

Christchurch City Council submission on the *Simplifying Local Government Proposal*

Response to the proposal's targeted questions

Note: This response to the targeted questions should be read alongside Christchurch City Council's main submission. The positions below reflect the same core themes: ensuring the reform process is evidence-led, capable of progressing at pace, supported by appropriate governance and analytical capability, and able to recognise metropolitan-scale system realities in Canterbury.

1. Do you agree there is a need to simplify local government?

- a. Yes.
- b. The current two-tier system creates duplication, inconsistent decision-making, and unnecessary cost, particularly where regional and territorial functions intersect (planning, transport, water, hazards, climate). Simplification should be aimed at better performance and clearer accountability, not just fewer governance bodies.
- c. Christchurch also considers that the issues identified reflect a wider pattern of fragmented and incremental reform across the local government system. Over time, Parliament has enacted a complex and sometimes inconsistent suite of legislative arrangements, reinforcing the need for a more coherent, system-wide approach to reform.

2. What do you think of the proposed approach overall?

- a. We support the intent: reduce duplication, improve efficiency, and strengthen regional performance. The idea of a functional review first is methodologically sound.
- b. However, we have significant concerns about whether the proposed mechanism will deliver meaningful change in practice. In particular, we are not yet convinced that, as currently designed, the CTB will consistently function as a credible transitional governance model for Canterbury, or that it will reliably produce an evidence-led Regional Reorganisation Plan (RRP) rather than a negotiated compromise among existing councils.
- c. The Council also considers it important that the reform process maintains momentum and provides sufficient certainty for councils, communities, and staff, including ensuring a governance and delivery model can be confirmed and ready for implementation prior to the next local government election cycle. Extended transition timelines risk delaying benefits and increasing organisational and investment uncertainty across the local government system. including ensuring a governance and delivery model can be confirmed and ready for implementation prior to the next local government election cycle.

3. Do you agree with replacing regional councillors with a CTB?

- a. Not as currently proposed (without stronger safeguards and supporting arrangements).

- b. The Council's view is that elected regional councillors should remain in place to govern existing regional council functions during the transition period, until a new governance and delivery model is confirmed and ready for implementation at the next local government election. This is provided the reform process can progress at pace and with appropriate capability and support from Government.
- c. This would allow the CTB (or equivalent transitional body) to focus on leading the functional review and development of the RRP, supported by a strong, independent secretariat and dedicated analytical capability, rather than attempting to simultaneously govern ongoing regional council operations.
- d. Separating these responsibilities would reduce transition risk, strengthen focus, and better support a rigorous, evidence-led reorganisation process. However, if the reform process cannot realistically deliver a clear, implementable model within the election cycle, alternative transitional governance arrangements with sufficient capability and mandate would need to be considered.

4. What do you like or dislike about the proposal to replace regional councillors with a CTB?

- a. What we like:
 - i. Acknowledges the need to reduce duplication and align regional decision-making.
 - ii. Uses existing elected leadership, which may strengthen public accountability relative to fully appointed models.
 - iii. Creates a potential mechanism to drive a region-wide functional review.
- b. What we dislike / are concerned about:
 - i. As per the current proposal, a CTB will be overloaded, with mayors expected to govern existing regional functions (including RMA reforms and regional spatial planning) while also leading major structural redesign.
 - ii. Canterbury's complexity (major metro centre + multiple districts + significant environmental and infrastructure challenges across the largest region in the country) is unlikely to be well-served by a mayoral forum model.
 - iii. High risk the RRP becomes a negotiated settlement, not a best-for-region design.
 - iv. Timeframes risk loss of momentum and delayed benefits for communities and ratepayers.
 - v. Delivering a credible RRP will require capability beyond traditional governance functions, including expertise in system design, infrastructure

finance, regulatory performance, organisational transition, and data-driven functional analysis. The proposal does not yet clearly demonstrate how this capability will be provided.

- vi. Extended transition arrangements without clear capability and funding pathways risk creating additional cost pressure for councils and ratepayers, particularly in the current fiscal environment.

