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Dear Sir/Madam

Waikato Regional Council Submission to draft proposal on Simplifying Local Government

Thank you for the opportunity to submit on the draft proposal on Simplifying Local Government. Please find attached the Waikato Regional Council's (the Council's) submission, formally endorsed by the Council's Strategy and Policy Committee on **10 February 2026**.

Should you have any queries regarding the content of this document please contact Sydney Green, Policy Advisor, Policy Implementation directly on (07) 8586074 or by email Sydney.Green@waikatoregion.govt.nz.

Regards,

Tracey May

Director Science, Policy and Information

Submission from Waikato Regional Council on the draft proposal for simplifying Local Government

Introduction

1. Waikato Regional Council (the Council) appreciates the opportunity to make a submission on the draft proposal on Simplifying Local Government (the proposal). The proposed legislation will have a significant impact on the way in which our council operates, both our governance and operational activities.
2. The Council recognises the need to simplify local government. With 10 district councils, one city council and one regional council covering a broad and diverse region, we see the benefits of streamlining local government in the Waikato. However, we consider that a combined territories board (CTB) comprised of mayors may not be the most efficient way of simplifying local government. We believe that regional councillors should be kept until the 2028 elections with the CTB having the sole focus on the reorganisation of local government for the region.
3. As reform proposals are progressed, we have the willingness and expertise to work with central government to ensure as smooth a transition as is possible, one that takes account of the well-acknowledged complexity of the Waikato region and the deep connections and relationships that we have built across Maoridom and primary sectors.
4. We have concerns about the proposed timeframes, and the capacity of Mayors of the proposed CTB to effectively govern regional functions in addition to administering territorial authorities. Undertaking these dual processes during a period of potential rates capping, and wider local government reform, is a significant task.
5. We consider that there is a significant risk that the regional voice and regional issues are diluted or lost through the proposed transition. Regional councillors hold regional governance knowledge and are equipped to lead the region through a challenging and complex transition period. We are concerned at losing our Māori ward elected representatives who guide us through the intricate and complex iwi Māori issues of our region, with the region having approximately 180 Iwi/Hapu/Marae with an interest in the region. Also, the Waikato/Waipā catchment is also governed by Te Ture Whaimana o Te Awa o Waikato, the Vision and Strategy for the Waikato River the only document of its kind in the country. Te Ture Whaimana is the primary direction setting document and where there is inconsistency between Te Ture Whaimana and national direction Te Ture Whaimana prevails, the depth of knowledge of experience that has been built over the last (almost) 15 years of implementation cannot be lost as a result of local government redesign.
6. We caution against understating the importance of regional councils; it is unclear from the draft proposal how the CTB will have the capacity to carry out the functions we currently serve to the level required by (and in many cases agreed with) our communities. The CTB Mayors will be under an exceedingly short timeframe to learn how to work with communities on complex long-term issues that regional councillors have been leading for decades.
7. We strongly disagree with the proposal's consideration of giving Crown Commissioners veto and voting powers. Whilst we welcome the opportunity to have a Crown Commissioner involved with the transition, we support a non-voting/observer role only.
8. An example of a non-voting central government observer role that works well within our council committee structure already is the New Zealand Transport Association (NZTA) observer on our Future Proof growth partnership.¹ As per the Terms of Reference, the NZTA is represented through its Director of Regional Relationships as an observer with speaking rights but in a non-voting capacity.

¹ [Agenda of Future Proof Implementation Committee Meeting - Friday, 12 December 2025 - Core Share](#)

