured, logical, and comprehensive, noting that it allowed flexibility for different types of decisions.

Those who were less confident cited:

- Vague or subjective language
- A lack of clear thresholds or triggers for engagement
- Uncertainty about how community feedback would influence decisions in practice, and
- Accessibility issues, including technical language and reliance on digital channels

Across responses, there was a strong call for greater transparency, clearer engagement expectations, particularly for decisions affecting smaller or more vulnerable communities, and reassurance that the Policy supports meaningful, not procedural, engagement

2. Factors for determining significance

Submitters were asked whether there were any additional factors Selwyn Water should take into account when assessing the significance of decisions. Feedback reinforced the importance of financial impacts, fairness, transparency, and long-term consequences when assessing significance.

Key themes included:

- Financial impact and affordability, with strong views that increases in costs, debt, or long-term financial commitments should be considered significant
- Distribution of impacts, particularly between urban and rural communities and for smaller or more vulnerable groups
- Public health, environmental impacts, and long-term system risk, which many submitters considered inherently significant
- Fairness, transparency, and trust in decision-making, including the use of evidence and clear explanations where engagement does not occur
- Reversibility, with irreversible or difficult-to-reverse decisions seen as warranting higher levels of engagement
- Consistency and alignment with Selwyn Water's Water Services Strategy, the Council's Long-Term Plan, and national approaches, including consideration of cumulative impacts

3. Engagement preferences

Submitters were asked to identify preferred engagement methods. Preferences, from highest to lowest, were:

- 23% email updates
- 21% online surveys or feedback forms
- 19% public events (drop-ins, facilitated meetings)
- 14% website announcements
- 12% social media
- 11% direct mail (letters or flyers)

Additional feedback supported:

- Using existing community networks such as community boards, residents' associations, and local councillors
- Offering online public events for accessibility, with in-person meetings where there is high public interest or concern; and
- A mixed approach combining workshops, focus groups, local media, and clearly signposted online information

4. Making it easier to share views

Submitters were asked what would make it easier for them to share their views with Selwyn Water.

Feedback emphasised the importance of engagement opportunities that are easy to access, ongoing, and transparent.

Key points included:

- Clear, plain-language information
- Multiple, accessible communication channels
- Visible engagement beyond formal consultation periods; and
- The ability to provide feedback at any time

Overall, respondents stressed that ease of participation depends on an open, responsive approach and visible acknowledgement of community input.

5. Confidence in how feedback is considered

Submitters were asked what would help them feel confident that their feedback is heard and considered.

Responses reflected scepticism, alongside clear expectations for building confidence. Submitters consistently emphasised:

- Acknowledgement of submissions
- Reporting back on what was heard
- Transparency about how feedback influenced decisions, and
- Clear explanations where feedback was not adopted

Confidence was linked to seeing tangible actions, early involvement in decision-making, regular updates, and accessible reporting of outcomes.

6. Other feedback and suggestions

Additional comments focused on strengthening the Policy's clarity, predictability, and transparency. Common suggestions included:

- Clearer definitions of what constitutes a significant decision
- Firmer triggers for when engagement must occur
- Reduced reliance on discretionary assessments
- Improved accessibility and plain-language explanations
- Clearer alignment with Council planning; and
- Safeguards to ensure engagement cannot be avoided through procedural exceptions.

Overall, submitters supported the Policy in principle but called for it to be strengthened to better demonstrate accountability, fairness, and transparency.

Part 1. Key themes from feedback

1. Desire for greater clarity about when engagement will occur

What we heard:

- While some submitters found the policy structure logical, many said it was not clear when engagement would actually happen.
- The phrase “case by case” was frequently criticised.
- Submitters expressed frustration that Selwyn Water appears to decide significance internally, with no visible checks or triggers.

Implications for the policy:

The policy would benefit from clearer engagement expectations, particularly for medium and high significance decisions.

There is strong support for:

- clearer thresholds or triggers, and
- greater transparency around how decisions are assessed for significance.

