

Water Services Delivery Plan Assessment

Chatham Islands Council

Te Kāwanatanga o Aotearoa
New Zealand Government



Internal Affairs
Te Tari Taiwhenua

Glossary and abbreviations

The table below sets out the abbreviations used in this report

	Abbreviation
Chatham Islands Council	CIC
Capital expenditure	capex
Council-controlled organisation	CCO
Department of Internal Affairs	Department
Drinking Water Quality Assurance Rules	DWQAR
Funds from operations	FFO
In-house business unit	IBU
Levels of service	LOS
Local Government Funding Agency	LGFA
Local Government (Water Services Preliminary Arrangements) Act 2024	Preliminary Arrangements Act
Long-term plan	LTP
Secretary for Local Government	Secretary
Service level agreement	SLA
Statement of comprehensive revenue and expense	SOCRE
Water services delivery plan	Plan
Wastewater treatment plant	WWTP
Water treatment plant (drinking water)	WTP

Assessment Cover Sheet

Background on council/s and engagement with the Department

Detail	Commentary
Councils involved in plan	Chatham Islands Council.
Number of connections	119 drinking water, 130 wastewater.
DIA comment on council engagement during Plan development process	<ul style="list-style-type: none"> • CIC has maintained engagement with the Department throughout the development of their Plan. • In April 2025, the Department supported CIC during their council meeting with Watercare to discuss Local Water Done Well and assist with the development of the Plan, following a request from CIC. • CIC consulted their communities in August 2025, with a preferred option of a delivery partner model involving a well-established entity with large scale water delivery expertise. The consultation noted service arrangements were already under discussion with Auckland Council which could be extended to include water services support from Watercare. • On 27 August 2025, CIC approved an IBU model, supported by a delivery of a third-party partner, noting CIC had continued discussions with Auckland Council and Watercare as an option. <p>The final Plan was submitted on 29 August 2025.</p>
Feedback provided to council prior to submission on Draft Plan	CIC did not submit a draft plan to the Department for review prior to submitting their final Plan.
Engagement with council during review and assessment process	<p>The Department requested the following additional information from CIC during the review process:</p> <ol style="list-style-type: none"> 1. An estimate of real water losses; 2. To confirm what allowances have been made in the plan for growth; 3. Any reports from the 2022 condition assessment of Wastewater assets, including to; <ul style="list-style-type: none"> • provide any other information regarding the condition or grade of above ground assets;

Detail	Commentary
	<ul style="list-style-type: none"> • provide any additional information about the remaining useful life of the assets; <ol style="list-style-type: none"> 4. Any additional information regarding the proposed Delivery Partner Model, including what role the CIC may have with respect to oversight of asset management; 5. Additional information (including confirmation that funding has been included in the capital works programme to address) regarding the following non compliances: <ul style="list-style-type: none"> • Waitangi and Kaingaroa drinking water supplies • Waitangi wastewater system 6. A list of significant projects that have been included in the tables on Page 23 and 24, with costings; 7. Additional detail on the work carried out in 2020/21 and 2021/22 using Ministry of Health and Three Waters Stimulus Funding; 8. Additional information on the approach and methodology used to determine the investment levels; and 9. Additional information and detail on proposed renewals. <p>CIC did not provide a response to the request.</p>
Other Background Comments	N/A

