

Response ID ANON-NK5U-BXPW-4

Submitted to Simplifying Local Government
Submitted on 2026-02-20 09:49:05

Summary

Tell us about yourself

Individual or organisation?

Organisation

Your name or your organisation's name

Your name or your organisation's name:
Dunedin City Council

What main perspective(s) are you bringing to this consultation?

Local government

Other perspective if applicable:

Where in New Zealand do you usually live?

What region do you live in?:
Otago

I live in an urban area

Background

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

Agree

What do you think of the proposed approach overall?

What do you think of the proposed approach overall?:

The Dunedin City Council (DCC) agrees with the consultation's proposal that change in the structure of local government is needed and is actively investigating options for this. DCC's priority is the consideration of the impact Local Government reform will have on our city and communities. Dunedin City covers a total of 3,314.8 square kilometres making it the largest city by land area in New Zealand, and the current population is estimated at 136,000 in 2024 and is projected to grow to 149,500 in 2054.

While in agreement that reform is needed, the DCC requests clarity on the role of Mayors in the Combined Territories Boards. Specifically, how the extra workload will be addressed and supported. The DCC recognises that these roles may have an unintended consequence of increased workload which could extend out to other elected members. Further consideration of how the regional reorganisation would be resourced is needed.

The DCC is concerned that the Local Government Commission is not adequately resourced to support the structural change proposed, and that therefore the government's proposal risks a substantial unfunded mandate falling on ratepayers, given the proposal states that interim transition governance arrangements would use existing regional council revenue.

Further, the DCC seeks clarity about what role the new proposed Ministry of Cities, Environment, Regions and Transport (MCERT) will have within the wider structure of reformed local government, given this new agency is intended to be the "one stop shop" for local government.

Further to the above points, the DCC seeks clarity on the goal of reform. The draft proposal is justified on two main grounds: that having both regional councils and territorial authorities operating in the same geographic areas is seen as "complex", "confusing", and "costly"; and that wider system reforms – including resource management reform, water services reform, and climate adaption - will change the future role and workload of councils, making this a timely moment to reconsider institutional arrangements.

From the proposal, DCC understands a rapid review of regional council functions is due by mid-2026 to identify which functions may be discontinued or shifted to central government. DCC submits that a detailed analysis should be undertaken prior to the establishment of the Combined Territories Boards for a clearer view on the role that Mayors and/or commissioners have within the short term of reform. There are existing pathways that could be taken to review functions within local government, including representation reviews.

The DCC also raises concerns regarding asset ownership and resource mismatches, stemming from lessons learnt during the last major local government reform of 1989. As an example, ownership of Otago Harbour assets was removed from the DCC

The DCC is of the view that its upcoming representation review is the pathway most suitable for it to consider changes to local governance. The DCC has concerns about the timeline for simplifying local government and the limited opportunities within this early stage to consult with stakeholders and community. DCC notes that this consultation is open when the rapid review by relevant agencies is already underway. The DCC supports a regional planning approach in principle, but not at the cost of fair representation. It recommends use of the next local election cycle to allow for a representative and planned transition. Reform must prioritise and preserve local democratic accountability. The case for replacing regional councils

has not been clearly proven in the proposal document, questions remain on the criteria for reform including the absence of an outcome-focused approach to simplifying local government. DCC is supportive of improving efficiency where it delivers real value to its communities but not at the cost of reduced services without detailed analysis of function.

While DCC supports central government establishing this reform process and requests the flexibility to use existing mechanisms for local government change, if the government commits to CTBs and the regional reorganisation plans, then DCC notes that developing and consulting on the regional reorganisation plans will involve significant work for both CTB members and those staff or contractors supporting them, wherever they are located. Resourcing this properly will strengthen the reorganisation plans and make them more likely to endure.

Simplifying regional governance

Do you agree with replacing regional councillors with a CTB?

Not Answered

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

DCC submits there are too many unknowns to assess risks confidently on the structure and function of CTBs in its interim governance role. The role of developing regional reorganisation plans provides opportunity to deliver reform through focused, outcome driven simplification however DCC is of the view that the reorganisation role will be at odds with the interim governance arrangements and the increased workload this will bring to Mayors and other elected members. DCC is concerned about the loss of institutional knowledge if regional councillors are replaced with a CTB. If reform proceeds with this element, then DCC submits that existing governance knowledge of regional function should be represented within the interim arrangements.