2. Strong concern about excessive discretion held by Selwyn Water

What we heard:

- A dominant theme across submissions was concern that the draft policy gives Selwyn Water too much unilateral discretion to:
 - determine whether a matter is significant
 - decide whether to engage, and
 - rely on exclusions or exceptions (particularly section 6).

- Several submitters explicitly described the policy as allowing decisions to be classified as "low significance" to avoid engagement.

Implications for the policy:

- Consider reducing reliance on open-ended judgement alone
- Feedback consistently supported: published significance assessments for medium and high decisions
 - clearer guardrails around when exceptions can be used, and
 - documented reasons when engagement does not occur

3. Calls for “hard triggers” for high-significance decisions**What we heard:**

- Many submitters asked for a defined list of decisions that would always (or almost always) be treated as significant.
- Common examples included: changes to charges or affordability,
 - significant changes to service levels
 - major contracts or outsourcing arrangements
 - strategic asset decisions, and
 - long-term financial commitments or debt

Implications for the policy:

- There is strong support for introducing presumptive high-significance categories, with flexibility to depart only where reasons are published.
- Doing so would improve predictability and public confidence without removing all flexibility.

4. Transparency and publication expectations**What we heard:**

- Transparency was raised repeatedly, often linked to low trust in the organisation as a new entity.
- Submitters asked for visibility of:
 - significance determinations
 - engagement plans
 - consultation outcomes, and
 - decisions made (including when feedback is not adopted).

Implications for the policy:

- Feedback supports embedding reporting expectations into the policy itself, such as:
 - short significance and engagement summaries,

- “what we heard / what we decided / why” reporting for medium and high significance matters,
- acknowledgement and publication of feedback themes.

5. Reliance on previous Selwyn District Council consultation

What we heard:

- Many submitters challenged the idea that earlier Council consultation can replace engagement by Selwyn Water.
- Concerns focused on:
 - changes in decision-maker
 - new charging authority from 2026/27 onwards, and
 - differences between high-level Long-Term Plan (LTP) consultation and later, specific operational decisions.

Implications for the policy:

- The policy may need tighter conditions around when previous Council consultation is considered sufficient.
- There is support for requiring Selwyn Water to explain why further engagement is unnecessary when relying on past consultation.

6. Concerns about the breadth of engagement exceptions (section 6)

What we heard:

- Section 6 attracted significant criticism.
- Submitters were concerned that exceptions for urgency, operational matters, legal obligations, infrastructure protection, commercial sensitivity, or environmental protection could be used very broadly.

Implications for the policy:

- Consider narrowing exceptions and clarifying that:
 - exceptions do not remove the need for transparency,
 - urgency should trigger post-decision communication, and
 - commercial sensitivity by itself may not justify total non-disclosure.

7. Expectations around mana whenua engagement

What we heard:

- Views were mixed, but two clear strands emerged:
 - support for recognising mana whenua interests in water decisions, and
 - concern that the current provisions are high-level and unclear in practice.

Implications for the policy:

- Feedback suggests the policy would benefit from:
 - clearer expectations of when mana whenua engagement is required, and
 - transparency about how mana whenua input influences decisions.

8. Scope and role clarity**What we heard:**

- Confusion exists about:
 - Selwyn Water's role versus Council's role,
 - which assets and services are within scope, and
 - whether the policy applies beyond drinking water and wastewater.

Implications for the policy:

- Submitters supported clearer statements that the policy relates only to Selwyn Water's transferred drinking water and wastewater responsibilities, not Council-retained functions.

9. Accessibility and communication style**What we heard:**

- Many submitters found the document technical or overly complex.
- Repeated references were made to accessibility issues for:
 - people with limited digital access,
 - people with English as a second language,
 - older residents, and
 - people who rely on local print media.

Implications for the policy:

- While the policy is a governance document, feedback suggests value in:
 - clearer plain-English explanations,
 - summaries or examples showing how the policy works in practice,
 - wider use of multiple communication channels when engagement does occur.

10. Perception of limited customer and community centricity**What we heard:**

Submitters expressed concern that the draft policy appears inward-looking and places too much emphasis on organisational discretion, rather than anticipating and prioritising the impacts of decisions on customers, ratepayers, and communities. As a new organisation, Selwyn Water was encouraged to

adopt a more outward-facing, customer-centred approach that builds trust through transparency and early engagement.

