



AGENDA

Ordinary Council Meeting Friday, 31 July 2026

Date Friday, 31 July 2026

Time 10:00 am

Location Council Chamber
District Council Building
King George Place
Timaru

File Reference 1858374

Timaru District Council

Notice is hereby given that a meeting of the Ordinary Council will be held in the Council Chamber, District Council Building, King George Place, Timaru, on Friday 31 July 2026, at 10:00 am.

Council Members

Mayor Nigel Bowen (Chairperson), Clrs Stacey Scott, Peter Burt, Stu Piddington, Scott Shannon, Michelle Pye, Owen Jackson, Graeme Wilson, Chris Thomas and Philip Harper

Quorum – no less than 5 members

Local Authorities (Members' Interests) Act 1968

Councillors are reminded that if they have a pecuniary interest in any item on the agenda, then they must declare this interest and refrain from discussing or voting on this item and are advised to withdraw from the meeting table.

Nigel Trainor

Chief Executive

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- 1 Opening Prayer and Waiata**
- 2 Apologies**
- 3 Public Forum**
- 4 Identification of Urgent Business**
- 5 Identification of Matters of a Minor Nature**
- 6 Declaration of Conflicts of Interest**

7 Reports

7.1 Receipt of submissions on future local governance in the Mid-South Canterbury / North Otago region under the Head Start Pathway

Author: Stephen Doran, General Manager Corporate
Brendan Madley, Senior Policy Advisor

Authoriser: Nigel Trainor, Chief Executive

Recommendation

That Council:

1. Receives the report “Receipt of submissions on future local governance in the Mid-South Canterbury / North Otago region under the Head Start Pathway”;
2. Receives and notes the written submissions on the Head Start consultation;
3. Receives and notes the supplementary documents and communications relevant to the Head Start consultation;
4. Acknowledges submitters who have spoken to their submission; and
5. Notes that all submissions will be considered as part of the deliberations.

Purpose of Report

- 1 The purpose of this report is for Council to receive all submissions and feedback on the Head Start consultation, and to hear from any individuals or organisations who wish to speak to their submissions.

Assessment of Significance

- 2 This issue is considered of very high significance given the likely impacts on governance arrangements, levels of services and council finances. Consequently, consultation has taken place, and this report outlines the feedback received.

Consultation

- 3 Consultation opened on 6 July and closed at 5pm on 24 July.
- 4 It is acknowledged that the consultation was constrained by the requirement to lodge any outline proposal under the Head Start pathway by 9 August.
- 5 Submissions were able to be made via an online form, hard copy (free-posted, emailed or hand-delivered to Council), or via email or letter.
- 6 The consultation was advertised or promoted via the following means:
 - 6.1 A hard copy consultation document (including submission form) was included in the 9 July edition of the Timaru Courier.

- 6.2 Two community meetings and panel discussions were held, in Timaru on 14 July and Geraldine on 16 July (these were also livestreamed and recording on Council's Facebook page).
- 6.3 The Council website (including a dedicated Head Start consultation webpage).
- 6.4 Consultation documents were available at Council facilities (Main Building, libraries/ service centres, art gallery, museum and CBay).
- 6.5 Posts on Council's social media channels.
- 6.6 Radio advertisements on the main South Canterbury stations.
- 7 Mainstream media coverage also promoted the consultation.

Submissions received

- 8 313 submissions were received by the end of the consultation.
- 9 A complete portfolio of all of these individual submissions is located at Attachment 1. The body of this report includes free-format comments from these submissions, but not the content of any attachments.
- 10 Four additional late submissions were also received. These were excluded from analysis.
- 11 The vast majority of respondents identified as living within the Timaru District. A small number (approximately a dozen) live in Waimate, Mackenzie, Christchurch, Wellington, or overseas.
- 12 For context, the number of submitters is approximately 0.5% of Timaru District residents.

Relevant correspondence received

- 13 Council officers are also aware of some relevant correspondence received by Council during the consultation period that provides important information or perspectives about local government reforms.
- 14 The documents are located at Attachment 2.
- 15 Councillors should consider this correspondence as part of their decision-making.
- 16 These documents are not formal submissions and do not necessarily represent the views of their entity/ organisation.
- 17 This correspondence is as follows:
 - 17.1 Letter received 3 July 2026 from Jaenine Parkinson, Chief Executive of Museums Aotearoa.
 - 17.2 Letter received 15 July 2026 from Justin Tipa, Kaiwhakahaere of Te Rūnanga o Ngāi Tahu.
 - 17.3 Documentation from the office of Rt Hon Simon Upton, Parliamentary Commissioner of the Environment (submission to the government regarding Simplifying Local Government, and correspondence with Minister Bishop).

Hearing

- 18 14 submitters initially requested to speak to their submission. Three have subsequently withdrawn as of the time of writing.
- 19 The current Hearing schedule is as follows:

Time	Name	Organisation (if applicable)	Method of attendance	Submission page reference (refer page # top right of Attachment 1)
10:20	Leanne Fifield, Charles Scarsbrook and Andy McKay	Timaru District Community Boards	In person	161
10:40	T G Broughton		In person	065
10:50	McGregor Simpson		In person	524
11:00	David Butler		In person	075
11:10	Les Baker		In person	016
11:20	Mike Thomas		In person	607
11:30	Barrie Payne		In person	417
11:40	Mark Oldfield		In person	395
11:50	Donald McFarlane		In person	353
12:00	Angela Blair	Geraldine.nz	Remotely	034
12:10	Angela Gregg		Remotely	208

- 20 This schedule is subject to change prior to the meeting, for example if a submitter withdraws.

Submission Analysis

Key themes

- 21 While views differed on the preferred structural option, there was strong agreement that any reform must maintain effective local representation, deliver tangible outcomes for communities, and improve governance and operational performance rather than simply create a larger organisation.
- 22 A strongly recurring theme was concern about the loss of local voice and community identity. Submitters from both community and business perspectives emphasised the importance of retaining meaningful local decision-making, particularly for smaller communities such as Geraldine, Temuka, and rural areas. Many supported stronger community boards or locally delegated structures to ensure decisions remain connected to local needs.
- 23 Some submitters stated that ever-centralised decision making would likely create worse outcomes for smaller communities, including through prioritisation being given to urban amenities (that they would be unlikely to utilise but still contribute financially to) at the expense of rural amenities.

- 24 There was also significant interest in opportunities arising from reform. Supportive submitters identified potential benefits from consolidating district and regional functions, reducing duplication, improving coordination of planning and infrastructure, strengthening economic development, and bringing Environment Canterbury functions closer to the communities they serve. Business-focused submissions highlighted opportunities for more consistent regulatory processes, greater technical capability, and streamlined decision-making.
- 25 However, concerns about costs, evidence and implementation were equally prominent. Many submitters questioned whether the claimed efficiencies and economies of scale had been adequately demonstrated. Several noted the absence of detailed information about rates impacts, transition costs, debt allocation, service standards and governance arrangements. There was scepticism that larger entities automatically lead to better outcomes, with some submitters warning of increased bureaucracy, reduced accountability, and the risk of services becoming more distant from communities.
- 26 Another strong theme was the need to focus on outcomes rather than structures. Some submitters argued that any reform should be judged by improved services, infrastructure, economic growth, affordability and quality-of-life outcomes, rather than organisational design alone. Some sought clear performance measures and evidence that reform would improve value for ratepayers and outcomes for residents. Some submitters argued that local representation and more efficient service delivery could co-exist depending on system and structure design, for example through broader, regional shared service agreements.
- 27 Less frequently raised were issues relating to specific boundary configurations or river catchment arrangements. While some submitters expressed views on catchment-based boundaries and preferred merger partners, these discussions were generally secondary to broader concerns about governance quality, representation, financial sustainability and service delivery.
- 28 Where submitters proposed or advocated for an alternative structural option, the most commonly cited options were a South Canterbury and North Otago Unitary Council (excluding Ashburton) or an All-of-Canterbury (excluding Christchurch) Unitary Council.
- 29 This report does not include officer commenting, primarily due to the short timeframe between the close of submissions and the reporting deadline. Notwithstanding this, in most cases officers consider that the questions posed by submitters cannot yet be responded to in any meaningful way because the information does not exist yet, or the relevant decisions have yet to be taken.
- 30 For example, questions relating to the impact of reforms on rates or debt are likely a matter for any Detailed Design phase (and likely future community consultation once more information is known and options are available). Questions relating to the quantum of benefits a unitary council might provide to its communities will be determined by decisions that it would take once formed, regarding operating structure and service provisions.
- 31 Elected members may wish to raise particular themes, comments or questions for discussion during the meeting, or as a key negotiating priority for any outline proposal.

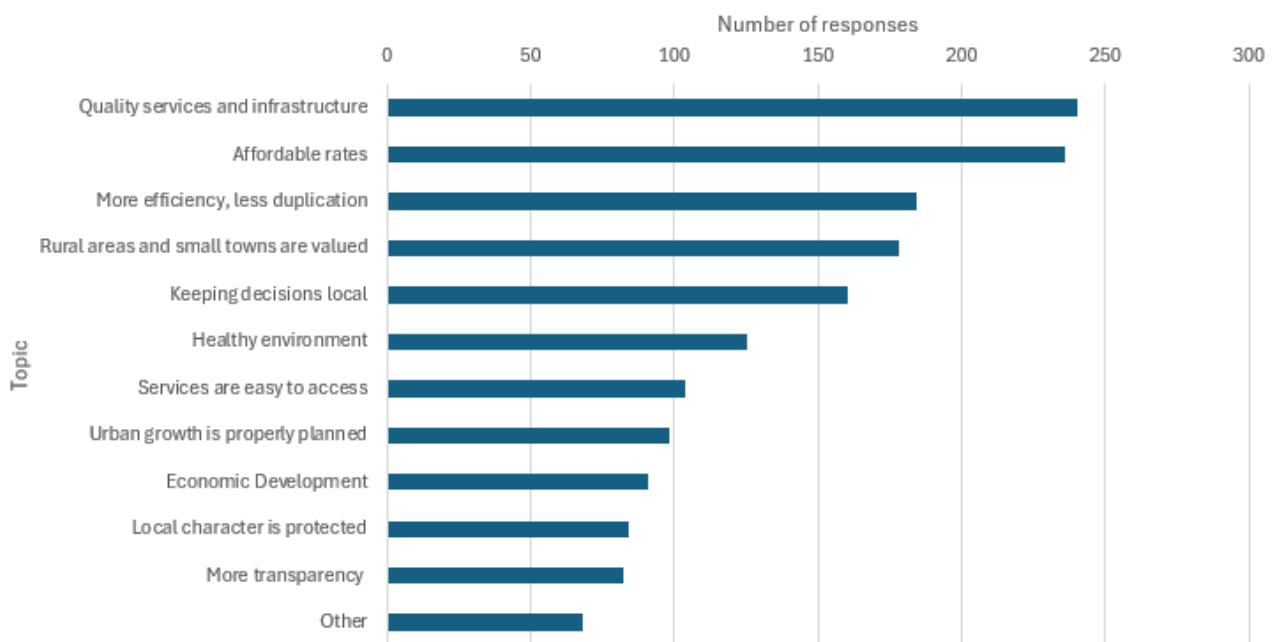
Responses: What matters most to you in any future local government structure?

- 32 Submitters were asked to identify up to five topics that were important to them.

- 33 Each topic received the following number of responses or selections, out of the total 313 submissions.

Topic	Responses
Quality services and infrastructure	240
Affordable rates	236
More efficiency, less duplication	184
Rural areas and small towns are valued	178
Keeping decisions local	160
Healthy environment	125
Services are easy to access	104
Urban growth is properly planned	98
Economic Development	91
Local character is protected	84
More transparency	82
Other	68

What matters most to you in any future local government structure?



- 34 The five most selected topics were “quality services and infrastructure”, “affordable rates”, “more efficiency, less duplication”, “rural areas and small towns are valued” and “keeping decisions local”. Most topics outside the top five received sizeable support.

- 35 Some submitters selected more than five topics, despite instructions to the contrary. Some selected less than five. The average submitter selected 5.27 topics.
- 36 Submitters who selected “Other” as an important topic were asked to provide more details. The following comments were made.

1	<i>Cultural values are incorporated at a decision making level. Local iwi to be part of/ represented on the Council.</i>
2	<i>More accountability by council. I am concerned at the unnecessary use of consultants. Council staff who are paid and qualified to make decisions need on appropriate projects need to man up.</i>
3	<i>A council that will actually listen to what the public have to say.</i>
4	<i>All of the above are important</i>
5	<i>All of the above but 'Basic Human Needs' must come first (see Maslow's Heirarchy of Human Needs). A healthy human = a RESPONSIBLE human, safe children, healthier homes and safer communities. A RESILIENT Community is a strong community. Structure is Key. What matters most in terms of Government is Truth, Transparency and Structure. What matters most in terms of Civil Defense is PRESERVATION OF LIFE.</i>
6	<i>All of the above, but little of it happens now so why should we expect it.</i>
7	<i>All of the rest of the options combined!! If you want anything in the new Council, you want it all and with more people available to pay rates there should be more to go around if spent where needed.</i>
8	<i>Communities of interest... strong communities work better together. A lot of sporting interactions already occurs with Oamaru. All 5 Councils serve rural communities and therefore think similarly. There is a nice balance with large communities in the middle and ends of the district... with only a hours drive between each centre - this will make for more balanced decisions. Good balance of economic activity, tourism farming, fishing, ports.</i>
9	<i>Competent Council</i>
10	<i>Have own Environment Council for the District not ruled from Christchurch</i>
11	<i>Having to live on a fixed income (pension) we cannot afford rate rises.</i>
12	<i>I fail to see how important decisions like this can be finalized without critical information about what happens to our assets, the local staff. Can we protect our local assets and amenities without having to share them with everyone else??</i>
13	<i>inclusion of the river catchments in any amalgamation</i>
14	<i>Less bureaucracy and rates money spent on infrastructure not nice things to have and maintain what we have Have environmental decisions made by the people that live there alongside practical people with logical outcomes</i>
15	<i>Maintenance of infrastructure is imperative.</i>

16	<i>More transparency and alerts/notifications on community messages. I listen to radio stations in Timaru and never hear community notices, alerts, reminders. It is seldom you see Facebook activity, and I feel as the rates have increased so much that we can barely afford to pay, but there is less and less visibility and transparency to where this money is going.</i>
17	<i>Not taking on another area's issues/debt,</i>
18	<i>Our councils, who have failed to provide affordable rates, must not continue to ride roughshod over the silent majority who have been beaten into submission by continual changes/ propositions. There is a perception that decisions are predetermined by councillors or hierarchy within.</i>
19	<i>People in council who aren't part of what appears to be the Timaru "old boys" club of old business men who sell local assets and waste millions of dollars on wasteful consultation projects for theatres - bring council back to basics</i>
20	<i>Please retain existing protection for the environment such as the Significant Natural Areas programmes and their associated relief of rates for these areas. Throughout the Timaru District there are Council owned reserves or managed by them such as Claremont Bush, Waitohi Bush, Oliver Reserve and many others - these must be given legal protection status so that they remain important remnants of our former extensive natural environments.</i>
21	<i>Rates are getting out of control and making home ownership difficult. Farmers are paying exorbitant rates for the lack of services they receive. Targeted rates are not reviewed or offered to the communities for consultation with a very small number of people make decisions that affect a large number of people</i>
22	<i>Rather than more efficiency, less duplication I would explain it as better internal communication, clear rules that are practical and easy to interpret</i>
23	<i>River catchments are included so the whole ecosystem is protected</i>
24	<i>River management and flood protection</i>
25	<i>School, Hospitals, housing, the economy doesn't run on charity. Our aging population is my greatest concern. People come to Timaru and Geraldine for the lifestyle. Lumping us in with Mid Canterbury jeopardises that.</i>
26	<i>That any change is of benefit to all people in the area. I do not think these changes will have any cost benefit to anyone</i>
27	<i>The locals should know what works best and economic development will occur by default if the basics are well set up and maintained.</i>

28	<i>The South Canterbury Chamber of Commerce surveyed members and received a minimal number of responses!</i> <i>Of the few that responded the focus centred on communities of interest and the need to work with districts based upon similar economies. Districts with aligned challenges and opportunities. that had the capability through population and contribution to GDP to appropriately influence and work with other third parties.</i> <i>A sound collection of stable economic drivers from across this region. (Agriculture, food processing, manufacturing, export and imports, aquaculture, construction, tourism & hospitality,</i> <i>Highly valuable water asset's and renewable power generation assets.</i> <i>Strong tourism numbers and room for future tourism demand.</i> <i>A similar rural outlook across all regions (not a metro focus).</i> <i>Concern has been raised regarding the costs of implementation and the skill sets required to govern and deliver improved and enhanced services.</i> <i>Plus the need for local voices to be heard.</i>
29	<i>Two councillors for the Geraldine ward</i>
30	<i>We need to control our water resource, if you go with Mackenzie then the other logical area is Waitaki to ensure we have a sustainable source of water for future development and growth for the entire region.</i>
31	<i>We require ongoing practical and common-sense development of our South Canterbury region. This must be affordable with quality governance. If scale is forced on us, then Mid Canterbury is a strong favourite in our opinion.</i>

Responses: Preferred Structural Option

- 32 Submitters were asked to rank the five structural options 1 through 5, with 1 being their most preferred option and 5 being their least preferred option.
- 33 The five options were:
- 33.1 Option A – A South Canterbury Unitary Council (consisting of Timaru, Mackenzie and Waimate District Councils)
 - 33.2 Option B – A Mid-South Canterbury Unitary Council (consisting of Timaru, Mackenzie, Waimate and Ashburton District Councils)
 - 33.3 Option C – A Mid-South Canterbury and North Otago Unitary Council (consisting of Timaru, Mackenzie, Waimate, Ashburton and Waitaki District Councils)
 - 33.4 Option D – Do not submit a Head Start proposal and enter the Back Stop pathway
 - 33.5 Option E – Other (an alternative structural option to Options A, B and C)
- 34 As a summary:
- 34.1 Submitters did not, overall, clearly identify a preferred structural option.
 - 34.2 Option C was the first preference of a plurality of submitters, yet was the worst performing second preference of the three substantive options (A, B and C). Unequal equal support contributed to Option C having the best median sum value but the worst mean value of the substantive options.

- 34.3 Option B was most likely to be the top or second top preference for submitters (for nearly 80% if no responses are excluded, compared to just over 50% for both Options A or C). Strong first and second preference support meant that Option B had, by a clear margin, the best mean value of the three substantive options.
- 34.4 Option A received relatively consistent support as first, second and third preferences, relative to Options B or C. It had the second best mean value of the three substantive options.
- 34.5 Most submitters clearly preferred options A, B or C relative to D or E. On aggregate, the Backstop pathway or an alternative structural option consistently scored lowest. This indicates that the main options provided during the consultation (A, B and C) reflected the majority of the communities' existing views of the most likely and viable options.
- 34.6 Responses need to be considered within the context of the overall number of submissions/ sample size of the community, the fact that some submissions did not respond to the ranking options question, and the fact that some submitters used some preference values more than once or did not rank all options.

- 35 The 313 submitters ranked these options as follows:

	Option A	Option B	Option C	Option D	Option E
1	85	85	101	17	15
2	55	132	40	8	15
3	98	29	75	20	7
4	15	18	22	101	39
5	18	10	37	84	93
No response	42	39	38	83	144

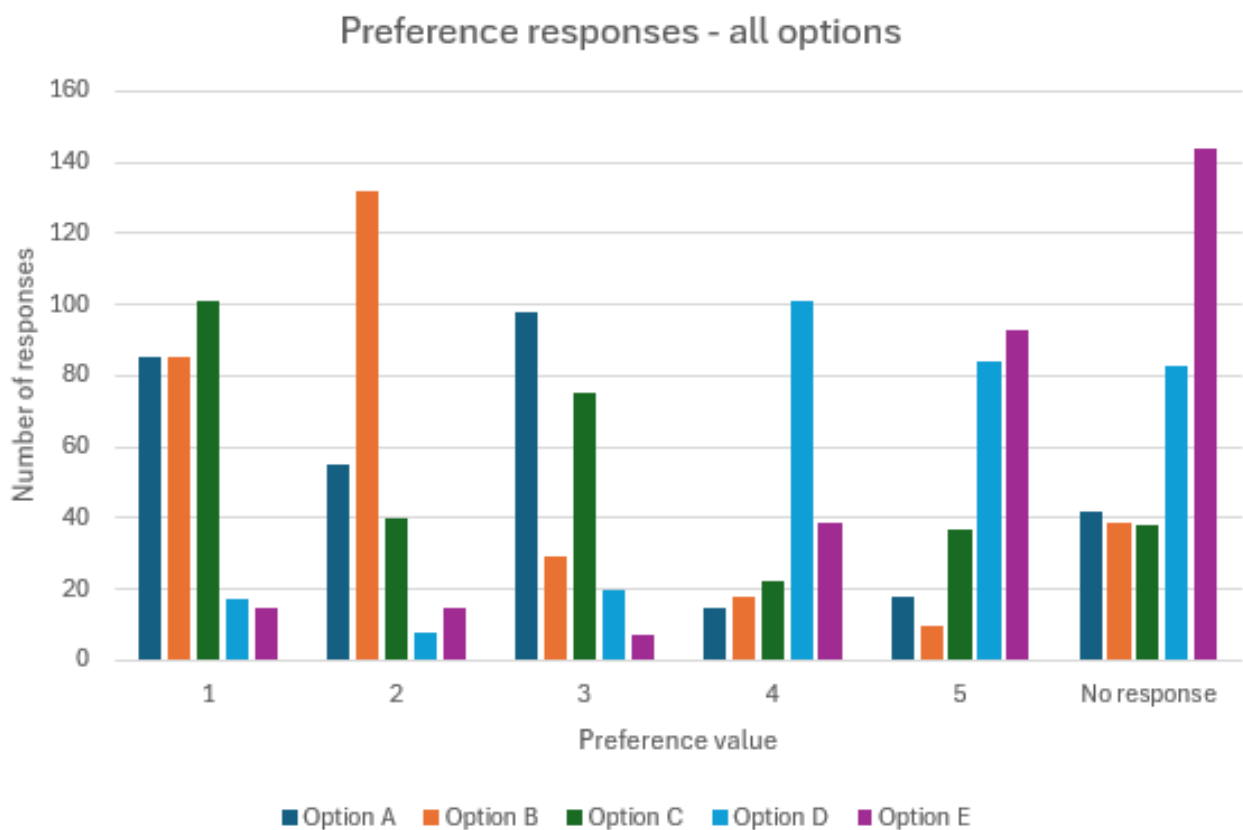
- 36 A quantitative analysis of these responses is shown below. Notes: "no response" submissions are excluded from these calculations; a relatively low mean, median, mode and median sum indicates that an option was relatively preferred; percentages may add to more than 100% because some submitters used preference values more than once.

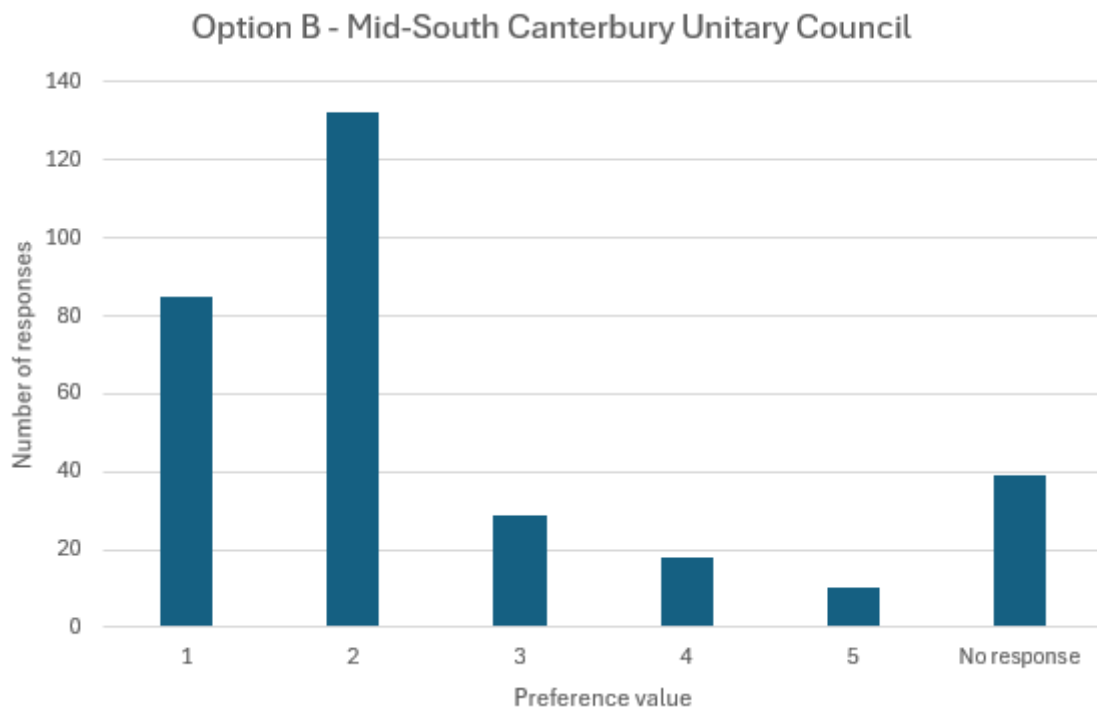
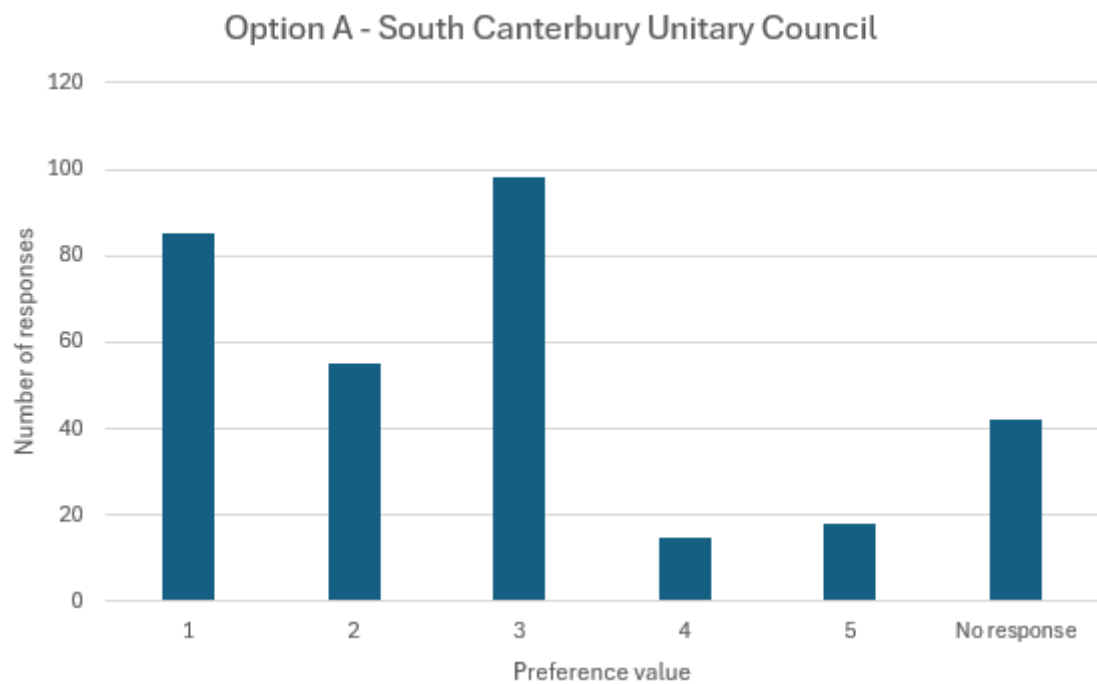
	Option A	Option B	Option C	Option D	Option E
Mean	2.35	2.04	2.46	3.98	4.07
Median	2	2	2	4	5
Mode	3	2	1	4	5
Median sum	186	189	173.5	373	264.5
% top two	51.66	79.20	51.27	10.87	17.75
% top	31.37	31.02	36.73	7.39	8.88

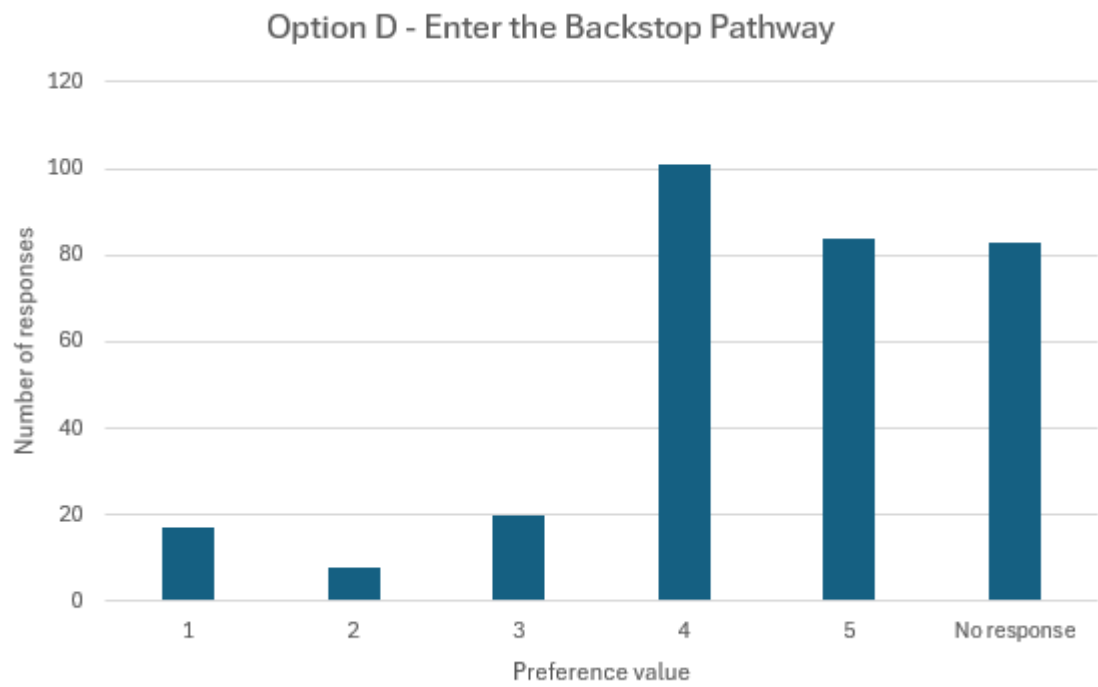
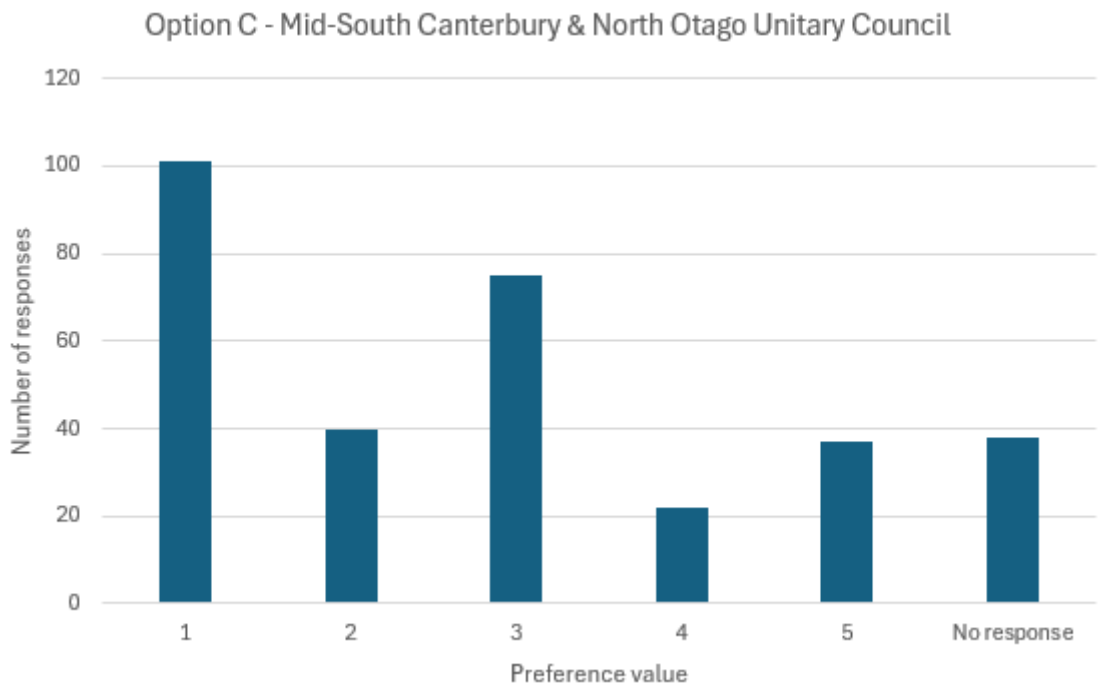
- 37 When "no response" submissions are included, the percentage of submitters that ranked each option either first, or first or second is recalculated as below.