Assessment Summary

Section	Commentary
Confirmation of submission completeness checklist	All sections of the Plan have been completed; however not all information has been provided. This is discussed in the body of this report.
General Comment on Plan	<p>The Plan from CIC is for an enhanced IBU delivery model, with support through a “delivery partner approach”. The Plan is transparent that CIC does not have the capacity and capability to deliver this model and are seeking a partnership with a delivery partner (such as Auckland Council or Watercare). The establishment of this delivery partner approach is identified as a headline risk for the Plan.</p> <p>CIC has completed all sections of the Plan, however the Plan has been assessed as not meeting the requirements under the Preliminary Arrangements Act for three primary reasons:</p> <ol style="list-style-type: none"> 1. Lack of asset condition assessment information, impacting the overall assessment of investment sufficiency and subsequently financial sustainability; 2. Insufficient detail on investment to address regulatory non-compliance; and 3. The financial projections for delivering water services over the period, with a reliance on central government funding. <p>These are discussed in more detail in the following sections.</p> <p>The conclusion of the assessment is that without asset condition assessment, it is not possible to have confidence that the level of capital investment proposed in the Plan is sufficient to comply with meeting current and future regulatory requirements. With the information provided in the Plan, it is not possible to confirm financially sustainable delivery of water services, including because of the level of reliance on central government revenue in order to meet the revenue sufficiency and financial sustainability requirements is not clear.</p>
Financial Sustainability Comment	See above comments regarding financial sustainability issues with the CIC plan.
Revenue Sufficiency	<p>The Plan notes throughout that the charges to consumers alone will not be sufficient to cover the expected costs, and that CIC requires additional Crown funding to enable costs to be covered. The Chief Executive Certification of the Plan states that “<i>Compliance [with the Preliminary Arrangements Act] is conditional on continued Crown Appropriation Funding, specifically Capex of \$18.6m and Opex of \$11m over ten years</i>”.</p> <p>This amount exceeds the existing appropriation for Crown Support for CIC (Local Government Administration – Non-Departmental Expense – Chatham Islands Council).</p>

Section	Commentary
	<p>While the Preliminary Arrangements Act does not specify a threshold level of certainty around central government funding in this scenario, the Department’s legal advice has indicated that a public commitment from the Minister of Local Government for this funding would be required for the Secretary to be sufficiently satisfied that the Plan contains sufficient revenue to meet the financial sustainability requirements.</p> <p>On this basis, the Plan is assessed as not meeting the requirements of section 13(1)(n) of the Preliminary Arrangements Act, which requires an “explanation of what the territorial authority proposes to do to ensure that the delivery of water services will be financially sustainable by 30 June 2028.”</p>
Investment Sufficiency	<p>Asset condition assessment:</p> <ul style="list-style-type: none"> • The Plan does not include any information regarding the condition of assets. The Plan notes that “asset condition in Waitangi and Kaingaroa is not available due to historic funding constraints”. • Under section 13(1)(h) of the Preliminary Arrangements Act, all plans are required to include “<i>an assessment of the current condition, lifespan, and value of the water services networks</i>” • The Department requested additional information from CIC on this, but no additional information was provided at the time of this report being completed. • Without this information, the ability to assess financial projections and investment sufficiency remains limited. If the asset condition is worse than assumed, this may impact the assessment of the sufficiency of the capital investment programme to meet the relevant regulatory requirements and standards. <p>Regulatory compliance:</p> <ul style="list-style-type: none"> • The Plan states investment to address wastewater discharge consent compliance and drinking water compliance is included in the Plan but insufficient information is provided on scope, timing and cost. The Department requested additional information from CIC on this, but no additional information was provided. <p>Without this information, the ability to assess financial projections and investment sufficiency remains limited.</p>
Financing Sufficiency	<p>The Plan does not include any borrowing. All additional revenue beyond charges to consumers is being sought from a central government grant.</p>
Overall assessment recommendation	<p>The overall recommendation from the assessment phase is to discuss the outcome of the assessment with the plans review panel</p>