Implications for the policy:

- Clarify that community and customer impacts sit at the centre of significance assessment
- Reduce reliance on perceived levels of prior public interest
- Explicitly recognise affordability, service levels, and localised impacts as drivers of engagement
- Reinforce transparency and accountability as foundations for public confidence

Recurring theme: trust and legitimacy

Across all sections of feedback, a recurring underlying theme was low baseline trust in Selwyn Water as a new organisation. Concerns about democratic accountability, decision-making authority, and perceived distance from the community strongly shaped reactions to the policy.

The feedback suggests that the policy is being judged not just on technical compliance, but on whether it visibly restrains discretion and demonstrates accountability.

Part 2: What we heard and how it is shaping the policy

This section explains how community feedback on the draft Significance and Engagement Policy is being used to improve the Policy before it is finalised. It outlines the key themes raised by submitters and the changes Selwyn Water is considering in response.

Our aim is to ensure the final Policy is clear, transparent, predictable, and gives the community confidence about when and how engagement will happen.

Improving overall understanding of the Significance and Engagement Policy

To improve clarity and accessibility, a Significance and Engagement Policy explainer will be added to the Policy. This guide explains how decisions are assessed for significance and how engagement approaches are chosen, and is intended to help readers understand the changes outlined below.

Key areas we are focusing on

Based on the feedback received, the following areas are the most important to address:

1. Clarifying scope and relationship with Selwyn District Council
2. Reducing discretion where possible and appropriate through clearer triggers, and publication requirements
3. Making significance assessment and engagement decisions more visible to the public
4. Tightening and explaining exceptions to engagement
5. Strengthening feedback and reporting back to the community
6. Improving clarity, accessibility, and predictability of the policy in practice

Topic	What we heard	What we're proposing	How this will appear in the Policy
Policy scope and Selwyn Water's role	Submitters expressed confusion about Selwyn Water's role versus Selwyn District Council's role, and about which services and assets are covered by the policy. There was concern that the Policy could be read as extending beyond Selwyn Water's transferred drinking water and wastewater responsibilities.	We will strengthen and clarify the scope of the Policy so it clearly applies only to Selwyn Water's drinking water and wastewater service-provider functions, and explicitly excludes functions retained by Selwyn District Council.	<i>Section 1 (Introduction) will be amended to clearly state:</i> This policy only applies to the things that Selwyn Water is responsible for. This is the provision of drinking water and wastewater services. It does not apply to the things that Selwyn District Council continues to be responsible, such as stormwater, land drainage, district planning and the making of bylaws – these will continue to be subject to the Council's Significance and Engagement Policy.
Customer and community-centred decision-making	Submitters were concerned that the draft Policy does not clearly demonstrate a customer and community-centred approach, and relies too heavily on internal discretion. There was concern that decisions affecting smaller areas or groups could be treated as low significance, or that perceived low public interest could limit engagement even where impacts are material.	We will strengthen the Policy to make clear that significance is assessed based on impacts on customers and communities, not just the scale, visibility, or level of public interest in a decision. We will emphasise early consideration of financial, health, environmental, service-level, and affordability impacts.	<i>Addition to the beginning of Section 2B:</i> In assessing the significance of a decision, Selwyn Water will look to understand and anticipate the potential impacts of that decision on its communities, including in terms of financial, health, environmental, and service-level impacts. A decision may be significant even where its impacts are concentrated on a specific community, geographic area, or group, particularly where those impacts are material. Decisions with major impacts, whether district-wide or localised, will generally be treated as significant. To assist Selwyn Water in determining whether a decision is significant, it will consider the following criteria.
How and when significance is determined	Submitters supported the use of criteria and a significance spectrum but were concerned that decisions about significance, could be overly discretionary and not visible to the public.	We will strengthen the Policy to improve consistency, transparency, and accountability in how significance decisions are made and recorded, while recognising that most medium and high significance decisions will also involve engagement.	<i>Amendment and addition to Section 2B</i> <i>Amendment:</i> Clarify that criteria will be considered, not "may" be considered. <i>Addition:</i> For decisions assessed as medium or high significance, Selwyn Water will prepare a brief written significance assessment outlining the criteria considered, the resulting significance rating, and the proposed engagement approach. This assessment will inform any