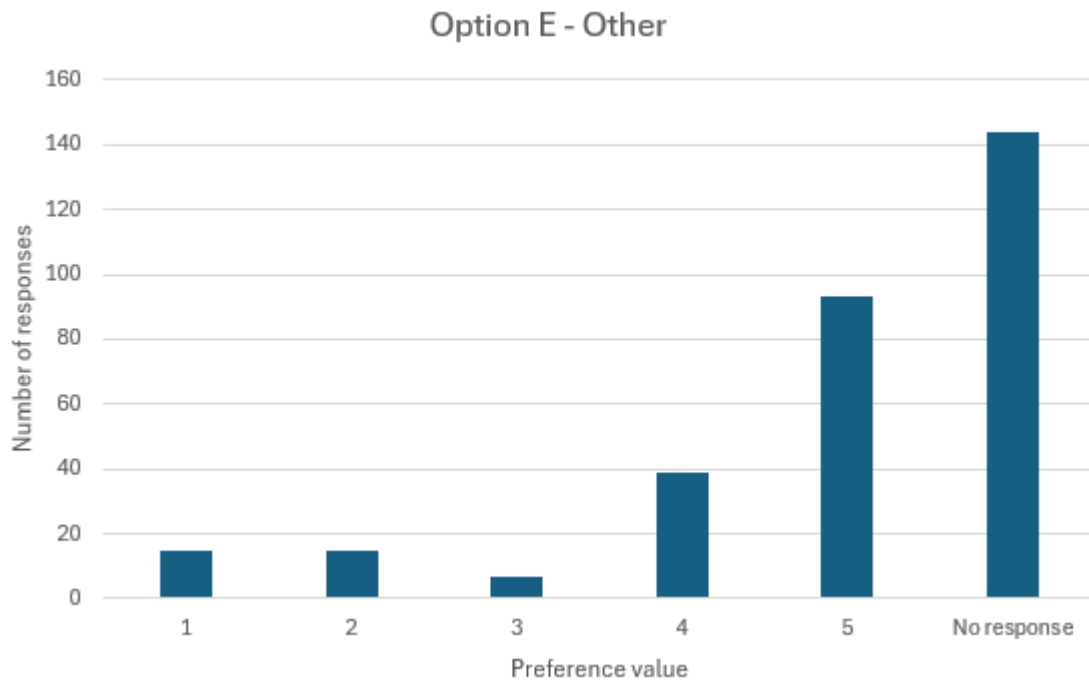
	Option A	Option B	Option C	Option D	Option E
% top two	44.73	69.33	45.05	7.99	9.58
% top	27.16	27.16	32.27	5.43	4.79

- 38 The preference responses are displayed visually below, firstly collectively and then per individual option.









- 39 Submitters who believed that another option was worthy of consideration were asked to provide more details. The following comments were made.

1	<i>3. Would the "Otago" province be happy to have a local authority in a different province</i>
2	<i>A Hurunui to Waitaki bigger option includes a lot of rural and DOC land so will need the population base of Chch to help fund. Currently Chch is the regions base for large events so we should be able to utilise them. BUT the rural communities can't be under represented just because less people live there. Population should NOT be the basis for representation.</i>
3	<i>A more catchment-specific model taking in the Rangitata catchment and Ashburton township, divesting the northern part of Ashburton to Selwyn. Divulging the Waitaki Catchment as a whole to Oamaru, not South Canterbury Unitary Authority.</i>
4	<i>A North Otago - South Canterbury Unitary. We probably need scale for Government acceptance and sustainability. Any of the A B or C options are better than Government control.</i>
5	<i>A South Canterbury plus Waitaki District Unitary Council</i>

6	<i>A unitary authority based on the Canterbury Region. This will provide a greater rating base across the region and will allow for effective provision of services like water management, river engineering and flood management, biodiversity protection, transport and quality science advice. My worry is that smaller regions as proposed will have high costs (for example servicing tourism driven infrastructure requirements in the Mackenzie Basin) with a smaller rating base. I also think that we risk losing the services provided by Environment Canterbury at the quantity and quality that they are currently. Small districts will struggle to resource flood management which could have catastrophic consequences for affected towns like Temuka.</i>
7	<i>A unitary council over the entire Canterbury region with the exception of the greater Christchurch urban area, (recognise the community of interest with Chch city), then the rest of the region goes into the 'rural' balance area of a unitary council.</i>
8	<i>Another solution is shared services, not forced political amalgamation.</i> <i>Councils can already share:</i> <i>* IT systems,</i> <i>* accounting platforms,</i> <i>* GIS,</i> <i>* procurement,</i> <i>* payroll,</i> <i>* records management,</i> <i>* web services,</i> <i>* and specialist expertise,</i> <i>without abolishing local governance or stripping communities of representation.</i> <i>Modern systems are specifically designed for multi-entity environments. Economies of scale can be achieved operationally without destroying local accountability.</i>
9	<i>Anything but this B.S. excuse of a Government deciding for us.</i>
10	<i>As a Geraldine resident who pays rates to TDC, does business in Timaru it is bad enough the we have to be lumped into the Waitaki Electorate that has NO benefit to Geraldine what so ever.</i>
11	<i>As we are a member funded association we don't wish to express an opinion on which merger is most preferred by our members.</i>
12	<i>Ashburton and Timaru should join that would then make Mackenzie, Waimate and Waitaki</i>
13	<i>Based on Catchment Boundaries - the Council comprised of the Timaru District Council, the Ashburton District Council and a partition of the MacKenzie District at the top of Burkes Pass. The line of this partition would extend southward along the crest of the Rollesby Range to the head of the Hakataramea Valley and extend northward along the top of the Two Thumb range until it intersected the boundary of the Timaru District Council overlooking the Upper Rangitata region. This would mean that all catchments east of this "divide line" will flow eastward and not westward into the MacKenzie basin.</i>

14	<i>break up of ecan and taken over by local councils based on water catchment</i>
15	<i>Canterbury wide</i>
16	<i>Collect information from your rate payers before making a decision.</i>
17	<i>Combine Timaru, McKenzie, Waitaki - leave ashburton to the northern councils</i>
18	<i>Do the headstart, but set a realistic timeline to work through the details without being hastily pressured by central government.</i>
19	<i>Dont have any control/dealings with Lake Ellesmere</i>
20	<i>Either Option A or B. are my preferred options. Option A has appeal because it appears the easiest, BUT the challenge of Option B gives incentive to grow and be more "doable" than Option C.</i>
21	<i>Expanding beyond the Waitaki south or the Rangitata North creates a management structure that won't be in touch with all the communities within it</i>
22	<i>Governance and Representation</i> <i>Local government reform should not simply consolidate existing councils into a larger organisation. It should also modernise how local government is governed.</i> <i>The Commission should consider governance models that move beyond the traditional ward-based committee structure and instead create a system that promotes strategic leadership, accountability and subject-matter expertise.</i> <i>The objective should be to establish one organisation, one executive, one strategy, but locally delivered services.</i> <i>Elected Representation</i> <i>The amalgamation of councils provides an opportunity to reduce duplication in elected governance while ensuring communities remain represented.</i> <i>Option One – Canterbury Council</i> <i>A single Canterbury Council would comprise:</i> <i>One directly elected Mayor.</i> <i>Approximately 30 elected Councillors representing Canterbury as a whole through a combination of constituency and at-large representation.</i> <i>Potential for one or more Iwi elected representatives.</i> <i>Approximately six standing governance committees with delegated authority.</i> <i>This would replace the current multiple councils and approximately 90–100 elected members across Canterbury, significantly simplifying governance while maintaining democratic representation.</i> <i>Option Two – South Canterbury Council</i> <i>A South Canterbury Council (Timaru, Ashburton, Waimate and Mackenzie, with the option for Waitaki to participate) would comprise:</i> <i>One directly elected Mayor.</i> <i>Approximately 16 elected Councillors.</i> <i>Potential for one or more Iwi elected representatives.</i>

Standing committees responsible for key council functions.

This would reduce the current number of elected members while providing governance at a scale appropriate for a population of approximately 125,000–150,000 people.

The exact number of elected members should ultimately be determined through representation reviews and community consultation, but the guiding principle should be efficient governance without compromising democratic accountability.

Functional Governance Model (Preferred)

Rather than organising decision-making solely around geographic wards, the new authority should consider a governance model based on service portfolios.

Councillors would continue to represent their communities but would also be appointed to committees responsible for defined areas of local government.

Suggested standing committees include:

Transport and Infrastructure

Environment and Water

Planning and Growth

Community and Facilities

Finance, Audit and Performance

Economic Development and Tourism

Regulatory Services

Each committee would receive delegated authority to make decisions within approved policy frameworks rather than merely acting as advisory committees.

This structure encourages elected members to develop expertise in their portfolios and focuses governance on outcomes rather than geographic competition.

Executive Leadership

Operational management should remain the responsibility of professional staff.

The organisation should comprise:

One Chief Executive.

One Executive Leadership Team.

One Finance division.

One Human Resources division.

One Information Technology division.

One Legal and Governance division.

One Procurement function.

One Communications and Engagement team.

One Asset Management function.

One Regulatory Services management structure.

One Regional Planning function.

The greatest efficiencies from amalgamation will be achieved through the consolidation of management structures rather than reducing frontline services.

Hub-and-Spoke Service Delivery

While governance and management should be centralised, operational services should remain community-based.

Existing council offices should continue as regional service hubs supported by a central corporate structure.

Examples include:

Building inspectors based throughout Canterbury.

Road maintenance depots retained in strategic locations.

Libraries and museums remaining locally operated.

Parks and recreation staff continuing to work from local depots.

Community halls managed through local service centres.

Customer service counters maintained within existing communities.

Residents should continue to receive services locally even though administration and strategic management operate as a single organisation.

This model delivers economies of scale while preserving accessibility and local knowledge.

Cabinet-Style Governance

The Commission should also consider adopting elements of a cabinet-style governance model, similar to those used by several large unitary authorities internationally.

Under this approach:

The Mayor would provide overall political leadership.

Committee Chairs would hold clearly defined governance portfolios.

Each Chair would be accountable for the performance of their service area.

Full Council would continue to set strategic direction, budgets and major policy.

For example:

Portfolio Responsibility

Transport and Infrastructure Roads, transport, Three Waters, capital projects

Environment and Water Planning, biodiversity, climate adaptation, natural hazards

Community and Facilities Libraries, parks, recreation, community halls, social housing

Finance and Performance Budgets, audit, procurement, organisational performance

Regulatory Services Building control, licensing, environmental health, compliance

Economic Development Tourism, investment, regional promotion and growth

This model provides greater accountability by assigning clear governance responsibility for major service areas.

Looking Beyond Existing Models

The Commission should not assume that a newly amalgamated authority must simply replicate the governance arrangements of today's councils.

Large unitary authorities overseas, including Cornwall Council in England, demonstrate that substantial efficiencies can be achieved by consolidating strategic governance while retaining strong local service delivery. Canterbury has the opportunity to design a governance model suited to the region's future needs rather than reproducing structures developed for much smaller councils.

Reform should therefore focus on:

Reducing duplication.

Centralising executive leadership.

Maintaining locally delivered services through a hub-and-spoke model.

Strengthening accountability through functional governance portfolios.

Encouraging region-wide strategic thinking.

Preserving community identity while improving organisational efficiency.

Overall Vision

The goal of amalgamation should be more than administrative consolidation. It should create a modern, resilient and financially sustainable organisation capable of serving Canterbury for the next generation.

Whether implemented as a single Canterbury Council or a South Canterbury Council as an interim step, reform should embrace contemporary governance principles, centralised management, functional decision-making and local service delivery. By doing so, Canterbury can achieve the efficiencies of scale expected from amalgamation while retaining the accessibility, responsiveness and community identity that residents value.

- 23 *Have a south Canterbury council and the role which ECAN presently does should be split with public transport given to the local council and the environmental role run by a South Island based organisation with one set of rules alongside this organisation local catchment groups would have a lot of input into local decision making. The new entity would be small nimble and employ very few staff as the rules would be set for implementation and staff would live and work in the area this does happen to a certain extent at present but ECAN headquarters is far too top heavy and remote and do not listen to the local officials. In many countries in the world the environmental role which our present day regional councils do is done at a national level this doesn't sound like you get local input but the guiding rules are all the same were ever you live but doing this you save 100s of millions of dollars on duplication and very disjointed and often bad outcomes both for the environment the economy and impact on people's life.*

24	<i>I believe Waitaki, Waimate, Mackenzie, Timaru should amalgamate.</i> <i>• This new Council to be called Aoraki.</i> <i>• The Kakanui mountains form a natural southern barrier and watershed.</i> <i>• I would suggest that the bottom end of Waitaki county would be better joining with Dunedin. Palmerston is south of the Kakanui range and therefore should be included in any Dunedin proposal. Dunedin is also the local people's 'community of interest'.</i> <i>• If the people in the Hampden and Moeraki (and maybe further north) area wish to be part of Dunedin, then perhaps a boundary could be created north of Hampden that runs from the sea to the mountains along say Mile Flat Road or similar.</i> <i>• However, I must emphasise that it is for the locals to make that decision.</i> <i>• To the North I would exclude the Ashburton County as it has close ties to Selwyn and Waimakariri counties further north.</i> <i>• The Rangitata River North Catchment is a comparatively small area of Ashburton and may be an area of co-operation between the eventual two local authorities.</i> <i>• It would be in Ashburton's best interests to amalgamate with Selwyn and perhaps the rural part of Waimakariri and let Urban Christchurch be its own council.</i> <i>• The urban areas of Selwyn and Waimakariri surrounding Christchurch could join with Christchurch</i> <i>• These are just my thoughts, and it is important for local people to make local decisions.</i>
25	<i>I don't have a specific goal under this option. However I rank it ahead of Option D because it will (hopefully) let us have a voice in choosing the eventual result.</i>
26	<i>I suggest, Waimate, MacKenzie, as they already align with Timaru, but also include Waitaki, a lot of people are already involved with Timaru, easier for Kurow district as well</i>
27	<i>I think that with a larger area we would have a better chance and less delaying and maintaining south Canterbury , Better for the rate payers and better knowledge and experience with what are presently other councils</i>
28	<i>I think that with a larger area we would have a better chance at delaying and maintaining south Canterbury , Better for the rate payers and better knowledge and experience with what are presently other councils</i>
29	<i>I would like that the Southern Boundary for a new Council be the old Canterbury Regional Boundary. And include a small portion of Otago to the Sea.</i> <i>The Canterbury Regional Boundary should be included form the Kakanui River to the Lindis pass. This is a common interest of the Waitaki River System.</i>
30	<i>I would like to see New Zealand taking a long view in future, this is a good start, but 4 years term would be better than 3 years for our future.</i> <i>3 years term of govt is not enough for our future, so I would like to have 4 years term.</i>
31	<i>I'd like the combination of Timaru, Waimate, Mackenzie and Waitaki districts to be considered as an option</i>
32	<i>If not five councils then my second option would be four councils but including the Waitaki catchment.</i>
33	<i>Keep as is</i>

34	<i>Leave local government structure as it is at present. Ratepayers should have their rates benefiting their community not going many kilometres away to establish facilities in a far away locality. Bring back borough and county councils. Furthermore, councils should not bother with so called consultants or contractors but have people of this nature on their staff, e.g. road construction gang - does job at cost.</i>
35	<i>Leave things as they are which is what people are saying will happen if we get a different government next election. So this issue will effect voting.</i>
36	<i>Like option C but without Ashburton - especially if Ashburton decides not to Join with the other councils.</i>
37	<i>Look at linking council areas with parliamentary electorates, which also are in serious need of reform because some are just bonkers due to the ridiculous population rules!</i>
38	<i>Maybe add Selwyn into the process</i>
39	<i>Mid South Canterbury and part of Selwyn with perhaps Selwyn River as boundary</i>
40	<i>Mid, South Canterbury and Waitaki - could also include Selwyn</i>
41	<i>Modify Option C to exclude Palmerston. The Southern boundary would be down the Kakanui range to Shag point.</i>
42	<i>My preferred option is for New Zealand to become a Constitutional Republic. In relation to this submission, Option C.</i> <i>I have spent the last 1.5 years training, planning and writing the Constitution of New Zealand with Lee Taituha along with an 8-Step Economic Reform Plan (www.unitenz.org). We are a peaceful Reformation movement. People come to us through the Education we provide on Civics and Kiwi Economics modelled on MMT (https://moslereconomics.com/mmt-white-paper/). Warren explains more here: https://youtu.be/W97s3zbFKvc?si=j6OMBqvt9GT_xyck</i> <i>We need to DEFINE, CONFINE, and REFINE the Structure of Government and I welcome you to review this body of work; there is plenty there to draw from. While others may fear change, I do not. I believe in progress, but progress must be democratic and it can be done peacefully.</i> <i>It is time to really pay attention to textualism and the systems, laws & policies that govern us. Help people to take responsibility and participate more actively in civics, especially at the local level.</i> <i>I believe this can be achieved by Local Government leveraging off the existing Co-ordinated Incident Management System (CIMS). We can't run out of Dollars but we can run out of people if they become too sick and/or disillusioned by the current system of Governance. We need a ground-up 'Basic Human Needs' approach (refer to Maslow's Hierarchy of Human Needs) parallel to Central Governments top-down CIMS approach.</i> <i>RULE OF 3: Human beings can last approximately 3 minutes without oxygen, 3 hours without shelter from extreme heat/cold, 3 days without water and 3 weeks without food.</i> <i>Oxygen = Psychological Survival Skills: understanding the Nervous System Response.</i> <i>Shelter = Building NEW homes</i> <i>Water = Efficient management</i> <i>Food = Supporting our farmers, entrepreneurs and small business owners</i>

*The Emergency Management Training Centre already offers two excellent modules:
Emergency Preparedness: CDEM Structure and Function & CIMS
Psychological First Aid*

These two modules are a great start and should be offered free of charge to civilians by utilising a 'Train the Trainer' approach. Volunteers today can become the leaders of tomorrow and this is also one way you close the Feedback Loop for communication, adaptation and progression.

Transform Councils into Local Commerce & Civics Centres as the place for education and training for anyone willing to step up and learn. The blueprint already exists, just extend it by recruiting Volunteers from the rural and remote areas. Make local learning - adult education - more convenient for people to attend.

The Geraldine Community Board formulated 8 Key Objectives in its last plan; from a CDEM perspective, these objectives are 'Functions' and those functions are important to Locals.

Having helped instigate the formation of 'Community Response Hubs' in Woodbury and Tripp Settlement, Peel Forest and Pleasant Valley I can now say from direct lived experience that this is where you should invest more money and not less in order to cast the network of communication and civil service far and wide across our newly formed region. Think Farmy Army.

In closing, as of today over 460 people have pledged their support for New Zealand to become a Republic. The data is telling me that a strong majority of them nationwide were born between 1970 and 1980 indicating that these generations are geared for change and willing to step up. We remember what life was like before the internet, raised by parents with a No. 8 wire mentality; the cornerstone of NZ Culture, Kiwi ingenuity, resourcefulness, and a 'can-do' attitude.

Having studied genetics and genealogy for many years now, I know this region has no shortage of pioneering spirit, fresh ideas, or natural leaders. What we need - as you know - is a solid foundation to our structure and I am more than happy to volunteer my time to this once-in-a-lifetime opportunity—for the future of my children and all New Zealanders.

I believe this education approach can address concerns about losing rural community voices while also stimulating real participation from younger generations in our incredibly special region. God defend New Zealand.

43 *Need to consider a wider Canterbury option, including Waimakariri and Hurunui catchment. Divide Canterbury into two unitaries - "Greater Christchurch" Urban including Rangiora, Kaiapoi, Woodend/Pegasus, Rolleston, Prebbleton and Lincoln and Provincial Canterbury including South, Mid, North and the remaining balance of Selwyn and Waimakariri. Should include Waitaki River catchment too.*

44 *No amalgamation.*

45 *No connection to Oamaru Council. They have insane rates rises and very unhappy community and a council that is so out of touch with the average person.*

46	<i>North boundary Rangitata river as in option A and maybe sharing the green optional extension with Ashburton (or not). South boundary North Otago as in option C.</i>
47	<i>North Otago should be half go South and the northern section join the Central South Unitary.</i>
48	<i>Only part of Waitaki District which includes the Waitaki River catchment and Oamaru township</i>
49	<i>Only selected this above Backstop as there should be some sort of Head Start proposal rather than none.</i>
50	<i>Open to seeing what other options might surface following public consultation</i>
51	<i>Option A should include river catchments. If this is pursued, it would make sense to include further parts of the current Waitaki District. Any solutions would need to consider what other Districts on the 'edge' i.e. Waitaki, Ashburton want to do</i>
52	<i>Option C encapsulates the Heartland concept. There are iconic rivers that need protection. Each major centre has distinct and attractive elements and economic drivers. There is a port and a mix of light industry and Fonterra. The rugby "Hanan Shield Districts" could allow eventually for a development of some sort of area identity. The combined population gives a reasonable rate payer base.</i>
53	<i>Reinstating the drainage boards would be a good idea. You're talking about the possibility of having river catchments as part of the new council and that is the only way it would be a feasible idea.</i>
54	<i>Same as option A, include Waitaki District</i>
55	<i>Say yes to Ashburton.</i> <i>Say no to Waitaki.</i>
56	<i>Seems a very natural fit with Mid & South Canterbury to the Alps using river boundaries</i>
57	<i>Shared services rather than amalgamation</i>
58	<i>SI, is so diverse the balance of headwaters to coastal waterways vs large urban areas is complex. The ECAN model was to support this in conjunction with district councils. The govt will looking at Option C through to Kaikoura, Christchurch unfortunately will be part of this! A higher level has been agreed within govt!!</i>
59	<i>Similar to option C above but without the Rakaia river catchment (sort of Waitaki + Timaru + Waimate + Mackenzie)</i>
60	<i>South Canterbury and North Otago</i>
61	<i>South Canterbury and North Otago = Timaru + Mackenzie + Waimate + Waitaki councils</i>
62	<i>South Canterbury and North Otago would have 2 river catchments rather than 3 for option B</i>
63	<i>South Canterbury/North Otago (Not Mid-Canterbury)</i>
64	<i>Status Quo</i>

65	<i>The area south of Oamaru including Palmerston and its catchment area should not be included and should go south to align more with its catchment area Waitaki boundary to south should only apply to Waitaki river catchment area and Oamaru This would need to be part of my option 1</i>
66	<i>The bigger the option the bigger the debt. Satellite offices?</i>
67	<i>The Canterbury Regional Boundary should be included from the Kakanui River to the Lindis Pass. This is a common interest of the Waitaki River System.</i>
68	<i>the current South Canterbury area plus Waitaki</i>
69	<i>The larger the unitary authority is the better, this will ensure a larger rate base to provide for the wider regional issues like river management, air and ground water quality and regional development. Otherwise we will end up with three or four small authorities duplicating these activities and services, which will in turn increase delivery costs to the ratepayers. We must take a wider, more long term view and look at options for the greater Canterbury area. Has there been any consideration to include Chatham Islands, they will need to be included in a larger authority? I understand the Chathams would come with its challenges, that are like to attract Central Government assistance. If Chathams were included in a larger authority, it would likely lock in service and support from this region, which is helpful for the local economy. We don't want to be forming unsustainable organizations and amalgamating again in another 15-20 years because of a narrow view at this time. The focus seems to be too much on the disestablishment of ECan, than the consequences of small inefficient authorities. I support the amalgamation of the activities, not at small scale.</i>
70	<i>The option of Timaru/Mackenzie/Waimate/Waitaki, with the southern part of Ashburton going south, & the northern side to the North with Selwyn, with the boundary perhaps along the line of the Hinds River. There is a degree of logic of splitting Ashburton as increasingly it is going to look North to the Rolleston/Christchurch conurbation.</i>
71	<i>The TDC should fight to retain their autonomy. Central Government has no mandate to coerce these changes. If Amalgamation is good local authorities should be left to let things evolve.</i>
72	<i>There has been no mention of the Chatham Islands. Should they be considered, Or are they someone's problem?</i>
73	<i>This unitary Council area, is a totally apt area and presents as a very feasible area of governance. The Strong rural farming sector, produces very similar product lines across the entire area. So there is your wealth creation, your centres of population essentially exist to support and service the above farm production/ The above strong production and wealth creation ties this unitary area into an easily manageable territory. Just make it happen.</i>
74	<i>This would consist of the current Timaru + Mackenzie + Waimate + Waitaki councils.</i>
75	<i>Timaru - Waimate - Mackenzie & Waitaki would seem to me to be worthy of consideration with Oamaru a possible add-on. Shared services also possible?</i>

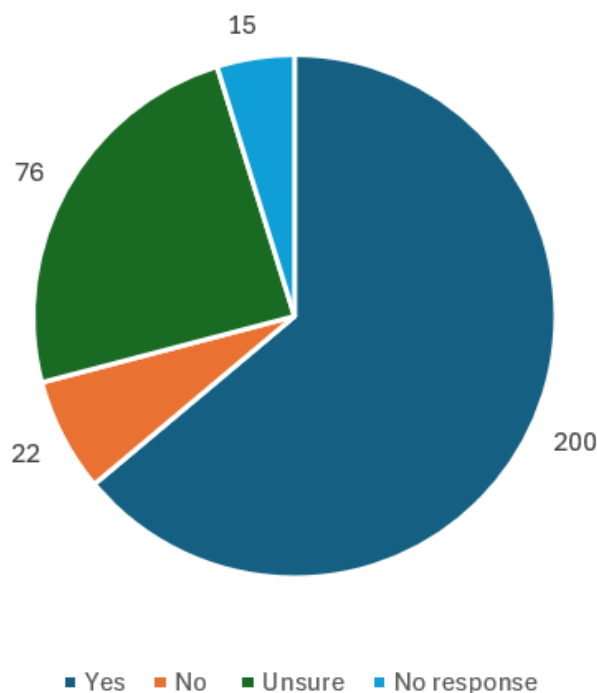
76	<i>Timaru + Waimate + Mackenzie + Waitaki (not including Waihemo ward). Southern boundary will be at Shag Point, northern boundary Rangitata river. Ashburton District should be combined with Selwyn. Waimakariri, Hurunui and Kaikoura can form a northern Canterbury block. Christchurch city should remain as its own unitary authority. Waihemo should be rejoined with Eastern Otago.</i>
77	<i>Timaru, Mackenzie, Waimate, Waitaki</i>
78	<i>We believe that we already work well with Waimate and McKenzie we would hope that you would work together and respect the expertise of these others who are already experts in their area and that no more staff is needed.</i>
79	<i>We submit that merging below the Waitaki should be strongly rejected. No community of interest and too many complicating issues South of the Waitaki.</i> <i>We strongly believe ECan has had its day. They completely overreached on environmental and with administrative empire building. Please don't let that be replicated!!</i>

Responses: River catchments as boundaries

- 80 Submitters were asked for their views on whether the boundaries of any unitary authority should be based on river catchments.
- 81 Nearly two-thirds of submitters stated that they preferred boundaries to be based on river catchments, as demonstrated via the table and visually below.