- a. We caution that appointing Crown Commissioners to do the job of a council represents an intrusion into local government powers. On principle, local government is an instrument for communities to practice their right to decide on their local affairs and pay for them through their elected members.
 - b. We consider that to take away this function is potentially an overreach of central government, potentially removing a layer of democratic rights of the region without community consultation.
9. The Council acknowledges that under the Simplifying Local Government proposal there potentially would no longer be regional elections in 2028. We consider that the challenging process of reforming Waikato local government requires steady and experienced leadership during this transition. In order to provide this continuity and allow for the complexity of the geographical and Treaty settlement-related issues facing the Waikato region, Council strongly recommends:
 - That the Regional Councillors remain in office until the 2028 local body elections. This will enable retention of institutional knowledge and a stable transition during the resource management system reform. Additionally, this will ensure appropriate democratic outcomes as well as ensuring that the regional voice is heard during the transition process.
 - That the CTB, comprising of Mayors and the regional council Chair, should be focused primarily on the regional reorganisation process, while they continue to govern their own councils during the resource management system reforms and potential rates capping prior to the 2028 elections.
 - That during the transition process (concluding at the time of the planned 2028 local government elections), regional councillors work on resolving the key issues for their regions. Work in this space could be undertaken by central and local government, with particular input from the regional council sector. In the Waikato region we are in the formative stages of investigating the possible options of transitioning the \$1.1 billion in flood protection infrastructure and catchment management to a new structural model. Models such as a council-controlled organisation (CCO) or council-controlled trading organisation (CCTO), with an associated funding model, are being explored. Structural funding models for regional council services such as transport and spatial plan development could also be investigated.
 - That during the transition period regional councillors continue to work with iwi upholding the Joint Management Agreements that are statutory requirements under Treaty Settlements. The Waikato leads the country in having the most mature implementation of Treaty Settlements, particularly in regard to the exercising of Joint Management Agreements. This maturity has not happened by chance and relies on the deep and connected knowledge and expertise of governors and staff at the regional level. These agreements and governance mechanisms are unique to the Waikato region. This approach during the transition process will ensure continuity of engagement while the Crown and iwi work on the future arrangements to honour Treaty Settlement obligations regarding the future structure of local government.
10. The Waikato region's chief executives have supported the Waikato Mayoral Forum (of which our Chair is a member) to develop key Waikato messages to inform submissions on the reform proposals. Attached to this submission is a copy of the letter Mayor Tim McIndoe, Chair of the Waikato Mayoral Forum, recently sent to Minister Bishop and Minister Watts.
11. The Council strongly supports and endorses the statements outlined in the Mayoral Forum letter. The Forum acknowledges that each council in the region is diverse and has challenges unique to their communities, however at the core is the need to individually and collectively serve our combined Waikato ratepayers well.
 - a. This letter emphasises the complexity of the region, and the importance of iwi partnerships. The Mayoral Forum also urges the Government to reconsider the timing of the transition, and the alignment with local and national elections. It suggests that Government allows councils to pause major statutory processes such as long-term plans, audits and representation reviews. The Forum highlights the importance of protecting the natural environment and identifies that catchment management issues need to be clarified. And the Forum also

identifies that involvement of the Waikato Regional Council chair on any future CTB will be essential. The Waikato Regional Council wholeheartedly supports and endorses these statements, which shows that the Waikato region is working collaboratively on the reform of local government.

12. Our submission provides overarching comments and then addresses the targeted consultation questions. Key submission themes are:
- Complexity of the Waikato region
 - Experienced leadership through transition
 - Mayoral capacity to lead successful change
 - Timeframe to deliver durable outcomes
 - ready settlement statutory obligations
 - Catchment management scale governance and decision-making Alternative delivery models – investigating use of Council Controlled Organisations (CCOs/CCTOs)
 - Sufficient resourcing from central government
 - A connected view of change
 - Regional Investment Fund
 - Ability to retain strong scientific and technical knowledge expertise

Complexity of the Waikato

13. We highlight the distinctive local government context of the Waikato region and have concerns that these unique qualities might not be sufficiently accounted for in the transitional regional model proposed.
14. The Waikato region plays a pivotal role in New Zealand’s economy and resilience. Its location as a critical national transport, freight and logistics corridor supports a diverse economy spanning primary industries (including farming, forestry, and aquaculture), advanced manufacturing, technology, renewable energy, tourism, and healthcare. Waikato Regional Council also manages significant natural resources, including river catchments, geothermal assets, 10,000km² of coastal marine area, 1200km of coastline, and \$1.1 billion in flood infrastructure which protects land that contributes \$2.5 billion to the region’s gross domestic product and protects several key transport corridors.
15. The region’s strengths are further supported by a growing Māori economy and the longstanding cultural and regional leadership of the Kīngitanga.
16. As New Zealand’s most important dairying region, Waikato supplies more than a quarter of the country’s milk, underpinning its largest export sector. It is also an important vegetable growing region.
17. The region is also a leader in energy production, and the geothermal and hydroelectric power stations along the Waikato River are critical to national energy security and resilience. Waikato is also a critical producer of aggregates for roading and construction, a significant mineral producing area, and has a substantial share of the North Island’s forestry resources, alongside a strong high-value manufacturing base, particularly in agritech and aviation.
18. Careful management of these assets is at the heart of what makes the Waikato region productive, resilient and prosperous. In the transition to a simplified local government structure, it is important that regional knowledge and expertise is retained. In particular, with the region’s wide geographic spread across 11 territorial authorities, there are distinct differences between issues facing people living in our city of Hamilton and those in provincial towns and rural areas. The transition to a more unified model will be particularly challenging in the Waikato because of this diversity. Retaining Waikato Regional Councillors’ expertise up till the 2028 elections will help support this transition.
19. Smaller rural areas in our rohe have shared concerns that their interests may get lost in the one-dimensional regional representation of the CTB as it is currently presented in the proposal.