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			public engagement or reporting undertaken in relation to the decision. Internal processes Selwyn Water will use a standard assessment framework template to ensure that each of the significance criteria is actively considered for every decision, including where a criterion is determined to be not relevant in a particular case. While medium and high significance decisions will generally be subject to engagement, Selwyn Water recognises the importance of appropriate transparency around significance determinations, including where a decision is assessed as low significance. Transparency for low-significance decisions will be provided through existing reporting, summaries, or governance processes, taking into account the nature and impact of the decision. Where significance decisions are reviewed or endorsed by the Board, the decision and the reasons for it will generally be made publicly available through Board reports, minutes, or other published material.
Lack of clear triggers for high-significance decisions	Submitters consistently raised concerns that the draft Policy does not clearly identify when a decision should be treated as high significance. There was uncertainty about when engagement should be expected, and concern that important decisions could be assessed as low significance.	We will strengthen the Policy by introducing clearer guidance on the types of decisions that are generally expected to be high significance, while allowing flexibility where justified and explained.	<i>Addition to the end of Section 2C:</i> The following types of decisions are generally expected to be high significance. • Material changes to charges or affordability (e.g. large increases outside of those previously forecasted, new charging structures, or costs that significantly affect households) • Significant changes to levels of service (e.g. reduced service standards, major operational changes) • Strategic asset transfers or control changes (e.g. selling, leasing, or

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			transferring control of major water infrastructure) - Significant contracts or outsourcing arrangements (e.g. large contracts of high value relative to the revenue Selwyn Water receives, long term operations contracts, contracts involving anything essential to Selwyn Water's ability to meet its obligations under the LGWSA, public private partnerships) - Long term financial commitments or debt (e.g. significant borrowing for major capital commitments that affect future charges) Where Selwyn Water considers a different significance rating is appropriate, the reasons for this will be clearly documented and explained.
Engagement expectations, predictability and channels	Submitters supported flexible engagement but were concerned about the lack of certainty around when engagement will occur. The frequent use of "case-by-case" language was seen as providing insufficient assurance, and there were no clear minimum expectations for medium or high-significance decisions. Many requested clearer expectations and practical examples showing how decisions would sit across the engagement spectrum, and clearer recognition of local engagement channels	We will strengthen the Policy by setting out clear minimum engagement expectations for medium and high-significance decisions, and by including illustrative examples to show how the engagement spectrum may be applied in practice.	<i>Additon to Section 5B</i> For decisions assessed as medium significance, Selwyn Water will, at a minimum, consult by informing the community about the proposed decision and providing an opportunity for feedback before the decision is made. The scale and form of engagement will be proportionate to the nature and impact of the decision. For decisions assessed as high significance, Selwyn Water will, at a minimum, consult the community by publishing an engagement document that explains the proposed decision and how the community can participate. Selwyn Water will actively seek community feedback and will report back on the feedback received, explaining how that feedback informed the final decision. Where statutory requirements or urgent circumstances prevent engagement in advance, Selwyn Water will publish the reasons for its

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			approach and provide information to the community as soon as reasonably practicable. Section 5D <i>Example additions to engagement spectrum</i> Inform Routine maintenance such as pipe renewals, temporary water outages, Selwyn Water reports Consult Review of Water Services Strategies and where there are significant changes to water charges or pricing structures Involve Infrastructure projects with significant localised impacts, where community knowledge can help shape design or delivery Collaborate Long-term planning decisions addressing complex challenges, where outcomes are developed jointly <i>Addition to channels for engagement:</i> Selwyn Water will also use appropriate local engagement channels where relevant, including local community boards (such as the Malvern Community Board), residents' and community associations, community meetings, and targeted engagement with affected communities, particularly where impacts are geographically concentrated.
Reliance on previous SDC consultation	Many submitters questioned the assumption that earlier Council consultation removes the need for engagement by Selwyn Water. Concerns focused on the change in decision-maker, the	We will remove references suggesting that previous Council consultation is sufficient in itself, and strengthen transparency where Selwyn Water takes earlier engagement into account.	<i>Amendments to Section 5B and removal of Section 5F.</i> References to relying on prior Selwyn District Council consultation have been removed. Previous Council consultation may be considered as one of several factors when assessing significance, but it will no longer be treated as automatically removing the need for