	# of responses	% of responses
Yes	200	63.90
No	22	7.03
Unsure	76	24.28
No response	15	4.79

Do you think that the resulting unitary council should include the river catchments at the edge of its territory?



Responses: Other comments

82 Submitters also had the opportunity to provide any other, free-format comments. The following comments were made.

- 1 *Option "A" has been chosen because there is already a community of interest although Waimate may need to realise that parochialism needs to move aside for the greater good of the region. There is a better chance of better representation of communities under option "A" rather than "B" and "C". Choosing "B" or more so "C" would more likely encourage the likes of Ashburton and Oamaru to feel disadvantaged or left out on a limb if attention they perceive was not given to issues within their area. That was evidenced during the last amalgamation 37 years ago. South Canterbury is in a very unique position having electricity resources at our doorstep, having the a port that handles the wonderful produce that our farmers produce for export, have great industry that provides employment opportunities, have a rowing course that is world class and is now subject to further refurbishment, have strong communities that care for their environment and the people within it, When ships berth at Timaru wharf, where to they head? Geraldine of course, the jewel in the crown. While council may think that central Government have a preference for a greater authority, I believe that we need to be brave and make a choice that better serves us rather than the government. Auckland Super City is a perfect example that proves big is not always better. Look at the mess they are in!! Option "A" is preferred by me.*

2	<i>1. Re river catchments, better management if included, but rating feasibility a question mark.</i> <i>2. Only elected councillors to have voting rights. All ratepayers to be treated equally.</i> <i>3. All ratepayers/parties to be consulted, including but not only Iwi.</i>
3	<i>4 - Yes because those river catchments are part of the communities that are in this new region and as such should be included.</i>
4	<i>50-50 With the Council on the other side of the river</i>
5	<i>A Big council should give more clout with Central Government and Big Urban Councils.</i>
6	<i>A rising tide carries all boats. As Australia models have been referred to, I am referring to where I used to live, that being Somerset region, Queensland where 3 councils merged, but the land mass is large. After the merger all ratepayers get a yearly A4 sheet a map of capital expenditure planned for their locality attached to their Rates Notice, this gives them the information showing what is planned, and even a Staged progression to the final result. It keeps the resident informed that their locality is not forgotten in the use of Rates income.</i>
7	<i>A single corporate services, management, and council governance functions will reduce waste, duplication and provide economies of scale for smaller councils. It will be easier to staff those services for smaller councils. However it's critical that practical hands on resourcing is visible and accessible, that services remain high and areas can grow and develop with a more vision and support. If local representation, voices and problem solving are lost through this process, it will never work.</i>
8	<i>After watching the council's Head Start workshop I'm surprised you deigned to include Waitaki in any options. Some comments, particularly from the mayor and CE, came across as condescending and snobbish. If nothing else, having Ashburton and Waitaki included may temper some of Timaru's "big fish in a small pond" attitude that unfortunately rears its ugly head too often.</i>
9	<i>Always full of new ideas and free any time to chat.</i>
10	<i>Amalgamation will not save money. It will just make it easier to open-up development. I lived through the amalgamation of Auckland Supa(?)City, living in rural Pukekohe and loosing Franklin County. After 15 years the consensus is that the amalgamation improved public transport, it freed up land for development and selling off water meant they could borrow for infrastructure. The integrated computer systems failed and took years to balance out.</i> <i>Our improved (?) transport system meant Pukehohe train station was closed for two years and our lovely old train station replaced with a glass and plastic one to match the others at Papakura and Manukau City. (Many commuters converting back to cars.) All this at the expense of the loss of our district heritage, good growing land and identity. Pukekohe Hill, protected under Franklin Council for it's market garden growing facilities, now has two exclusive retirement villages with fabulous views planted on it.</i> <i>Improved public transport between districts is not an issue for the South Island. Selling off/giving away water rights should not be in the gift of any government as it is vital for life. Different districts should look after their own pieces of river.</i>

11	<i>Any Local Authority amalgamation must include a focus on core business and achieving cost efficiencies from an economy of scale to control the financial burden on ratepayers. The promised outcome of this from forming the Auckland Unity Authority did NOT achieve its objectives, let's not repeat that mistake ourselves.</i>
12	<i>Any new Authority has to be large enough to counter what has been a very Christchurch urban-centric Environment Canterbury weighting. Yet localised enough to not lose touch with its roots.</i>
13	<i>Any of these options is going to have a negative effect as many people will end up without jobs - any amalgamations always does this! Regardless of anything else. Also, on the whole the larger things are the less efficient they become.</i>
14	<i>As a unitary council it is essential that river catchments be included. Councils notoriously look to escape responsibilities and there must be no opportunity for councils to pass the buck. The larger groupings are not favoured because Ashburton looks to Christchurch as its neighbour and Oamaru to Dunedin.. A Timaru based council could not do justice to either of these centres.</i>
15	<i>At the public meeting I attended the council representatives talked about joining Council that are showing growth. Ashburton clearly shows strong growth - far more than South Canterbury and North Otago. I think only some of Waitaki should be included A lot of the District is in Otago region.</i>
16	<i>Balance is critical, I think it's important to keep or improve on what each area has to offer. Being swallowed up by immalgamation on a large scale means loss of individuality and characteristics that have appeal and set one area apart from another. I want our area to stand out and be a "must see" or "go to" place.</i>
17	<i>Bigger the better! Hopefully efficiency of scale works to reduce cost</i>

18	<i>Both options keep the new council within a coherent South Canterbury / Canterbury footprint that shares an existing regional council (Environment Canterbury), a common economic geography (Christchurch-oriented trade, transport and services links), and long-standing community-of-interest ties between Timaru, Waimate and Mackenzie (and Ashburton under Option B).</i> <i>Option A offers the tightest, most locally coherent grouping and is explicitly noted by Council's own consultation material as the option the three districts "broadly agree on" already — this matters for deliverability within the Government's tight 2028 timeframe. Option B provides more scale (population ~100,900 vs ~63,500) which may better satisfy the Government's economies-of-scale requirement, without reaching outside the natural Canterbury catchment.</i> <i>Both keep river catchment management (Rangitata, and optionally Rakaia) within a Canterbury-wide context rather than fragmenting it across a regional boundary. Stay away from Waitaki, Option C would pull Waitaki District (North Otago) into a Canterbury-based unitary authority. North Otago belongs with Dunedin, not Timaru. Oamaru's people, hospitals, university pathways, media and sporting loyalties all point south to Otago, the same way Timaru's point north to Christchurch — and Otago's own reform conversation already treats Waitaki as part of Otago's future, not South Canterbury's. Absorbing North Otago on the strength of one shared river catchment, while ignoring that underlying pull, is exactly the "local voice" mismatch the consultation document itself warns against.</i>
19	<i>Bring both local borough and county councils. Local government should mean local facilities for the locals.</i>
20	<i>Canterbury plains and river catchments raises unknown dollar costs as climate change increase with increased flows with need for additional protection to people, property and stock. How is this done across whole of eastern side of alps? What happens to existing uneven debt levels in existing districts?</i>
21	<i>Catchments must be included to ensure their important functions are treated equally on each side of the river. As well as their primary function to carry water they provide important habitats for native wildlife, fish and have recreational uses as well. The whole river catchments must be sustainably managed as the whole river system plays an important part in making our overall landscapes attractive and scenic.</i>
22	<i>Clean and Green?</i> <i>Regional Councils have done a terrible job protecting our environment!!</i> <i>Change is needed!!!</i> <i>Our rivers are our most precious resource.</i>
23	<i>Concern over debts other councils / areas may have accrued.</i>

24	<i>Dealing with TDC is a nightmare so anyone else added into the mix has to be a good thing surely? Will we be voting again once this has been decided? I don't have a clue as to which option will be better. And it really doesn't matter does it. You lot don't listen. We are in so much DEBT now, what's a few more mill.</i>
25	<i>Design of representation is key and should represent industry and catchments and population in three dimensional matrix. Bigger is not always better, but scale enables investment in technology and innovation and AI and efficiency which must be pursued and delivered.</i>
26	<i>Don't merge the Council's. Learn from the big muck up that Auckland and the various Council's became when the Super City was formed. They were forced into it by the Government in 2009/2010. No referendum.....and no referendum within five years of it forming.....to see how it was going....or should it be dismantled. Many Aucklanders from that time would say it should never have gone ahead and needed dismantling now. It has not improved services/rates/etc., as it has been more costly in the long run.....services are now nearly non existent.....it now looks like a slum over lots of areas in Auckland.....there are now more staff than there ever was before when each Council had their own staff. BIG MISTAKE.....don't do this.</i>
27	<i>Either take the Waitaki District as a whole or leave it alone. Don't just cherry pick the river catchments</i>
28	<i>Fewer councillors and one Mayor should mean a saving, but that saving will be spent on consultants and researchers!! Will there be un-elected council members with a vote at meetings.</i>
29	<i>Focus on KISS principle - keep it simple smartarse! And IF Ashburton were to be included in same body as Waimate and Mackenzie, then going bigger and bringing in Oamaru is the way to go so that the "centre of gravity" of the council remains balanced. It also makes river catchment management less complex.</i>
30	<i>Fully support getting rid of environment canterbury - should have been done 20 years ago - good riddance to it.</i>
31	<i>Good governance requires the selection of very competent staff, in all managerial positions. Select only those who are proven their former appointments. This is an opportunity to utilise the wealth production of this South Island Central Unitary Council area and make this area the envy of the nation. It just requires enlightened leadership to make it hum.</i>
32	<i>Good work on the options presented. I think the Ashburton to Oamaru area, with the catchment areas of the Waitaki and Rakaia gives the greatest advantages, with respect economies of scale, protection of fresh water assets, tourism activities etc. I used to have a distribution business selling fruit juices and covered virtually the Rakaia river to Oamaru including the Mackenzie basin. Its not that big an area, but it all holds similar ideals and values</i>

33	<i>Have it run by waimate council, they seem to be more sensible and honest</i>
34	<i>Having lived through the evolution of Auckland Supacity, where the idea was sold on the basis of cost saving and reduced bureaucracy with greater efficiency, all too predictably none of this has come to pass. Any economies re staffing and bureaucratic overheads was short lived. The cynic in me suggests that without extreme care and astute management, the same mistakes will be made.</i>
35	<i>I am concerned about Waitaki being taken into the proposed amalgamation. They have huge fiscal debt, fluoridated water and unaffordable rates. They are also in Otago and over the other side of the Waitaki so it makes no sense. Unsure about the river catchments as this would mean the question needs to be asked if this means the old drainage boards will be re-established, if it's a yes then that would be a yes from me. Will the special character of South Canterbury be retained when amalgamation happens as this is something I think needs to be maintained.</i>
36	<i>I am not in favour of this change. The local bodies should be left to make their own changes.</i>
37	<i>I am opposed to national or local governance which involves any special rights or privileges based on an individuals ancestry or cultural affiliation. So equal rights for all who wish to represent us either nationally or locally. Also, no to any form of so called co-governance or unelected decision making rights for Ngai Tahu or any other tribal entity.</i> <i>As far as I'm concerned, many problems our nation faces today are the result of 40 odd years of rampant globalisation. Our nations very day to day existence & security on many levels, is now totally dependent on foreign goods/services, natural resources, banks, corporations & powers. So, with an eye on increasing global insecurity, ensuring New Zealand's food, energy, resource, manufacturing & infra-structural security will be crucial for our long term independence & survival.</i> <i>This why I am now a firm believer in much more effective national unity governance & radical localisation. So, as I see things, how NZ is governed needs reforming from the top down, not just locally. But such a process would need to be coupled with the creation of a sustainable, self reliant, long term national vision.</i> <i>I'm also very much in favour of simplifying local government, but more along the lines of small, lean, nimble & beautiful. Such a devolutionary philosophy could be woven into changes in both national & local governance.</i> <i>Also, when making changes on a local level Empire building should also be avoided. Historical regional boundaries should be respected, especially as every region of New Zealand has it's own geography, local climate, resources, unique past & stories, so strengths & weaknesses.</i> <i>Having said all this, the only option that appeals to me is D. But of course, I'm also very much in favour of developing options, so E as well.</i>

38	<i>I believe that Waitaki District should remain in the Otago region more in line with Electoral boundary</i>
39	<i>I believe there is simplicity and efficiency to be gained by unifying municipal and regional council functions. However, Council should not invest time and money into a highly uncertain and unpredictable configuration of local council amalgamation. Council's focus should remain on delivering its core functions. I also do not believe that larger scale is a silver bullet for solving council funding challenges. I think the root cause of infrastructure deficits is the rates-based funding model, which has historically been incentivised to remain artificially low due to electoral pressures. In my opinion, we need rates reform, rather than boundaries being redrawn.</i>
40	<i>I don't know the gov't proposed deadlines re the opposition to the idea of a unitary council. I think within South Canterbury it would work alright, in Temuka having the community Board on the TDC and representation we have been served well and I think the TDC has done a great job overall with things such as infrastructure and recreational reserves. The rate hike has been hard having a low income, however, I recognise this is happening nationwide. I can see Ashburton might be out on a limb as in I think they have more connection with ChCh than with us further south, however, chch may be big enough in and of itself. Going wider than South Canterbury I think will prove logistically harder as although small in population the Sth Is is big geographically and the regions as they are have diverse interests both social (demographic) and economic so building such diversity into one council would be cumbersome and time consuming and difficult to determine priorities for, alongside equitable outcomes. Oamaru also has other organisations whose primary network in terms of support and head offices are Dunedin based so to have this distinction and then to have a council that is Mid or Sth Cnty centric would not prove beneficial for their cohesion as a community.</i>
41	<i>I don't really have any qualifications, apart from living here, to make a decision about this matter. I am pleased that you are going to be investigating a full range of options. I just quite like the idea of the rivers and catchment areas, providing the boundaries. In all honesty, what I don't like is the way the current government keeps pushing their ideas through without full consultation so I am grateful for the fact that they do seem to be allowing some local input this time. I don't really understand the full implications of the changes. I wish you all the best in your considerations and hope you can come to an agreement that works the best for all areas.</i>
42	<i>I have always thought that each river catchment should be managed by one authority as one authority may have different management priorities than its neighbour. Local knowledge is important.</i>
43	<i>I know this will be ignored</i>

44	<i>I lived for 8 years in Marlborough with its unitary council, and a population of about 50,000. The system seems to work very well. I think it will be difficult to have 2 entities trying to cooperate over river catchment issues. I think option 2 or 3 will require more communication to prevent people in different towns from feeling isolated from decision making.</i>
45	<i>I prefer the larger options that include catchment. Therefore preferred option is the Waitaki catchment area in the south to the Ashburton catchment area in the North.</i>
46	<i>I support a locally led Head Start proposal rather than waiting for the backstop process. Option B strikes the right balance for South Canterbury: it brings enough scale to deliver genuine efficiency gains and reduce duplication between district and regional functions, without pushing decision making so far from our communities that local voice is lost. Option A, while the easiest to agree on, risks falling short of the Government's economies of scale test and may not solve the cost pressures we're facing. Option C adds useful catchment integration but at the cost of two further sets of external negotiation and a governance footprint that stretches too far from Timaru. Whatever option proceeds, local representation arrangements (wards, community boards, or local service centres) need to be clearly built in from the start, not left to a later phase.</i>
47	<i>I support Option B – a Mid-South Canterbury Unitary Council because it strikes the right balance between achieving the scale needed for future local government while retaining a strong connection to the communities, industries and values that define our region. Mid-South Canterbury shares common economic drivers, particularly in agriculture, food production, tourism and rural enterprise. We also share a strong sense of identity, built on resilient communities, a collaborative approach and an understanding of the opportunities and challenges that come with living and working in a predominantly rural region. This makes it a logical fit for integrated planning and decision-making. I also support the inclusion of river catchment boundaries where appropriate. Water is fundamental to the future of our region, and managing it within natural catchments provides a more strategic approach to environmental stewardship, infrastructure investment and long-term economic development. Most importantly, Option B provides the scale to deliver better outcomes without losing the local knowledge, identity and practical decision-making that our communities value. It will help ensure future governance supports sustainable economic growth, productive land use and thriving communities, while keeping decision-making close to the people and communities who understand Mid-South Canterbury best."</i>
48	<i>I think including Oamaru/waitaki is a terrible idea. The river forms a natural boundary and they are, and always have been more aligned with Otago. Keeping Canterbury together makes more sense. Their ratepayers are disgruntled with mismanagement and massive rates increases, which we don't want to see here.</i>

49	<i>I think it is really important that the unitary council should follow the river catchment boundaries. Will be messy during the setup phase but more efficient long term. I also think its really important the Ashburton and North Otago communities voices are heard and they go the way they prefer - we might like to include them but if they'd prefer to go in another direction it should be their choice.</i>
50	<i>I WAS DEEPLY INVOLVED IN THE 1989 LOCAL GOVERNMENT REORGANISATION AS THE CHIEF EXECUTIVE OF THE TIMARU DISTRICT COUNCIL AT THAT TIME. I STRONGLY SUPPORT A UNITARY COUNCIL WHICH INCLUDES RIVER CATCHMENTS</i>
51	<i>I wish this wasn't being rushed! This is significant work that should be consultative and should have some access to the proposed RMA changes! It wasn't telegraphed ahead of the last election! However, if this is a way of creating less duplication + keeping costs down, great. But where has that happened? I'm skeptical!</i>
52	<i>If combined with North Otago, do the other Councils have to cover their costs that are currently outstanding to update their infrastructure? i.e their consideration to increase rates up to 4590.</i>
53	<i>If suggested above and I have read correctly, the mid and south should be collaborated where ever possible. The way Mid Canterbury council is run is highly successful and praised, so South can't council would benefit immense from any form of co council operations</i>
54	<i>Including the catchment ensures protection for the whole river</i>
55	<i>Integrated decision-making and communication across all council functions is essential planning, consenting, compliance and environmental monitoring should work together so they all understand intended meanings and outcomes. A unitary council should provide a more coordinator, efficient and accountable service with clear ownership of decisions. If the unitary council includes major River catchments we will need more environmental/E can money to manage this</i>
56	<i>It is important when electing councillors that all districts are represented by at least one councillor from each area.</i>
57	<i>It will be hard to sell South Canterbury parochialism in Wellington. It's very likely that river catchment boundaries of regional councils will a basic determination for the decision makers, so including the Waitaki river catchment across that river would be a realistic proposition. The same principle for the Rangitata and Rakaia catchments. Obviously, reserve funds and debt relating to individual districts needs to be 'ring fenced' to stay in those districts or communities.</i>

58	<i>Keeping it small and local is incredibly important. South Canterbury is a desired destination for many. Timaru has been a fantastic place to live, with an excellent council. I have been a ratepaying resident here since 2017. I was also a homeowner and resident of North Otago/Waitaki for many years, and there is a noticeable difference in how we are viewed as ratepayers with the services and infrastructure offered. Currently, the Waimate and Timaru district councils are working very effectively; both communities seem to have their ratepayers on board and taking an active interest in what is happening, and there was a large turnout at the Waimate public meeting. However, as you know, Waitaki has had much recent community backlash over huge rate increases, and the transparency of this process has undermined faith in the council and mayor. It would be a dire shame to merge with a council in this position with the community. Why create issues?</i>
59	<i>Last option. Build a wall, keep the rabbits out. But seriously. Combining large areas into one control catchment will implement "blanket" style control measures which don't fit the full area suitably.</i>
60	<i>Local people with knowledge making decisions in future, We have to have Lake Opuha in to support Economics in future for South Canterbury</i>
61	<i>Mid and South Canterbury seems like a sensible combination, using the Rakaia River and Waitaki River as boundaries.</i>
62	<i>My concern that if no options are selected then the region may be forced into an option that no one really wants. I feel there is greater cohesion with option A. Larger is not always better</i>
63	<i>My concern with Timaru, Waimate, Mackenzie, Waitaki and Ashburton option is the area is too big, and the smaller areas will lose their peoples voices.</i>
64	<i>My preference is for Timaru, Waimate MacKenzie & Ashburton. What the council's & our citizen's preferred option for amalgamation is, may not be what other neighboring councils want. i.e they may be looking to go without including Timaru District.</i> <i>The TDC needs to look at all other council's proposals, not just one, including other councils further afield. For example if Waimate is considering going with Dunedin & Ashburton is considering going with Christchurch we may be better off going with Christchurch.</i> <i>The infrastructure costs for a small rate payer base with a large geographical area, such as TDC MDC ADC & WDC may make it difficult to keep rate increases low in the future.</i> <i>Each councils current & projected debt before amalgamation should be a consideration. If each councils current / projected debt is to be ring fenced for the rate payers base of those areas into the future then this would not be an issue. Don't burden rate payers in Timaru with any other council's current or projected debt</i>

65	<i>My submission sets out to provide feedback on how subsequent proposals can be designed to allow residents to make an informed choice on the options presented. At this stage, the assessment material underserves a decision of this level of significance for local governance.</i>
66	<i>Natural boundaries (rivers/ mountains) should define regional decision-making. South Canterbury/ Waitaki/ North Otago and Mackenzie is the logical geographic region (the Rangitata to the Waitaki R and up to Aoraki).</i>
67	<i>No.</i> <i>I do not consider river catchments, or rivers themselves, to be appropriate determinants of local government boundaries.</i> <i>Historically, many council boundaries have followed rivers because they were convenient physical landmarks. However, modern local government is responsible for delivering integrated services that increasingly extend across natural features.</i> <i>Using rivers as administrative boundaries can unnecessarily divide communities, infrastructure networks, transport corridors and economic areas. It may also create uncertainty over responsibility for assets, flood protection, river management and emergency response where responsibilities are shared between neighbouring authorities.</i> <i>Instead, establish boundaries based on communities of interest, transport connections, service delivery, economic relationships and administrative efficiency.</i> <i>Where practical, boundaries should follow surveyed cadastral boundaries or other clearly defined administrative lines rather than waterways.</i> <i>This would provide:</i> <i>Clear jurisdictional responsibility.</i> <i>Simpler governance arrangements.</i> <i>Reduced duplication between neighbouring authorities.</i> <i>Greater certainty for residents, businesses and infrastructure providers.</i> <i>Boundaries that are less likely to change over time.</i> <i>River management should continue to be undertaken through statutory planning processes, inter-agency agreements and integrated environmental management, rather than by using rivers as political boundaries.</i> <i>The primary objective should be to create logical and enduring administrative boundaries that support efficient governance and effective service delivery, rather than relying on geographical features that may no longer reflect how communities function or how public services are delivered.</i>
68	<i>Not to rush, wait to gather information and ideas on how would this work.</i>
69	<i>Only within its boundary. The boundary river will require joint management. It must be defined and practical with co-operative decisions.</i>

70	<i>OPTION A AND B HAVE CATCHMENT AREAS WHICH ARE CONFUSING FOR INSTANCE B HAS LARGE AREA ABOVE THE GORGE AND ANOTHER SMALL AREA BELOW STATE HIGHWAY ONE. OPTION A WOULD SEEM MESSY IF OAMARU WAS EXCLUDED</i>
71	<i>Option B and C should include Rakaia catchment.</i>
72	<i>Option B is my favourite purely based on Rates income. Including ADC would increase the overall income received by rates. Option A, TDC has the largest rates income out of the three districts, this would then be shared across a large geographical area. Option C has plus's and minuses. We need to consider the work ECAN carries out and the rural area's included in the new Unitary Council. We will also need to consider the resources in these area's and the spread of services.</i>
73	<i>Option C is good idea but keep Rakaia River on the south side as a boundary which would keep out the complex sites such as Te Waihora / Lake Ellesmere. Leave to another unitary council. All councils have had enough time to get on and do it. It is wasting money on legal reforms. The longer it is left the more indecision and costs incur.</i>
74	<i>Our rate base is to small to fund river catchment. we need government funding.</i>
75	<i>Perhaps it is time for all the old provincial boundaries to be put aside, and decisions be made on the future rather than the past.</i> <i>• In the past unbridged rivers were the natural boundaries. However today it is the mountain ranges which are the natural boundary, as transport links through them are much more difficult.</i> <i>• Also, mountain ranges stop the creation of 'communities of interest' much more than now bridged rivers.</i> <i>• One of the most important aspects of amalgamation is to keep communities of interest and that means keeping Rural and Urban areas in separate councils.</i> <i>• I see both Timaru and Oamaru as rural based urban areas whose livelihood is very intertwined with their rural areas.</i> <i>• Christchurch is its own economy and culture. I would very much oppose any scheme that included Christchurch.</i> <i>• Ecan's running of Canterbury as a whole suffered badly from the sheer numbers of urban representation drowning out the Rural Voice. The issues faced by the communities are quite different and need to be handled differently.</i> <i>I do not live in Timaru, but Maungati, which is closer to Timaru than Waimate and therefore our main centre. Also, I am a ratepayer in Timaru.</i> <i>I will also be submitting this proposal to Waimate council.</i> <i>Yours etc</i> <i>Barrie Payne</i>

76	<i>Piecemeal arrangements ie multi group responsibility mean that no authority really has a constructive overview.</i> <i>If many are 'responsible' then in reality no-one is. (Like communist block toilets)</i> <i>The assumption (!) is that there will be expert (not the inexperienced in offices) input for concrete decisions.</i> <i>Too often we see suggestions and no follow through.</i> <i>This applies to all suggestions around long term planning and the more immediate responses re: climate change consequences.</i> <i>Big thanks and appreciation to those responsible for constructing and circulating this excellent document, and to the Timaru Courier for its convenient layout.</i>
77	<i>PLEASE - DON'T MAKE MISTAKES OF THE PAST. IF THIS DOESN'T Go anywhere before the election and there is a change of government (like I hope there is) where will leave it leave the TDC, what is costing, probably whole lot more that it's trying to save.</i>
78	<i>Q1's restriction to five preferences is a bit tight, there are several more I could have added.</i>
79	<i>Q3: River catchments (if a territory border) should be a shared territory (pro-rata based on population) - if at all possible.</i>
80	<i>Rates shared if catchments shared . Meridian already makes a large contribution on the Waitaki catchment . Rakaia would be shared with Selwyn or new Greater Chch ! Economy of scale gives reasonable finance for catchment & environmental considerations .</i>
81	<i>My experience of the effect of amalgamations is that they usually have negative results especially for small entities on the margins. Local knowledge leads to efficiency and good communications between local bodies and citizens.</i>
82	<i>Should Geraldine not have a voice on the Unitary Council we would like one of the elected councillors appointed to represent the Geraldine area. Geraldine should at the very least retain a Community board, or similar, responsible for liaising with the elected member regarding local matters and ensuring we maintain a strong local voice. This board could be given responsibility to oversee more mundane local matters.</i> <i>Would the changes to boundaries reduce the number of MP's required and hence further reduce costs and simplify local governance?</i>
83	<i>Stop employing clowns. Shut down "Timaru Holdings Ltd" who buy properties and sell them at a loss. Councillors who have a conflict of interest in projects should not be allowed to vote e.g. Theatre Royal Project.</i>

- 84 *Thank you for the opportunity to provide feedback to Timaru District Council on the proposed local government reorganisation options. The Fuel Companies have recently had the opportunity to consider the consultation material and would appreciate the following feedback being considered.*

bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (the Fuel Companies) operate nationally and own, lease, occupy and maintain fuel terminals, bulk fuel facilities, service stations, truck stops, aviation fuel infrastructure and associated distribution networks across New Zealand. The Fuel Companies regularly engage with both territorial authorities and regional councils on planning, consenting, compliance, infrastructure and environmental matters and, as a result, have extensive experience navigating a wide range of local government structures and regulatory approaches throughout the country.