Issues for discussion with Panel

Issue	Description	Recommended treatment
Asset condition	Due to insufficient detail on asset conditions, it is not possible to have confidence that the level of capital investment proposed in the Plan is sufficient to meet the requirement to comply with current and future regulatory requirements	<p>In order to meet the requirements of the Preliminary Arrangements Act, an amended plan needs to include information on the condition of the assets.</p> <p>Discuss with the Panel the appropriate treatment of these issues.</p>
Regulatory compliance	<p>Specific detail (scope, timing and cost) for the projects planned to address the drinking water compliance and wastewater consent compliance have not been provided.</p> <p>If funded, the proposed water capex programme provides for compliance and renewals funding to address issues with failures, and investment will be considered sufficient to meet compliance and renewals. Growth has not been provided for.</p>	<p>An amended plan should include detail on the specific projects planned to address the drinking water and wastewater compliance issues.</p> <p>Discuss with the Panel the appropriate treatment of these issues.</p>
Revenue sufficiency	The Plan notes that revenue from consumer charges will not be sufficient to cover operating costs and that compliance with the Act is contingent on Crown funding over and above what is currently appropriated.	<p>In order for the plan to meet revenue sufficiency, assurance is required that the required Crown funding is available.</p> <p>Discuss with the Panel the appropriate treatment of this issue.</p>
The proposed model to deliver water services	The details of the proposed model for an in-house model with a delivery partner to support the water services is still being developed and is a significant risk in the implementation of the model. While enough information has been provided in the Plan to meet requirements, the uncertainty around the details of this model are a risk.	<p>We recommend that an amended plan also includes additional detail on the delivery partner model and how it will function in practice.</p> <p>Discuss with the Panel the appropriate treatment of this issue.</p>

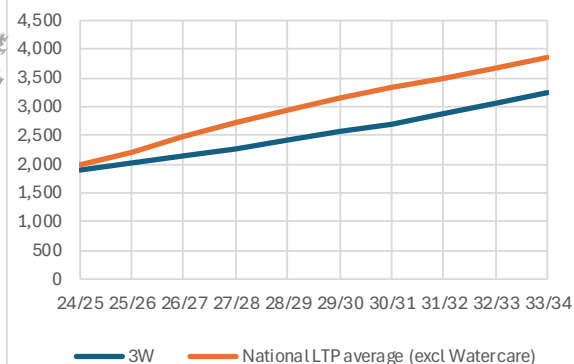
Council summary information

Summary information	Level
Current population	612
Drinking water connections	119
Wastewater connections	130
Stormwater connections	-
High growth council	No
10 year population growth	0.0%



Affordability and growth

Water services charge compare to national LTP average



Item	Year 1	Year 10	10 Year Average
Total charge as % of median income	2.00%	2.80%	2.41%
Annual price increase	N/A	5.70%	5.70%
DC collected per new connection (\$)	0	0	0

Assets, network and compliance

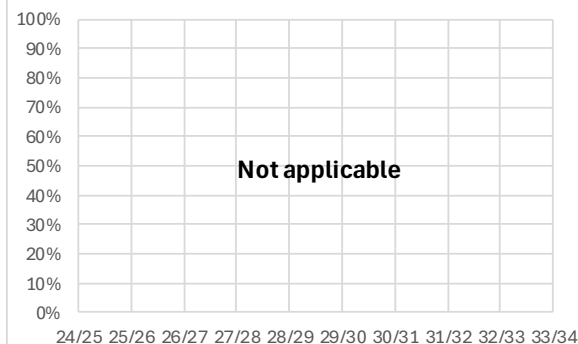
Asset measures	Year 1	Year 10	10 Year Average
Total assets per connection (\$)	35,912	157,792	105,504
Total debt per connection (\$)	0	0	0
Operating costs per connection (\$)	4,392	12,976	10,181
Age of network (years)	DW	WW	SW
Average age outlined in plan	20	50	N/A

Network performance	Level
Level of service performance measures achieved	29%
Water loss rate (litres per day)	Not Stated
Average consumption (litres per person per day)	250

Compliance	Met by June 2028
Drinking water compliance	Partial
Resource consent compliance	Partial