Experienced leadership through transition

20. We see three distinct aspects of the transition to Simplifying Local Government:
- a. Firstly is the ongoing governance and management of regional council activities during the transition, including Treaty Settlement issues and resource management system reform, as well as oversight of the routine functions of the regional council.
 - b. Secondly the work required to reorganise local government within the Waikato region. This work, proposed to be undertaken by the CTBs, is particularly complex in the Waikato given the wide geographic base, the large number of territorial authorities, and issues such as flood protection and catchment management which are cross-boundary and involve \$1.1 billion of flood protection assets.
 - c. Thirdly there is the role of Mayors who will be required to continue to govern their own territorial authorities, while at the same time dealing with rates capping and resource management system reforms.
21. Critical to a successful local government future for the region is the need to get the transition model right. We consider that continuity of regional governance knowledge concerning regional issues is critical for a successful transition. We consider that Mayors have a localised appreciation of regional council functions, but the nuances of regional issues are complex, and regional councils have different functions to territorial authorities (For example, Section 30 versus Section 31 of the Resource Management Act 1991²), which reflects on the role of the governors when making decisions. Regional governance input will help ensure that the institutional knowledge is transferred for new CTB. While we disagree with the proposal to set up a CTB, should it go ahead, our councillors would endeavour to work collaboratively alongside central government to best advocate for our communities and to make any transition as successful as possible. The government must ensure that the institutional knowledge is not lost through this transition.
22. Knowledge of regional council operations and regional scale issues needs to be transitioned into a new entity. This is a key reason to keep regional councillors functioning alongside the CTB through to the 2028 elections. During this transition time the Chair of the Waikato Regional Council should also be appointed to the CTB to focus on the regional reorganisation plan (as supported by the Mayoral Forum).
23. Retaining regional councillor involvement during transition would help preserve institutional memory, democratic legitimacy, and trusted iwi relationships while CTBs and regional reorganisation plans are developed.

Mayoral Capacity to lead successful change

24. Regardless of the future form and function of Waikato local government in the future, it is imperative that the functions and services that are presently provided by regional councils continue. Further, it is critical that the representative governance to support successful delivery of services to communities, on the matters they deem important, must be at the core of any proposed change.
25. We have concerns around mayors having the capacity to fulfil the obligations required of them for the CTB, alongside their current duties and local interests.
26. While governing the regional council, the mayors will be required to pick up the workload of regional councillors. At WRC this includes 90+ committee meetings per annum, with council workshops and Joint Management Agreements meetings on top of this. This workload would be in addition to performing new functions such as developing Regional Spatial Plans, a combined Long-Term Plan, and other significant statutory documents. Mayors will be responsible for that while managing their own

² [Resource Management Act 1991 No 69 \(as at 17 December 2025\), Public Act 30 Functions of regional councils under this Act – New Zealand Legislation](#)

council duties in connection with their territorial authority, and also navigating the new three waters delivery arrangements.

27. Mayors were elected in 2025 to govern their territorial authorities, they did not expect the additional workload of regional responsibility. Further, those campaigning for mayoral roles in the future should have an understanding of the scope of the role with the combined regional responsibilities included, and voters should know that mayors they are voting for will have these additional regional responsibilities.
28. We consider it democratically important that the mayors' role on the CTB is not delegated to other councillors, given mayors will be elected on the basis of their role in regional representation as well.
29. Given the above-mentioned capacity and heavy workload issues, along with the preservation of democratic principles, we believe that a logical solution is to have regional councillors continued through to the end of their current term, with the mayors (including the regional council chair) of the CTB working on the regional reorganisation plan. With regional councillors continuing to guide the regional council's ongoing workload, while working on investigating the potential for a CCO/CCTO for catchment-based flood protection and drainage services, there would still be Waikato Regional Council Chair. Certainly there would also be value in the WRC Chair being appointed to the CTB until the end of 2028 to assist in the transfer of knowledge in both governance and operations.

