

20 February 2026

Department of Internal Affairs

Via online platform: <https://consultations.digital.govt.nz/simplifying-local-government/proposal>

Tēnā koutou

Canterbury Mayoral Forum Submission on Simplifying Local Government proposal

1. The Canterbury Mayoral Forum (Mayoral Forum) welcomes the opportunity to provide this submission on the Simplifying Local Government proposal.
2. The Canterbury Mayoral Forum comprises the mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council, supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.
3. All Canterbury councils actively participate in the Forum: the Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate, and Waitaki District Councils, the Christchurch City Council, and the Canterbury Regional Council.
4. This submission has been developed with input from all our members and focuses on matters of general agreement in the proposal. Our council members are also making individual council submissions on these matters, and we ask that the Department carefully consider each of these.

Mayors standing together for Canterbury.

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Introduction

5. The Mayoral Forum recognises and is supportive of the Government's objectives to improve system performance, strengthen accountability, lift economic productivity, and deliver better long-term outcomes for communities. The Mayoral Forum acknowledges that aspects of the current system are under pressure and that change is required to address long-standing economic, environmental, and funding challenges.
6. The scale and pace of change across the reform programme will require careful management, and significant investment from communities and councils to transition to new statutory responsibilities. This submission should also be read alongside the Mayoral Forum's submissions on the broad suite of reforms currently under consultation; including the Planning Bill, Natural Environment Bill, Rates Target Model proposal and the Emergency Management Bill.

Canterbury context

7. Canterbury is the largest region in New Zealand with a land area of 44,500 sq. km extending north of Kaikōura to the Waitaki River in the south, and from Te Pātaka-o-Rākaihautu Banks Peninsula to Aoraki Mount Cook. Within the region are diverse and iconic landscapes and ecosystems, including alpine and high-country tussock habitats, major lakes, and globally significant braided river systems.
8. Canterbury is the second largest region in terms of population, and in the year ended June 2025, Canterbury was the fastest growing region. The population of the Canterbury region is close to 700,000, and includes Christchurch, the second largest urban area in New Zealand. The population is unevenly distributed across Canterbury and the ten territorial authorities, with most of the population (77%) in the greater Christchurch urban area.
9. Five of ten fastest growing districts in New Zealand were in Canterbury, and our region has forecast population to increase to about 900,000 by 2048.
10. Waitaha Canterbury lies wholly within the Takiwā of Ngāi Tahu whānui, with 10 of the 18 Papatipu Rūnanga holding interests within our regional boundaries.
11. Canterbury boasts one of New Zealand's most diverse and connected business communities in the country. With a global city at our doorstep, an international airport, two deep-water ports, and two leading universities driving research and innovation, we are connected and aligned in a way that few regions can match.
12. Manufacturing and agriculture are the 'twin engines' of Canterbury's economy, but there is diversity between the industry compositions of Canterbury's sub-regions. For example, primary industries accounted for the smallest proportion in the whole Canterbury region compared with 25.3% in the region excluding the Greater Christchurch area. In some districts,

tourism is a significant component of the economy – tourism is 42.5% of Mackenzie’s total employment. Emerging innovative economies include aerospace.

13. It is within this broad context that this submission has been developed.

Case for change

14. The Mayoral Forum agrees that an evidence-led approach to determining how functions are delivered across Canterbury is timely and has the potential to deliver benefits for communities and ratepayers. However, the proposal put forward by Government is not wholly supported by the Mayoral Forum in its current form.

15. The Mayoral Forum recognises the critical role that local government has in supporting and building strong, healthy, and prosperous communities. We strongly support the concept of localism and subsidiarity in that the function of governance and decision making should be devolved to the level of government closest to affected communities.

16. The current system has a number of challenges, not least of all:

- i. highly prescriptive legislative framework for local government, with increasing responsibilities, unfunded mandates and complex changes that happen quickly
- ii. current structure and funding system constrains local government’s ability to govern, deliver and fund services to their communities in an environment of limited revenue and increasing costs
- iii. the demand on infrastructure that comes with growth, the challenge adapting to climate change and responding to the increasing frequency and intensity of weather events.

17. The Mayoral Forum supports simplification where it genuinely improves clarity of roles, accountability, and delivery outcomes.

18. The changes presented in this proposal must be robust and well thought through in their implementation to ensure local governance and government systems are fit for purpose for the next 30-40 years.

Central and local government relationship

19. A genuine central and local government partnership, founded on mutual respect and trust is critical to how local government, central government and communities are effectively integrated to deliver genuine wellbeing outcomes.

20. The Mayoral Forum believes that local and central government need to work collaboratively for the communities we serve, noting the critical part each plays in providing safe, healthy, and productive environments.

21. Whether our funding comes from taxes or rates, we are supporting the same people and the same communities.
22. We welcome a more deliberate conversation about how we could work collectively to design a fit for purpose and contemporary public sector for our communities and how the various layers of local and central government, the roles we play and functions we respectively deliver play out for our communities.
23. The challenges associated with funding pressures and the central and local government relationship should be addressed as a priority, working together to establish co-investment opportunities and sustainable local government financing and funding mechanisms. Local government financial viability is being challenged, and our ability to invest in 'core services' reduced through the unfunded or underfunded mandates from central government.

Combined Territories Board

24. The majority of the Mayoral Forum does not support the Combined Territories Board (CTB) simultaneously undertaking the roles of the regional councillors. Members feel there is insufficient capacity for the CTB to assume regional councillor responsibilities while also developing the regional reorganisation plan (RRP) and implementing the new resource management regime, while continuing to lead their territorial authorities.
25. The Mayoral Forum supports the establishment of the combined territories board (CTB) to develop the regional re-organisation plan(s) (RRP).
26. The Mayoral Forum also notes that given the changes imposed by the resource management reforms, it is critical that the CTB fully understands regional council functions.
27. The Mayoral Forum wants to work together, with mana whenua and Central Government, to get the best outcomes for Canterbury.