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

Crown Commissioner on CTB (non-voting)

Allocating voting power

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

Not Answered

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

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

Membership of the CTBs will be important and have a direct correlation with the influence of how proposals will be received. DCC submits that CTBs must be primarily comprised of elected members and that they have the capacity to do their role, and the support of their councils. DCC is of the view that geographical extent of each council area and local voice needs to be represented regardless of population size. Based on the 2023 Census, there is an asymmetric population distribution with Dunedin likely to dominate decision making relevant to other councils. DCC maintains that representation reviews provide an existing pathway for local government reform.

If the government commits to CTBs and mayoral membership, then DCC supports the proposal of the Local Government Commission determining voting power of each Mayor, based on population, and adjusted to ensure smaller communities receive effective representation.

The DCC notes that current legislation already enables structural change. DCC's priority remains focused on its city and communities and is of the view that flexibility for alternative pathways for reform would enable local voice to be emphasised throughout local government change. Additionally, support of local decision making is a view the government has taken in other areas of reform such as the establishment of water entities. DCC submits that a representation review is one pathway that emphasises local decision making and allows for consultation with its communities. The proposal to replace regional councillors leaves significant potential for the loss of local voice specific to the knowledge held by those councillors in the governance of regional functions. There is also an additional risk the proposal removes established representation and partnership arrangements.

Cross boundary issues

What do you think about the ways that communities crossing regional boundaries could be represented?

What do you think about the ways that communities crossing regional boundaries could be represented?:

The DCC recognises that this situation does not apply to Ōtepoti Dunedin and submits that this should be worked through with the territorial authorities where it does apply.

Improving local government

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

Not Answered

What do you like or dislike about the proposal to require regional reorganisation plans?:

The DCC is of the view that representation reviews are a useful and established mechanism for addressing governance and boundary issues. DCC recognises the reform presents opportunities for greater collaboration between local governments in principle, however this depends on the development of fair and effective representation arrangements as answered in previous questions. DCC also notes the proposal lacks adequate consultation with mana whenua and partners and has not clearly articulated the specific problems the reform is intended to solve. As mentioned in previous questions, DCC seeks a focused, evidence based, outcome driven solution to local government reform, one that is delivered through robust and transparent processes.

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

What do you like or dislike about the criteria proposed for assessing regional reorganisation plans?:

The DCC notes that the issues the proposed changes are meant to resolve have not been clearly articulated in the consultation. The proposal states that once regional reorganisation plans are submitted, the Local Government Commission will assess it against criteria including big-picture fit, affordability now and into the future, better services, clear leadership, local say, Treaty arrangements and feasibility. The Commission will then advise the Minister of Local Government, who may approve the plan, request changes, make changes directly, or appoint a new Commissioner to draft a new plan. The current assessment criteria the Local Government Commission considers in a reorganisation investigation (clause 10, Schedule 3 of the Local Government Act 2002) are:

- better fulfilment of the purpose of local government as specified in section 10 [which includes “to enable democratic local decision-making and action by, and on behalf of, communities”];
- productivity improvements within the affected local authorities;
- efficiencies and cost savings; and
- assurance that any local authority established or changed has the resources necessary to enable it to effectively perform or exercise its responsibilities, duties, and powers; and
- effective responses to the opportunities, needs, and circumstances of the affected areas; and
- enhanced effectiveness, efficiency, and sustainability of local government services; and
- better support for the ability of local and regional economies to develop and prosper; and
- enhanced ability of local government to meet the changing needs of communities for governance and services into the future; and
- effective provision for any co-governance and co-management arrangements that are established by legislation (including Treaty of Waitangi claim settlement legislation) and that are between local authorities and Iwi or Māori organisations.

The DCC notes that if the government proceeds to establish CTBs with the responsibility of developing regional reorganisation plans, then the assessment criteria should be expanded to include the above. DCC also note that collaboration opportunities and key terms in the proposed criteria only work if representation is fair and effective, and that the current mechanism of representation reviews are already effective for addressing governance and boundary issues.

Treaty of Waitangi and Māori Representation

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

What do you think about how the proposal provides for Iwi/Māori interests and Treaty arrangements?:

The DCC is of the view that the proposal does not provide for Iwi / Māori interests despite the intent that existing mechanisms for Māori participation that does not depend on regional councillor seats will continue under the new arrangements. The proposal does not give confidence on how enduring Māori representation will be represented in practice. DCC is unable to provide further feedback on this element of the proposal without meaningful engagement with mana whenua in Ōtepoti Dunedin.

Upload a submission you have prepared in advance

Upload a document (optional)

Upload a document:

Simplifying Local Government consultation - cover letter from the Mayor.pdf was uploaded