

## **Submission by Environment Network Manawātū on the Simplifying Local Government Proposal**

Environment Network Manawātū (ENM) is a member-led environment hub in the Manawātū region, passionate about protecting the environment, connecting and inspiring communities to take environmental action. We're motivated by our responsibility to care for the earth and each other; becoming better Te Tiriti partners; working collaboratively and inclusively. We provide sector leadership, build capacity and capability, and create community, by sharing ideas, supporting community voices and utilizing valuable local knowledge and work effectively to push for positive change. We focus on supporting activities that align with our four pou of Climate Action, Biodiversity & Enhancement, Community Food Sovereignty and Circular Economy, Palmerston North City Council's sector lead organisations, we are their go-to group for environmental matters.

There was a high level of engagement from members and friends of ENM in preparation of this submission.

### **Environment Network Manawātū (ENM) strongly opposes the Simplifying Local Government proposal in its current form.**

Environment Network Manawātū (ENM) supports constructive reform, continuous improvement, and the pursuit of efficiencies where they genuinely improve outcomes for communities and the environment. We are not opposed to change. However, we are deeply concerned about the *process, speed, and substance* of the generation-scale restructuring contained within the Simplifying Local Government proposal.

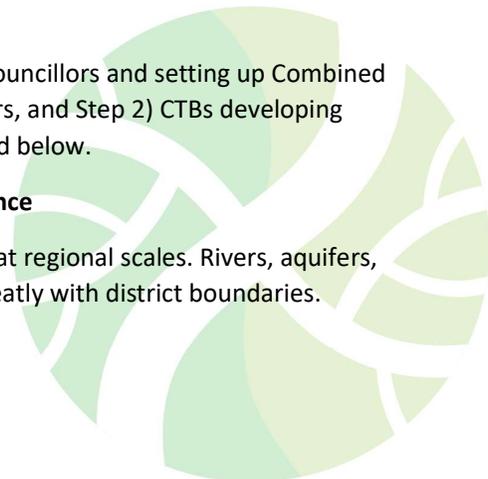
This reform has been advanced rapidly, with limited early engagement with the public, local government, iwi, or the organisations that work daily at the interface between communities and environmental systems. There has been no clear articulation of the problem this reform is intended to solve, nor evidence that the proposed structural changes are the most effective or proportionate response. Without a well-defined problem statement, it is difficult to assess whether the solution is appropriate, necessary, or sustainable.

Good reform takes time. It requires early collaboration, shared understanding, and careful testing of assumptions. In our view, this proposal falls short on all three.

The reform's structural changes of Step 1) abolishing Regional Councillors and setting up Combined Territorial Authority Boards (CTBs) with representation by mayors, and Step 2) CTBs developing Regional Reorganisation Plans, are of concern to ENM as outlined below.

### **1. Undermining Independent Regional Environmental Governance**

Regional councils exist because environmental systems operate at regional scales. Rivers, aquifers, air sheds, biodiversity corridors, and climate risks do not align neatly with district boundaries.



Independent, regionally focused governance has proven essential for setting limits, enforcing standards, and maintaining a long-term perspective.

Replacing directly elected regional councillors with CTBs made up of mayors risks significantly weakening that independence. Mayors are elected to advocate for their own communities, not their neighbours, and not for the environment as a system in its own right. They already carry substantial responsibilities and are subject to strong local political pressures.

Of particular concern is the blurring of roles between decision-making, delivery, and enforcement. The proposed structure risks eroding the separation of powers that underpins good governance. Even if unintended, this creates real risks of reduced independence, weakened checks and balances (affecting efficient operation), increased political influence over enforcement decisions, and, in worst cases, conflicts of interest. Environmental regulation is most vulnerable when those responsible for setting priorities are also those under pressure to enable development.

## **2. Loss of Democratic Accountability and Participation**

Direct election provides legitimacy and accountability, particularly for difficult environmental decisions that require saying “no” or enforcing limits. Removing directly elected regional representation reduces transparency and narrows the pathways for communities to influence decisions that affect their land, water, and health.

Centralised or indirect governance structures also reduce access for community groups, iwi, and smaller organisations. ENM is concerned that this will further marginalise voices that are already under-represented, including Māori, women, disabled people, and rural communities. Different perspectives and inclusivity of voices is imperative. If you are seeking a model that increases effectiveness, this is not it.