5. What level of Crown participation in regional decision-making do you prefer?

- a. None, as a default setting.
- b. We prefer local democratic accountability to remain key. However, if the Government proceeds with a CTB model, there may be circumstances where limited Crown participation could be justified to ensure national consistency for particular functions (especially where national reforms centralise standards or compliance).
- c. If Crown participation is included, it should be:
 - i. clearly bounded to defined matters (not general governance),
 - ii. used sparingly,
 - iii. and designed to support evidence-based decision-making, not override local voice as a norm.
- d. We do not support a majority-vote Crown Commissioner model.

6. Do you agree that mayors on the CTB should have a proportional vote adjusted for effective representation?

- a. In principle, yes, but the detail is critical.
- b. We support weighted voting that recognises population, and we understand the need for “effective representation”. However, the system must not be designed in a way that materially under-weights the needs of a major metropolitan centre or produces ongoing decision paralysis.
- c. For Canterbury, the voting design must:
 - i. recognise Christchurch’s scale and regional impact,
 - ii. remain understandable and durable,
 - iii. avoid creating incentives for minority-vote bargaining that undermines metropolitan delivery.

7. What do you like or dislike about the voting proposal for the CTB?

- a. Like:
 - i. Tries to avoid the two extremes of “one mayor, one vote” and pure population dominance.
 - ii. Provides a role for an independent body (LGC).
- b. Dislike / concerns:
 - i. “Effective representation” is not yet defined at CTB scale, and could become a mechanism that systematically dilutes metropolitan decision-making.
 - ii. Uncertainty and discretion may undermine confidence and create ongoing contestability.
 - iii. Dual-threshold voting for some RM decisions risks slowing or complicating decisions further unless tightly designed.

8. Do you support the proposal to require CTBs to develop regional reorganisation plans?

- a. Yes, with stronger process design requirements.
- b. A mandatory RRP is the most promising part of the proposal, provided it is a true functional review that can produce multiple structural solutions (not a single forced model).
- c. To be credible, the process must:
 - i. be evidence-led and transparent,
 - ii. include robust community and mana whenua engagement,
 - iii. allow sub-regional (e.g., Greater Christchurch) workstreams,
 - iv. and be supported by a dedicated, high-capability independent secretariat and analytical function, with settings that enable the functional review and RRP to progress at pace and provide clarity ahead of the next local government election cycle.

9. What do you think about the criteria proposed for assessing regional reorganisation plans?

- a. The criteria are a useful starting point, but need strengthening and clarification, particularly around:

- i. metropolitan scale and complexity (major cities have different infrastructure requirements, growth pressures, and delivery pace requirements),
 - ii. ratepayer impacts (including cross-subsidisation and affordability),
 - iii. infrastructure system risk (including water quality, stormwater, and catchment-scale management),
 - iv. implementation realism (workforce capability, IT systems, service continuity, transition costs),
 - v. and clearer tests for Treaty partnership and Māori representation (not just “arrangements continue”).
- b. We also consider the criteria should explicitly require assessment of whether outcomes are best delivered at:
 - i. metropolitan,
 - ii. sub-regional,
 - iii. regional,
 - iv. national,
 - v. or shared-service scale, so the end plan can be a suite of solutions.

10. What do you think about how the proposal provides for iwi/Māori interests and Treaty arrangements?

- a. The proposal does not yet provide sufficient clarity or assurance on how enduring Māori representation and partnership will be maintained and strengthened in practice.
- b. While it states existing Treaty settlement obligations would “carry over”, it also removes current formal Māori representation at the regional level (including the Ngāi Tahu Representation Act 2022 arrangements), and it is not clear what enduring replacement is intended.
- c. For Canterbury, the reforms must:
 - i. maintain mana whenua partnership in regional decision-making,
 - ii. provide a clear, durable representation mechanism at the regional/metropolitan level (not ad hoc committee arrangements),
 - iii. and ensure any new governance form supports kaitiakitanga across freshwater, biodiversity, coastal and climate functions.

11. What do you like or dislike about the ways that communities crossing regional boundaries could be represented?

- a. We generally support approaches that preserve:
 - i. clear accountability,
 - ii. democratic legitimacy,
 - iii. and practical service delivery.

- b. However, “district adoption” risks creating representation that is indirect or confusing, while “additional representation” risks making CTBs larger and less workable. Any approach should be simple, transparent, and minimise governance complexity.