Financing

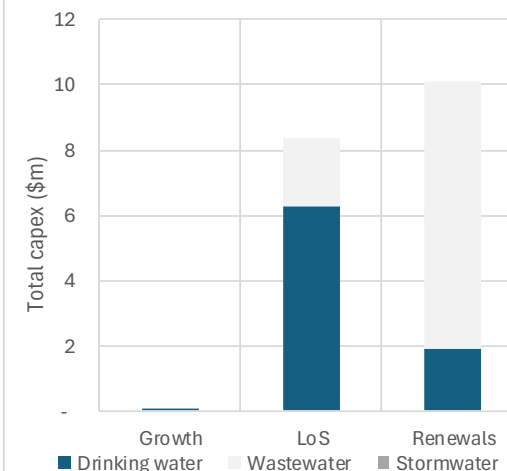
Net debt to operating revenue



Item	Year 1	Year 10	10 Year Average
Water related net debt to operating revenue %	N/A	N/A	N/A
FFO to debt	N/A	N/A	N/A
Whole of Council net debt to revenue (approx)	N/A	N/A	N/A

Capital expenditure	Category of capital expenditure			Total over 10 years
	Growth	Level of service	Renewals	
Drinking water	100	6,260	1,897	8,257
Wastewater	-	2,111	8,232	10,343
Stormwater	-	-	-	-
Total 10 years	100	8,371	10,129	18,600

Capex spend by type, 10 year total



Assessment Report: Part A – Statement of financial sustainability, delivery model, implementation plan and assurance

Section in Part A	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Delivery model and implementation				
Financially sustainable water services provision	Includes a statement that the CIC's IBU will not meet financial sustainability requirements due to the uncertainty of Crown funding.	Discussed in the General Commentary on Plan section.	For discussion with panel	Yes
The proposed model to deliver water services	<p>The proposed model is for CIC to continue delivering water services in-house under an enhanced business unit model. This will include</p> <ul style="list-style-type: none"> • New administrative support arrangements to allow ring fencing; • A new delivery partner to provide strategic direction and water expertise; • Review of LOS (town supply vs rural service approach); and <p>Consolidating operational and maintenance contracts.</p>	The details of the proposed model for an in-house model with a delivery partner to support the water services are still being developed. The lack of detail is a significant risk in the implementation of the model.	Meets requirements	Yes
Implementing the proposed service delivery model	<p>Key milestones to achieve full ring-fencing and compliance with legislation stated are:</p> <ul style="list-style-type: none"> • Delivery partner heads of agreement and contract October 2025-July 2026; • Crown funding agreement - December 2025; • Implement administration provider - - July 2026; • Procure water, roading and waste contracts - Dec 2026-July 2027; • Accounting and process changes - July 2026; and <p>Develop water services strategy and budget - July 2027.</p>	<p>Limited information is provided in the implementation plan, but it is sufficient to meet the requirements of section 13(2) of the Preliminary Arrangements Act.</p> <p>Milestones and dates are provided.</p>	Meets requirements	No

Section in Part A	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Consultation and engagement undertaken	<p>CIC undertook public consultation between 1-22 August 2025.</p> <p>CIC consulted on:</p> <ul style="list-style-type: none"> • Option 1a: Stand Alone Business Unit (IBU) • Option 1b: Stand Alone Business Unit (IBU) with Delivery Partner (preferred option) • Option 2: Multi council WSCCO <p>Overall feedback was supportive of the preferred option with the delivery partner approach.</p>	Consultation meets the requirements of Part 3 of the Preliminary Arrangements Act.	Meets requirements	No
Assurance and adoption of the plan				
Council resolution to adopt the Plan	CIC resolved to adopt the Plan on 27 August 2025.	N/A	Meets requirements	No
Certification of the Chief Executive of Ashburton District Council	The Chief Executive certified the Plan on 27 August 2025.	N/A	Meets requirements	No