One of the greatest challenges experienced by the Fuel Companies under the current system is the inconsistency in planning frameworks, consenting processes, capability, and regulatory interpretation between jurisdictions. Consolidation into fewer, better-resourced organisations has the potential to improve consistency, efficiency, and decision-making.

The Fuel Companies support local government reform options that:

- reduce unnecessary duplication of local government functions;*
- improve coordination of planning, infrastructure and environmental management functions;*
- provide access to greater technical capability and specialist expertise;*
- result in more consistent regulatory outcomes across regions; and*
- do not increase the number of entities exercising regional functions.*

The Fuel Companies support the option to amalgamate councils within the Mid-South Canterbury Region into a single unitary authority, as this is consistent with the objective of simplifying local government by reducing duplication, retaining integrated regional functions, providing a single point of accountability, and delivering greater consistency in planning, infrastructure and regulatory decision-making across this part of Canterbury. Options to retain or create multiple organisations exercising regional functions, increases the potential for duplication, fragmented decision-making, and inconsistent regulatory outcomes across the Canterbury Region. For businesses operating across multiple districts

and regions, a single unitary authority provides the clearest pathway to a simpler, more coordinated and more efficient local government system.

Thank you for considering this feedback. If you have any questions or would like to discuss any aspect of it further, please do not hesitate to contact me.

Ngā mihi

Ana

85 *The headwaters to the sea need to be looked after by the same body for continuity. As does pest control - you can't remove pests from one area and leave them unchecked in another.*

86 *The idea of joining with debt laden Waitaki is a terrible option. It's very highly likely you have already made your decision. Look at what happened with the Alpine Energy farce. You had a buyer/buyers already lined up before the overwhelming majority of against submissions were even looked at.*

87 *The inclusion of river catchments should be considered where this makes sense with regard to regional council functions.*

88 *The new unitary council must have community boards in each local area - with more authority than present CBs. Budget, Income streams. Unitary council needs to take over all social housing and schools. It will become the real 'go to' local government for the people's daily lives and concerns. Unitary council needs to have authority to charge resource use levies, for example, water use, quarrying, factories et c., Let's call it 'Aoraki'?*

89 *The population of the largest option, Option C, is not dissimilar to non-metropolitan boroughs (150k) in the UK & substantially lower than the lowest US state population (588k) which are treated as unitary governance areas, & within the range of other democratic states in Europe. The comparison with Australia is relatively small rural councils but with very large land areas so no comparison is perfect, however across the range of comparators the combined land area and the population size of Option C both seem manageable and sustainable in a democratic representative environment, with strong governance structures as part of the "package".*

90 *The previous two local authority amalgamations have resulted in a huge decline in services and amenities to rural areas and towns whereas Timaru has created more monopolies. Any large projects or decisions (eg. Theatre Royal, Alpine Shares, Showgrounds Development, Strathallan care) should have total ratepayers' input at same time as local body elections.*

91	<i>The right thing to do is to take on the Waitaki. On paper it isn't the smart decision but it is the right thing to do and the short term pain will turn to a much bigger long term gain as we consolidate the entire central south island. Any other option eventually weakens us. Long term thinking here please and even though it isn't palatable to many, bring in the Waitaki, with us they have a voice, if they end up with Dunedin they will languish. It's the right thing to do.</i>
92	<i>The river catchments' inclusion in any option is essential. The rivers are essential to the area of any amalgamation, both environmentally and spiritually. They will be there long after us, and must be included and protected.</i>
93	<i>There are already good relationships and arrangements between Timaru, Mackenzie and Waimate. The Waitaki and Rangitata Rivers make natural territory boundaries. I think the Waitaki Council should stick with Otago.</i>
94	<i>There is no information provided on the debt level of each current council. However Waitaki, from what I have read in the media carries a lot of debt. South Mid Canterbury councils seem to be a good fit using the Waitaki and Rakaia Rivers as natural boundaries, including their catchment areas. Option B councils should not take over the significant debt of another council.</i>
95	<i>There is no way we should join with Waitaki how has huge fiscal debt, high rates and fluoride in their water. They are also part of Otago and they support the wrong rugby team. I've been told about the drainage boards and think that we should have the catchments added as long as the drainage boards are in existence.</i>
96	<i>These are LOCAL government reforms. Reform may be inevitable and even necessary but it needs to be based on more than factors such as population. It is important that whatever form our new council will take it still feels local. A huge geographic spread such as suggested in option C will erode any local character, which in turn will not help residents engage. And it is hard to see how small towns and rural areas will have a clear voice. A local council needs to have some basis in local identity and a geographic boundary that makes sense. There is a clear South Canterbury identity so merging Timaru, Mackenzie and Waimate is the best option if these reforms are going ahead.</i>
97	<i>This govt is fixated on centralization which may in this case, not a good thing.</i>
98	<i>This is completely dependent on knowing what adjacent council districts favour.</i>
99	<i>This is such a complex topic, and one that is very hard to see a big picture for the average ratepayer. I don't believe economies of scale are always the best option. Bureaucracy has a way of growing rather than shrinking, as we have seen with national government. I would like to see strong safeguards against this bureaucratic growth occurring put into place alongside the reforms.</i>

100	<i>This process is imposed by a failed government. Local government is just that. Local. The argument that costs will be reduced by amalgamation is being used by a government that has failed to provide any proof for it's claim.</i> <i>More importantly, local representation will be seriously hindered by the enormity of workload of representative councilors. Because of this realisation come election time, who will be putting their hands up? The workload instilled on representatives in what would be a mega council would mean their role would be full-time, unlike the status quo of most councilors at present. If that was the case, they should be paid well. Then do we see career councilors versus those that live, work and have a true understanding of what matters in their neighborhood, town and rural community.</i> <i>Let us not be blinded by a government that takes little care for local decision making. Local government should be retained for the sake of democracy not to save pennies.</i>
101	<i>This should include the district health board coverage over these areas</i>
102	<i>Timaru could learn a lot from Ashburton, I moved from North island to Timaru in 2008 and moved to Saint Andrews in 2025. Timaru has not guts in there council it's lacking in inspiration. You should have bigger ideas the only big thing that it has going for it is the Rock and Hop. Shut the Main Street for traffic from Coffee culture through to the old bank at least. Green space for buskers, eateries with outdoor dining, boutique shops get the bars in there. You want to encourage people into central city not just bay hill or south end of town. Move visitors is more money look at events, the theatre and rugby grounds upgrade wasn't thinking big enough you had 10 years to build a stadium for national and international events when Christchurch was down but no instead you waste rate payers money on consultants and think small but pay large to turn around and change your minds. Look at Ashburton market every weekend is huge on main road, wheels month draws in lots of people, there bars and eatery's, more businesses than Timaru that locals support.</i>
103	<i>To Timaru Council</i> <i>Council Big Reforms Decisions??</i> <i>Council jargon:</i> <i>A. Possible advantages -</i> <i>• Builds on existing economic and community connections across South Canterbury.</i> <i>• May be more deliverable within the Government's timeframe.</i> <i>• Could support better integration of local and regional functions than current arrangements</i> <i>• May provide stronger long-term planning for infrastructure, land use, freshwater, transport and economic development than current arrangements although with less scale than the larger options</i> <i>• Gives local councils and communities more influence over the shape of reform than waiting for the backstop process</i> <i>• Could reduce some duplication between district and regional council functions over time.</i> <i>• The three councils broadly agree on this approach already.</i> <i>Possible disadvantages or risks</i>

B. Possible disadvantages or risks:

- *Is likely to be too small to meet the Government's economies of scale measure*
- *Some regional functions, especially river and freshwater management, may still require cross-boundary arrangements.*
- *Detailed arrangements for assets, debt, staff, services and representation are not yet known*
- *Local voice arrangements would need careful design due to different population sizes in existing districts.*
- *Using only territorial boundaries would leave some river and catchment management issues to be managed through cross-boundary arrangements including for the Waitaki River....*

My Feedback:

The language you've shared has several features commonly found in public consultation documents. That doesn't necessarily mean it is intentionally misleading, but it is written in a way that emphasizes administrative processes and potential benefits while making it difficult for many ratepayers to understand the real trade-offs.

Here are some observations.

*Language Analysis**1. Heavy use of qualifying words The repeated use of words such as:*

"may"

"could"

"likely"

"might"

"potential"

This allows positive outcomes to be suggested without making firm commitments which is a problem.

For example:

"Could support better integration..."

This sounds positive, but it doesn't promise anything "measurable."

2. Positive framing versus cautious negatives

The advantages are written by using optimistic language:

- *stronger*
- *better*
- *integration*

- *influence*
- *long-term planning*
- *economic development*

Whereas the disadvantages are softened:

- *"likely to"*
- *"may still require"*
- *"not yet known"*

In effect the reader (The Ratepayer) comes away remembering the positives while the negatives appear temporary or manageable.

3. Administrative jargon

Terms like:

- *economies of scale*
- *integration*
- *governance arrangements*
- *representation*
- *catchment boundaries*
- *territorial boundaries*
- *freshwater management*

Mean little to many ordinary ratepayers.

The obvious question becomes:

*How will this improve my town, my rates, my roads, my parking, my CBD, my services?
When it comes down to the billions you propose on an "open Visa account."*

Those questions are largely absent.

4. Missing the local impact

Almost nothing explains:

- *Will Stafford Street improve?*
- *Will parking improve?*
- *Will Timaru CBD become more vibrant?*
- *Will rates go up?*
- *Will services improve?*
- *Will empty shops be filled?*

Instead the discussion is about governance structures--empty.

For many people, governance is not the outcome they care about!

The biggest omission

The consultation appears to ask:

"Which governance structure do you prefer?"

Rather than

"What outcomes do you want your council to achieve?"

Those are very different questions.

Many ratepayers may feel they are being asked to choose between five bureaucratic models without first establishing whether the current council has achieved its existing objectives.

Therefore, my rebuttal and submission Response is as follows:

After reading the consultation document, I am left with the impression that the discussion is centred almost entirely on changing governance structures rather than addressing the issues that matter most to ratepayers.

Throughout the document there is repeated use of words such as may, could, likely, and potential. These words create the impression of significant benefits without making "any firm commitments or measurable promises." While that may be appropriate from a legal perspective, it makes it difficult for ordinary residents to understand exactly what they are being asked to support.

The consultation appears to focus on how councils should be organised rather than what outcomes councils should deliver.

Before considering

Options A, B, C, D or E,

I believe the more fundamental questions should be:

- *How will this improve Timaru's CBD?*
- *How will this reduce vacancies in Stafford Street?*
- *How will this encourage businesses to invest?*
- *How will this improve parking?*
- *How will this improve the visitor experience?*
- *How will this improve services while keeping rates affordable?*

These are the issues residents experience every day and need to know.

Changing governance boundaries alone does not create vibrant town centres or stronger local economies.

Timaru's CBD should be one of the Council's highest priorities. A thriving town centre attracts visitors, supports local businesses, encourages investment and builds community pride. Yet the consultation gives little attention to these practical outcomes.

If Council wishes to seek support for structural reform, it should first demonstrate how any proposed model will deliver measurable improvements for communities rather than simply describing different administrative arrangements.

Good governance should be judged by visible results—not by organisational charts.

Until there is a clear vision showing how these proposed changes will improve the everyday lives of South Canterbury residents, I believe many ratepayers will remain unconvinced that changing council structures should take precedence over revitalising our town centres, improving infrastructure, supporting local businesses and delivering better value businesses and for ratepayers.

The discussion should then begin with the community's future, not with bureaucracy.

Stafford Street, for example, is at the heart of Timaru so why isn't this a larger part of governance entities? Where Council should demonstrate its ability to revitalise Timaru's existing CBD through practical projects, restructuring of the vitulization of Stafford Street which becomes more inviting, whereby, residents can see, use, and benefit from every day shopping and where the desire to remain in the CBD brings forth profit to businesses.

Look at a simple (ChatGBT architecturally generated design) of Stafford Street. Not the closure--but rather the utilization of how it can thrive. See Timaru's potential! Look at ways Stafford Street can attract people to stay in the CBD when the vibrancy becomes inviting. Timaru benefits; all is a win-win for who venture into the CBD of Timaru.

Please note--that plan

A. 5.4 billion dallors,

B. 8.4 billion dallors,

C. 10.5 billion dallors,

Is at a prohibitive cost--particularly when you do not have the money on hand, whereby you once again have to barrow and take out a loan. Plus the fact, as ratepayers, we are over stretched beyond current projections.

So NO! You cannot keep spending borrowed monies and have this "run-away Visa" spend up!

Both

D and E is what needs to be looked at, particularly Option D.

If you " The Council were a business" you would have failed and gone bankrupt long ago and never survived.

Tired of these spend ups without having the money saved over time.

104	<i>try and do the best for existing council staff within the merger process, i realise there will be duplications of roles but maybe consider sub- offices for local inquiries smaller scaled back from what is exiting. Think about the need for travel for some I.E building inspectors again working out of sub-offices but to the same set of rules. Not everything can be done electronically, sometimes a person and face is what is required. Do not lose that sense of community even in the more remote parts, have the ability to fund smaller projects in those areas. Bigger Towns funding projects should not be at the expense of smaller areas or communities.</i>
105	<i>Vital the Councils, through consultation, make their decisions by the deadline time. Efficiency and less duplication will come by getting rid of regional councils and absorbing their role into an efficient council compromising current local councils. Regional councils are too large and remote from much of the area they govern.</i>
106	<i>Waimate can teach us lessons on finance which will have long term benefits without penalising the ratepayers. We can utilise other peoples infrastructure to achieve our goals.</i>
107	<i>Waitaki river catchment should be in, but not the Rakaia catchment. The cost of managing these major river systems needs shared.</i>
108	<i>Waitaki should be included in the group of Timaru, Waimate & Mackenzie</i>
109	<i>Water catchment is one of the main drivers of this process, so control of catchments is essential for governance.</i>
110	<i>We are a part of the Canterbury Region. Being split into small unitary authorities will not serve us or our communities well. Auckland Council serves around 1.8 million people and they manage representation. Freshwater management becomes exceedingly difficult if territorial boundaries do not follow catchment boundaries.</i>
111	<i>We need more time to come up with a progressive practical economic and environmental solution there is no doubt ECAN has run its course and is out of control with 1100 employees with high turn over and inept senior management the CEO has hardly been in in South Canterbury you can run an organisation from an ivory tower in Christchurch.</i>
112	<i>What is wrong with the centre of the river being the boundary. I can find nowhere where this is not allowed. Solves a potential argument.</i>
113	<i>When Geraldine amalgamated with Timaru years ago we were promised that things would be better for us but in truth we lost everything, it was worse. Our roads, bridges and lots of other facilities have not been maintained and i can see the same thing happening with the proposed changes. All the small country towns will lose any rights they have at the moment.</i>
114	<i>Where would central office be?</i>

115	<i>While it is desirable to have some oversight into the management of the Waitaki, Rangitata, (and/or Rakaia) catchments, this a costly exercise. A return to the South Canterbury Catchment Board structure should be researched as it worked well in terms of practical and affordable management. ECan has completely overreached on environmental!!</i>
116	<i>While this is early days, achievements of the various Districts should be maintained in the further process. In regard to the Timaru District for example, this would be the progress in the District Plan review like Significant Natural Areas, Outstanding Natural Landscapes and Features, Visual Amenity Landscapes and others. Similar for the Mackenzie District progress regarding the protection of the Mackenzie Basin landscape.</i>
117	<i>Will the present council debt remain with the area or will the debt be added to the combined option.</i>
118	<i>Without knowing what the attitude of Mid-Canterbury is I believe that Option C is the only option that makes sense given the Government's expressed direction. Must however establish a Customer focus 'can do' culture under the new business model and eliminate the constant road block of can't do prevalent in Timaru.</i>
119	<i>Worried about taking on other council's debt and how this would affect our rates. Worried about having to pay for other council's aging/ill maintained infrastructure and how that affects our rates. What happens if there is a change of government-will this continue or be thrown out? Would including river catchments increase our costs substantially?</i>
120	<i>Would it be called The Aoraki District or Regional Council. 1 May and (2 Councilors from each geographical area) 6-8 or 10 Councilors? Fully paid? 1 CE with a "Manager" in each region. 1 Council HQ Timaru would appear to be halfway meeting point. Meetings by wider bimonthly physical or if urgent issue Mayor and CE to decide unless Mayor and more than half elected members call for special meeting.</i>
121	<i>Yes to Rangitata but No to Waitaki.</i>
122	<i>You don't mention anything about debt? Does the amalgamated entity inherit all the debt associated with each district? If so, we (Timaru) need to refuse amalgamation with North Otago/Waitaki 100%.</i>

Attachments

1. Head Start consultation submissions and attachments (under separate cover) 
2. Head Start - relevant correspondence received  



Mayor Nigel Bowen

Email: nigel.bowen@timdc.govt.nz

cc. Cara Fitzgerald, Gallery Director of Aigantighe Art Gallery,
Geraldine Vintage Car & Machinery Museum,
Philip Howe, Director of South Canterbury Museum,
Te Ana Māori Rock Art Centre

3 July 2026

RE: Local Government Simplification – Inclusion of Museums and Galleries in Reform Planning

As central government advances its programme of local government reform, I am writing to urge that museums and galleries be explicitly included in all consultation and planning related to amalgamation or structural reform.

The Government's focus on improving efficiency and reducing duplication presents an opportunity for councils to address long-standing fragmentation across cultural infrastructure. Museums and galleries, though funded and managed locally, are core civic assets that anchor regional identity, support education, and strengthen community cohesion.

The Proposed Local Government (System Improvements) Amendment Bill identifies "libraries, museums, reserves, and other community and recreational facilities" as core services of a local authority (clause 11A). This signals a clear expectation that cultural infrastructure remains central to council responsibilities.

Reform that reshapes governance, boundaries, or responsibilities will directly affect asset stewardship, funding settings, capital planning, and the governance of major cultural institutions. Without explicit inclusion, these institutions risk being overlooked despite their scale and public value.

Auckland's experience with amalgamation offers important lessons on governance models, asset consolidation, and the risks of involving cultural institutions too late. Councils now considering reform have a rare chance to apply these insights early.

Structural reform that shifts institutions between council-run and CCO models, or consolidates CCOs across new regional boundaries, also creates an opportunity to redesign funding models and revenue streams in a more coherent and sustainable way. Early inclusion ensures new structures are built on realistic, well-funded responsibilities rather than inherited constraints.

Given the significance of the reforms underway, we ask that councils:

- Include museums and galleries in all consultation processes related to amalgamation or structural reform.
- Engage directly with sector leaders to understand operational, financial, and governance implications.
- Recognise cultural infrastructure as essential regional infrastructure.
- Advocate for a national cultural infrastructure funding mechanism to reduce pressure on ratepayers.

Museums and galleries safeguard \$5.6 billion in cultural assets, deliver \$32 million in educational value, and anchor regional tourism and identity. As councils navigate the most significant reforms in a generation, these institutions must not be left out of the conversation.

We would be pleased to facilitate conversation or answer any questions you might have to support your council's thinking as reforms progress. Please feel free to contact us at any time.

Ngā mihi nui,



Jaenine Parkinson
Chief Executive

jaenine@museumsaotearoa.org.nz



Te Rūnanga o NGĀI TAHU

15 July 2026

His Worship Nigel Bowen
Mayor of Timaru District Council
PO Box 522
Timaru 7940

Sent via email: nigel.bowen@timdc.govt.nz

E te Koromatua, tēnā koe,

Local Government Reform – Opportunities for Te Waipounamu

I am writing regarding the Government's Head Start reform programme for local government and the opportunities it creates for the future of local governance across Te Waipounamu.

The reforms provide a once-in-a-generation opportunity to modernise our 1989 system and design local governance and service delivery arrangements that are genuinely fit for the future of South Island communities. Ngāi Tahu strongly supports all regions within our Takiwā submitting a compliant Head Start proposal by 9 August. We acknowledge the tight timeframe and appreciate the considerable work already undertaken to engage with communities and with one another.

Given the scale of the change being contemplated, it is vital that we collectively consider how new arrangements can best reflect the aspirations and needs of our communities. The decisions made now will shape community wellbeing, economic development, infrastructure delivery, environmental stewardship, and democratic representation for decades ahead. Our view is that incremental change is not enough. Simply converting existing boundaries into unitary councils will fall short of what is needed to meet the challenges before us.

As an iwi we have been reflecting carefully on what these reforms mean for Ngāi Tahu and for the communities across our Takiwā. While our thinking will continue to evolve as proposals develop, four key principles underpin our approach:

1. **Local government boundaries should align with the Ngāi Tahu takiwā boundary.** The Ngāi Tahu takiwā is a natural and enduring contour in the physical and social landscape of Te Waipounamu. Aligning local government boundaries with the Ngāi Tahu takiwā would be an appropriate acknowledgement of the “new age of cooperation” promised in our Settlement.

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Website: www.ngaitahu.iwi.nz

Te Rūnanga o Ngāi Tahu

2. **River catchments should be the primary determinant of unitary council boundaries within the Ngāi Tahu takiwā.** Catchment-based governance offers the opportunity for more integrated and effective management of freshwater, land use, biodiversity, infrastructure and hazard resilience, recognising that natural systems do not conform to current administrative boundaries.
3. **A joint takiwā-wide entity should be established to provide shared back-office and specialist functions on behalf of new unitary councils.** A shared services model could improve efficiency, reduce duplication, strengthen capability and support financially sustainable outcomes while allowing councils to maintain strong local connections and decision-making.
4. **Future arrangements should incorporate genuine cooperation between councils and Papatipu Rūnanga.** Strong council-iwi cooperation built on our enduring and legislatively anchored rangatiratanga will help ensure decisions are informed by local knowledge, long-term stewardship considerations and te Tiriti-based relationships.

We are confident that governance arrangements developed in accordance with these principles will produce an outcome that meets the Government's expectations for Head Start while delivering lasting benefits for communities across Te Waipounamu.

In our view, a future system should include three components:

1. Strong, visible, on the ground governance for inherently local matters like halls and community centres, pools, libraries, arts, heritage and other community facing services.
2. Regional or sub regional unitary councils responsible for the full suite of current regional, district and city functions.
3. A Takiwā-wide shared services entity delivering functions where scale is essential, for example data, science, IT, workforce development and other specialist capabilities.

Ngāi Tahu has significant experience operating a governance model in which strong local decision-making and authority (Papatipu Rūnanga) co-exist with a larger, more centralised entity that leverages scale for collective benefit (Te Rūnanga o Ngāi Tahu). Our hope is that communities across our takiwā come to see that such a model is both achievable and desirable within the new local government system.

I have asked the Office of Te Rūnanga to engage with councils on these ideas and explore how they may be reflected in the Head Start proposals currently under development. This engagement will be framed and informed by existing relationships and discussions between Papatipu Rūnanga and councils, as well as by the takiwā boundaries of Papatipu Rūnanga, which are independent of the reforms.

Te Rūnanga o Ngāi Tahu

As reform proposals take shape, we look forward to continuing these conversations and working alongside councils to help shape a stronger, more resilient and more effective system of local governance for Te Waipounamu.

Nāku noa, nā



Justin Tipa
Kaiwhakahaere
Te Rūnanga o Ngāi Tahu

**Parliamentary Commissioner for the Environment**

Te Kaitiaki Taiao a Te Whare Pāremata

Hon Chris Bishop
Minister for Resource Management Reform
Parliament Buildings
Wellington 6140

By email: chris.bishop@parliament.govt.nz

29 January 2026

Dear Minister

At the time you announced your intention to remove the governance level of regional councils, you also announced a rapid review of regional council statutory functions, with a view to identifying which of those functions might better be delivered by central government. Given the importance of regional councils in the current environmental management system – and my statutory role to report to Parliament on the effectiveness of that system – I asked to contribute to the review.¹

The first stage of that review, described as an initial light touch assessment, has now been completed and has recommended an odd collection of miscellaneous functions as candidates for centralisation, subject to a more detailed phase two analysis. Officials have advised you and Hon Simon Watts that resource management and biosecurity functions can instead be considered as part of separate and ongoing reform initiatives.

I am writing to you directly to raise a number of concerns you may wish to consider that could prove useful as you move forward. I clearly misunderstood the nature of the review. It is designed to fit a timetable that cannot give serious consideration to what is at stake for environmental management, given both the replacement of the Resource Management Act, and the announced decision to remove regional councillors.

I had thought that the rapid review process, while rapid, would still engage a comprehensive examination of regional council functions. Unfortunately, its scope was limited in two ways:

1. Resource management and biosecurity functions are to be considered through other processes. I am not convinced that their respective ongoing reform

¹ The nature of my interest is grounded in section 16 of the Environment Act, which provides, *inter alia*, that I should keep under review the system of agencies established to manage the environment, and under section 16 (1)(b) “investigate the effectiveness of environmental planning and environmental management carried out by public authorities”.

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Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

processes will be able to undertake a first principles review of the relevant functions. With respect to biosecurity, I understand that MPI is already drafting an amendment bill. As far as regional resource management functions go, the earliest any review of where particular functions should lie is likely to be well after the Planning and Natural Environment Bills have been enacted. By then, if the proposed approach proceeds as envisaged, the Combined Territories Boards (CTBs) will be well advanced in recommending whatever they propose despite the fact that central government will not have clarified its view of what functions should sit where.

2. For those functions that were covered by the rapid review, the question asked was what might be 'centralised'. This implied that anything that wasn't going to be centralised could be localised, i.e. conducted below the level of the region at a territorial authority level. A comprehensive first principles review should also ask what functions should **not** be fragmented and therefore should continue to be delivered at least at the regional level.

In my view, there are at least four functions that do not make sense at a level below that of the region (or at least a catchment). They are:

- catchment management to secure water and soil outcomes (including flood management)
- the management of pests and weeds and the protection of biodiversity
- compliance and enforcement of environmental regulations, and
- monitoring of and reporting on the state of the environment.

Determining regional governance arrangements, without a good sense of what functions should be conducted at what level and how, is to place form before function. It risks sub-optimal and perverse outcomes. If done poorly, the ultimate cost will fall to the Crown and it could be expensive.

Finally, while I see a political benefit in local mayors making decisions (through CTBs) about local functions, they lack the right incentives and knowledge to make decisions in respect of the functions I have identified above (and maybe others). Most of the regional functions they are being asked to consider sit well beyond their current mandates and most have no experience of them.

While unitary councils could provide an attractive solution, there is a real risk that even there CTBs will present you with proposals for many more unitary councils than the 17 regional entities you currently have. That could pose serious problems for functions, such as catchment management, that must not be fragmented. It would also run counter to the simplification your resource management reforms hope to deliver.



Parliamentary Commissioner for the Environment

Te Kaitiaki Taiao a Te Whare Pāremata

In my view, central government needs to be clear in its own mind about what functions must continue to be operated at the regional level (or elevated to the centre) and only then consider what the best governance arrangements for them might be.

I recommend that you slow down your current local government reorganisation process to give you time to complete a comprehensive review of what functions are best performed at what level, so that you can provide clear direction on what must continue to reside at regional or national level.

I would welcome a meeting with you to discuss these issues further.

Yours sincerely

Rt Hon Simon Upton

Parliamentary Commissioner for the Environment

Te Kaitiaki Taiao a Te Whare Pāremata

Cc Hon Simon Watts, Minister of Local Government



Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

Submission on the Simplifying Local Government: A draft proposal consultation document

20 February 2026

To the Department of Internal Affairs

Submitter details

This submission is from the Parliamentary Commissioner for the Environment, Simon Upton.

My contact details are:

Phone: 04 495 8350

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Parliamentary Commissioner for the Environment

The Parliamentary Commissioner for the Environment was established under the Environment Act 1986. As an independent Officer of Parliament, the Commissioner has broad powers to investigate environmental concerns and is wholly independent of the government of the day. The current Parliamentary Commissioner for the Environment is Simon Upton.

Introduction

Thank you for the opportunity to provide feedback on the consultation document titled *Simplifying Local Government: A draft proposal*. As the document notes, the primary focus of regional councils is environmental management. As a result, changes to their governance and functions go to the heart of my mandate to maintain an oversight of the agencies and processes that constitute our environmental management system.

Section 16 of the Environment Act 1986 provides, *inter alia*, that I should keep under review the system of agencies established to manage the environment, and under section 16(1)(b) “investigate the effectiveness of environmental planning and environmental management carried out by public authorities”. I deal with regional councils almost every day and am acutely aware both of what is asked of them and their performance.

The proposed reform of local government is an opportunity to ask some fundamental questions about how we manage our biophysical environment, including the potential to take some responsibilities back to the centre. I have raised questions in a number of reports about the absence of central guidance in areas as disparate as freshwater modelling and biosecurity implementation. There are also close links with the work I continue to undertake on environmental information and the need to federate the vast amount of siloed information that is currently held by agencies, including regional and local councils.

The *Simplifying Local Government* consultation document outlines a draft proposal, which is framed as the preferred approach for local government reform. My submission focusses on environmental management aspects of the proposals.

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Fundamentally, my concern is that the current process risks placing form before function. I will discuss this below before setting out alternative ways forward. In addition, the Appendix to this submission contains an assessment of some key regional environmental functions.