Timeframe to deliver durable outcomes

30. We consider that the timeframe for the transition should not be prior to end of the 2025-2028 triennium. We have concerns about the proposed timeframes, and we doubt the ability of the CTB to effectively govern regional functions during this transition. At this stage, it is unclear how the CTB will effectively administer territorial authorities potentially also under a rates capping regime while also leading discussion on the reorganising the structure of local government. Local government must work within its Long-Term Plan planning timeframes to properly resource this work. There is a lot of existing work that is programmed and planned, that our communities need delivered without delay.
31. Current Waikato Regional Councillors are represented on the six iwi Joint Management Committees which are set up under Treaty Settlement legislation. These committees, which meet regularly and require equal numbers of Crown and iwi representatives, will need to continue through to 2028 in order to meet Treaty obligations. At present these Joint Management Committees require 10 regional councillors across multiple committees to service their meeting up to four times a year. In addition, there are new Treaty Settlement requirements likely to come from the Hauraki rohe which will require representation. In addition there are also a number of Mana Whakahono a Rohe agreements which will require governance guidance on terms of agreement and operation. These issues are best managed under the current regional council governance structure through to the 2028 election – by which time the government should have developed an alternative mechanism of engagement.

Treaty settlement statutory obligations

32. The Waikato leads the country in depth of experience and maturity in the Joint Management Agreement space, having implemented Joint Management Agreements for over a decade. The relationships held by governors and staff across multiple iwi in the region require careful management, particularly so during the transition period. Many of the region's Mayors will interact with a small number of iwi in relation to localised issues, the relationships held with iwi at a regional scale are more complex and expansive, and it is an area where regional governance can add substantive leadership value.
33. Any process agreed on by the government must clarify how existing Treaty Settlement legislation will be upheld. Absolute clarity on this matter is required. Regional councils are presently a named partner to a number of Treaty Settlement obligations, named by the Crown to deliver on aspects of the Crown's agreements and obligations with Treaty Settlement Iwi. If this partner is to change then it is

imperative that the Crown has provided absolute clarity for local government and Settlement Iwi what this changed relationship should be. It should not be up to local government to determine this with iwi; it is a matter for the Crown to define and local government to deliver upon.

Catchment management scale governance and decision making

34. Catchment scale management needs to be a core focus for the CTBs; presently the proposal is silent on this matter. This is essential for protecting our communities and assets against weather events while managing the overall health of our catchments. Our flood management and drainage assets protect productive enterprises who contribute significantly to regional and national GDP. The complexity of the flood control and catchment management systems in the Waikato makes the region unique, therefore we suggest investigating alternative delivery methods for management of these vital systems in the reorganisation process. WRC is currently investigating what this might look like and is looking at the potential of Council Controlled Organisations (CCOs) and Council Controlled-Trading Organisations (CTOs).
35. Regional councils undertake the critical function of management across whole catchments. This management is not constrained by smaller territorial authority boundaries but provides for the connecting management of resources such as water, air, soil, the coast, biodiversity, and the management of biosecurity matters including pest incursions. Managing at the catchment scale enables a big-picture and efficient delivery across the entire catchment, taking account of interests upstream and downstream and being mindful of how intricately linked impacts are, often called a 'mountains to the sea' approach. In the Waikato, the management of the Waikato River catchment is the best example of this complexity.
36. The Waikato catchment is the longest, most complex in the country, crossing eight territorial boundaries. The catchment begins at Lake Taupo, with water entering the system from the Whanganui River via the Tokaanu Power Scheme, it travels down through the Waikato River and out to Port Waikato. Approximately 20% of the water entering Lake Taupo is from the Whanganui River catchment, with an estimated 10% of this water exiting through Port Waikato. Importantly, the consents associated with this water flow are up for renewal in 2037. The water in the system not only provides for the towns and communities, both urban and rural, along the Waikato catchment but water in the system also provides for the ongoing growth of Auckland. The Waikato catchment also includes the Waipa River and tributaries, joining the Waikato at Ngāruawāhia; these rivers cannot be managed independently; they are a complete system.
37. Catchment and river scale management along the length of the river (from Lake Taupo to Port Waikato) ensures that water is allocated fairly so that all are able to thrive, that energy is provided to the national grid through the hydro network, and that critical national infrastructure (State Highway 1 and other important transport routes, and the North Island Main Trunk Line) is able to be maintained to support the country. Decisions made along the length of the river can impact the movement of goods and services in and out of Auckland, Tauranga and Ruakura ports.
38. Flood management and river management is undertaken for the entire flood system ensuring that contributors/beneficiaries along the length of the catchment continue to pay for lower catchment flood management infrastructure. This ensures that there is equity across the system and the cost burden does not fall on one part of the system; a fragmented approach to management would severely financially disadvantage communities and landowners if the entire system was not properly understood.
39. Our Waihou/Piako and Hauraki Plains/Coromandel river systems are also complex; activities in the upper catchments impact the lower catchment and ultimately impact the coastal environment and associated aquacultural activities in the internationally recognised Firth of Thames and Hauraki Gulf.