Assessment Report: Part B – Network Performance

Section in Part B	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Investment required in water services				
Serviced population and serviced areas	<p>There are two community water schemes and a single wastewater scheme. No growth has been allowed for. Information on un-serviced areas is provided.</p> <p>Performance measures are partially achieved. Average water consumption is about 250 L/p/day. Water loss has not been calculated.</p>	The required information has been provided.	Meets requirements	
Assessment of the current condition and lifespan of the water services network	<p>The water and wastewater systems are described. Limited condition information is available. A small proportion of wastewater assets were CCTV inspected recently with the condition being found better than expected. Most of the water and wastewater network assets are expected to be in poor or very poor condition based on the level of current faults. Critical assets are identified.</p> <p>Average ages of network assets are estimated at 20-43 years for water, and about 50 years for wastewater. There are no stormwater assets other than those used solely for the transport network.</p> <p>There has been recent investment in water and wastewater treatment plants.</p>	See 'General Comment on Plan' section for more information about the lack of asset condition assessment.	For discussion with panel	
Asset management approach	<p>Asset management systems are very limited at present. The delivery partner approach seeks to improve asset management practices over time.</p>	The proposed asset management approach will be supported by the delivery model.	Meets requirements	

Section in Part B	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Statement of regulatory compliance	<p>There have been boil water notices and 'do not drink' advisories at the water supplies. There are compliance issues with DWQAR including treatment performance capability, monitoring and reporting.</p> <p>There are no expired consents or consents expiring in the next 10 years. There have been no resource consent enforcement actions taken. The wastewater discharge consent is currently non-compliant with conditions of consent.</p>	<p>Specific detail (scope, timing and cost) for the projects planned to address the drinking water compliance and wastewater consent compliance have not been provided. The Plan states these are included in the capex programme subject to external funding.</p>	<p>Does not meet requirements – detail to be provided on the specific projects and timing</p>	
Capital expenditure required to deliver water services and ensure that water services comply with regulatory requirements	<p>Significant capex projects are:</p> <ul style="list-style-type: none"> • Waitangi water upgrades including new bore, WTP, storage and critical network projects and compliance projects; • Kaingaroa WTP compliance upgrade and critical network renewals; • Alternative water sources investigation; • New WWTP, new septage lagoon, upgrade land application system and critical network renewals; • O&M facility. <p>No stormwater capex as there are no stormwater assets.</p> <p>The proposed water capex programme provides for compliance and renewals funding to address issues with failures. Renewals occurring after 2034 are proposed to be reviewed alongside alternative LOS options.</p>	<p>If funded, the Plan states that capex programme investment is considered sufficient to meet compliance and renewals. Growth is not provided for.</p>	<p>If funded, likely to meet requirements</p>	
Historical delivery against planned investment	<p>Little capex has been delivered in recent years, noting that other externally funded projects have been delivered successfully. A significant uplift in investment has been identified with \$2.2m-3.23m over the 2026/27 to 2031/32 period.</p>	<p>The proposed delivery partner approach is expected to allow delivery of the capex programme.</p>	<p>Meets requirements</p>	

Assessment Report: Part C – Revenue and financing arrangements

Section in Part C	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Revenue and charging arrangements				
Charging and billing arrangements	Currently billed as part of rates. The proposed model is a continuation of internal delivery.	Information provided on charging meets the requirements of the Plan (although the revenue does not meet the revenue requirements of the Plan).	Meets the requirements	Yes
Water services revenue requirements and sources	<p>The costs of water services are rising from \$822k per annum to \$2,350k per annum. The operating costs rise from \$571k in the current year to \$1,622k by the end of the Plan.</p> <p>The major component of that increase is in the year 2026/27 where cost rise from \$577k to \$1,250k. This has been described as the correct level of operating cost.</p> <p>Revenue requirements are also impacted by the absence of borrowing. The Plan outlines a capital spend of \$18.6m, which is all funded by grants.</p> <p>The total of the grant funding built into the Plan is \$11m for the years 2026/27 through to 2033/34. The pattern of grant would indicate that \$1.4m per annum of grant would be embedded even past 2033/34.</p> <p>Of the expected total spend of \$32.6m the users fund \$2.95m.</p>	<p>The Plan is premised on significant external funding. The external funding is expected to come from the Crown.</p> <p>Page two of the Plan states that “Council does not have funding to resolve these critical issues.” The page contains financial information that is not supported by the Plan. It states a capital spend of \$49.5m while the finalised Plan has \$18.6m.</p> <p>The Plan also states that “...with a small customer base (~130 connections) and no debt financing CIC does not meet the financial sustainability requirements without a mechanism to secure ongoing Crown funding.”</p>	Meets the requirements	Yes
Existing and projected commercial and industrial users’ charges	Charges rise to \$1,585 for water and \$1,645 for wastewater. This is an increase of \$599(61%) and \$619 (60%) respectively.	Information provided meets the requirements, but revenue outlined does not fund the service without additional Crown funding.	Meets the requirements	Yes
The affordability of projected water services charges for communities	Affordability sits at 2.1% for the current year and rises to 2.8% of median household income.	Adequate coverage of affordability.	Meets the requirements	No