Placing form before function

The approach outlined in the consultation document places form before function. It proposes to remove the governance level of regional councils and to ask newly assembled Combined Territories Boards (CTBs), comprising territorial local authority (TLA) mayors, to prepare regional reorganisation plans (RRPs). This will be done without any guidance from central government about what functions **must** be delivered regionally as distinct from locally (or in some other way). Leaving CTBs to decide which functions currently undertaken regionally should be delivered by local authorities, and which should be handed to joint council-owned organisations or combined (unitary) councils. This suggests that the Crown has little idea about the extent to which it relies on the regional delivery of certain services or doesn't care how they are delivered.

The RRP's are supposed to identify all council functions in a region. This sounds like a reasonably simple task. However, a significant complicating factor is the upheaval of these functions due to ongoing reforms. How are CTBs supposed to map all relevant functions if some of these functions are the subject of reform by central government? For example, there are suggestions that compliance, monitoring and enforcement will be placed in the hands of a national compliance regulator. Outside the resource management reforms, water services and climate adaptation reforms are also changing the regional institutional landscape. In short, on current timelines, we won't fully understand what needs to be delivered – and crucially by whom – until well into the development of RRP's. This will create a great deal of uncertainty and delivery risk. This risk will be exacerbated if, for any reason, the already tight implementation timeframes are to be shortened.

More practically, local mayors were elected to make **local** decisions about **local** services. They lack the right incentives and knowledge to make decisions in respect of some critical regional functions. The regional functions they are being asked to consider sit well beyond their current mandates and most mayors have no experience of them. Given that they were elected by their territorial area – and have a statutory duty to serve that area – the incentives driving their decisions may not align with the interests of the region more broadly.¹

At the very least, if CTBs are chosen to make decisions, the current chairs of regional councils should be included on them. They were, after all, democratically elected to apply their minds to matters that cannot be managed through a patchwork quilt of local authorities. If CTBs are to provide any sort of advice on future structures, they need full access to the expertise (including advice from technical staff) that currently supports regional functions.

The Government has commissioned a 'rapid review' of what current functions could be centralised. However, as mentioned above, other processes impacting on local authority functions are already in train. Given the limited time to undertake the rapid review, those functions were left to be considered in the context of other legislative reform programmes. I am concerned that the *Simplifying Local Government* proposals will proceed without having the ownership of these functions resolved.

The rapid review also confined itself to asking "what might be centralised?" The implication was that anything that wasn't going to be centralised **could** be localised, i.e. conducted below the level of the region at a territorial authority level. A comprehensive first principles review should

¹ See sections 10 and 11 of the Local Government Act 2002.

also ask what functions should **not** be fragmented and therefore should continue to be delivered at least at the regional level. The Appendix to this submission includes my assessment of environmental functions currently delivered by regional councils.

In short, the consultation document proposes a governance solution (albeit intended to be transitional) without the Government providing clear guidance about what functions that governance might apply to. For reasons that have not been clearly articulated beyond anecdotes, the Government seems eager to be rid of elected regional councillors but has very little idea about who should take responsibility for what they are statutorily charged with delivering. It is extraordinary that the Crown has not spelt out clearly what functions it expects to be executed regionally, including its own intentions with respect to a range of functions on which all New Zealanders rely. The process that has been launched places form before function. The consequences could be very serious and prove costly to the Crown and resource users.

The risk of fragmented and poorly managed regional functions would, of course, be reduced if the end point of RRP was unitary authorities based on current regional boundaries (like Auckland or Marlborough). Reading between the lines of the Government's announcement, one is tempted to conclude that unitary authorities are the preferred (but unstated) outcome, but the politics of determining this preference has been deemed too sensitive. Perhaps the unspoken hope is that local mayors on CTBs will reach the conclusion that unitary authorities at the regional level are what is needed to 'simplify' local government.

If that is the case, it is a risky strategy. There is no guarantee that mayors on CTBs will wish to simplify themselves out of existence. Rather, there is a real risk that CTBs will present the Minister of Local Government with proposals for many more unitary authorities than the 17 regional entities that Aotearoa New Zealand currently has. For example, under the Local Water Done Well reforms, 67 territorial authorities are proposing to establish 42 water entities for delivering water services, as demonstrated by the water services delivery plans.² That sort of parochially inspired fragmentation could pose serious problems for the management of soil and water that **must** be managed at a catchment level.

River catchments form the basis for current regions, which can trace their roots back nearly a century, to the catchment boards and commissions of the 1940s and 1950s. New Zealand is one of the few countries in the world to have built scientific, technical and management capability around a coherent catchment model. It would be stupefying if, without any guidance from central government, CTBs were left free to invent wholly new entities. It would also run counter to the simplification that both the local government and the resource management reforms are aiming to deliver.

In summary, there are many functional issues to work through before the nation can settle upon an appropriate future form of local government.

A way forward

A better process would be for the Government to pause the *Simplifying Local Government* process and undertake a comprehensive review of all functions currently undertaken by regional councils and unitary authorities. The Government should reach a view about which might best be undertaken centrally, and which should continue to be handled regionally. Once functions have been triaged on that basis, an informed discussion can then ensue on the appropriate form of governance or oversight that is required for each of those functions. Some of these might lend themselves to delivery by clusters of local authorities (in a similar way to the

² For more details, see <https://www.dia.govt.nz/Water-Services-Policy-Water-Services-Delivery-Plans#Plans>. 39 of the 42 water services delivery plans have been approved, with the outstanding three amended plans due later in 2026.

arrangements developing in respect of council operated water services) and CTBs may have some useful views to share on this. But many will involve functions that simply do not intersect with the functions of local councils.

In my view, there are at least four functions that do not make sense to deliver at a level below that of the region (or at least a catchment). They are:

- catchment management to secure water and soil outcomes (including flood management)
- the management of pests and weeds (biosecurity) and the protection of biodiversity
- compliance and enforcement of environmental regulations, and
- monitoring of and reporting on the state of the environment.

More detail on the reasoning behind my focus on these four functions is available in the Appendix.

Each of these functions touches on biophysical matters that require significant scientific and technical skill sets. Gathering these skills is not easy. They are already stretched very thinly across the current 17 regional and unitary councils. The situation would be much worse if the RRP's recommended many more than 17 bodies over which that resource needs to be spread. This is not some theoretical risk: as noted before, the water services reforms have proposed 42 entities.³ The consultation document states that one of the reasons for reforming the local government sector is to reduce competition for skilled expertise.⁴ This argument only holds if functional delivery is undertaken at a more aggregated level, such as the region, or even returned to central government. Aggregation will only occur if there is direction about which functions must not be fragmented.

Regional delivery via a unitary authority (based on current catchment derived boundaries) is likely to offer the best balance of economies of scale and flexibility for many of the environmental functions of concern to me. However, it would require a great deal of consultation to settle on those genuinely district, local and place-making functions that citizens currently associate with their TLAs. While Community Boards may have been accepted in Auckland, the workability of that sort of arrangement in far-flung rural regions would need to be considered afresh.

I briefly examine below, three different approaches to delivering those functions that clearly cannot be fragmented or devolved below a regional level.

Option 1: Delivered centrally or regionally, but governed and funded centrally

Under this option, functions that are currently regional would be delivered and governed by a central government agency. An agency like the Environmental Protection Authority (EPA) would take back responsibility for complex technical functions, such as catchment management or adaptation planning. Such an approach could assist the standardisation of data, processes and frameworks. The scale also allows for the retention – and sharing nationwide – of very specialised expertise. I have previously recommended that a national freshwater modelling support centre should be established to provide national-level collaboration and coordination

³ It is possible that a region's RRP might recommend separate regional entities to manage functions separately, such as biosecurity and catchment management. That could result in many more than 42 total entities if that happens across the 17 regions.

⁴ *Simplifying Local Government* consultation document, p.10.

of technical expertise.⁵ I also made the case for an EPA with regional branches providing oversight and national leadership for gathering environmental information.⁶

Such a centre of expertise could go further and actually carry out catchment management and planning functions. New Zealand has not had an agency like this since the days of the Ministry of Works and Development. But there is no reason why a centralised model for environmental management and monitoring could not be easily constructed by making the technical and management expertise currently held within regional councils the regional nodes of such an entity. A dedicated pool of central expertise could be networked with the regional nodes to provide practical support and help overcome the fragmentation of scarce skills. There could well be efficiencies to be gained which would offset some of the costs central government would have to pick up.

Under such a model, central government would need to shoulder responsibility for the environmental management decisions that are taken, including – as they already do – complex trade-offs that affect local communities. Delivery could also be seen as distant and technocratic. The contrast with current arrangements may, however, be more apparent than real. Many of the very difficult decisions regional councils have had to make, particularly in respect to water quality, have been at the behest of central government. Many sources of community anger directed at regional councils have in fact originated in the many editions of national policy statements on freshwater. The centrally governed model described above would mean that accountability for decision-making would be transparently aligned with central government, which has always sought to control the outcomes even if regional councils have been left to defend them.

Option 2: Delivered centrally or regionally and funded centrally, but with some regulatory decisions delegated to a regional entity

It would be possible to adopt the approach outlined in Option 1, but delegate decision-making over some level of rule setting to regions. Under this approach, the efficiencies of a single technical agency could be retained but political responsibility for using that technical capability to meet environmental limits would be in the hands of the region. Given the determination to abolish regional councils, some new entity would be needed as the decision-maker. New Zealand has a tradition of catchment commissions that could be revived. Membership could be appointed, on the basis of skills, to act on behalf of central and local government. This model could help ensure that local nuances and local environments are not forgotten.

Option 3: Delivered regionally and governed and funded regionally

This approach would leave both the delivery and governance of regional functions in regional hands. Logically, unitary authorities would be the most sensible way to achieve this. The fact that the reform process excludes existing unitary authorities suggests that this is a safe landing place (although I question the exclusion from the process of Nelson and Tasman, which – as neighbouring small unitary authorities – might benefit from amalgamation). If unitary authorities are not preferred, CTBs will need to set up some sort of regional entity (or entities, if they want to manage some functions differently) that makes sense in terms of catchment boundaries. They will also need to decide how to fund such entities.

⁵ See recommendation 5 in PCE (2024). *A review of freshwater models used to support the regulation and management of water in New Zealand*. <https://pce.parliament.nz/publications/a-review-of-freshwater-models-used-to-support-the-regulation-and-management-of-water/>

⁶ See recommendation 1 in PCE (2022). *Environmental reporting, research and investment. Do we know if we're making a difference?* <https://pce.parliament.nz/publications/environmental-reporting-research-and-investment/>

Flood management and water quality management would have to be the cornerstone of any such entities as effective management requires focus on entire river networks and associated groundwater in relevant catchments. Indeed, as noted above, the precursors to regional councils were catchment boards set up under the Soil Conservation and Rivers Control Act 1941.

Regional delivery of water quality management would ensure that different parts of a river and its catchment are not managed by different entities using different limits. If fragmentation beyond the catchment level were to occur, in the context of water quantity and quality, this could mean that the allocation of water (or the right to pollute it) in the upper reaches of a catchment could restrict users in the lower catchment. In the context of flood management, it could mean that decisions taken in the upper catchment could place those in the lower catchment at greater risk.

It is, I hope, unthinkable that these functions could be fragmented. They would still have to be funded. User charges are one source of income. Another could be an environmental charge, similar to the drainage charges that New Zealand has had for the best part of a century. To the extent that everyone benefits from good environmental management, a portion of TLA rates could be devoted to the regional entities.

Balancing central, regional and local concerns

Overall, regional delivery is likely to offer the best balance of economies of scale and flexibility, for those core functions that must be delivered at least regionally. In some cases, functions could be completely centralised. State of the environment reporting and biosecurity are at least worth investigating on this basis. On the other hand, the fact that some functions must be coherent at a regional level does not mean that executing them has to be distant from local communities. Local nuances need to be taken care of. The current reality, especially in smaller councils, is that the same people on the ground often deal with biosecurity, biodiversity and catchment management. The 'face' of service delivery and regulatory responsibility can be one person working with catchment groups or talking directly to landowners. This suggests there are economies of scope in delivering these functions together at the regional level.

I have given a great deal of thought to bringing catchment management closer to communities and hapu. My report, *Going with the Grain*, points to the very significant role that catchment groups are already playing in some parts of New Zealand.⁷ Designing a restructuring of local government in New Zealand without considering how it will engage with catchment groups would be a huge omission.

The rapid review process and proposed criteria in the consultation document are unlikely to lead to any of the three options described above being fully considered. In addition, the proposed criteria are unlikely to prevent the fragmentation of functions. They do not rule out different parts of a river and its catchment being managed by different entities.

⁷ PCE (2024). *Going with the grain: Changing land uses to fit a changing landscape*.
<https://pce.parliament.nz/publications/going-with-the-grain-changing-land-uses-to-fit-a-changing-landscape/>

Recommendations

My central recommendation is that the proposed process for drawing up Regional Reorganisation Plans outlined in *Simplifying Local Government* should be paused until the government has completed a comprehensive review of regional functions and determined which (if any) should be centralised, and which must continue to be delivered and/or governed regionally.

If CTBs are to provide advice, they should only do so once the Government has made its view about central and regional functions clear. CTBs should, at the very least, include current chairs of regional councils.

If my central recommendation above isn't accepted, **I recommend inclusion of 'system coherence' as another criterion for regional reorganisation plans to explicitly require an assessment of system coherence as a whole.** This would mean answering the following questions for each of the functions mapped in the regional reorganisation plans:

- Does the regional reorganisation plan support system coherence, including successful function delivery?
- What is the optimal scale (site, sub-catchment, catchment, local, regional) for delivering functions, in order to avoid making the status quo worse (e.g. through over-fragmentation, over-centralisation, or additional duplication)?
- What do biophysical fundamentals mean for the optimal scale? (e.g. water does not flow uphill. Flood management and water management need to encompass the whole catchment, which includes the entire river and its tributaries)
- Is there a sufficient pool of expertise and resource for the function to be conducted at the level proposed?

I also note that the consultation document does not propose any adjustments to council boundaries at this stage (including in instances where current district council boundaries do not line up with regional council boundaries). In my view, any decisions on boundary changes should take into account the criterion of system coherence, including relevant biophysical considerations and optimal scale for efficient function delivery.

The consultation document proposes that the Local Government Commission will assess the regional reorganisation plans against the criteria and make a recommendation to the Minister of Local Government. Given that the primary focus of regional councils is environmental management, **I recommend that the soon-to-be established Ministry of Cities, Environment, Regions and Transport (MCERT) provides a commentary on the regional reorganisation plans to the Local Government Commission and makes this commentary publicly available.**

Another option would be to offer the Parliamentary Commissioner for the Environment an option to provide public commentary on the regional reorganisation plans, although I will in any case be monitoring any proposals in terms of my mandate under section 16 of the Environment Act.

Concluding remarks

The reform of local government is an opportunity to ask some fundamental questions about how we manage our biophysical environment, including the potential to take some responsibilities back to the centre. The way it has been launched is deeply flawed.

For the reform to succeed, central government needs to be clear in its own mind about what functions must continue to be operated at the regional level (or elevated to the centre) and only then consider what the best governance arrangements for them might be. I am seriously concerned that the current process places form before function with a risk of over-fragmentation and consequently lost opportunities for some of the efficiencies and improved effectiveness that might have been hoped for.



Rt Hon Simon Upton
Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

Appendix: Assessment of environmental functions currently delivered by regional councils

The table below captures my high-level assessment of environmental functions currently delivered by regional councils. I would expect a comprehensive review to look at these functions in more detail, including further disaggregation of the functions.

Overall, many – if not all – of the functions will benefit from more central leadership of a technical nature and in respect of environmental data, while still needing regional delivery to best take account of local circumstances.

Table: PCE assessment of environmental functions currently delivered by regional councils.⁸

Environmental functions		Comments
Biosecurity		Functions could be better allocated with a stronger and clearer split between the central level (i.e. MPI providing stronger national leadership, including technical expertise and data on biosecurity) and regional (operational) levels, to address any gaps, tensions and inconsistencies in management approaches.
Biodiversity		Functions could be better allocated with a clearer split between the central level (i.e. MfE and DOC providing stronger national leadership, including national priorities, technical expertise and data) and regional (operational) levels to address any gaps, tensions and inconsistencies in management approaches.
Integrated catchment management	River, flood and drainage management	Catchment-scale is the appropriate scale for flood management. Flood management requires focus on an entire river network across a relevant catchment. There might be a case for centralising technical expertise (including modelling expertise) and environmental data including flood mapping capabilities.
	Freshwater management (quality and quantity)	Overall, freshwater management is appropriately undertaken at a catchment-scale. Functions could be better allocated with a stronger and clearer split between central and regional government, with central government: • providing national direction with clear objectives to resolve any tensions between conflicting priorities • consistently setting minimum standards • providing national leadership in gathering environmental information and coordinating technical expertise, including modelling skills and expertise

⁸ This table excludes housing and infrastructure, building and construction, and land and maritime transport, as it focusses on environmental functions.

		- providing national leadership in undertaking enforcement and compliance activities and regional entities or unitary authorities: - giving effect to national direction and being responsible for catchment management, including management of freshwater quality and quantity, taking into account sensitive local environments and catchment circumstances. This includes local partnerships to implement relevant treaty settlement legislation.
	Land management	Overall, land management is appropriately undertaken at a catchment-scale. Functions could be better allocated with a stronger and clearer split between central and regional government, with central government: - providing national direction with clear objectives to resolve any tensions between conflicting priorities - consistently setting minimum standards - providing national leadership in gathering environmental information and coordinating technical expertise including the modelling skills and expertise needed to inform spatial planning - providing national leadership in undertaking enforcement and compliance activities and regional entities or unitary authorities: - giving effect to national direction and being responsible for catchment management, including land use, soil and erosion management, taking into account sensitive local environments and catchment circumstances. This includes local partnerships to implement relevant treaty settlement legislation.
	Developing a Natural Environment Plan	Following legislative direction, regional entities or unitary authorities will be developing a Natural Environment Plan, taking into account sensitive local environments and catchment circumstances.
	Resource management more broadly	More broadly, there is a case for central government to play a stronger role in the delivery of resource management functions, including: - providing national direction with clear objectives to resolve any tensions between conflicting priorities - consistently setting minimum standards - providing national leadership in gathering environmental information and coordinating technical expertise

		providing national leadership in undertaking enforcement and compliance activities.
Natural hazard management		There could be stronger and clearer definition of roles between central and regional entities to ensure better strategic alignment and consistent assessment of natural hazards, including centralising technical expertise and data on hazards, and addressing any accountability gaps. Further, centralising technical and science expertise needed to manage even local hazards, such as landslides, will improve its quality and affordability.
Monitoring of and reporting on the state of the environment		There is a case for stronger national leadership in gathering environmental information and coordinating technical expertise, including modelling skills and expertise. This could be delivered by the Environmental Protection Authority with a regional presence. The publication of national state of the environment reports could be a responsibility of the Parliamentary Commissioner for the Environment as a means of ensuring the integrity and independence of reporting to Parliament and the people of New Zealand.
Regional parks and other natural areas that provide biodiversity, landscape value and recreation at a regional level		Management of regional parks and other natural areas that provide biodiversity, landscape value, and recreation at a regional level is highly context specific and is appropriately undertaken by regional entities or unitary authorities.
Waste and hazardous substances		While decisions affecting local communities need to be made locally, there might be a case for stronger national leadership, to provide consistent assessments, and for centralising technical expertise and data, and coordinating technical expertise, including modelling skills



Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

Hon Chris Bishop
Minister Responsible for RMA Reform

By email: chris.bishop@parliament.govt.nz; Cc: Hon Simon Watts, Minister of Local Government; Hon Nicola Willis, Minister of Finance

20 April 2026

Dear Minister

Re: Simplifying Local Government

I am writing to draw your attention again to the risks that could be posed to the management of water in New Zealand should reforms of local government lead to responsibility for river catchments being fragmented.

I wrote to you on 29 January 2026, noting that there were several integrated catchment management functions currently undertaken by regional councils that should not be further fragmented. That letter included the following paragraph:

“While unitary councils could provide an attractive solution, there is a real risk that ... CTBs will present you with proposals for many more unitary councils than the 17 regional entities you currently have. That could pose serious problems for functions, such as catchment management, that must not be fragmented. It would also run counter to the simplification your resource management reforms hope to deliver.”

I have received no reply to that letter and want to be clear about how important it is that water is managed at the level of a catchment. Catchment management not only needs to protect water as a community and environmental asset, but must also manage the risks water can pose through flooding. New Zealand has an enviable record of managing all manner of environmental and hazard risks at the level of a catchment. The productivity of our primary sector industries and the safety of our populations depend on good management of our water resources.

Handing the management of catchments to more than one local government entity would represent the biggest step backwards in New Zealand environmental management for more than half a century.

My advice is to make it clear that whatever new units of local government are settled upon, catchment management must **not** be fragmented. If you decide to approve unitary councils at scales below that of catchments, you should then either take the function back to central government or re-establish catchment boards. These existed between the end of the Second World War and 1989.

The first option would obviously shift costs from ratepayers to the Crown, but could make more efficient use of the technical skills needed to effect good catchment management.

The second option would scarcely qualify as ‘simpler’ local government. It would also create an artificial boundary between many elements of modern environmental management – but it would be preferable to a patchwork quilt of councils focused on fragments of catchments.

Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

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Overseas experience (e.g. Australia's Murray–Darling Basin) shows that splitting up catchments can lead to poor management of floods, water extraction and water quality. Problem resolution can be difficult, as there is inevitably disagreement over who is at fault and who should pay. Central government often ends up picking up the tab.

Regions, such as the Waikato and Canterbury, pose particular challenges with unified catchment management. I believe workable solutions are available, but central government must define the parameters – one of which is catchment integrity. I am copying this letter to your colleague, the Minister of Local Government, and to the Minister of Finance who will ultimately face the fiscal consequences of policy failure in this space.

I am, as always, happy to share with you and your colleagues the insights of this office.

Yours sincerely

Rt Hon Simon Upton
Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

7.2 Adopting a Constitution for the Joint Water Organisation and confirming scope of services

Author: Elliot Higbee, Legal Services Manager

Authoriser: Stephen Doran, General Manager Corporate

Recommendation

That Council:

1. Receive and note the *Adopting a constitution for the joint Water Organisation and confirming scope of services* Report.
2. Note the Joint Shareholders Committee on 29 July 2026 will appoint a director and chairperson to the Water Organisation and provide delegated authority to them to sign all documentation required to establish the company, in consultation with the Committee's chair.
3. Endorse the recommendation of the Joint Shareholders Committee that stormwater service delivery will remain with Council.
4. Approve the draft constitution attached to enable the establishment of the joint Water Organisation.
5. Authorise the Chief Executive to take all necessary steps to establish the joint Water Organisation as a company.

Purpose of Report

- 1 This report seeks:
 - 1.1 endorsement from Council that stormwater services will remain with the Councils, and not be transferred to the joint Water Organisation (WO); and
 - 1.2 adoption of the WO's constitution.
- 2 A general delegation is also sought enabling the Chief Executive to take all necessary steps to establish the joint WO as a company.

Assessment of Significance

- 3 This report and decision are assessed as low significance as they simply implement existing Council decisions. The constitution has been developed through two meetings of the Joint Shareholders Committee, who have also had an exposure draft of this paper circulated prior to publication. External legal advice has been obtained.

Background

- 4 Timaru and Mackenzie District Councils (the Councils) have decided to establish a joint Water Organisation, as a company under the Companies Act 1993. This requires a constitution, which is the foundational document for the company and sets out the core mechanisms for the company's operation.
- 5 The constitution is subject to, and will be heavily augmented by, the Shareholders Agreement (SHA), which will come to Council in the couple of months. The SHA will deal with matters such

as reserved matters the company cannot do, shareholder entry and exit, share valuation, establishment period funding repayment, debt guarantees, harmonisation rules and restating the Joint Shareholder Committee's (JSC) terms of reference.

- 6 When the Councils entered into the commitment agreement to establish the joint Water Organisation, they delegated shareholding responsibilities and other functions and powers to the JSC. One power that the Councils retained is the power to approve the constitution.
- 7 The attached constitution has been developed using the Department of Internal Affairs template, modified following engagement with the JSC, and external legal advice. The reports to the JSC are available here:
 - 7.1 [3 June 2026 JSC Agenda, report 7.4 "Constitution and shareholders agreement for the Water Organisation"](#)
 - 7.2 [13 July 2026 JSC Agenda, report 7.4 "Foundation documents update"](#)
- 8 The attached constitution has been endorsed by the JSC, with final minor changes to reflect feedback from that meeting and with a final review circulated prior to publication of this report to JSC members.
- 9 Finally, in establishing the WO, the commitment agreement requested Officers undertake a further interrogation of the Councils' decision to retain stormwater services in house, rather than transfer these to the joint Water Organisation.
- 10 Two reports were provided to the JSC on this topic, both in the above links at report number 7.3 for both meetings.
- 11 The recommendation from the JSC was to retain stormwater services inhouse as previously decided.

Discussion

- 12 The Constitution has been drafted to reflect the commitment agreement, and fine tune the operations of the WO to ensure flexibility, and an appropriate level of shareholder governance over the company.
- 13 This flexibility includes the ability for additional new Councils to join, including for services only partially serving a district, to be transferred. The details of the drafting process are set out in the reports above at paragraph 7.
- 14 In respect of stormwater, officers spent some time as set out in the reports interrogating this option. In the end, officers were of the view that the user experience of the service was determinative – in other words how residents go about complaining about stormwater issues and obtaining appropriate regulatory approvals or guidance – along with the other advantages and disadvantages supported retaining stormwater as proposed by the Councils water service delivery plans. From the 13 July 2026 report:
 13. *Despite these issues with the status quo Officers consider that the preferred option is to retain responsibility. This is because:*
 - 13.1 *Stormwater is materially different to the other water services. Rather than a volumetric consumption / discharge-based service, stormwater services are a land use management function to mitigate nuisance from stormwater.*
 - 13.2 *Transferring responsibility for stormwater to the WO would fragment this service, because Council will retain many other significant stormwater management responsibilities:*

13.2.3 *Responsibility for transport corridor stormwater functions by law cannot transfer, and remain with council. The Council's Resource Management Act and Building Act functions all intersect heavily with stormwater management. The Council's greenspace, and parks ownership have significant stormwater functionality.*

13.2.4 *Should the Councils under the Simplifying Local Government policy framework amalgamate into a unitary authority, they will likely inherit flood management functions, which obviously have strong cross over with stormwater management.*

From the communities' point of view, it must be preferable for responsibility for stormwater management to sit with one entity.

...

- 15 For clarity, retaining stormwater services means the Councils will continue to be responsible for the service, and will be required to complete corporate reporting. As discussed in the 13 July 2026 report at para 12.3:

This means both Councils remain responsible for stormwater service delivery, and statutorily in control of policy development and pricing for the service.¹ This requires the Councils to retain capacity to oversee service delivery, including planning, reporting and financial management, as they will still need to make these decisions.

- 16 The minutes record the decision of the JSC on stormwater as follows:

7.3 Structural decision: Stormwater

1. The Legal Services Manager spoke to the report to seek the Joint Committee's endorsement of a preferred option for stormwater service delivery, to go to the respective Council's for adoption.
2. It was highlighted that if stormwater remains in house it will need to be ringfenced, and there will be a requirement to clearly identify and define stormwater to help ensure costs associated are accounted for.
3. It was also clarified that stormwater sits outside the proposed rates cap. Also, the strategy for stormwater will be complete by 01 July 2027 for Timaru District Council.
4. Further discussion included a possibility of a shared services agreement and the complexities of stormwater.

Resolution 2026/19

Moved: Cllr Michelle Pye

Seconded: Cllr Mark Adams

That the Committee:

1. Receive and note this report *Structural Decision: Stormwater*.
2. Endorse the preferred option for stormwater service delivery: that Mackenzie and Timaru District Councils' will retain responsibility for stormwater service delivery as currently provided for in their respective Water Services Delivery Plans.
3. Note that this option will mean that the Mackenzie and Timaru District Councils are the water services providers for stormwater services in their district, and will continue to be responsible for the service, including planning, reporting and financial management obligations under the Local Government (Water Services) Act 2025.
4. Note that this preferred option, if endorsed, will be presented to Council for adoption.
5. Note that Timaru District Council will, in conjunction with Mackenzie District Council, develop a shared service delivery arrangement for stormwater service with the joint water organisation.
6. Note that this arrangement will be reviewed after the stormwater risk management plan is completed, which is required by 27 August 2028.

Carried

Options and Preferred Option

- 17 Officers recommend:
- 17.1 Council retains stormwater services, and endorses the JSC's recommendation for the reasons above including the prior reports;
 - 17.2 Council adopts the proposed Constitution for the WO, and provides the general delegation to the Chief Executive (with MDC's Chief Executive) to take all necessary steps to establish the company.
- 18 Alternatively, the Council could:
- 18.1 Direct a different approach to stormwater, with a transfer requiring statutory consultation (see 13 July 2026 report at para 21 for impacts);
 - 18.2 Make changes to the constitution, which would require co-ordination with MDC; or
 - 18.3 Seek further analysis.
- 19 Officers note that these changes would impact timeframes for company establishment.

Consultation

- 20 The JSC has been involved in the matters within this report as set out above.

