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Future for Local Government review

To be lodged online through the submissions portal:

https://submissions.futureforlocalgovernment.govt.nz/have-your-say/submissions-to-the-review-into-the-future-for/

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<u>Western Bay of Plenty District Council Submission on the Future for Local</u> <u>Government review</u>

- Western Bay of Plenty District Council (WBOPDC) welcomes the opportunity to provide feedback on the "Review into the Future for Local Government (2022) He mata whāriki, he matawhānui: Draft report" (the report). We think that the report is aspirational and clearly identifies issues and ideas for local government to consider.
- 2. WBOPDC would like to recognise the collaborative process that the review Panel have undertaken when preparing the report. It highlights the value of partnership and engagement when looking to the future and seeking positive change for Aotearoa New Zealand. We appreciate the opportunity to hear the Panel speak in December and the conversations with Antoine Coffin on 22 December 2022.
- 3. We would also like to note the challenges that the local government sector has faced not only within the reform space but more generally due to recent weather events. These events have highlighted the need for a local response, the responsiveness of our communities and central government.
- 4. The pace of reform is of concern to WBOPDC especially given that it coincides with two other significant reform processes Three Waters reform and the Resource Management Act (RMA) reform. It appears these

processes, whilst concurrent, have been progressed in relative isolation from each other, and there are gaps and inconsistencies in the proposed arrangements and processes. We suggest that it may have been useful for the review of local government to be completed in advance of these two other reforms to provide a stronger foundation for the proposed changes anticipated by the other reforms.

- 5. In our recent submission to the RMA reform, we requested that the RMA reform process be put on hold until the recommendations of this review can be taken into account particularly regarding the form and function of local government, but also in relation to additional funding mechanisms.
- 6. The pace and scope of these concurrent reforms is also placing significant pressure on local authorities, tangata whenua and other interested stakeholders to understand and respond in a meaningful way. Short submission timeframes have occurred directly after local elections and over the Christmas and summer holiday period. This has presented challenges in ensuring elected members can effectively engage in the reform process, as well as staff resourcing and availability of tangata whenua, and others involved in the multiple reform processes.
- 7. We have reiterated these messages in our submissions on the Three Waters reform and the Resource Management Act reform.
- 8. Our key messages below, illustrate our overall thoughts and responses to the report. In Table 1 we have provided specific responses to the recommendations and questions posed by the report.

Key messages from WBOPDC

Please take action

- 9. Over the past 15 to 20 years there have been a number of reviews of local government and the various roles and functions that the sector can or should be involved in. These reviews have been completed in good faith and the sector has willingly contributed time and energy. However, we would note that the numerous recommendations that have been proposed have not been implemented.
- 10. We ask that this review leads to change through the implementation of the recommendations. The ongoing uncertainty that the review and reform processes create is challenging for local government, our staff and our community. We are also concerned about the ongoing financial cost of

review processes and note that this money could be spent on delivering outcomes that have a positive impact on the wellbeing of our community.

<u>Te Tiriti o Waitangi and Partnership</u>

11. We appreciate that local government should ensure a more meaningful expression of rangatiratanga and a more culturally specific exercise of kāwanatanga with te ao Māori values reflected at all levels of the system. WBOPDC note that there may be some challenges in understanding what this may mean dependent on the context and place. We agree with the Panel that there may be different understanding of what a specific word may mean. This highlights the need for genuine conversations both with local government and with the community as we move forward.

Capacity and capability

12. The report identifies the need for capability and capacity building across many areas of local government. We note that this issue is exacerbated by the changes proposed in the Three Waters reform and the RMA reform. It is strongly recommended that due consideration be given to building the long-term capacity and capability in the fields of planning, project managers, scientists, Matauranga Māori, transport, communication, engagement, and governance.