Section in Part C	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Funding and financing arrangements				
Water services financing requirements and sources	The Plan needs external financing of \$29.6m. This is shown as being through grants and not external borrowing.	CIC does not have the capacity under current arrangements to access the type of funding available to other Councils. Debt available to other councils is limited for CIC due to the high reliance on Crown grants.	Meets the requirements	Yes
Internal borrowing arrangements	Not applicable to CIC.	N/A	N/A	N/A
Determination of debt attributed to water services	Not applicable to CIC.	N/A	N/A	N/A
Insurance arrangements	Assets of \$2.2m are covered by insurance which has a maximum \$15.25m cover.	Meets the requirements.	Meets the requirements	No

Assessment Report: Part D – Financial sustainability assessment

Section in Part D	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Financially sustainable water services provision				
Confirmation of financially sustainable delivery of water services by 30 June 2028	This section of the Plan references back to earlier commentary regarding the need for central funding for the CIC capital programme.	See 'Summary of assessment section' for commentary on overall financial sustainability.	For discussion with panel	Yes
Actions required to achieve financially sustainable delivery of water services	The Plan notes establishing the delivery partner model and agreement on funding from the Crown as the key actions required.	See "Summary of assessment section" for commentary on overall financial sustainability.	For discussion with panel	Yes
Risks and constraints to achieving financially sustainable delivery of water services	The Plan references the foreword from the CEO which outlines the key risks in the Plan, which include: <ul style="list-style-type: none"> • Requiring Crown funding for delivery of the capital programme; • Establishing the delivery partner model; and • Limited capacity within CIC to implement the model. 	Key risks are outlined in the CEO foreword and referenced throughout the Plan.	Meets requirements	N/A
Assessment of revenue sufficiency				
Projected water services revenues cover the projected costs of delivering water services	Projected revenues cover projected costs of delivering services, on the assumption that the services will be funded by Crown grants.	See "Summary of assessment section" for commentary on revenue sufficiency and the reliance on Crown funding for the capital programme.	For discussion with panel	Yes

Section in Part D	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Average projected charges for water services over FY2024/25 to FY2033/34	Charges are based on uniform charges per property. Water supply is \$991.96 per annum per connection. All connections have meters which are monitored but not used for charging. Wastewater is based on a pan charge of \$1031.10 per pan. A residence for a single household is deemed to have only one pan.	Charges are clearly outlined in the Plan and increase from 2.0% to 2.8% of median household income. We note the very small number of connections and the reliance on Crown funding for the balance of the capital programme.	Meets requirements	N/A
Projected operating surpluses/(deficits) for water services	The Plan contains very healthy operating surpluses. However, these are based on Crown grants that will meet the capital spending and the shortfall in operating revenue.	Sufficient information provided regarding approach to projected operation cash surplus.	Meets requirements	N/A
Projected operating cash surpluses for water services	Cash surplus has been set to zero to balance funding impact statement. The Plan notes that this leaves CIC in a net-zero cash position.	Sufficient information provided regarding approach to projected operation cash surplus.	Meets requirements	N/A
Assessment of investment sufficiency				
Projected water services investment is sufficient to meet levels of service, regulatory requirements and provide for growth	An investment programme totalling \$18.6m is proposed to address LOS, compliance and renewals for water and wastewater. Growth investment is not allowed for but would be supported provided external funding was available.	Note the earlier commentary regarding the lack of asset condition information. Without this information it is not possible to accurately assess the sufficiency of investment and on this basis the requirements may not be met.	For discussion with panel	Yes
Renewals requirements for water services	The Plan notes that investment levels have been determined by an external provider using a Rural Service Model. Asset sustainability is positive from 2025/26 onwards.	The Department asked for additional information on the "Rural Service Model" used to calculate renewals, however no additional information was provided. Note the earlier commentary regarding the lack of asset condition information and the subsequent impact on the assessment of investment sufficiency.	For discussion with panel	Yes