Relevant Legislation, Council Policy and Plans

- 21 Local Government Act 2002
- 22 Local Government (Water Services) Act 2025
- 23 Companies Act 1993

Financial and Funding Implications

- 24 No further financial or funding implications where available at the time of publishing this report.

Other Considerations

- 25 There are no further considerations.

Attachments

1. FINAL Constitution of Central South Island Water Limited [!\[\]\(3d0946c14414af438def0008e8322b30_img.jpg\) !\[\]\(828aaf7b071d1ea02a45562329097457_img.jpg\)](#)

Constitution of Central South Island Water Limited

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1. DEFINITIONS AND INTERPRETATION

1.1 In this Constitution, unless the context otherwise requires:

"Board" means Directors who number not less than the required quorum, acting together as a board of Directors.

"Board Skills Matrix" has the meaning given to it in the Shareholders' Agreement.

"Business Day" means a day (other than a Saturday, a Sunday or a public holiday) on which registered banks are open for business in South Canterbury, New Zealand.

"Chair" means the chair of the Board appointed in accordance with clause 12.8.

"Companies Act" means the Companies Act 1993.

"Company" means Central South Island Water Limited.

"Constitution" means this constitution of the Company (including the Schedules) and all amendments to it from time to time.

"Class A Shares" means Shares in the Company with the rights attaching to those Shares as set out in clause 4.3.

"Class B Shares" means Shares in the Company with the rights attaching to those Shares as set out in clause 4.4.

"Director" means a person appointed as a director of the Company in accordance with this Constitution.

"Distribution" means the payment of a dividend and any other "distribution" as that term is defined in section 2 of the Companies Act.

"Financial Year" has the meaning set out in the LG(WS) Act.

"Independent Director" means a Director who is neither a current elected member of any Local Authority that is a Shareholder nor a current employee of any Shareholder or the Company.

"LGA" means the Local Government Act 2002.

"LGOIMA" means the Local Government Official Information and Meetings Act 1987.

"LG(WS) Act" means the Local Government (Water Services) Act 2025.

"Local Authority" has the meaning set out in section 5 of the LGA.

"Ordinary Resolution" means a resolution that is approved by a simple majority of the votes of those Shareholders entitled to vote and voting on the question.

"Reserved Matters" has the meaning given to it in the Shareholders' Agreement.

"Service Area" means:

- (a) the context of the Company, as set out in the LG(WS) Act; and
- (b) in respect of each Shareholder, the 'district' (or part district) of that Shareholder as a 'territorial authority' (as those terms are defined in the LGA).

"Shares" means the shares in the Company on issue from time to time, and includes the Class A Shares and the Class B Shares.

"Shareholder" means any person for the time being registered in the Company's share register as the holder of one or more Shares in the Company.

"Shareholders' Agreement" means the shareholders' agreement relating to the Company to be entered into between the Company and the Shareholders within six months of the date of this Constitution (as amended or replaced from time to time).

"Joint Shareholders Committee" has the meaning set out in the Shareholders' Agreement.

"Special Resolution" means a resolution that is approved by at least 75% of the votes of those Shareholders entitled to vote and voting on the question.

"Statement of Expectations" has the meaning given to it in section 220 of the LG(WS) Act.

"Subsidiary" has the meaning set out in the Companies Act.

"Water Organisation" has the meaning set out in section 4 of the LG(WS) Act.

"Water Services" has the meaning set out in section 4 of the LG(WS) Act, and for the purposes of this document shall be the water supply services and wastewater services transferred by the territorial authorities that established the Water Organisation in accordance with the Transfer Agreement between each territorial authority and the Water Organisation.

"Water Services Annual Budget" has the meaning set out in section 220 of the LG(WS) Act.

"Water Services Annual Report" has the meaning set out in section 220 of the LG(WS) Act.

"Water Services Strategy" has the meaning set out in section 220 of the LG(WS) Act.

1.2 **Interpretation:** In this Constitution, the following rules of interpretation apply, unless the context requires otherwise:

- (a) headings are for convenience only and do not affect interpretation;
- (b) the singular includes the plural and vice versa, and a gender includes other genders;
- (c) another grammatical form of a defined word or expression has a corresponding meaning;

- (d) words in this Constitution have the same meaning as in the Companies Act unless inconsistent with the context;
- (e) a reference to a party, person or entity includes:
 - (i) an individual, firm, company, trust, partnership, joint venture, association, corporation, body corporate, estate, state, government or any agency thereof, municipal or local authority and any other entity, whether incorporated or not (in each case whether or not having a separate legal personality); and
 - (ii) an employee, agent, successor, permitted assign, executor, administrator and other representative of such party, person, entity;
- (f) a reference to dollars or \$ is to New Zealand currency and excludes every tax and duty;
- (g) a reference to a clause or schedule is to a clause or schedule of this Constitution;
- (h) a reference to a statute, ordinance, code or other law includes regulations and other instruments under it and consolidations, amendments, re-enactments or replacements of any of them;
- (i) references to the word 'include' or 'including' are to be construed without limitation;
- (j) references to any form of law is to New Zealand law, including as amended or re-enacted;
- (k) a reference to a document or instrument includes the document or instrument as novated, altered, supplemented or replaced from time to time;
- (l) "written" and "in writing" include any means of reproducing words, figures or symbols in a tangible and visible form;
- (m) any obligation falling due for performance on or by a day other than a Business Day shall be performed on or by the Business Day immediately following that day; and
- (n) an obligation not to do something includes an obligation not to allow or cause that thing to be done.

1.3 If there is any conflict:

- (a) between a provision of this Constitution and the provisions of the Shareholders' Agreement, the terms of the Shareholders' Agreement will prevail (other than to the extent prohibited by the Companies Act) and the Shareholders must pass such resolutions as may be necessary to amend the provisions of this Constitution to make it consistent with the Shareholders' Agreement;
- (b) between a provision in this Constitution and a mandatory provision in the Companies Act, the LG(WS) Act, LGOIMA or the LGA, then the mandatory provision in the Companies Act, the LG(WS) Act, LGOIMA or the LGA will prevail; and

- (c) between:
 - (i) a provision in this Constitution and a provision in the Companies Act which is expressly permitted to be altered by this Constitution; or
 - (ii) a word or expression defined or explained in the Companies Act and a word or expression defined or explained in this Constitution,

then the provision, word or expression in this Constitution will prevail.

2. CAPACITY AND OBJECTIVES

- 2.1 **Water Organisation:** As at the date of its incorporation, the Company is a Water Organisation in terms of section 44 of the LG(WS) Act.
- 2.2 **Business:** The Company must not carry on any business other than the provision of, or preparation for the provision of, Water Services and activities that are related to, or necessary for, the provision of, or preparation for the provision of, Water Services, in order to meet the objectives as set out in section 17 of the LG(WS) Act.
- 2.3 **Purpose:** In carrying out its business, the Company will:
 - (a) deliver safe, reliable and financially sustainable Water Services across the Service Areas;
 - (b) support the collective resilience and wellbeing of the South Canterbury region; and
 - (c) operate in a manner that is responsive to the differing needs and contexts of its communities, and taking into account environmental and cultural stewardship.
- 2.4 **Capacity:** Subject to this Constitution, the Shareholders' Agreement, the Companies Act, the LG(WS) Act, the LGA and the Statement of Expectations, the Company has full capacity, rights, powers and privileges to carry on or undertake any business or activity, do any act, or enter into any transaction.
- 2.5 **Compliance:** The Company must give effect to the contents of the Statement of Expectations when conducting its business and setting its Water Services Strategy.

3. WATER ORGANISATION REQUIREMENTS

- 3.1 The Company must comply with:
 - (a) all of the obligations and requirements that apply to a Water Organisation and water service provider under the LG(WS) Act and any other legislation;
 - (b) all applicable statutory and regulatory obligations relating to Māori and the Treaty of Waitangi, including those set out in the LGA and LG(WS) Act; and
 - (c) the applicable parts of the LGOIMA (Parts 1 to 7).
- 3.2 In relation to the Company's preparation of its Water Services Strategy, the Joint Shareholders Committee:

- (a) will be able to provide comments on the draft strategy, but will not have the power to require changes or approve the final strategy.
- 3.3 As specified in section 242 of the LG(WS) Act, this process will also apply to the Company's preparation of its Water Services Annual Budget (with any necessary modifications).
- 3.4 **Auditor:** In accordance with the LG(WS)A, the auditor for the Company will be the Auditor General.
- 4. SHARES**
- 4.1 **Pari Passu:** Save as expressly provided in this Constitution, a board resolution specifying any specific terms attaching to Shares or as otherwise required by law, all Shares will rank pari passu in all respects.
- 4.2 **Share Classes:** The Company may issue shares conferring entitlements that differ from the ordinary shareholder rights conferred by the Companies Act, including Class A Shares and Class B Shares, each having the rights set out in this Constitution.
- 4.3 **Class A Shares:** Class A Shares shall have the following rights attached to them:
 - (a) the right to receive notice of and attend every meeting of Shareholders; and
 - (b) the right to one vote on a poll at a meeting of the Company on any resolutions,but do not have any right to any share in the distribution of the surplus assets of the Company.
- 4.4 **Class B Shares:** Class B Shares shall have the following rights attached to them:
 - (a) the right to receive notice of and attend every meeting of Shareholders; and
 - (b) the right to a proportionate share in the distribution of the surplus assets of the Company, reflecting the net value of the water services assets transferred to the Company by each Shareholder,but do not have any right to vote on a poll at a meeting of the Company on any resolutions.
- 4.5 **Redeemable Shares:** The Company may redeem a redeemable share:
 - (a) at the option of the Company;
 - (b) at the option of the holder of the share; or
 - (c) on a date specified in this Constitution or the terms of issue of the relevant shares,for a consideration that is:
 - (d) specified;
 - (e) to be calculated by reference to a formula; or
 - (f) required to be fixed by a suitably qualified person who is not associated with or interested in the Company.

- 4.6 **Pre-emptive Rights:** Section 45 of the Companies Act does not apply to the Company.
- 4.7 **Issue of Shares:** Subject to this Constitution, the Shareholders' Agreement and the LG(WS) Act, the Board may:
- (a) issue Shares at any time, to any person listed in clause 7.4(b) or any other person permitted to hold Shares in accordance with the LG(WS) Act and in such numbers as it thinks fit;
 - (b) issue Shares in different classes which have different rights;
 - (c) issue Shares which are redeemable (as defined in section 68 of the Companies Act); and
 - (d) divide existing Shares into different classes which have different rights,
- provided that no Shares may be issued unless the issue is first approved by Special Resolution.
- 4.8 **Reissue of Shares:** Any shares reissued by the Company must be treated as the issue of new shares.
- 4.9 **Compliance:** The Company must comply with the Act when it purchases or acquires shares issued by it.
- 5. CALLS ON SHARES**
- 5.1 **Board may make calls:** Subject to the Shareholders' Agreement, the Board may make calls on any Shareholder in respect of any money unpaid on their Shares, and not previously made payable at a fixed time, by prior written notice to the relevant Shareholder specifying the time and date for payment (such time and date to be no earlier than 10 Business Days after the notice is given to the relevant Shareholder). The relevant Shareholder must comply with the terms of any call made by the Board. A call may be payable by instalments. The Board may revoke or postpone a call.
- 5.2 **Interest and expenses:** A person who fails to pay a call on the due date must pay:
- (a) interest on that money from the day payment was due to the day of actual payment at a rate fixed by the Board; and
 - (b) all expenses which the Company has incurred or may incur because of non-payment,
- provided that the Board may waive payment of all or part of that interest or those expenses.
- 6. LIEN OVER SHARES**
- 6.1 **Existence and subject matter of lien:** If a Shareholder fails to pay any call on the due date, the Board may at any time by written notice to the Shareholder require payment of the unpaid amount together with any amount payable under clause 5.2. Such notice must specify a further date (not earlier than 10 Business Days from the date of the notice) by

which payment is required to be made, and must state that if such payment is not made on or before the specified date, clause 6.2 will apply.

6.2 Company has first lien:

- (a) The Company has a first lien over:
 - (i) each Share and the proceeds of sale of the Share; and
 - (ii) all distributions made in respect of the Share,for:
 - (iii) all unpaid calls owing in respect of the Shares and any amount payable under clause 5.2; and
 - (iv) sale expenses owing to the Company in respect of the Shares.
- (b) The registration of any transfer of a Share will not operate as a waiver of any lien the Company may have on that Share, unless notice to the contrary is given by the Company to the transferee.

7. TRANSFER OF SHARES

- 7.1 **Right to transfer:** Subject to any restrictions set out in this clause 7, the LG(WS) Act and the Shareholders' Agreement, a Share may be transferred by entry of the name of the transferee in the share register for the Company following receipt by the Company of a validly signed form of transfer.
- 7.2 **Prior approval required:** No Shareholder may sell, assign, transfer or dispose of, directly or indirectly, the legal or beneficial ownership of any of its Shares except in accordance with the provisions of this clause 7 and unless such sale, assignment, transfer or disposal:
 - (a) has first been approved in writing by all Shareholders; or
 - (b) is a permitted transfer in accordance with clause 7.4.
- 7.3 **No delay:** The Board may not exercise any powers conferred by this Constitution to refuse or delay the registration of any sale, assignment, transfer or disposal of Shares completed in accordance with clause 7.2.
- 7.4 **Permitted transfers:** Subject to the LG(WS) Act, the restrictions in this clause 7 do not apply to the following transfers:
 - (a) the transfer of Shares from the trustees of any consumer trust to:
 - (i) the new trustees of that trust;
 - (ii) the Local Authority/ies for the Service Area where the beneficiaries of that trust reside; or
 - (iii) another consumer trust established for the purpose of providing water services to the public; and

- (b) the transfer of Shares by a Local Authority to:
 - (i) another Local Authority
 - (ii) any successor Local Authority to that Local Authority; or
 - (iii) a consumer trust established for the purpose of providing water services to the public.

7.5 **Board may refuse to register:** The Board may refuse or delay the registration of any transfer of a Share to any person if:

- (a) the transfer would result in a breach of law, this Constitution or the Shareholders' Agreement;
- (b) any money payable on that Share is due for payment and has not been paid;
- (c) the Company has an unsatisfied lien on that Share or the proceeds of sale of that Share;
- (d) the transferee is a person without legal capacity to contract or the transfer has not been properly executed;
- (e) the transfer is not accompanied by proof (reasonably required by the Directors) of the right of the transferor to make the transfer;
- (f) the Directors acting in good faith determine that registration of the transfer would not be in the best interests of the Company; or
- (g) the transfer document is not in the usual or common form or otherwise in the form prescribed by the Board from time to time (if any),

provided that the Board must at all times comply with section 84 of the Companies Act.

8. DISTRIBUTIONS

- 8.1 **Distributions:** The Company must not pay any Distribution in any way, directly or indirectly, to the Shareholders, except pursuant to clause 15.

9. COMPANY ACQUIRING ITS OWN SHARES

- 9.1 **Company may acquire its own Shares:** The Company may purchase or otherwise acquire its own Shares and may hold its own shares uncanceled but only in accordance with section 67A, 67B and 67C of the Companies Act.

10. SHAREHOLDER MEETINGS

- 10.1 **Annual meeting:** The Board must hold an annual Shareholders' meeting in accordance with section 120 of the Companies Act unless in the case of any annual meeting, everything required to be done at that meeting (whether by way of resolution or otherwise) is done by written resolution in accordance with section 122 of the Companies Act.

10.2 **Special meetings:** A special Shareholders' meeting:

- (a) may be called at any time by the Board; and
- (b) must be called by the Board on the written request of the Joint Shareholders Committee.

10.3 **Proceedings at Shareholders' meetings:** The provisions of the First Schedule to the Companies Act as modified by this Constitution, including the rules set out in Schedule 1, govern proceedings at Shareholders' meetings.

11. REPORTING REQUIREMENTS

11.1 **Reporting:** Subject to clause 11.2, the Board must:

- (a) prepare the plans or reports required by the Shareholders by notice in writing to the Company (provided that such notice must comply with the requirements in section 249(4) of the LG(WS) Act), in accordance with the requirements specified in that notice;
- (b) within eight months of the start of each Financial Year of the Company, prepare, adopt and provide to its Shareholders, a water services half-yearly report in accordance with section 248 of the LG(WS) Act, which reports on the Company's operations during the first six months of the Financial Year and must include information required to be included by the Statement of Expectations; and
- (c) within three months of the end of each Financial Year of the Company, adopt its Water Services Annual Report for that Financial Year, provide that Report to the Shareholders, and publish it in accordance with the LG(WS) Act. This Report must include the information required to be included by:
 - (i) the Statement of Expectations;
 - (ii) the Companies Act; and
 - (iii) sections 243 and 246, and Schedule 4 of the LG(WS) Act and, where applicable, section 244 of the LG(WS) Act.

11.2 **Information to be withheld:** Nothing in this clause 11 requires the inclusion in any reporting document required to be produced under this Constitution of any information that may be properly withheld if a request for that information was made under the Local Government Official Information and Meetings Act 1987.

12. DIRECTORS

12.1 **Independent Directors:** All Directors must be Independent Directors.

12.2 **Number of Directors:**

- (a) From incorporation of the Company until 30 June 2027, the minimum number of Directors is one and the maximum number of Directors is five.

- (b) From 1 July 2027, the minimum number of Directors is three and the maximum number of Directors is five.

12.3 **Appointment and removal by Shareholders:**

- (a) The Joint Shareholders Committee will appoint up to the number of Directors set out in clause 12.2, by notice in writing to the Company. Directors may be removed and replaced in the same way.
- (b) The Joint Shareholders Committee and the Company shall promptly take such steps as may be necessary to effect the appointment, replacement or removal of any individual (including if a Director fails to vacate office when required to do so) in accordance with this clause 12.3 if applicable, including, in the case of the Joint Shareholders Committee, by exercising their voting rights in the relevant Joint Shareholders Committee meeting (or by way of written resolution).

12.4 **Appointment where vacancy exists:** Where there is a casual vacancy on the Board, the Board may, by majority vote, recommend an appointment to fill that vacancy to the Joint Shareholders Committee for its approval in accordance with the Shareholders' Agreement. A Director appointed under this clause may be removed and replaced in the same way.

12.5 **Skills of Directors:** All Director appointments must be made in accordance with the Board Skills Matrix, with the aim of ensuring that the Board as a whole has an appropriate mix of skills, knowledge, and experience in relation to providing water services, as reflected in the Board Skills Matrix. Each Director must be appointed based on their competency to perform the role of director of a Water Organisation.

12.6 **Term of Appointment:** Unless otherwise approved by the Joint Shareholders Committee:

- (a) Each Director will be appointed for a term of 3 consecutive years ("**Term**"), subject to clause 12.6(c) in respect of initial staggered appointments.
- (b) A Director may be reappointed for up to 2 further Terms at the expiry of his or her Term of appointment, provided that no Director may be appointed for more than 3 consecutive terms (being a maximum of 9 consecutive years), without the further approval of the Joint Shareholders Committee under clause 12.6(d).
- (c) To enable an orderly rotation of the Board, each person appointed as a Director upon incorporation of the Company will be appointed for an initial Term of 1, 2 or 3 years, as determined by the Joint Shareholders Committee at the time of appointment, with the intention that at least 1 Director appointments will expire in each of the 3 years following incorporation. An initial staggered Term of less than 3 years will count as one Term for the purposes of the maximum in clause 12.6(b). Following expiry of that initial Term, each such Director is eligible for reappointment subject to clause 12.6(b).
- (d) The Joint Shareholders Committee may, in exceptional circumstances only, approve the reappointment of a Director for one additional Term beyond the maximum set out in clause 12.6(b) for example, where reappointment is necessary to retain specialist skills or critical institutional knowledge that the Board would otherwise be unable to source.

12.7 **Vacation of office:** A Director vacates office if that Director:

- (a) resigns by written notice of resignation to the Company. The notice is to be effective when it is received at that address or at a later time specified in the notice;
- (b) reaches the end of their term and is not reappointed;
- (c) is removed from office in accordance with clause 12.3;
- (d) becomes disqualified from being a Director pursuant to section 151 of the Companies Act or clause 12.17; or
- (e) dies.

12.8 Appointment of Chair:

- (a) The Joint Shareholders Committee must appoint a Chair.
- (b) The Chair will hold office until:
 - (i) they cease to be a Director of the Company; or
 - (ii) a new Chair is appointed by the Joint Shareholders Committee.

12.9 Powers of the Board:

- (a) Subject to clause 12.9(b) and any restrictions in the Companies Act, the LG(W)S Act, the Shareholders' Agreement or this Constitution, the business and affairs of the Company must be managed by or under the direction or supervision of the Board.
- (b) The Board has, and may exercise, all the powers necessary for managing, directing and supervising the management of the business and affairs of the Company except to the extent that this Constitution, the Shareholders' Agreement, the Companies Act or the LG(W)S Act expressly requires those powers to be exercised by the Shareholders or any other person.

12.10 Prohibited Matters: Notwithstanding clause 12.9(b), the Board must not, and must not cause the Company to:

- (a) incur indebtedness to any person other than the New Zealand Local Government Funding Agency Limited or a New Zealand registered banking institution; or
- (b) grant a security interest over any of the assets of the Company,

except to the extent permitted by the LG(W)S Act and the Shareholders' Agreement.

12.11 Shareholder Reserved Matters: Notwithstanding clause 12.9(b), but subject to any restrictions in the LG(W)S Act, the Board must not, and must not cause the Company to enter into any transaction or matter that is a Reserved Matter, unless first approved in writing by the Shareholders or Joint Shareholders Committee (as applicable) in accordance with the Shareholders' Agreement.

12.12 Solvency test: Notwithstanding any approval attained pursuant to clause 12.10, the Board must not cause the Company to borrow or raise any money, or enter into or incur any

guarantee or other liability of any nature, if the effect of doing so would be that the Company will not satisfy the solvency test (as that term is defined in the Companies Act).

- 12.13 **Proceedings of the Board:** The provisions of the Third Schedule to the Companies Act as modified by this Constitution, including the rules set out in Schedule 2, govern proceedings at meetings of Directors.
- 12.14 **Directors duties:** In addition to the duties set out in the Companies Act, the Directors must assist the Company to meet the objective set out in clause 2.2 and any other requirements set out in the Statement of Expectations or the LG(WS) Act.
- 12.15 **Directors to act in good faith:** A Director, when exercising powers or performing duties, must act in a manner which that Director believes to be in the best interests of the Company (notwithstanding that it may not be in the best interests of any particular Shareholder) provided that Director must not exercise such powers or perform such duties in a manner which is inconsistent with section 17 of the LG(WS) Act.
- 12.16 **Indemnity and insurance of Directors and employees:** The Company may indemnify and effect insurance in accordance with any part or all of section 162 of the Companies Act provided that:
- (a) the Board must ensure that particulars of any indemnity given to, or insurance taken out for, any director, or employee of the Company are immediately entered in the interests register; and
 - (b) the Board may impose any conditions in relation to any indemnity or insurance if the conditions do not contravene the Companies Act.
- For the purposes of this clause 12.16 "director" includes any former director, "employee" includes any former employee and "Company" includes any related company.
- 12.17 **Disqualification of Directors:** A person will be disqualified from holding the office of Director if he or she:
- (a) is or becomes disqualified from being a Director under any provision of the Companies Act or the LG(WS) Act; or
 - (b) is not or ceases to be an Independent Director; or
 - (c) dies; or
 - (d) becomes a protected person under the Protection of Personal and Property Rights Act 1988; or
 - (e) is an undischarged bankrupt.
- 12.18 **Remuneration of Directors:**
- (a) The Joint Shareholders Committee shall determine the total sum available to the Board each year to make remuneration payments in accordance with clause 12.18(b).
 - (b) The Board may not authorise any form of remuneration to be paid to a Director without Board approval and unless such payment is made and authorised in

accordance with the provisions of the Companies Act and the approval of the Joint Shareholders Committee in accordance with clause 12.18(a).

- (c) The Board may authorise the reimbursement by the Company of reasonable travelling, accommodation and other expenses incurred by Directors in attending Board meetings, Joint Shareholders Committee meetings, Shareholder meetings or in relation to any other affairs of the Company.

12.19 Other offices with company held by Director:

- (a) Any Director may act by himself or herself or by the Director's firm in a professional capacity for the Company, and the Director or the Director's firm will be entitled to remuneration for professional services as if the Director were not a Director. Nothing in this clause authorises a Director or the Director's firm to act as auditor of the company.
- (b) A Director may hold any other office or place of profit in the Company (other than the office of auditor) in conjunction with the Director's office of Director for such period and on such terms (as to remuneration and otherwise) as the Board may determine, subject to the necessary reporting disclosures and avoidance of conflicts of interest.

13. INTERESTS OF DIRECTORS

13.1 Disclosure of interests: A Director must disclose particulars of any interest in a transaction or proposed transaction of the Company in accordance with section 140 of the Companies Act.

13.2 Interested Directors: As set out in section 139 of the Companies Act, a Director is "interested" in a transaction to which the Company is a party if:

- (a) the transaction relates to a dispute between the Company and the Shareholders, or the enforcement of remedies available to the Company against the Shareholders;
- (b) they are a party to the transaction or may derive a material financial benefit from it;
- (c) they have a material interest in another party to the transaction;
- (d) they are a director, officer or trustee of another party to the transaction;
- (e) they are a director, officer or trustee of a person who may derive a material financial benefit from the transaction;
- (f) they are a parent, child or spouse, civil union partner, or de facto partner of a person described in clause 13.2(a); or
- (g) they are otherwise directly or indirectly materially interested in the transaction.

13.3 Interested Directors may act: A Director who is interested in a transaction entered into, or to be entered into, by the Company must not do any of the following:

- (a) sign a document relating to that transaction on behalf of the Company; or

- (b) do any other thing in their capacity as a Director in relation to that transaction,

provided that a Director may vote, sign documents and otherwise do any other thing in their capacity as a Director with regard to any matter relating to the following:

- (c) any payment or other benefit of the kind referred to in section 161 of the Companies Act in respect of that Director in accordance with clause 12.18;
- (d) the entry into an indemnity or insurance arrangement in respect of that Director in their capacity as a director of the Company in accordance with clause 12.16; or
- (e) transactions in which a Director is interested solely in their capacity as a director of a Subsidiary of the Company.

13.4 **Interests register review:** The Board shall review the interests register at the beginning of every Board meeting.

13.5 **No prohibition re quorum:** No prohibition under this clause 13 will prevent the attendance of a Director at a Board meeting from counting for quorum purposes.

14. NOTICES

14.1 **Service:** Notices may be served by the Company upon any Director or Shareholder, either by personal delivery, by electronic means or by posting it in a prepaid envelope or package addressed to the recipient at his or her last known address (or, in the case of a company, its registered office). A notice may be given by the Company to joint Shareholders by giving the notice to the joint Shareholder named first in the Share Register in respect of the Share, or to such other person as or the joint Shareholders may in writing direct.

14.2 **Time of service:** Notices are deemed served at the following times:

- (a) when given personally, on delivery;
- (b) when sent by post or document exchange, five Business Days after (but exclusive of) posting; and
- (c) when sent by email, at the time of transmission, if (in the event receipt is disputed) the sender produces a printed copy of the email which evidences that the email was sent to the email address of the recipient.

Any notice which has been served on a Saturday, Sunday or public holiday is deemed to be served on the first Business Day after that day.

15. LIQUIDATION

15.1 If the Company is liquidated, the liquidator may, with the approval of the Shareholders by Special Resolution and any other approval required by the Companies Act or the LG(W)S Act, but subject to the requirements of the Shareholders' Agreement (as notified by any Shareholder to the liquidator) and, if applicable, the rights or restrictions attached to the different classes of shares issued by the Company:

- (a) enter into a transfer agreement with the Shareholders to distribute to the Shareholders in kind the whole or any part of the assets of the Company; and
- (b) vest the whole or any part of any such assets in trustees upon such trusts for the benefit of the persons so entitled as the liquidator thinks fit, but so that the Shareholders are not compelled to accept any Shares or other securities on which there is any liability.

16. METHODS OF CONTRACTING

- 16.1 A deed which is to be entered into by the Company may be signed on behalf of the Company by:
- (a) two or more Directors;
 - (b) a Director, and any person authorised by the Board, whose signatures must be witnessed; or
 - (c) one or more attorneys appointed by the Company.
- 16.2 Subject to clause 16.1, an obligation or contract which is required by law to be in writing, and any other written obligation or contract which is to be entered into by the Company, may be signed on behalf of the Company by two people acting under the express or implied authority of the Company.
- 16.3 Subject to clause 16.1, any other obligation or contract may be entered into on behalf of the Company in writing or orally by two people acting under the express or implied authority of the Company.

SCHEDULE 1**Rules for Shareholder Meetings****1. CHAIR**

- 1.1 If the Chair is present at the meeting, he or she must chair the meeting.
- 1.2 If there is no Chair or if the Chair is not present at the meeting within 15 minutes of the start time, the Directors present may elect a chair for that meeting, failing which, the Shareholders (or their representatives) present may elect a chair for that meeting.