40. Flood management, river control works, and drainage services are core statutory functions of regional councils, underpinning community safety, economic activity, and infrastructure resilience. However, the current funding model, where targeted ratepayers bear most of the cost, is increasingly unsustainable and has the potential to cause hardship to those who are supposed to benefit from these services. Ageing assets, escalating renewal and operating costs, climate driven increases in flood risk, and broader community expectations around resilience have intensified affordability pressures.
41. Recent lessons from Cyclone Gabrielle, and the associated review of Hawke's Bay's flood management systems, reinforce that heavy reliance on targeted rates is inadequate to maintain critical flood infrastructure without becoming unaffordable for some ratepayers. A review of Waikato Regional Council's funding approach is therefore underway that aims to consider the apportionment of costs: who pays now, who benefits, and whether there are some who should contribute but currently do not, and why. This work will make transparent the trade-offs inherent in funding decisions, support sustainable investment in the right assets in the right places, and ensure that an appropriate level of flood management and drainage services are provided as climate risks grow. We believe the findings of this review will be very informative in considering relevant funding structures, and will have initial findings by June this year, with stakeholder engagement planned in preparation for our next long-term plan.
42. In the Waikato our flood management schemes currently account for more than \$70 million of annual expenditure and involve \$1.1 billion worth of assets funded through a mix of targeted rates and general rates. Current regional councillors with rural backgrounds have deep expertise in the operation of these assets. This is why the reorganisation of catchment management should be undertaken with the expertise of regional councillors through to the 2028 election. A similar approach could be undertaken with transport policy and public transport, which is also successfully delivered 'at scale'. Transport services that are planned, developed and delivered at the regional level avoids the fragmented approach and equity issues that might be faced if this service was provided through the market or was delivered at a district level.
43. The benefits of catchment scale management include:
- Whole of catchment infrastructure and flood management decisions balance upstream and downstream interests.
 - Whole of river system hazard management works without decisions requiring multiple decision makers.
 - Whole of catchment approach manages land use and biodiversity and interventions with a consistent approach toward outcomes.
 - Catchment based approaches have a complete view of flood management matters, thus having the ability to make decisions related to entire catchment communities (rather than component parts).
 - Biosecurity management that focusses on larger scale programmes across catchments generating efficiencies of delivery

Alternative delivery models – investigating use of Council Controlled Organisations (CCOs/CCTOs)

44. If CTBs are progressed, we suggest that CTBs are charged with investigating alternative models of delivery such as council-controlled organisations (CCOs) and council-controlled trading organisations (CCTOs) and associated governance and funding models as viable alternatives for delivery of services. The Council is open to working collaboratively with central government, territorial authorities and relevant sectors to find viable options moving forward. We note that regardless of the governance model we have in the future, the issues we have now will also be transferred; currently our biggest challenge is funding our infrastructure assets.
45. The Council is in the preliminary stages of investigating functions that could be conducted through alternative delivery models such as CCOs; this includes flood management, catchment management and transport activities.

In the Waikato our flood management schemes currently account for more than \$70 million of annual expenditure and involve \$1.1 billion worth of assets, funded through a mix of targeted rates and general rates (in accordance with our Funding and Financing Policy).

Sufficient resourcing from central government to make reform a success

46. Local government will look to central government for implementation support and guidance, and we ask that the government makes sufficient appropriations to ensure that this is provided. Often central and local government are criticised for not resourcing the transition or roll-out of new initiatives; as important as any reform or legislative change may be, it is the execution and implementation of the change that should be well understood and provided for. The resourcing of this change may span a number of years; ratepayers should not be expected to cover any increases in costs that may arise from this proposal.

A connected view of change

47. To ensure the successful delivery of a streamlined local government reform for our ratepayers, there is a need to take a view of the entire system of local government, resource management, and funding reform, to view how all pieces are connected and to ensure that each does not conflict with what the other is trying to achieve. Sequencing and timing, and practical application of the component parts, need to be well thought out and supported.

Regional Investment Fund

48. Our Council is concerned about the future management arrangements for key funding streams and assets currently held or available to Council. Specifically, we consider it imperative that any future legislation preserves the entitlement to current co-funding agreements with central government (for example, the \$12.5 million funding granted under the Regional Infrastructure Fund), and protects key financial assets such as Council's \$100 million investment fund that is held on behalf of the region following the vesting of port shares with Waikato Regional Council. We urge prudent financial oversight of these funds to ensure that they continue to be available for the region's ratepayers as intended.