The messiness of democracy is not a flaw; it is how trust, capability, and shared stewardship are built over time. Effectiveness and efficiency cannot be measured solely by how much money is saved.

## **3. Centralisation Disguised as Simplification**

The proposal represents a significant centralisation of power, despite publicly declared (election campaign) commitments to localism. Decisions appear increasingly driven by assumed “national priorities” — housing, infrastructure, and economic growth — with environmental wellbeing notably absent as a core objective.

The notion of CTB developing reorganisation plans for how councils in regions can operate effectively and efficiently implies a simplified central approach, however nature is complex. Environmental problems are complex. Simplifying governance structures does not simplify ecological reality. Treating local government as a business to be streamlined ignores the social, cultural, and environmental systems it exists to serve. Evidence from environmental science consistently shows that simplistic, centralised, engineering-led solutions are inadequate for nature-based challenges.

Centralised practice is removed from the local experience, knowledge, and environmental perspective and risks simplification of local complex environmental issues. It is more likely to result in short term fixes not long term solutions and sustainable effective outcomes.

#### **4. Loss of Expertise, Partnerships, and Proven Outcomes**

ENM works closely with regional council staff and elected members in a genuine partnership for environmental stewardship. This has enabled community services over decades, enabling projects such as long-term bush restoration, freshwater improvement initiatives, estuary management, biodiversity corridors, and community-led conservation programmes.

Without regional expertise, funding mechanisms, and institutional support, many of these initiatives would not exist. The proposal provides no assurance that community-led projects such as Ruahine Kiwi, Green Corridors, freshwater restoration, plastic pollution reduction, or local food resilience initiatives will continue to be funded or supported.

#### **5. Collaboration Is a Legitimate Goal. This Is Not the Way to Achieve It**

We acknowledge that the intent to improve regional collaboration between councils is reasonable. Many regional challenges require collective action. However, collaboration does not require dismantling democratic representation or weakening independent environmental governance.

Better coordination, shared strategies, and joint problem-solving can be achieved through existing structures or incremental reform. Treating local government as partners in the reform process is more democratic and carries more integrity. Consolidating power in CTBs is a blunt instrument that creates more risk than benefit.

#### **Conclusion**

This proposal represents a generation-scale restructuring undertaken with undue haste, insufficient engagement, and no clear problem definition. It risks weakening environmental protection, democratic accountability, local expertise, and community trust while offering uncertain efficiency gains.

Environment Network Manawatū urges the government to pause, clearly articulate the problem it is seeking to address, and engage meaningfully with communities, partner with local government, iwi, and environmental practitioners to design reforms that strengthen rather than hollow out environmental stewardship and local democracy.

More will be lost than gained if this proposal proceeds as drafted.



## **Appendix**

### **More About ENM**

ENM leads by example, supporting our network members in their mahi and making sure they have what they need to achieve their goals. We believe in bringing people together, strengthening community connections and providing opportunities to create spaces where people feel comfortable talking about what's needed and work together to find solutions.

We know that to make a real difference, we need to stay strong ourselves focus on effective resources allocation for our communities and helping our network groups and locals build their skills. By encouraging learning, working together, and supporting volunteers, we help everyone make a positive impact.

### **Our Pou**

ENM focuses on supporting activities in these four pou to achieve our vision:

#### **1. Climate Action**

We raise awareness about climate change and support community actions that encourage reduced carbon emissions, waste, and overconsumption, while promoting clean air and sustainable cities. Through advocacy and collaboration, we push for climate-friendly policies and hold local and central government accountable for meaningful action.

#### **2. Biodiversity Protection & Enhancement**

We protect and restore native species and improve water quality by supporting initiatives like Manawatū River Source to Sea, with a focus on preserving ecosystems and strengthening regional biodiversity for a healthier environment.

#### **3. Community Food Sovereignty**

We strive to ensure access to healthy, locally grown, sustainable and culturally appropriate food. By supporting networks like Manawatū Food Action Network, we help communities to grow their own food, make healthy food more accessible, reduce food waste, and provide free or affordable food to people.

#### **4. Circular Economy**

We aim for a thriving planet that sustains future generations by fostering a circular economy where resources are reused and valued. We connect and support community groups, provide education, and build strong networks to improve local practices. Through shared initiatives and upskilling, we empower people to make informed choices and contribute to sustainable change

