

## Forest & Bird Guidance on Simplifying Local Government consultation

### What is being consulted on?

The Government is asking for feedback on a proposal to change how local government is structured and performs its regional functions in Aotearoa New Zealand.

You can read the consultation document here:

[https://www.dia.govt.nz/diawebsite.nsf/Files/Local-Government-2025/\\$file/Simplifying-Local-Government-a-draft-proposal-27-November-2025.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Local-Government-2025/$file/Simplifying-Local-Government-a-draft-proposal-27-November-2025.pdf)

Submissions are being accepted by filling out an online survey:

<https://consultations.digital.govt.nz/simplifying-local-government/proposal/consultation/>  
or by submitting your feedback to: [simplifyinglocalgovernment@dia.govt.nz](mailto:simplifyinglocalgovernment@dia.govt.nz)

Submissions close at 5pm on the 20<sup>th</sup> of February 2026

Right now, most people are represented by two councils, elected by their local community:

- 1.) A city or district council led by a mayor, and
- 2.) A regional council led by councillors.

The proposal aims to change who makes regional decisions, including on environmental issues such as freshwater, air quality, biodiversity, pest management and climate resilience, and how councils work together effectively into the future.

### What would change?

This system change would include replacing regional councillors with a Combined Territories Board (CTB) made up of mayors (or a selected councillor) of each district and city. They would take on all regional council functions. For the natural environment, this would mean CTBs would manage:

- Biodiversity and biosecurity



- ⌚ Rivers, lakes, coasts, wetlands and air quality
- 🐁 Pest control
- 📋 Environmental rules, resource management, and compliance
- 🚍 Regional transport
- ☂️ Climate-change planning
- ⚠️ Natural hazard management, such as landslides, flooding and coastal erosion and civil defence
- 🤝 Treaty settlement obligations

Under CTBs, there would be no separate councillors focused solely on regional environmental outcomes, as there is in the current local government structure.

## What are the possible threats to nature?

The proposal shifts decision-making from locally elected representatives to potential central government influence, changing who makes the decisions. This creates a risk that long-term care for nature is pushed aside in favour of short-term development and that decisions on complex environmental issues are made without the right input. Further, this could mean that Treaty-based responsibilities for te taiao are not properly upheld. Nature could fall through the cracks.

## What do Forest & Bird think?

While Forest & Bird agree that local government needs to change to meet future challenges and collaborate more effectively, we are concerned that the Simplifying Local Government proposal falls short of what is needed<sup>1</sup>, detracting from what makes the current system inefficient.

Forest & Bird is concerned that the Simplifying Local Government proposal:

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<sup>1</sup> Department of Internal Affairs (2023) *He piki tūranga, he piki kōtuku | The future for local government*: [https://www.dia.govt.nz/diawebsite.nsf/Files/Future-for-Local-Government/\\$file/Te-Arotake\\_Final-report.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Future-for-Local-Government/$file/Te-Arotake_Final-report.pdf)

- Ignores the panel's recommendations from the 2023 future for local government review.
- Does not clearly define the problem - it assumes Regional Council governance is the problem but provides no rationale for this.
- Lacks clarity of local government functions, potentially introducing increased central government oversight and the ability to veto or make decisions on behalf of the community.
- Reduces local government's ability to check and balance central government overreach and removes autonomy.
- Diminishes local government's ability to address the twin-crises of climate change and indigenous biodiversity loss and how that applies in a local/regional context.
- Potentially limits Councils' capacity to meet community needs.
- Does not clearly integrate with the Government's wider packages of reforms (including RMA reforms).
- Risks cuts to funding for the environment.
- Does not address the ownership of assets, such as flood banks.
- Does not consider alternative models, such as a catchment-based approach to governance.

## What should my submission say?

We encourage you to help us be a voice for nature by making an individual submission. We recommend including the below points to address the questions in the consultation document, along with your own perspectives and any local examples you think could be relevant.

- What do you think of the proposed approach overall?

Forest & Bird are concerned that the overall approach falls short and will not achieve its goal. The problem is not well defined and assumes that Regional Council governance is the problem but provides no evidence of this.

The proposed approach risks centralising power, entrenching parochialism, and redirecting the focus to urban issues over region-wide environmental issues.

The proposal also does not address the ownership of significant regional assets, such as floodbanks.

- Do you agree with replacing regional councillors with a CTB?

No, select 'strongly disagree'.

There is no rationale for this proposal, nor have any alternative options been considered. Regional councils are an important environmental check and balance for district and city councils with their own important functions and responsibilities.

CTBs as proposed already exist in similar forms for regional activities like regional transport planning, indigenous biodiversity, biosecurity, and climate strategies. These initiatives are often Regional Council led and function effectively.

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

Select 'None - only mayors on the CTB'.

We think it is important that the local representatives you have democratically elected remain as the local decision-makers for your community and environment. Local representatives will have a greater understanding and connectedness to people and place, rather than enabling a Crown Commissioner to be appointed, under unknown criteria, with potential strong central government influence and overriding decision-making power.

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

Select 'neither agree nor disagree'. We do not support the establishment of a CTB.

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

We do not support the establishment of a CTB. We further want to highlight that the term 'effective representation' does not appear to be clearly defined in the consultation document. Aotearoa's communities are diverse, so effective representation needs to ensure that all communities have a voice.

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

Forest & Bird's preferred option would be to use catchment-based committees aligned with natural systems such as rivers and coastlines. Here, communities would elect local representatives, alongside iwi, hapū and technical experts, to committees with decision-making powers on issues affecting their local environment.

This would complement the 'Ki uta ki tai' model, meaning 'from the mountains to the sea'. This is a model already used widely by local government and represents a holistic, integrated approach to environmental management. It emphasises the interconnectedness of the entire ecosystem—land, water, mountains, rivers, and oceans—and is used to guide sustainable resource management.

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

Select 'neither agree nor disagree'.

We agree with the concept that a regional (or catchment-based) reorganisation plan could be advantageous. This could improve effectiveness and efficiency dependent on details and decision-making. However, we do not agree that a CTB would be the most appropriate group to make these plans.

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

The criteria fail to consider the natural environment and have a strong focus on built infrastructure.

The criteria also fail to represent local communities first and foremost, by suggesting combining small councils that may have very different communities and local needs.

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

The proposal focuses on contributions and opportunities for Māori to participate, but does not consider that decisions should be made in partnership, with Māori undertaking a crucial and important role in decision-making at the same level as the CTB.

Whatever model is chosen to represent local communities and governance, Māori must have a primary role in that system.

The fact that Treaty settlements will be honoured is non-negotiable.