<u>Funding – for the community and the local government sector</u>

- 13. The Panel noted that the report was 'light' on specific funding mechanisms and that they would be focusing on this in preparation for the final report. We agree with this commentary and think that rates are still seen as the default funding stream.
- 14. We encourage the Panel to identify other meaningful funding streams and mechanisms, particularly where there is a national benefit or approach that could be utilised to provide local services. This may also translate into a need for a national policy approach or legislation rather than decentralisation.
- 15. There will always be limited funding and an oversubscription of requests.

 The competition for funding needs to be considered when identifying new funding approaches and supporting the achievement of outcomes in areas with the greatest need. Addressing equity issues across the country will be

challenging and there needs to be a consistent approach to funding decisions.

Keeping it local

- 16. We strongly support keeping the 'local' in local government and local governance. We understand that this is also the view of the Panel and that 'big' is not always better. We do however want to acknowledge the fundamental trade-off between scale, expert knowledge, and localism.
- 17. The success of keeping it local (and in achieving the outcomes identified by the community) in part will rely on a stronger and well-defined partnership between local and central government. This partnership needs to determine how national priorities can be implemented at a local level without the loss of local voice, or overriding the place-based initiatives that communities identify. A good example of this is the national approach anticipated in the Climate Change Adaptation Bill versus working with property owners directly affected by climate change.

Support for the focus on outcomes and wellbeing

- 18. We support the focus on community outcomes and achieving a higher level of wellbeing for our community. We want to note the difference between 'promote' (section 3, Local Government Act 2002) versus 'deliver' and how this might be considered in any structural reform.
- 19. There is an overlap of outcome intentions in this report with outcomes envisioned in the Natural and Built Environment bill and health reforms. It would be challenging to have multiple outcomes across different areas, and this is likely to create confusion as to how these outcomes are to be achieved and by whom. This deflects from the overall intention of stronger relationships and outcomes for local communities.
- 20. We understand that the Welsh Well-being of Future Generations Act 2015 could potentially address these issues, noting the limitations that have been identified following the Welsh Parliamentary review in 2021. We believe that legislative reform in this space will be necessary to achieve the intended outcomes and to enshrine a stronger relationship between local and central government.

We need to decide on the purpose and functions of local government

- 21. The purpose and functions of government at a local level need to be agreed before decisions are made on the most appropriate structure. Form should follow function.
- 22. We believe that building community resilience is one of the functions that must be retained at a local level. This is to ensure that we can be as prepared as possible for the ongoing impacts of natural disasters and the effects of climate change.

Simplicity should be a design principle for legislative and structural change

23. We think that simplicity needs to be one of the principles when considering legislative change and governance structures. When considering the multiple areas of reform and the report recommendations it appears that extra layers of bureaucracy will be created, with corresponding confusion for our community and an overall negative impact on achieving the community outcomes.

Prioritise the final recommendations

24. The Panel needs to determine an appropriate prioritisation and sequence for the final suite of recommendations. We acknowledge that in some instances there are no barriers to implementing several of the proposed recommendations. However, to achieve the fundamental shifts that the report identifies, we think a prioritised approach would be beneficial.



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Table 1 – WBOPDC response to recommendations from the draft report

Discussion areas	Recommendations/questions	WBOPDC response
Thriving local government is vital for Aotearoa New Zealand	No specific recommendations/questions	We generally support the draft report and the direction that the Panel is recommending. This support is tempered with the key messages provided above and specific points below.
Revitalising citizen-led democracy	Recommendations 1. That local government adopts greater use of deliberative and participatory democracy in local decision-making.	We support the recommendations. Our understanding is that current legislation already provides for the use of deliberative and participatory democracy in local decision-making. We are always looking to make stronger connections with our community outside of the required formal processes. Good examples of this are events run by Council for community benefit, engagement with schools and community development initiatives. We also think that in some instances the requirement to use the