Combined Territories Board – voting

28. Determining the process for voting on the CTB is complex and challenging. Proportional voting is not seen as resolving underlying representation or legitimacy concerns, neither was a single vote system. Clarity of purpose for the CTB is seen as more important than setting voting mechanism too early in the process.
29. The Local Government Commission should play a key role in determining final voting structures, and we agree that different matters may have different voting systems.

Mana Whenua, Treaty Settings, and Māori outcomes

30. The Mayoral Forum is of the view that partnership with mana whenua needs to be embedded from the outset. Treaty partnership should shape how functions are assessed, how outcomes are defined and how decision-making settings are designed.

31. Any arrangements, whether transitional or in the new system, should not weaken existing Canterbury settings, including current Ngāi Tahu representation arrangements and established partnership mechanisms.
32. The RRP must demonstrate how Treaty settlement commitments administered by councils will be upheld, and how Māori outcomes and kaitiakitanga are supported across environmental, infrastructure and planning functions.

Functional review

33. The Mayoral Forum supports the proposed functional review, starting with an assessment of what functions are required, how they are currently delivered, how well they are performing and at what scale they are best placed. This approach provides a stronger foundation for reform and is consistent with the Mayoral Forum's view that form should follow function.
34. The functional review should identify where delivery is fragmented, where capability is duplicated, where outcomes are inconsistent and where coordination failures produce unnecessary cost or risk.
35. Different functions may be best delivered at different scales, including metropolitan, sub-regional, regional, local, shared service, or national, and the process should be explicitly designed to identify the right scale for each, rather than defaulting to region-wide solutions.
36. Care needs to be taken that the review is comprehensive enough to support the development of the re-organisation plans for enduring outcomes for our communities.

Timing of re-organisation

37. The Mayoral Forum has concerns with the timing of the proposal and the development of the re-organisation plans, particularly in relation to the 2028 local government elections.
38. There is a view that the development and finalisation of any RRP should not straddle a local election cycle, for two main reasons. First, momentum will be key to delivering these reforms in an orderly way. Local elections will necessitate a 'distraction' from developing the RRP for a period and – depending on the results – could result in a change of direction for its content (including needing work to be re-completed).
39. Second, there is a risk that a local election straddling the development of the RRP could undermine electoral integrity and public participation, especially if it will be implemented partway during the following triennium. In the 2028 elections – if a partially completed, yet to be finalised RRP, looms to take effect during the following triennium – there is likely to be voter confusion on what they are voting for, and what candidates can expect to represent and/or confidently campaign on.

Financial cost associated with reorganisation

40. The Mayoral Forum is concerned about the lack of analysis and information on how the Simplifying Local Government proposal will be resourced and funded, particularly given the scale and uncertainty of costs to transition and implement other cost of the reforms in this proposal.
41. Transitional costs must be identified early, quantified realistically, and supported by clear funding mechanisms. These costs should not be underestimated or left to ratepayers without transparent support settings, including how costs will be shared, who will fund what and how central government requirements will be funded.
42. At a time when councils are exercising financial discipline in response to community signals and rate-capping proposals, whilst also facing climbing costs for infrastructure and service delivery, it is expected that central Government would in part fund set up costs to alleviate a cost burden on local government.
43. The Mayoral Forum would not favour any outcomes where reform results in unfunded mandates, hidden cost transfers, or opaque cross-subsidisation that is not justified by demonstrable regional benefit. Transitional funding and cumulative costs of the suite of local government reforms need to be considered. Funding these changes conflicts with, and distracts from, the intent of the Local Government (System Improvements) Bill to focus on core services.

Link with other government reforms

44. There are several government reforms currently underway, and the Mayoral Forum would like to see stronger alignment between the multiple changes that are either in process or being mooted. The two Resource Management bills, the Emergency Management bill, the Rates Target Model and Simplifying Local Government proposals, and implementing local water done well, will all change how things operate at a local government level.
45. Poor alignment of the major reforms leaves our communities vulnerable. Quick change with limited consideration quickly becomes redundant, uncertainty of outcomes or direction leaves ratepayers and voters confused and frustrated, and the associated costs will continue to rise. These costs are inevitable, despite a rates cap, and in some way will be borne by the ratepayer, likely through increased user charges and/or reduced services.

Business As Usual

46. The proposal raises significant questions and uncertainty about councils' business as usual over the next several years.
47. Councils have begun planning their next Long-Term Plan (LTP) 2027-2037. This is a significant undertaking involving considerable cost and resource for all our councils and built on a number of assumptions.

48. Some of our Canterbury councils are legislatively required to complete a Representation Review in 2027 for the 2028 elections. How could this be credibly undertaken in light the of the development of the RRP?
49. Councils are also delivering on their current LTPs and Annual Plans that have been through extensive public consultation with their communities. Re-organisation has not featured in these to date.
50. The Mayoral Forum is concerned about how Audit NZ's processes will take the reform proposals and legislation changes into consideration. We will be required to meet the audit requirements of the legislation that is in force at the time, but the new legislation may change the focus of our Plans.

Conclusion

51. The Canterbury Mayoral Forum thanks you for the opportunity to make this submission on the Simplifying Local Government Proposal.
52. The Mayoral Forum would be very happy to expand on any points covered in this submission. Please contact our secretariat, Maree McNeilly at secretariat@canterburymayors.org.nz or on 027 381 8924.

Nāku iti noa,nā



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