Ability to retain Ability to retain strong scientific expertise and technical knowledge

49. Additionally, we are concerned that the uncertainty and confusion created by this proposal is having a negative impact in our staff, including driving movements away from our sector and creating a level of reluctance for applicants to our vacant roles. Regional council staff hold a wealth of relevant knowledge and expertise, including in science, policy, planning, resource management, and spatial mapping. We consider ensuring the continuity of regional council staff technical expertise essential; this is key in terms of regional knowledge. We seek clarity on what this transition will mean for our staff of 650 people and highlight the vast amount of regionally specific technical expertise that is at stake of being displaced.

Concluding general comments

50. Retaining regional council involvement during transition will help preserve institutional memory, democratic legitimacy and trusted iwi partnerships while the CTBs and regional reorganisation plans are developed. We encourage transitional arrangements within Treaty settlement responsibilities that retain regional council involvement as this will further support continuity and a shared partnership approach.

51. We consider the changes that have been set out in the draft proposal's consultation document require a deeper level of understanding of the functions, responsibilities and services that the regional council provides to the region. Our comments are made to ensure that the future for local government for the Waikato achieves an appropriately representative model that delivers in the most effective and efficient way for our residents and ratepayers.

52. We look forward to future consultation processes on simplifying local government and would welcome the opportunity to comment on any issues explored during development of legislation, and work with the DIA to make the transition as effective as possible for our communities.

Submitter details

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Feedback from Waikato Regional Council on the draft proposal for Simplifying Local Government consultation questions

Consultation question	Council response
<p>1. Do you agree there is a need to simplify local government?</p>	<p>The Council supports reform of the local government <u>system</u>.</p> <p>We agree that regional and district councils can have overlapping functions that create confusion; we question that a first step to addressing this confusion is the removal of the governance layer of regional councils. We look forward to the rapid review of regional council functions, and our ability to input into this process to ensure that the decision made on regional councils form or function is well informed.</p> <p>We suggest local government be reformed by addressing issues of unfunded mandates, unclear and competing national direction, unclear accountabilities, and the fragmentation of functions. To simplify local government, we must look at the entire system of government.</p>
<p>2. What do you think of the proposed approach overall?</p>	<p>In order to assess the proposal, it would have been useful to have evidence and clear issue definition. This would have assisted more targeted submissions and would help to understand where we could offer insights and solutions for matters that will need to be addressed in subsequent processes such as the rapid review of regional council functions and determining the framework for the regional reorganisation plans.</p> <p>We highlight that there is a need to differentiate the importance of each region in New Zealand and the contributions they make to the whole. The Waikato particularly provides functions and services to underpin not only the prosperity of the Waikato but also those of the Auckland and Bay of Plenty regions.</p> <p>The Waikato River catchment in particular is complex, spanning from the central North Island to providing drinking water to Auckland from its northern reach. The Waikato region is a key contributor to New Zealand's primary production, and is placed in the golden diamond (the economic area of Auckland, Waikato and Tauranga, taking account of westward to Taranaki, and the highly productive southern Waikato) and population of the upper North Island, including through its transport connections to New Zealand's largest ports and provision of an inland port to support this system.</p>
<p>3. Do you agree with replacing regional councillors with a CTB?</p>	<p>We do not agree with replacing regional councillors with a CTB.</p> <p>Given the complexity of the Waikato region, we assert that the reform of local government requires steady and experienced leadership during this transition time. To provide this continuity and allow for the complexity of geographical and Treaty- Settlement related issues, we recommend that the regional councillors remain in office until the 2028 local body elections in order to provide a stable</p>