Section in Part D	Summary of content in Plan	Assessment Review Comment	Assessment	Focus for panel
Total water services investment required over 10 years	Investment levels have been determined by an external provider to achieve the desired LOS. Asset investment ratio is positive from 2025/26 onwards.	Note the earlier commentary regarding the lack of asset condition information and the subsequent impact on the assessment of investment sufficiency.	For discussion with panel	Yes
Average remaining useful life of network assets	The Plan notes that “this table was omitted due to a lack of reliable information related to future replacement values.”	N/A – no content to assess.	For discussion with panel	Yes
Assessment of financing sufficiency				
Confirmation that sufficient funding and financing can be secured to deliver water services	The Plan assumes that water services will be funded by Crown grants.	See “Summary of assessment section” for commentary on the reliance on Crown funding for the capital programme.	N/A	N/A
Projected council borrowings against borrowing limits	Not applicable to CIC.	N/A	N/A	N/A
Projected water services borrowings against borrowing limits	Not applicable to CIC.	N/A	N/A	N/A
Projected borrowings for water services	Not applicable to CIC.	N/A	N/A	N/A
Borrowing headroom/(shortfall) for water services	Not applicable to CIC.	N/A	N/A	N/A
Free funds from operations	Not applicable to CIC.	N/A	N/A	N/A
Assessment of financing sufficiency	The Plan assumes that water services will be funded by Crown grants.	See “Summary of assessment section” for commentary on the reliance on Crown funding for the capital programme.	N/A	N/A

Assessment Report: Part E – Projected financial statements for water services

Section in Part E	Summary of content in Plan	Assessment Review Comment	Focus for panel
Projected funding impact statement	Statement provided for 2 waters combined	Meets the requirements.	N/A
Projected statement of comprehensive revenue and expense	Statement provided for 2 waters combined	Meets the requirements.	N/A
Projected statement of cashflows	Statement provided for 2 waters combined	Meets the requirements.	N/A
Projected statement of financial position	Statement provided for 2 waters combined	Meets the requirements.	N/A

Assessment Report: Part E – Financial projections and measures

Projected statement of comprehensive revenue and expense

Water Services Delivery Plan page 39

Projected statement of financial position

Water Services Delivery Plan page 40

Financial measures: revenue sufficiency

Water Services Delivery Plan pages 32 - 34

Financial measures: investment sufficiency

Water Services Delivery Plan pages 35 - 36

Financial measures: financing sufficiency

Water Services Delivery Plan pages – not provided by CIC

Assessment Report: Water Service Delivery Plan – Additional information

Additional information	Summary of content in Plan	Assessment Review Comment	Focus for Panel
Additional disclosures to support Plan	N/A	N/A	N/A
Significant capital projects	<ul style="list-style-type: none"> • Waitangi water upgrades including new bore, WTP, storage and critical network projects and compliance projects; • Kaingaroa WTP compliance upgrade and critical network renewals; • Alternative water sources investigation; • New WWTP, new septage lagoon, upgrade land application system and critical network renewals; • O&M facility. <p>No stormwater capex as no there are no assets.</p>	If funded, the capex programme investment is considered sufficient to meet compliance and renewals	Yes
Key issues, constraints, risks and assumptions	<ul style="list-style-type: none"> • Requiring Crown funding for delivery of the capital programme; • Establishing the delivery partner model; and • Limited capacity within CIC to implement model. 	Discussed in the report.	Yes