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	difference between Long-Term Plan consultation and later operational decisions, and the fact that charging authority now sits with Selwyn Water.		Selwyn Water to consider its own engagement.
Engagement exceptions	Many submitters were concerned that the engagement exceptions are broad and cumulative, and could be used to routinely avoid engagement. There was concern that decisions could proceed without transparency or accountability.	We will strengthen Section 6 to reinforce transparency and accountability, while avoiding requirements that would be impractical or onerous for routine decisions. Transparency will be provided in a proportionate and aggregated way, rather than on a case-by-case basis.	<i>Addition to Section 6</i> The circumstances set out in this section do not remove Selwyn Water's commitment to transparency. Where engagement is not undertaken, Selwyn Water will still consider how best to inform the community about the decision, unless legally prohibited. Where a decision is made urgently or in an emergency meaning that engagement cannot be undertaken in advance, Selwyn Water will inform the community of the decision, the reasons for it, and any implications for customers as soon as practicable after the decision is made. Selwyn Water will maintain oversight of how engagement exceptions are applied. The use of engagement exceptions will be periodically reported to the Board, including the types of circumstances in which exceptions have been relied upon. Where appropriate, this information will be included in public Board reporting. Nothing in this section overrides Selwyn Water's obligation to engage where it is required to do so under the LGWSA.
Mana whenua engagement	Submitters supported recognising mana whenua interests in water decisions but were concerned that the draft section was too high-level, with limited clarity about timing, process, and how mana whenua	Selwyn Water has engaged early with mana whenua on how they wish to work with Selwyn Water in relation to this Policy, and we have updated the Policy with suggested changes	<i>Amendment to Section 2B: to clarify how decisions are determined limited or no cultural impact.</i> Guided by engagement with mana whenua, where a decision is assessed as having limited or no cultural impact, it is more likely to be of low significance. Decisions with the potential for material cultural

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	views influence decisions.	based on this and community feedback.	impact are more likely to be of high significance. <i>Amendment to Section 3: to provide clearer expectations for meaningful engagement</i> We are committed to providing relevant information to inform mana whenua and Māori contribution and improve access to engagement and decision-making processes. <i>Addition to Section 3: Explanation of how views may influence decisions</i> While recognising that mana whenua may not have an interest in every decision, we will work together to assess whether decisions have no, limited, or significant cultural impacts. <i>Amendment to Section 5E: to clarify when and how consultation is required for decisions involving land and water</i> Where any of the options identified involve a significant decision in relation to land or a body of water, Selwyn Water will take into account the relationship of Māori and their culture and traditions with their ancestral land, water sites, wāhi tapu, valued flora and fauna and other taonga. Selwyn Water will undertake consultation as set out in Section 3 of this policy.
Strategic water services assets	Submitters found the list of strategic water services assets unclear and overly broad. Concerns were raised that the appendix reads like a general category list rather than a strategic asset register, and that it does not clearly limit its scope to assets transferred to Selwyn Water.	We will clarify the purpose and scope of the appendix and confirm that it relates only to Selwyn Water's transferred drinking water and wastewater assets. We will also make clear that the list is high-level and will be refined over time.	<i>Addition to Appendix 1 and strategic water services assets</i> Appendix 1 identifies strategic water services assets for the purposes of this policy and is limited to Selwyn Water's transferred drinking water and wastewater assets. This appendix is intended to operate as a high-level schedule and will be refined over time as Selwyn Water further identifies and documents its strategic water services assets. <i>Addition to asset list:</i> Land for wastewater disposal