Consultation question	Council response
	<p>transition during the resource management reforms. This provides for democratic outcomes, as well as ensuring that regional voice is heard during the transition process. This means that the CTB comprising the mayors can be focused primarily on the regional reorganisation process, while they continue to govern their own Councils during the rates capping and RM reforms prior to the 2028 elections.</p> <p>We question the capacity of mayors to undertake functions at both a local and regional scale. Having just had local elections, we have seven new Mayors in the Waikato region (out of 11). The local government experience of these Mayors is varied. Coming up to speed with territorial authority business, and then regional matters, would be a significant task. Mayors already fulfil full time roles. The roles presently held by regional governors, whilst not full time, still require a significant dedicated resource.</p> <p>Transitional provisions are an important consideration that the proposal does not fully address. To move from the existing arrangement to the CTBs is unlikely to make the CTBs successful in their first iteration. Also, the reform needs to be mindful of the work of the initial CTBs and how much decision-making power they will have, particularly as this relates to resource management reform. The CTB members will have a tenure that expires in 2028, that is the opportunity to appoint governors who are fully aware of roles and responsibilities and can better appreciate their role and function.</p> <p>In looking at the numerous reform proposals, CTBs, who will have responsibilities for developing and making decisions on the Regional Spatial Plan chapter of the Regional Combined Plan, must have this complete (with best endeavours) by the third quarter of 2027; this is of concern. The decisions on the Regional Spatial Plan Chapter, which is a significant component of the resource management system reform framework, should not be made by members with a less than 12-month tenure. This work should be carried out by current regional councillors through to 2028, as they have been part of the detailed process of developing the Spatial Plan to date.</p>
<p>4. What do you like or dislike about the proposal to replace regional councillors with a CTB?</p>	<p>Regional councillors and mayors have been elected to govern different statutory functions; the roles are not simply interchangeable.</p> <p>Firstly, regional councillors were elected in 2025 under a clear statutory framework with a legitimate expectation that they would serve a full three-year term. Allowing duly elected Regional Councillors to complete their current triennial term through to the 2028 local body elections is consistent with democratic principles, constitutional norms, and established public-law expectations. It will also maintain continuity of governance and institutional knowledge while new local government structures are developed.</p> <p>The Council notes that structural reform can proceed in parallel with the continuation of elected regional governance. No necessity has been demonstrated to prematurely end existing electoral mandates in order to achieve the objectives of the Simplifying Local Government reforms. Allowing Regional Councillors to serve through to 2028 provides a prudent balance between reform delivery and democratic stability.</p>

Consultation question	Council response
	<p>Secondly, regional councillors and mayors have been elected to govern different statutory functions. The roles are simply not interchangeable, and the Mayors will not fully understand regional council functions and responsibilities.</p> <p>Thirdly, removing the current regional governance arrangements, including Māori constituencies, without the need for a representation review through a public process is of concern. Similarly, there is no indication how representation reviews will be undertaken to ensure appropriateness of representation given functions. As a result of regional growth, the need to revise constituency boundaries may have been likely. Mayors and the communities that they represent are for existing territorial authority functions and are not representative of functions and services delivered regionally. There may well be a dilution of community of interest representation through replacement of regional councillors without an appropriate review of representation.</p> <p>CTBs will place increased accountabilities on mayors who already have significant governance responsibilities. On top of the existing expectation to fulfil their full-time role, the proposals add additional roles of governing regional council business as usual (existing statutory requirements) and developing a regional reorganisation proposal. Expecting mayors to govern regional functions and lead complex reorganisation planning within such a short timeframe increases the risk of governance overload and reduced attention to fulfilling statutory obligations.</p> <p>We suggest a transitional system in which regional councillors can continue their functions, and the mayors on the CTB can focus on the Regional Reorganisation Plans.</p>
<p>5. What level of Crown participation in regional decision-making do you prefer?</p> <p>a. None – only mayors on the CTB</p> <p>b. Crown Commissioner (non-voting)</p>	<p>The Council does not support options C, D or E of the proposal document.)</p> <p>Crown involvement or appointment of commissioners can be seen as a fundamental challenge to local democracy. Ratepayers are the main funders of council activity and participate in processes to determine where that funding is allocated (or not), and elect the people to make the decisions on what should get funded. Government appointees, who it is assumed will be funded by ratepayers, are not elected by those funding local government.</p> <p>In principle, local government is an instrument for communities to practice their right to decide on their local affairs and to fund these activities accordingly, and to hold their elected members to account.³ We consider that removal of this function could be viewed as central government overreach, potentially removing a layer of democratic rights of the region without community consultation.</p>

³ [Ministry for the Environment Regulatory Impact Statement: Response to review of Environment Canterbury](#)

Consultation question	Council response
<p>c. Crown Commissioner (veto power)</p> <p>d. Crown Commissioner (majority vote)</p> <p>e. Crown Commissioners instead of a CTB.</p>	<p>We do not support a Crown Commissioner having veto power or being directly appointed to the CTB; this contradicts the democratic foundation of local government, and the right of ratepayers to vote in who they will hold accountable for making decisions on spending their money wisely – and subsequently having the ability to vote members out also.</p>
<p>6. Do you agree that mayors on the CTB should have a proportional vote adjusted for effective representation?</p>	<p>We agree that mayors on the CTB should have a proportional vote adjusted for effective representation, with amendments.</p> <p>We do not consider that proportional representation is effectively achieved based solely on the number of residents. Weighting proportionality on populations alone cannot account for other important considerations, and risks ignoring issues related to the geography of resource distribution. We consider it important to note that there is evidence of a strong correlation between smaller populations and higher voter turnout.⁴ The higher level of interest and political engagement from smaller constituencies might not be sufficiently represented.</p> <p>Again, we reiterate that matters of regional governance, such as catchment management, are not determined by numbers of people in a geographic area. The use of a proportional vote seems a simplistic tool to use for such significant investment decisions. For example, flood protection, coastal management, biodiversity, and transport networks all require bespoke and local application of bespoke solutions that demand in-depth understanding and an objective point of view at catchment-scale.</p>
<p>7. What do you think about the ways that communities crossing regional boundaries could be represented?</p>	<p>As above, we do not consider that proportional representation is effectively achieved based solely on the number of residents.</p> <p>A recent example of existing work that tackles considerations for issues around crossing regional boundaries is the Infrastructure Development Plan (IDP) by The Upper North Island Strategic Alliance (UNISA). UNISA is a collaboration between Northland, Waikato and Bay of Plenty Regional Councils, Auckland Council, Whangarei District Council and Hamilton and Tauranga City Councils. The IDP identifies the strategic drivers, priorities, challenges and opportunities for the Upper North Island in terms of inter-regional infrastructure that will make a difference for the region and New Zealand.⁵</p>