2. NOTICE OF MEETINGS

- 2.1 Each Shareholder and every Director of the Company must be sent written notice of the time and place of the meeting at least 10 Business Days before the meeting.
- 2.2 The notice must state:
 - (a) the nature of the business to be discussed at the meeting in sufficient detail to enable the Shareholders to form a reasoned judgment in relation to it; and
 - (b) the text of any Special Resolution to be put to the meeting.
- 2.3 An irregularity in a notice of a meeting is waived if:
 - (a) the Shareholders attend the meeting without protest as to the irregularity; or
 - (b) if each Shareholder agrees to the waiver.
- 2.4 If a meeting is adjourned for 30 days or more, notice of the adjourned meeting must be given as in the case of an original meeting. It is not otherwise necessary to give any new notice for an adjourned meeting.
- 2.5 The accidental omission to give a notice of a meeting to, or the non-receipt of a notice of a meeting by, any person entitled to receive notice does not invalidate the proceedings at that meeting.

3. METHODS OF HOLDING MEETINGS

- 3.1 A Shareholders' meeting may be held either:
 - (a) at the place, date, and time appointed for the meeting; or
 - (b) by means of audio, or audio and visual, communication. The Shareholders (or their representatives) participating must constitute a quorum and must all be able to simultaneously hear all participants throughout the meeting.

4. QUORUM

- 4.1 No business may be transacted at a Shareholder meeting if a quorum is not present.
- 4.2 A quorum for a Shareholder meeting requires at least one representative from each Shareholder to be present (including online) or to have completed postal votes (where permitted).
- 4.3 If a quorum is not present within the 30 minutes after the start time for the meeting:
 - (a) if the meeting is called under section 121(b) of the Companies Act, the meeting is dissolved;
 - (b) for any other meeting, the meeting is adjourned to:
 - (i) the same day in the following week at the same time and place, or
 - (ii) to another date, time and place to be fixed by the Directors.

5. ADJOURNMENTS

- 5.1 The chair:
 - (a) may adjourn the meeting from time to time and from place to place, but no business can be transacted at any adjourned meeting other than the business left unfinished at the meeting from which the adjournment took place; and
 - (b) must adjourn the meeting as above if directed to do so by the meeting.

6. VOTING

- 6.1 If a Shareholder meeting is held under rule 3.1(b), unless a poll is demanded, voting at the meeting will be by:
 - (a) voting by voice; or
 - (b) voting by show of hands,
 and the chair of the meeting will decide which method is used.
- 6.2 A declaration by the chair of the meeting that a resolution is carried by the necessary majority is conclusive evidence of that fact unless a poll is demanded.
- 6.3 Subject to the Shareholders' Agreement and to any rights or restrictions attached to any Share:
 - (a) where voting is by voice or a show of hands, every Shareholder present in person or by representative has one vote; and
 - (b) on a poll every Shareholder present in person or by representative has one vote in respect of every Share held by that Shareholder which entitles a Shareholder to vote; and

- (c) in the case of an equality of votes, the chair of the meeting does not have a casting vote.

7. PROXIES AND POSTAL VOTES

- 7.1 Each Shareholder has the right to appoint a representative as its proxy to attend and vote at Shareholder meetings on its behalf. Any such representative so appointed is entitled to attend and be heard at Shareholder meetings and to demand or join in demanding a poll, as if that representative was the relevant Shareholder.
- 7.2 A Shareholder may not cast a postal vote at a Shareholders' meeting unless the Board has previously authorised postal votes for that meeting in which case:
 - (a) the notice of that meeting must state whether postal votes are authorised; and
 - (b) postal voting must be carried out in accordance with clause 7 of the First Schedule to the Companies Act.

8. MINUTES

- 8.1 The Board must ensure that minutes are kept of all proceedings at Shareholder meetings.
- 8.2 Minutes which have been signed correct by the Chair of the meeting are prima facie evidence of the proceedings.

9. SHAREHOLDER PROPOSALS

- 9.1 The Shareholders may give written notice to the Board of a matter the Shareholder proposes to raise for discussion or resolution at the next Shareholder meeting. The provisions of clause 9 of the First Schedule of the Companies Act apply to any notice given under this rule 9.1.
- 9.2 The Chair of a Shareholder meeting will allow a reasonable opportunity for the Shareholders to question, discuss or comment on the management of the Company.

10. OTHER PROCEEDINGS

- 10.1 Except as provided in this Schedule 1, and subject to this Constitution, a Shareholder meeting may regulate its own procedure.

SCHEDULE 2**Rules for Board Proceedings****1. NOTICE OF MEETING**

- 1.1 The Chair, or if requested by the Chair an employee of the Company, may convene a meeting of the Board by giving notice in accordance with this clause.
- 1.2 A Director other than the Chair may convene a meeting only with the agreement of the Chair, or where the Chair is unavailable or unwilling, with the agreement of at least one other Director.
- 1.3 At least five Business Days' notice of a meeting of the Board must be given to every Director who is in New Zealand, and public notification must also be given in accordance with the requirements set out in Part 7 of LGOIMA. The notice must include the date, time and place of the meeting and the matters to be discussed.
- 1.4 An irregularity in the notice of the meeting is waived if all Directors attend the meeting without protest as to the irregularity or if all Directors entitled to receive notice of the meeting agree to the waiver.
- 1.5 Notice of a meeting may be given by any means permitted by LGOIMA and the Companies Act.
- 1.6 The Company will ensure that it complies with all other applicable LGOIMA requirements in relation to providing public notification of the Board.

2. METHOD OF HOLDING MEETINGS

- 2.1 The Board may meet in person or by any technological means that:
 - (a) allow participating Directors to be in communication with other participating Directors in a manner that is relatively contemporaneous; and
 - (b) ensure the meeting is compliant with the requirements set out in Part 7 of LGOIMA.
- 2.2 Where Directors are not all in attendance in one place but are holding a meeting through such a system of communication that complies with paragraph 2.1 of this Schedule 2:
 - (a) the participating Directors will be taken to be assembled together at a meeting and present at that meeting (including for the purposes of quorum requirements);
 - (b) the meeting will be taken to be held at the place agreed to by the participating Directors so long as at least one participating Director is physically present at that place; and
 - (c) all proceedings at meetings conducted in such a manner will be valid and effective as if conducted at a meeting at which all of them were physically present.

3. QUORUM**3.1 At any meeting of Directors:**

- (a) a quorum will only be present if at least a majority of Directors are present; and
- (b) any resolution, unless otherwise specified in this Constitution or the Shareholders' Agreement, will be passed if a majority of the votes cast on it are in favour of it.

3.2 If a quorum is not present within 30 minutes of the time appointed for the commencement of the Board meeting, the Board meeting must be adjourned to the same day in the following week at the same time and place, or to such other date, time and place as the chairperson may appoint, and if at the adjourned meeting a quorum is not present within one hour after the time appointed for the commencement of the meeting, the Directors present (regardless of the person who appointed them) will constitute a quorum. No business may be transacted at a meeting of Directors if a quorum is not present.**4. VOTING****4.1** Every Director has one vote.**4.2** The Chair does not have a casting vote.**4.3** Subject to clause 12.10, a resolution of the Board is passed if it is agreed to by all Directors present without dissent or if a majority of the votes cast on it are in favour of it.**4.4** A Director who abstains from voting is not presumed to have voted in favour of the relevant resolution of the Board.**5. MINUTES****5.1** The Board must ensure minutes are kept of all proceedings at meetings of the Board. Such minutes will be made available to the public in accordance with, and to the extent required by, section 51 of LGOIMA.**6. RESOLUTIONS****6.1** A resolution in writing, signed or assented to by all Directors then entitled to receive notice of a Board meeting, is as valid and effective as if it had been passed at a meeting of the Board duly convened and held.**6.2** A resolution may consist of several documents (including facsimile or other similar means of communication) in like form each signed or assented to by one or more Directors.**6.3** A copy of all resolutions must be entered in the minute book of Board proceedings.**7. NO NOTICE TO DIRECTORS OUTSIDE NEW ZEALAND****7.1** It is not necessary to give notice of a meeting of the Board to any Director temporarily absent from New Zealand.

8. OTHER PROCEEDINGS

- 8.1 Except as provided in this Schedule 1 and this Constitution, the Board may regulate its own procedure.

DRAFT

7.3 Deliberations on future local governance in the Mid-South Canterbury / North Otago region under the Head Start Pathway

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Authoriser: Nigel Trainor, Chief Executive

Recommendation

That Council:

- 1 Receives and notes the report “Deliberations on future local governance in the Mid-South Canterbury / North Otago region under the Head Start Pathway”;
- 2 Confirms that its preferred option is: Option A South Canterbury Unitary Council **OR** Option B Mid-South Canterbury Unitary Council **OR** Option C Mid-South Canterbury and North Otago Unitary Council **OR** Option D Enter the Backstop Pathway **OR** Option E Other.

Then, if it resolves Options A, B, C or E

- 3 Confirms that it prefers for the boundaries of any amalgamated council to be based on river catchments **OR** existing territorial boundaries;
- 4 Identifies key Timaru District Council priorities for negotiating an outline proposal with partner councils; and
- 5 Requires that the material content of any outline proposal to be approved by Council resolution **OR** delegates authority to the Mayor, Deputy Mayor and Chief Executive to jointly approve the material content of any outline proposal.

Purpose of Report

- 1 The primary purpose of this report is for Council to determine its preferred structural option for any outline proposal lodged under the Head Start Pathway.
- 2 If Council resolves that it prefers to lodge an outline proposal, a secondary purpose of this report is for Council to identify its preferred basis for the setting the boundaries of its preferred structural option, identify key priorities for negotiating an outline proposal with partner councils, and to confirm the approval pathway for it to be lodged.

Assessment of Significance

- 3 This issue is considered of very high significance as it will likely result in fundamental reform in the nature, scale and function of local government. Impacts include likely significant changes to representation and governance structures, service delivery arrangements and long-term financial sustainability.
- 4 Consequently, consultation has occurred with the public as detailed in the previous report in this agenda. It is acknowledged that this consultation has not been able to be conducted in a way that would normally be envisaged for a decision of this significance. This is because Council has been constrained by the timeframe set by central government, and the information available within this timeframe.

- 5 Council is not making a final or conclusive decision at this meeting as to whether to amalgamate, with whom, or how this would impact levels of service. Further, any successful outline proposal will enter a Detailed Design phase, where central government has indicated that additional public consultation will occur.

Executive summary

- 6 Government has invited councils to voluntarily submit outline proposals to reform the local government sector under the Head Start pathway by 9 August 2026.
- 7 Councils that do not submit a proposal, or are not part of a successful proposal, would enter the Backstop Pathway after the 2028 local elections.
- 8 On 30 June, Council considered initial analysis and resolved to consult with the community on several structural options.
- 9 Council now has several decisions to make, and should consider the community feedback received (written and oral) when doing so to ensure that it has an appropriate understanding of the views of interested and affected parties.
- 10 Council should determine its preferred structural option for any outline proposal, or determine to enter the Backstop Pathway. It should be noted that selecting between these options at this meeting is not a conclusive decision to amalgamate and with whom. Cabinet will decide whether to approve or decline outline proposals, and any decisions made at this meeting will be subject to negotiations with other councils prior to lodging any proposal. Successful outline proposals are also subject to a Detailed Design process, with additional Cabinet approval required.
- 11 Further, if it resolves to lodge an outline proposal, it should determine the basis for boundaries, key negotiating priorities, and the approval pathway for an outline proposal.
- 12 It is proposed that an Extraordinary Council Meeting take place on Tuesday 4 August 2026 to consider the material content of any outline proposal, if Council does not wish to delegate this authority.
- 13 This report is based on the information available to officers at the time of writing, and on analysis requested by elected members. There remains substantial uncertainty in the reform framework. Councillors will need to consider whether sufficient information exists to make a decision on its preferred structural option and other matters (noting that the process set by central government involves additional Detailed Design and involvement by Council).

Background

Central government context

- 14 Central government has indicated that local governance structures and functions are to be reformed with an objective to reduce complexity and increase efficiencies. Through its Simplifying Local Government process, regional and territorial authorities will be reconstituted as unitary authorities. This will occur either via the Head Start or Back Stop pathways.
- 15 Through the Head Start pathway, central government is seeking councils to voluntarily elect to create geographically larger unitary authorities, which would combine existing territorial activities and existing regional council functions.

- 16 The Head Start Pathway is a voluntary early option for councils to take, where outline proposals have to be submitted by 9 August 2026. If supported by Cabinet, these plans would move into a more detailed design and consultation phase, leading toward implementation at a governance level for the 2028 local elections.
- 17 Central government has stated that councils that do not enter the Head Start pathway (or become part of a successful Head Start outline proposal, whether supported by them or not) will enter the Back Stop pathway after the 2028 local elections. Cabinet has yet to take policy decisions about the exact design of the Back Stop pathway, however officers currently understand that this would result in reform decisions being taken at a more centralised level
- 18 The outline proposal, while being strategic and high-level, has to make the case for the change and have a clear evidentiary basis from information already held by Council.
- 19 Any such proposal will be assessed against five assessment criteria: supports the new planning system; simplifies local governance; economies of scale; maintains local voice; and deliverability. Impacts on treaty settlements must also be identified and considered.
- 20 Given that Timaru District is considering a sub-regional proposal, information is also required about how activities currently managed at a regional level might be impacted or managed under the proposed new unitary authority. In other words, any proposal requires content additional to a preferred structural option.
- 21 Central government's stated timeframe for any successful outline proposal under the Head Start pathway is outlined below. It is noted that there are at least two Cabinet decision gateways included, in addition to Parliament considering bespoke legislation to give effect to successful proposals.

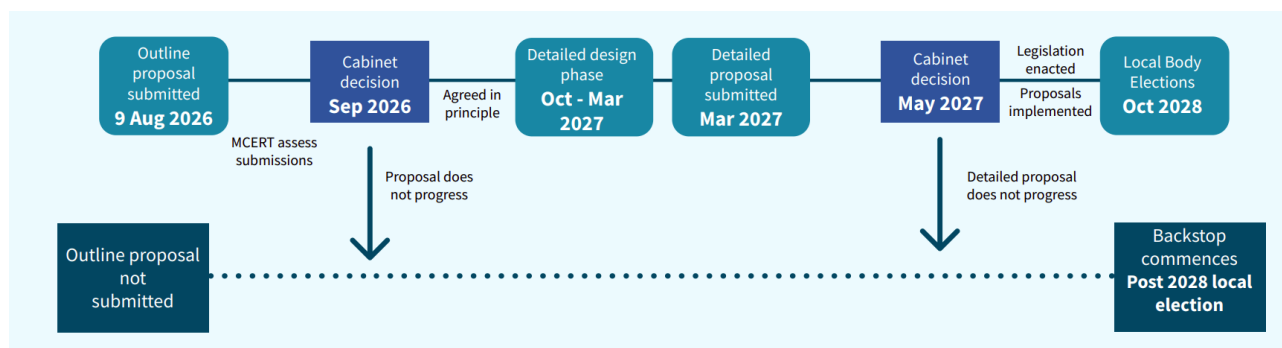


Figure: Timeline for Government Decision Making Following Proposal

- 22 There are no announcements or updates from central government to report since the 30 June 2026 Council meeting.

Local context

- 23 Since the 30 June 2026 Council meeting, work has continued at a Mayoral Forum level and sub-regionally to improve understanding of reform implications and opportunities, and to seek greater alignment between councils about preferred structural options. This includes discussions between Timaru District Council and the councils of potential partners Waimate, Mackenzie, Ashburton and Waitaki. The Mayor may wish to provide a verbal update to Council about these initiatives.

- 24 As of the time of writing, a workshop is due to be held on 29 July 2026 between the four other councils that Timaru District Council has identified an interest in potentially partnering with. The purpose of this workshop is to identify positions and seek alignment on the content required for any potential outline proposal, given that any proposal must be supported by at least two councils.
- 25 As of the time of writing, the positions and timeframes of these potential partners are as outlined below.

Ashburton District	Ashburton District Council have decided to delay determining their preferred structural option until 5 August. The reason for the delay is to gather more information about the preferences of other Canterbury councils. Three structural options remain for their consideration: a standalone unitary council; a southward-facing council with South Canterbury (with or without Waitaki), and; a northward-facing council consisting of Ashburton, rural Selwyn, rural Waimakariri and Hurunui (with or without Kaikoura).
Mackenzie District	Mackenzie District Council undertook consultation in conjunction with Timaru District Council. A decision is likely in late July or early August.
Waimate District	Waimate District Council has identified several structural options that it is considering; these are similar to what Timaru and Mackenzie have consulted on. A decision date of early August is likely, which would coincide approximately with the Timaru and Mackenzie consultation results and preferred options being clearer.
Waitaki District	On 7 July, Waitaki District Council resolved that its preferred option was a unitary authority with South Canterbury (retaining the Waitaki District in its entire current form). It is willing to consider adding Ashburton and/or other southern councils (Central Otago, Clutha and Gore) into its preferred option. Waitaki partners with these three southern councils currently for its "Southern Waters" CCO.

- 26 The 9 August deadline means that initial work to develop a potential outline proposal needs to occur proactively and in parallel to consultation and Council decision making. None of the work undertaken pre-commits Council or constrains Council's decision making in any way. A verbal update from the workshop will be provided to the Council at this meeting.
- 27 Statistical information about potential partner councils is contained in the report in the 30 June 2026 Council meeting agenda¹.

Discussion

Potential inclusion of partners where there is no prior agreement in place

- 28 Councillors should provide a clear direction as to their willingness to include partners with which there is no formal agreement in place in any outline proposal (assuming that the eligibility criteria stated above has been met).

¹ Refer to agenda item 8.15 - https://www.timaru.govt.nz/data/assets/pdf_file/0003/1144578/Council-AGENDA-30.06.2026.pdf

- 29 A Head Start proposal may include councils (or parts of councils) that do not support the proposal, subject to certain eligibility criteria.
- 30 An outline proposal is eligible if it is:
- 30.1 Lodged by two or more territorial councils (regional councils cannot lodge); and
 - 30.2 Supported by either a majority of territorial councils affected by the proposal, or supported by territorial councils comprising a majority of the population affected by the proposal.
- 31 This eligibility is important at least one other council must agree with the entirety of the content of the proposal (as noted earlier in this report, an outline proposal must contain more than just the preferred structural option). Councils who have not made any agreement to be included (or parts thereof) may be included in outline proposals subject to meeting the second eligibility criterion above.
- 32 At the time of writing, the preferred options of all other potential partner councils are not yet known (only Waitaki have indicated a preference); therefore it is possible that one or more may not prefer to be amalgamated with Timaru in a future unitary council.
- 33 Councils that have not agreed to a certain model may likely react negatively to being included in an outline proposal, considering it akin to a “forced” or “hostile” takeover. However, it is noted that this would be a proposal; final decisions are made by Cabinet.
- 34 Councillors need to trade-off the perceived benefits of incorporating any partner into a proposal (i.e. how their inclusion would strengthen the new unitary council), against the likely deterioration in relations with this council and its communities. Any deterioration of relations may be at a governance level and/ or a community level, and occur during any transition period and into the existence of the new unitary council. Councillors should consider how this might impact the new unitary council, including its degree of social cohesion.
- 35 It is noted that all partners may be willing; these considerations would not be relevant in such instances.

Basis for boundaries

- 36 Council can resolve that the boundaries of any preferred structural option are based on 1) the existing boundaries of the territorial authorities that comprise the future unitary authority; 2) river catchments; or 3) a different methodology (particularly relevant if the preferred structural option consists of parts of existing territorial authorities).
- 37 Any decision made by Council is subject to negotiations with partner councils prior to lodging an outline proposal.
- 38 Officers have undertaken an initial scoping of this topic, and envisage that it would be subject to future work in any Detailed Design process (especially to understand how existing unitary councils manage this issue where their boundaries are not based on catchments).
- 39 Water management is a key function of regional councils currently, and would become a key function of any new unitary authority.
- 40 An appeal of basing boundaries on river catchments is that it would allow the unitary authority to have exclusive decision-making powers over all the waters within its boundaries. The

Parliamentary Commissioner for the Environment supports new unitary authorities being established on this basis (refer Attachment 2 of the previous Head Start report in this agenda).

- 41 By contrast, boundaries based on existing territorial authority boundaries would be relatively straightforward to establish and respect existing communities of interest. However, in general, they would be relatively complicated to manage longer-term at a regional function level. A cross-council committee or similar would likely need to be established with the unitary council that manages the other portion of boundary catchments.
- 42 If river catchments are the proposed basis for boundaries, officers recommend that these boundaries are expansionary rather than contractionary. What this means is that the catchment on “the other side of the river” is included in our unitary authority, rather than the catchment on “our side of the river” being included in the neighbouring unitary authority.
- 43 The most notable reason for this is that if the entire northern portion of the Waitaki River catchment was managed by a neighbouring unitary authority, it would deduct sizeable areas of Waimate and Mackenzie from our unitary authority, likely undermining the viability of the entity and significantly dividing communities of interest. It is also noted that the southern portion of the Waitaki catchment is valuable from a community of interest perspective as it forms the southern boundary for the Canterbury region. The northern portion of the Rangitata and Rakaia catchments are less sizeable and their inclusion or exclusion likely have less significant implications.
- 44 At the moment, and aside from the well-designated southern Canterbury boundary, the northern catchments would be indicative and subject to refinement through the detailed design process.
- 45 Service delivery of territorial and regional functions at the margins of a new unitary authority would need to be managed separately from any decision about what to base boundaries on. This is most visibly demonstrated in situations where services are provided from catchments beyond their boundaries, for example as might be the case with irrigation.
- 46 Note: it is not envisaged that Option C would necessarily have a river catchment as its southern boundary; instead it would use the existing Waitaki District boundary as its southern boundary.

Information requested from and provided by Environment Canterbury

- 47 Officers have obtained information from Environment Canterbury about:
 - 47.1 Rates analysis (refer to Attachment 1)
 - 47.2 Current regional functions (refer to Attachment 2)

47.3 Public transport contributions to Timaru

Bus services:

- Temuka to Timaru
- Timaru school
- MyWay service

After fare revenue, 51% of the net costs are funded by NZTA.

Total Mobility: 60% funded by NZTA

Community Vehicle Trusts: 60% funded by NZTA

The Annual Plan 2026/27 indicates approximately \$1.6 million in funding support from NZTA for Public Transport.

47.4 Central government grants for the region, and how they are apportioned sub-regionally

Breakdown of Subsidies and Grants

	2024/25 \$000	2023/24 \$000
New Zealand Transport Agency	68,306	66,925
Ministry for the Environment	1,535	865
National Emergency Management Agency	-	2,553
Ministry for Primary Industries	8,975	10,784
Other Grants	3,720	6,869
Total Subsidies and Grants	82,536	87,996

Note: information about how these were apportioned at a sub-regional level was not provided at the time of writing.

48 Separately, officers requested information from Environment Canterbury about:

48.1 2024/25 actuals in the same format as the rates analysis information provided above.

48.2 For the Rakaia, Rangitata and Waitaki catchments:

48.2.1 Nature and value of ECan assets in the catchment e.g. stopbanks

48.2.2 Number of rateable properties

48.2.3 Any other high-level information relevant to assets and liabilities in these catchments that ECan might hold

49 This information had not been provided at the time of writing.

Options and Preferred Option

50 Officers deem that Council has four key decisions to take at this meeting.

DECISION ONE: OF THE OPTIONS CONSULTED ON, WHICH IS ITS PREFERRED OPTION?

51 Councillors should resolve its preferred option, of those consulted on.

52 These options are:

52.1 Option A – A South Canterbury Unitary Council (*consisting of Timaru, Mackenzie and Waimate District Councils*)

52.2 Option B – A Mid-South Canterbury Unitary Council (*consisting of Timaru, Mackenzie, Waimate and Ashburton District Councils*)

52.3 Option C – A Mid-South Canterbury and North Otago Unitary Council (*consisting of Timaru, Mackenzie, Waimate, Ashburton and Waitaki District Councils*)

52.4 Option D – Do not submit a Head Start proposal and enter the Back Stop pathway

52.5 Option E – Other (*an alternative structural option to Options A, B and C*)

52.5.1 Councillors may identify an alternative structural option that they deem preferable to Options A, B or C. The main alternative options stated during consultation were a South Canterbury and North Otago Unitary Council, and an All-of-Canterbury (excluding Christchurch) Unitary Council.

53 Information about public feedback on these options is available in a separate report in this agenda.

54 Initial scoring of these options against the Head Start criteria is contained at Attachment 3 Further, scoring against the Head Start criteria and additional criteria is contained at Attachment 4. Option A corresponds to Option 2 in the attachments, Option B corresponds to Option 5 in the attachments, and Option C corresponds (broadly but not exactly) to Option 7 in the attachments.

55 Guidance for Head Start outline proposals indicates that Cabinet may assess proposals “in the round” and, therefore, some criteria may be weighted more heavily than others.

56 Councillors need to use their judgement when selecting a preferred option and considering their relative strengths and trade-offs. Most notably:

56.1 Which option does it deem is in the best interests of the Timaru District?

56.2 Which option does it deem likely to perform well as a Head Start proposal given the criteria set by central government?

56.3 Which assessment criteria are most important to securing positive future outcomes for the Timaru District and its communities?

57 General considerations and trade-offs for Options A, B and C are:

57.1 Option A maintains a coherent South Canterbury local identity/ community of interest, but the population size given the relatively large geographic scale may mean that regional functions will be either relatively expensive or may require a decrease in the level of service. Of the three options, this option is deemed to have the greatest potential to “maintain local voice” but the lowest potential to achieve financial “economies of scale”.

57.2 Option B is a middle option, achieving a greater population and geographical base than Option A but less than Option C. Of potential attraction is that it is an option that achieves increased population and scale (relative to Option A) whilst remaining solely within the Canterbury Region boundaries. Councillors may wish to consider whether the scale generated by this option is sufficient, and how any South Canterbury community of interest might be affected by the addition of a Mid-Canterbury community of interest.

57.3 Option C achieves the greatest population and geographical scale of these three options, and keeps the Waitaki River catchment intact. The population size provides the greatest potential to achieve “economies of scale” and absorb regional functions with the lowest possible level of disruption, of these three options. However, the geographic size and inclusion of parts of North Otago could dilute communities of interest and affect the ability to “maintain local voice.” From a planning perspective, the Waitaki District (south of the river catchment) is subject to both the Canterbury and Otago regional spatial plans; this adds a degree of complexity which would need to be managed.

- 58 The above overview assumes that the costs of delivering regional functions is relatively uniform across the various councils on a per capita basis, and that it corresponds broadly to revenue received from the councils. This assumption is based on initial information received from Environment Canterbury.
- 59 In general, the “Deliverability” assessment criteria may score more highly for options with fewer councils involved, as the process to establish any new entity will likely be less complex. Conversely, the “Simplifies local government” assessment criteria may generally score more highly with more councils involved.
- 60 Subject to negotiations with partner councils, it may be possible to mitigate areas where an option scores relatively poorly.
- 61 Council can select Option D (Entering the Back Stop pathway) as its preferred option, either via resolution or by act of not lodging an outline proposal. Several councils nationally have identified that they will be entering the Back Stop pathway. The most common reasons cited is that they deem that the timeframe does not allow them to gather sufficient information or undertake sufficient consultation, or that they lack partner councils willing to work with them or support their proposals.
- 62 Entering the Back Stop pathway is a valid option for Council. It may allow for more relevant information to be identified and more strategic decision making to be taken.
- 63 The risk associated with the Back Stop pathway is that Council (and the district’s community) may have less influence on the future of local government in the area, as it is likely that central government will take a more active decision making role than under Head Start.

DECISION TWO (IF INTENDS TO LODGE HEAD START OUTLINE PROPOSAL): WHAT TO BASE THE BOUNDARIES ON?

- 64 Councillors should resolve whether it would prefer that the boundaries of any unitary authority be based on existing territorial authority boundaries, river catchments, or some other methodology or combination of the two.
- 65 Information to inform this decision is contained in the Discussion section of this report.
- 66 In general, basing boundaries on river catchments would better enable any unitary authority to better undertake its regional functions such as water management but could divide communities of interest. Basing boundaries on existing territorial council boundaries would maintain existing communities of interest but could create longer term complexity or inefficiency in delivering regional functions.
- 67 Council may decide that a hybrid approach is appropriate. For example, the northern and southern boundaries could be set differently. Note that Option C proposes that the southern boundary would be based on territorial boundaries, not catchment boundaries.

DECISION THREE (IF INTENDS TO LODGE HEAD START OUTLINE PROPOSAL): WHAT IS IMPORTANT FOR TIMARU DISTRICT TO ACHIEVE IN NEGOTIATING AN OUTLINE PROPOSAL?

- 68 Councillors should identify key negotiating priorities or topics for the development of any outline proposal.
- 69 This would enable officers to work with partner councils to prepare a draft outline proposal that reflects the interests of the Timaru District as deemed by elected members.

- 70 Negotiating priorities may be specific or high-level themes. They can relate to positions, desired outcomes, and timeframes.
- 71 Topics may include:
- 71.1 Representation arrangements.
 - 71.2 Future community consultation in any Detailed Design process.
 - 71.3 Options available to Timaru District Council throughout any Detailed Design process.
 - 71.4 Key Timaru District Councils projects to be prioritised regardless of future arrangements.
 - 71.5 Management of regional functions.
 - 71.6 Water and CCO arrangements.
 - 71.7 Treatment of rates, assets and debt.
 - 71.8 Government assistance (including regulatory relief) sought.
- 72 It is noted that Council may, in some instances, wish to signal a current view which could be subject to change based on obtaining more information through the Detailed Design process.