⁴ [Elections Quick Fact sheet 2025](#)

⁵ [UNISA Infrastructure Development Plan 2025](#)

Consultation question	Council response
<p>8. Do you support the proposal to require CTBs to develop regional reorganisation plans?</p>	<p>It makes sense that the CTB, or transitional entity/entities with these functions, have responsibility for the development of regional reorganisation plans, but being mindful of other points raised in our submission, we believe that these should be done in a wider reform context looking at the timing and sequencing of resource management and other reform.</p> <p>We recommend that the CTB should use the process under section 82 of the Local Government Act 2002⁶ (special consultative process) to develop these plans.</p> <p>To assist with the transition, we recommend that ‘a transition document’ be required to be developed by regional councils that outlines significant regional issues and responses to these; both responses undertaken to date and those planned for the future, in order to inform future regional decisions. The basis of this document could be akin to the pre-election report that the Chief Executive is presently charged with. This would ensure that regional issues of significance, and likely considerable investment, are prioritised and have visibility. We consider that an organised and transparent transition capturing the region’s nuances, issues and opportunities for efficiencies (including, for example, arrangements for governance of initiatives such as Regional Deals partnerships) is essential for providing for a productive and successful future of our region.</p>
<p>9. What do you think about the criteria proposed for assessing regional reorganisation plans?</p>	<p>We request clarity on the sequencing of the review of regional council functions described on page 7 and page 19 of the proposal.</p> <p>Page 7 states this review will occur before CTBs are established, whereas page 19 suggests it will occur before CTBs develop reorganisation proposals.</p> <p>This difference is important, as this sequencing affects the ongoing delivery of regional council functions and services. We recommend clarifying the sequencing as clear communication will be required for our ratepayers.</p> <p>We suggest the government investigate the use of CCOs/CCTOs for this transitional period. In the Waikato we already work closely with Hamilton City on the provision of the majority of buses, and we also work with all the other territorial authorities on the co-design of regional transport priorities through the Regional Transport Committee. . Waikato Regional Councillors are already in the preliminary stages of investigating functions that could be conducted through alternative delivery models in the flood control, drainage and catchment management systems.</p>
<p>10. What do you think about how the proposal</p>	<p>We are concerned about the lack of detail in the proposal regarding fulfilment of Treaty Settlement obligations; absolute clarity on this matter is required.</p>

⁶ [Local Government Act 2002](#)

Consultation question	Council response
<p>provides for iwi/Māori interests and Treaty arrangements?</p>	<p>In order for reform to be successful, the Treaty Settlement relationship, and associated responsibilities, must be clearly defined. Reform of local government and the resource management system will not achieve the desired outcomes if there is time (and legal process) needed to define the relationship clearly. This is the responsibility of the Crown, and ratepayers should not end up funding determination of this relationship as an unintended consequence of local government reform.</p> <p>We have concerns that the proposed approach for the mayors leading the CTB would be contrary to the democratic decision of those communities who decided to retain Māori wards in last year’s elections and referendums (in the Waikato region: Hamilton City Council and Rotorua Lakes District Council).</p> <p>Further, the present proposal to have Mayors represent all constituents would need take account of the following:</p> <ol style="list-style-type: none"> 1. The current government enacted the Local Government (Electoral Legislation and Māori Wards and Māori Constituencies) Amendment Act 2024, which requires councils to hold a public poll at the 2025 local elections if they wish to retain or establish Māori wards 2. Local government referenda carried out under the Local Electoral Act 2001 (LEA) binds the Crown under section 6 of this legislation. Therefore, even if government can legislate to dispense of local government Māori ward representation at the CTB, this decision would need to carefully consider the impact on the Crowns obligations under the LEA.