DECISION FOUR (IF INTENDS TO LODGE HEAD START OUTLINE PROPOSAL): HOW WOULD ANY OUTLINE PROPOSAL BE APPROVED?

- 73 Councillors should resolve how any Head Start proposal is to be approved by Council, and lodged.
- 74 The default position is that Council resolution is required to approve a lodge a proposal on behalf of Council, however elected members may deem it appropriate to delegate this authority (for example to the Mayor, Deputy Mayor and Chief Executive jointly).
- 75 This is relevant because the preparation and approval of any outline proposal will be a dynamic, potentially fast-paced process involving negotiations with other councils, and likely require Council decisions in response to changes sought by other councils. The timeframe for responding to other councils (given the 9 August deadline to lodge any outline proposal) may preclude arranging a formal Council meeting.
- 76 The trade-off for any delegation is that it may lessen the transparency and accountability of the delegated parties to elected members and the wider public. This could be mitigated to some extent, for example through the delegated parties lodging a report to Council outlining decisions that they took under delegated authority and their rationale for doing so.
- 77 A placeholder Extraordinary Council Meeting has been diarised for the afternoon of Tuesday 4 August to consider the material content of any outline proposal, if Council does not wish to delegate the authority for material decision-making. Given the short timeframe between meetings, the outline proposal will most likely be tabled at the meeting.

Consultation

- 78 Council has undertaken consultation on the Head Start pathway, as detailed in the previous paper in this agenda.
- 79 The consultation that has been undertaken has been informed by legal advice commissioned by Local Government New Zealand. This notes that due to there being no current legislative basis for the Head Start Pathway, with any enabling legislation not likely until 2027, there is no exemption from council decision making requirements in the LGA.

- 80 This means that any local authority that submits an outline proposal will be doing so in reliance on its general power of competence in section 12 and in line with sections 76-81 of the LGA around decision making and consultation.

Relevant Legislation, Council Policy and Plans

- 81 Local Government Act 2002 (particularly ss 76–81)
- 82 Significance and Engagement Policy
- 83 Government reform framework
- 84 Government RMA reform / Regional Spatial Plans

Financial and Funding Implications

- 85 There are minimal financial and funding implications directly as a result of this report.
- 86 The cost of lodging any outline proposal (consisting of officer resource and potential specialist external support) can be met from existing budgets.
- 87 Separately, the overall financial cost of any amalgamation (including transition) is unknown at this time and would be a matter for Detailed Design. Any financial benefit to offset these costs (and whether there would be a net benefit or net cost) would depend on future decisions about how the new unitary is designed and managed.
- 88 Analysis to date suggests that each of the five councils under consideration has good cashflow, and most have sizeable headroom under their debt cap. Financial analysis of partner councils would be a priority during a Detailed Design process.
- 89 To date there have been no announcements of any support from central government to help support the implementation of their policy.

Other Considerations

- 90 Officers will continue to update elected members and the community as and when central government releases additional relevant information about Simplifying Local Government.

Attachments

1. Rates Analysis - provided by Environment Canterbury [↓](#) 
2. Regional council functions - provided by Environment Canterbury [↓](#) 
3. Independent Options Evaluation - Head Start criteria only [↓](#) 
4. Independent Options Evaluation - full evaluation [↓](#) 

ANNUAL PLAN 2025/26																						
REGIONAL RATES ANALYSIS BY SERVICE																						
	Kaikōura		Hurunui		Waimakariri		Christchurch		Selwyn		Ashburton		Timaru		Mackenzie		Waimate		Waitaki		\$000	
																					TOTAL	
Bus and ferry services																						
General rates	98	1%	363	3%	954	9%	6,159	57%	1,377	13%	778	7%	667	6%	207	2%	198	2%	97	1%	10,898	
Targeted rates	-	0%	-	0%	3,263	6%	45,051	85%	3,296	6%	-	0%	1,627	3%	-	0%	-	0%	-	0%	53,238	
	98	0%	363	1%	4,218	7%	51,210	80%	4,674	7%	778	1%	2,294	4%	207	0%	198	0%	97	0%	64,136	
Direct - Expenditure	-	0%	-	0%	7,061	6%	99,143	85%	6,635	6%	-	0%	3,562	3%	-	0%	-	0%	-	0%	116,401	
Indirect - Expenditure	53	0%	198	1%	2,296	7%	27,877	80%	2,544	7%	423	1%	1,249	4%	113	0%	108	0%	53	0%	34,914	
	53	0%	198	0%	9,357	6%	127,020	84%	9,179	6%	423	0%	4,810	3%	113	0%	108	0%	53	0%	151,315	
Flood and River Resilience																						
General rates	182	1%	677	3%	1,780	9%	11,483	57%	2,568	13%	1,450	7%	1,243	6%	387	2%	370	2%	181	1%	20,321	
Targeted rates	540	4%	285	2%	2,226	17%	3,588	27%	1,782	13%	1,820	14%	2,135	16%	437	3%	512	4%	56	0%	13,383	
	722	2%	962	3%	4,006	12%	15,071	45%	4,350	13%	3,270	10%	3,378	10%	824	2%	881	3%	238	1%	33,703	
Direct - Expenditure	853	4%	278	1%	3,401	17%	6,647	32%	2,461	12%	2,003	10%	2,899	14%	543	3%	840	4%	651	3%	20,578	
Indirect - Expenditure	401	2%	535	3%	2,227	12%	8,377	45%	2,418	13%	1,817	10%	1,878	10%	458	2%	490	3%	132	1%	18,733	
	1,254	3%	813	2%	5,628	14%	15,024	38%	4,879	12%	3,821	10%	4,777	12%	1,001	3%	1,330	3%	784	2%	39,311	
Pest Management																						
General rates	55	1%	205	3%	539	9%	3,480	57%	778	13%	439	7%	377	6%	117	2%	112	2%	55	1%	6,157	
Targeted rates	32	2%	195	12%	195	12%	115	7%	324	20%	373	23%	146	9%	97	6%	130	8%	49	3%	1,655	
	88	1%	400	5%	734	9%	3,595	46%	1,102	14%	812	10%	523	7%	214	3%	242	3%	104	1%	7,813	
Direct - Expenditure	-	0%	100	3%	-	0%	34	1%	705	21%	38	1%	38	1%	1,941	57%	580	17%	-	0%	3,435	
Indirect - Expenditure	115	1%	527	5%	968	9%	4,740	46%	1,453	14%	1,071	10%	689	7%	283	3%	319	3%	137	1%	10,301	
	115	1%	627	5%	968	7%	4,774	35%	2,158	16%	1,108	8%	726	5%	2,224	16%	899	7%	137	1%	13,736	
1. Direct expenditure – Costs can be linked specifically to a district as the work undertaken relates to an identifiable location.																						
2. Indirect expenditure – Costs cannot be specifically linked to a district as the work undertaken relates to the wider region. Indirect expenditure by TA is therefore indicative. The apportionment is based on the district revenue split for the service																						
3. Other major non-rates funding sources:																						
- Bus and ferry services - Grants (NZTA) and user pays (bus fares)																						
- Flood and river resilience: Grants (MBIE) and user pays (land leases and forestry income)																						
- Pest Management - Grants (MPI)																						

What are Canterbury Regional Council's functions?

In our Long-Term Plan 2024-34, Canterbury Regional Council organised our functions into three core services. This approach helps us to be more outcome-focused and purpose-driven and to achieve the greatest environmental, social, economic and cultural outcomes for Waitaha Canterbury.



Environmental Regulation and Protection We are the environmental regulator and responsible for managing the use of natural resources including air, soil, water and land.	- Regulatory frameworks (\$14m) - Authorisations (consenting) (\$27m) - Compliance (\$27m) - Incident response (\$4m) - Pest management (\$14m) - Indigenous biodiversity and mahinga kai (\$14m) - Data, information and advice (\$23m) - Local action support (\$9m) 
Community Preparedness & Response to Hazards We are responsible for supporting the community to be prepared for, and able to respond to, natural and human induced hazards and events.	- Flood and river resilience (\$38m) - Flood warning and advisory service (\$2m) - Data and information on contaminated land and natural hazards (\$5m) - Civil Defence Emergency Management (\$5m) - Navigation safety in ports, harbours, rivers and lakes (\$3m) 
Public Transport We are responsible for planning, operating, managing, and delivering effective public transport services and improvements in Waitaha Canterbury.	- Bus and ferry services in Greater Christchurch and Timaru (\$153m) - Total Mobility funding, and support for Community Vehicle Trusts (\$17m) - Regional transport 

\$ figure are expenditure as per draft Annual Plan 2026/27, to nearest million

Enabling functions These core services and functions can only be delivered through the support of enabling and supporting functions, which include:	Corporate Services / Finance Digital Solutions, assets, financial management, procurement Tumu Herenga & Governance Support for Tiriti partnership ,Chair, Council and Chief Executive	Communications & Engagement Stakeholder relationships, community consultation and engagement, customer advisory, communications and media People & Capability Health, Safety and Wellbeing, recruitment, org development	Strategy & Planning Strategic guidance to Core Services, Organisational performance reporting, secretariat support to regional bodies
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How could regional functions be organised differently?



In 2025/26 we have provided the following core services to our community. The functions within these can be separated into different categories (this page), which could be delivered in different ways (next page).

Environmental Regulation and Protection	
- Regulatory frameworks (\$14m) - Authorisations (consenting) (\$27m)	Compliance (\$27m)
- Indigenous biodiversity and mahinga kai (\$14m) - Data, information and advice (\$23m)	- Incident response (\$4m) - Pest management (\$14m) - Local action support (\$9m)
Community Preparedness and Response to Hazards	
- Flood and river resilience (\$38m) - Flood warning and advisory service (\$2m) - Data and information on contaminated land and natural hazards (\$5m)	- Civil Defence Emergency Management (\$5m) - Navigation safety in ports, harbours, rivers and lakes (\$3m)
Public Transport	
- Bus and ferry services in Greater Christchurch and Timaru (\$153m) - Total Mobility funding, and support for Community Vehicle Trusts (\$17m)	Regional transport

\$ figure are expenditure as per draft Annual Plan 2026/27, to nearest million

RMA functions which are subject to change (including potentially centralisation) under forthcoming new resource management legislation.

Key regional functions that are relevant to both urban and rural communities, present significant life safety and economic risk if delivery is interrupted, require specialist skillsets and infrastructure to deliver, and could be delivered by unitary councils or various levels of shared entities.

Transport functions that are largely relevant to urban communities, require specialised knowledge to implement, and which are subject to funding agreements with central government. Including regional transport enables strategic alignment.

Delivering these services requires ‘enabling functions’ – science, strategy, finance, communications, health and safety, digital, project management, etc. When considering where to deliver these core services, we should also consider what the enabling requirements are needed to effectively deliver them.

Ways of delivering key regional functions in future



These are options for illustration and discussion. They are focused on *where* the functions could be delivered, with *how* they are delivered, including to what extent and within what financial envelope, subject to decision by relevant governors.

Options to deliver key functions

Each unitary delivers all regional services in their subregion independently Pros: gives full control to governors of new unitaries, enables hyper-local decisions (inc with Papatipu Rūnanga) Cons: expensive, duplicative, may create competition for resource and expertise, difficulty considering wide-scale matters across catchments	Deliver with Canterbury-level shared service entity proportionally funded and governed by new unitaries Pros: continuity with existing expertise and regional strategies, gives some control to governors of unitaries Cons: may be competition for resource and expertise across regions, requires compromise between needs of new unitaries
Deliver with South Island-level shared service entity proportionally funded and governed by new unitaries Pros: larger scale leverages investment, skills and advocacy, alignment with Ngāi Tahu takiwā, could be cost-effective Cons: requires organisation transition for existing RCs, requires agreement of needs and priorities between new unitaries	Deliver with national-level shared service entity proportionally funded and governed by new unitaries Pros: larger scale leverages investment, skills and advocacy, more funders could mean more capacity Cons: complex, less voice for needs of South Island and new unitaries, would require all new unitaries to agree on priorities

Options to deliver transport functions

Merge all transport functions (delivery, infrastructure, regional transport etc.) into function that is governed by new urban unitary Combined function could be housed within the unitary or in a separate arms-length entity. Public Transport Authority and Road Controlling Authority roles with semi-commercial orientation; mixed funding (bulk/local/fares); higher ridership potential; performance-based contracts; depot and fleet strategy. Regional transport policy functions included.
Form hybrid Crown + local entity to deliver Canterbury public transport, with key focus on Christchurch Hybrid Crown and local governance with professional board appointed by Minister and council(s); integrated Public Transport Authority functions focused on mass movement of people; bulk funding from Crown with board investment decisions deriving from regional spatial plan direction; significant fare revenue with commercialisation focus; asset ownership focus (incl. rail where relevant).
Full centralisation of public transport in New Zealand A nationally centralised public transport model where strategic planning, standards, major procurement, funding settings and performance management are led by a single national public transport authority (or equivalent Crown entity). Regional and local inputs retained through formal advisory and engagement mechanisms, but core decision rights sit centrally to drive consistency, scale economies and system integration

Delivering regional functions through shared services

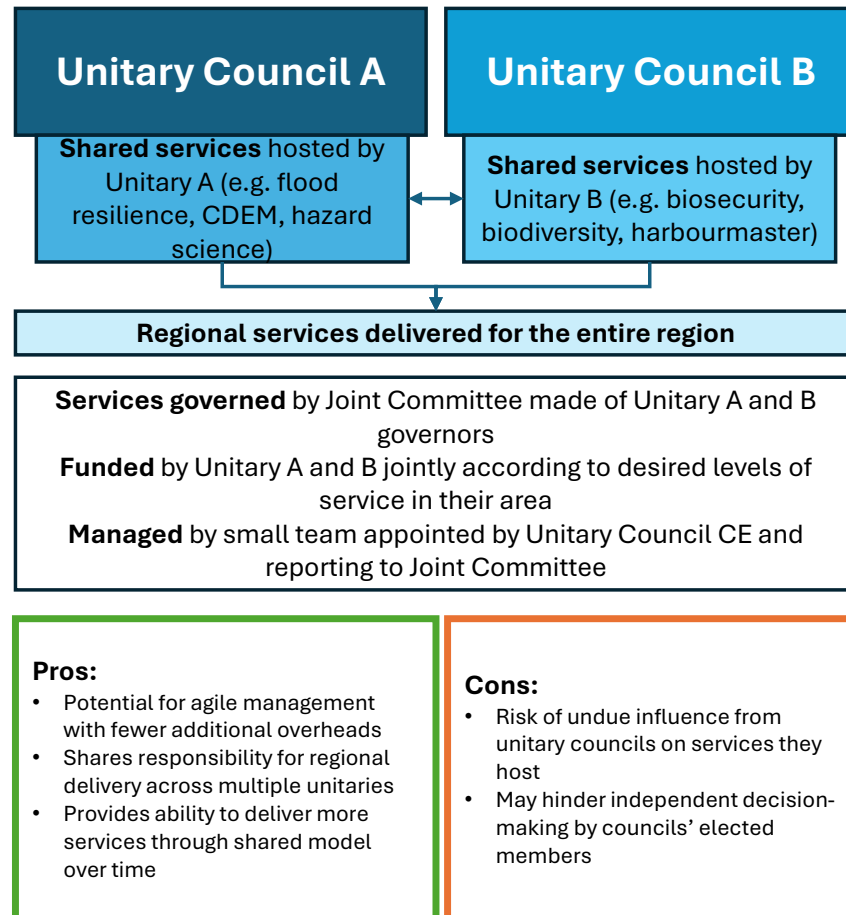


Simplifying Local Government Head Start proposals must show **deliverability** and **economies of scale**, including **enabling effective delivery of key regional functions**.

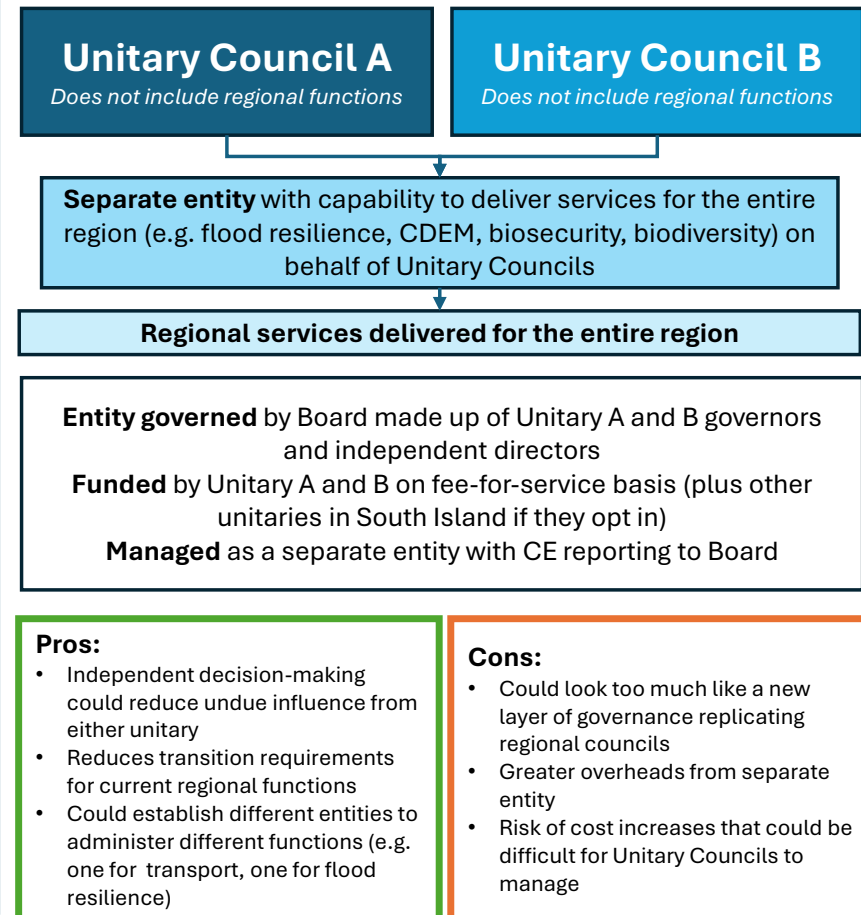
Conversations in Canterbury have identified a shared services model as a potential option to deliver regional functions.

This A3 outlines, for discussion, different shared services models that could deliver regional functions in future.

Embedding shared services into councils



Delivering shared services via an entity



rationale>

South Canterbury Amalgamation Options

Investor: Timaru District Council
Facilitator: Edward Guy
Initial Workshop: 25-May-26
Version No.: 6.1
Last Modified by: 22-Jun-26

OPTIONS EVALUATION - SCORES ASSESSED FROM STATUS QUO HEAD START ONLY			Activity options									
			Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	
			Timaru Unitary Authority "Go it alone" Scoring Assessed Against Status Quo	3 TLA's Unitary Unitary Authority - Timaru, Mackenzie & Waimate District Councils	3 TLA's Unitary Waitaki Catchment - ECAN Southern Boundary Splits Waitaki District in Two (excludes Oamaru)	3 TLA's Unitary Waitaki District Council	3 TLA's Unitary Ashburton District Council	3 TLA's Unitary Ashburton District Council Rakaia Catchment Boundary Extends into the Selwyn District ensuring the entire Rakaia Catchment is Included	3 TLA's Unitary Ashburton District Council Waitaki Catchment Splits Waitaki District in Two (excludes Oamaru)	3 TLA's Unitary Ashburton District Council Rakaia Catchment Waitaki Catchment 2 Full Catchments	3 TLA's Unitary Rural Canterbury Unitary (excludes Christchurch City)	
Investment Objectives			Relative Importance of objective	0.10	1.03	1.00	0.43	1.30	1.60	1.07	1.37	1.20
Supports New Planning System	Supports regional spatial planning (Scale)	10%	-3	1	2	1	2	3	3	3	4	4
	Does it make coordination easier? (Reduction in the number of plans)	10%	-2	2	2	2	3	3	3	3	3	4
Simplifies Local Governance	Reduces complexity (Reduction in Governance Entities)	7%	0	2	2	3	3	3	3	3	3	4
	Improves accountability (Community understands how decisions are made and who's responsible)	7%	3	2	2	1	1	1	1	0	-1	-1
	Supports effective decision making (Reduces duplication, negotiation, between Councils and conflicting priorities)	7%	-1	1	2	1	2	3	3	4	5	5
Economies of Scale	Population & rating base (Scale)	7%	0	1	1	2	2	3	3	3	4	5
	Infrastructure & asset base (Scale)	7%	1	2	2	3	3	3	3	4	5	5
	Capability (Ability to Attract and Retain Appropriate Skills - Combined Revenue)	7%	-1	1	1	1	2	3	3	4	5	5
Maintains Local Voice	Representation & democratic access (Based on Status Quo - Assumes representation will have Local Boards)	7%	3	2	1	-1	1	1	-1	-1	-1	-3
	Local decision making & influence (Based on Status Quo - Assumes representation will have Local Boards)	7%	2	2	1	-1	1	1	-1	-1	-1	-3
	Maintaining community identity (Deal with local issues effectively)	7%	2	1	0	-1	0	0	-1	-1	-1	-2
Deliverability	Implementation & transition risk (Complexity of Merging Organisations)	20%	0	-1	-1	-2	-1	-1	-2	-2	-2	-3
100%												
Ranking												
Final Ranking				9	6	7	8	3	1	5	2	4
Overall Assessment												
Recommendation												
Notes: Score -5 to +5. The purpose of the scale is to show both direction and strength of impact. A positive score does not mean an option is without risk, and a negative score does not necessarily rule an option out - it simply identifies where the trade-offs appear to sit. Scores are based on Status Quo, Not Option 1												
			Score	Score name	Meaning							
				-5 Very strong negative impact	Major adverse impact; option is likely to materially worsen outcomes.							
				-4 Strong negative impact	Significant adverse impact; serious concerns or trade-offs.							
				-3 Moderate negative impact	Clear downside; impacts are material but may be manageable.							
				-2 Minor negative impact	Some adverse impact; relatively limited or capable of mitigation.							
				-1 Very minor negative impact	Slight downside; unlikely to be decisive on its own.							
				0 Neutral / no material change	No clear positive or negative impact compared with the status quo.							
				1 Very minor positive impact	Slight improvement; useful but not material.							
				2 Minor positive impact	Some improvement; limited but meaningful benefit.							
				3 Moderate positive impact	Clear positive impact; materially improves outcomes.							
				4 Strong positive impact	Significant improvement; strong contribution to desired outcomes.							
				5 Very strong positive impact	Transformational or best-performing impact; substantially advances desired outcomes.							

rationale

South Canterbury Amalgamation Options

Invitation: Timaru District Council

Facilitator: Edward Gray

Initial Workshop: 25-May-26

Version No.: 0.1

Last Modified by: 22-Jun-26

OPTIONS EVALUATION - SCORES ASSESSED FROM STATUS QUO FULL EVALUATION (HEAD START + ECONOMIC, ENVIRONMENTAL, SOCIAL AND CULTURAL)			Activity options																																													
			Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9																																					
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Investment Objectives			Relative Importance of objective	0.09	1.12	0.88	0.24	1.88	2.03	1.49	1.98	0.12																																				
Supports New Planning System	Supports regional spatial planning (Scale)	5%	-3	1	2	1	2	3	3	4	4																																					
	Does it make coordination easier? (Reduction in the number of plans)	5%	-2	2	2	2	3	3	3	3	4																																					
Simplifies Local Governance	Reduces complexity (Reduction in Governance Entities)	3%	0	2	2	3	3	3	3	3	4																																					
	Improves accountability (Community understands how decisions are made and who's responsible)	3%	3	2	2	1	1	1	1	0	-1																																					
	Supports effective decision making (Reduces duplication, negotiation, between Councils and conflicting priorities)	3%	-1	1	2	1	2	3	3	4	5																																					
Economies of Scale	Population & rating base (Scale)	3%	0	1	1	2	2	3	3	4	5																																					
	Infrastructure & asset base (Scale)	3%	1	2	2	3	3	3	3	4	5																																					
	Capability (Ability to Attract and Retain Appropriate Skills - Combined Revenue)	3%	-1	1	1	1	2	3	3	4	5																																					
Maintains Local Voice	Representation & democratic access (Based on Status Quo - Assumes representation will have Local Boards)	3%	3	2	1	-1	1	1	-1	-1	-3																																					
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	Maintaining community identity (Deal with local issues effectively)	3%	2	1	0	-1	0	0	-1	-1	-2																																					
Deliverability	Implementation & transition risk (Complexity of Merging Organisations)	10%	0	-1	-1	-2	-1	-1	-2	-2	-3																																					
Supports Economic Development	Affordability of Services (Efficiency of Delivering Services)	6%	-1	0	0	0	1	1	1	2	-1																																					
	Ease of doing business & investing (Regulatory Simplification)	6%	1	2	2	1	3	3	3	3	-1																																					
Looking After Our Environment	Integrated environmental stewardship (Ease in defining & implementing optimised and balanced solution across the environmental domain)	4%	0	1	2	2	2	2	2	3	1																																					
	Long-term resilience (Ease in planning and implementing solutions for climate resilience, natural hazards etc)	4%	-1	1	1	1	2	2	2	3	-1																																					
	Consistent regulation (Consistency of Consenting, Monitoring and Enforcement)	4%	1	2	2	2	3	3	3	4	2																																					
Liveability & Social Cohesion	Access to community facilities & services	6%	0	1	-1	-2	2	2	1	2	-1																																					
	Community cohesion	6%	0	0	-1	-2	3	3	1	1	-2																																					
Culture	Iwi Māori relationships & Treaty obligations	4%	1	2	2	2	3	3	3	4	-1																																					
	Protection of local identity, heritage & sense of place (Maintaining Uniqueness)	4%	0	2	1	-1	3	3	2	2	-2																																					
	Community expression (Collectively share and articulate a shared identity, values and experiences)	4%	0	2	1	-1	3	3	2	3	-3																																					
100%																																																
Ranking			9	5	6	7	3	1	4	2	8																																					
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Notes: Score -5 to +5. The purpose of the scale is to show both direction and strength of impact. A positive score does not mean an option is without risk, and a negative score does not necessarily rule an option out - it simply identifies where the trade-offs appear to sit. The scoring framework has been structured so that 50% of the assessment reflects the central government / Head Start perspective, and 50% reflects a local government and community perspective. This is intended to balance alignment with the Government's reform criteria with the practical local impacts for communities, councils and service delivery. All options have been scored against the current state / status quo. Option 1 is not the baseline — it is one of the options being assessed. This means the scores reflect whether each option is expected to improve, worsen or make no material change compared with current arrangements.																																																
<table><tr><th>Score</th><th>Score name</th><th>Meaning</th></tr><tr><td>-5</td><td>Very strong negative impact</td><td>Major adverse impact; option is likely to materially worsen outcomes.</td></tr><tr><td>-4</td><td>Strong negative impact</td><td>Significant adverse impact; serious concerns or trade-offs.</td></tr><tr><td>-3</td><td>Moderate negative impact</td><td>Clear downside; impacts are material but may be manageable.</td></tr><tr><td>-2</td><td>Minor negative impact</td><td>Some adverse impact; relatively limited or capable of mitigation.</td></tr><tr><td>-1</td><td>Very minor negative impact</td><td>Slight downside; unlikely to be decisive on its own.</td></tr><tr><td>0</td><td>Neutral / no material change</td><td>No clear positive or negative impact compared with the status quo.</td></tr><tr><td>1</td><td>Very minor positive impact</td><td>Slight improvement; useful but not material.</td></tr><tr><td>2</td><td>Minor positive impact</td><td>Some improvement; limited but meaningful benefit.</td></tr><tr><td>3</td><td>Moderate positive impact</td><td>Clear positive impact; materially improves outcomes.</td></tr><tr><td>4</td><td>Strong positive impact</td><td>Significant improvement; strong contribution to desired outcomes.</td></tr><tr><td>5</td><td>Very strong positive impact</td><td>Transformational or best-performing impact; substantially advances desired outcomes.</td></tr></table>													Score	Score name	Meaning	-5	Very strong negative impact	Major adverse impact; option is likely to materially worsen outcomes.	-4	Strong negative impact	Significant adverse impact; serious concerns or trade-offs.	-3	Moderate negative impact	Clear downside; impacts are material but may be manageable.	-2	Minor negative impact	Some adverse impact; relatively limited or capable of mitigation.	-1	Very minor negative impact	Slight downside; unlikely to be decisive on its own.	0	Neutral / no material change	No clear positive or negative impact compared with the status quo.	1	Very minor positive impact	Slight improvement; useful but not material.	2	Minor positive impact	Some improvement; limited but meaningful benefit.	3	Moderate positive impact	Clear positive impact; materially improves outcomes.	4	Strong positive impact	Significant improvement; strong contribution to desired outcomes.	5	Very strong positive impact	Transformational or best-performing impact; substantially advances desired outcomes.
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8 Consideration of Urgent Business Items

9 Consideration of Minor Nature Matters

10 Public Forum Items Requiring Consideration