Discussion areas Re	ecommendations/questions	WBOPDC response
3.	That local government, supported by central government, reviews the legislative provisions relating to engagement, consultation, and decision-making to ensure they provide a comprehensive, meaningful, and flexible platform for revitalising community participation and engagement. That central government leads a comprehensive review of requirements for engaging with Māori across local government-related legislation, considering opportunities to streamline or align those requirements. That councils develop and invest in their internal systems for managing and promoting good quality engagement with Māori.	special consultative procedure (SCP) results in engagement processes that are superfluous and do not add any value to the outcome. A good example of this is the requirement to use the SCP to consult on thoroughfares for earthquake prone buildings. We are concerned that a review of the legislative provisions relating to engagement, consultation and decision-making is premature until the roles and responsibilities of local government and potential structural changes are confirmed. This feedback applies to all recommendations where a legislative review of specific functions is identified. We support the recommendations to review requirements for engaging with Māori across local government related legislation, and development and investment in Council systems to support engagement. We note that this would also partially address the capacity and capability issue that has been identified. However, we reiterate our comment above that some recommendations may be premature or require sequencing to ensure both the best outcome and the best use of available funding.

Discussion areas	Recommendations/questions	WBOPDC response
	 5. That central government provides a statutory obligation for councils to give due consideration to an agreed, local expression of tikanga whakahaere in their standing orders and engagement practices, and for chief executives to be required to promote the incorporation of tikanga in organisational systems. Question 1. What might we do more of to increase community understanding about the role of local government, and therefore lead to greater civic participation? 	We support the intention of the recommendation for a statutory obligation for the inclusion of agreed local tikanga whakahaere in standing orders, engagement practices and organisational systems. We agree with the Panel that there is a need to increase community understanding about the role of local government. We support civics education and the potential for on-line voting.
A Tiriti-based partnership between Māori and local government	Recommendations	We generally support the recommendations and think that they should be one of the initial areas of focus. Understanding how a partnership between local government and Māori could operate is likely to set a strong foundation for the other roles and responsibilities for both parties. This would create the

Discussion areas	Recommendations/questions	WBOPDC response
	 That central government leads an inclusive process to develop a new legislative framework for Tiriti-related provisions in the Local Government Act that drives a genuine partnership in the exercise of kāwanatanga and rangatiratanga in a local context and explicitly recognises te ao Māori values and conceptions of wellbeing. That councils develop with hapū/iwi and significant Māori organisations within a local authority area, a partnership framework that complements existing cogovernance arrangements by ensuring all groups in a council area are involved in local governance in a meaningful way. 	framework and principles for consideration of structural change. This also needs to be considered in conjunction with the changes proposed in the Three Waters and RMA reform. We understand that these recommendations would shift the commentary about the relationship and responsibility of Te Tiriti to local government and may support stronger relationships at a local level. Funding would be required for iwi, hapū, local Māori organisations and local government to support the development of partnership frameworks. Consideration will need to be given to how a meaningful relationship with all parties in a particular area may be created. We think that a sustainable funding model needs to be developed to ensure elevation of Māori. There is a significant demand on Māori representation envisaged across the reform programmes. A sustainable funding model will assist in preparing people to take on these roles.

Discussion areas	Recommendations/questions	WBOPDC response
	8. That central government introduces	
	a statutory requirement for local	
	government chief executives to	
	develop and maintain the capacity	
	and capability of council staff to	
	grow understanding and knowledge	
	of Te Tiriti, the whakapapa of local	
	government, and te ao Māori values.	
	9. That central government explores a	
	stronger statutory requirement on	
	councils to foster Māori capacity to	
	participate in local government.	
	10. That local government leads the	
	development of coordinated	
	organisational and workforce	
	development plans to enhance the	
	capability of local government to	
	partner and engage with Māori.	

Discussion areas	Recommendations/questions	WBOPDC response
Allocating roles and functions in a way that	11. That central government provides a transitional fund to subsidise the cost of building both Māori and council capability and capacity for a Tiritibased partnership in local governance. Recommendations	We support the focus on local wellbeing and outcomes. We note that outcomes have been
enhances local wellbeing	 12. That central and local government note that the allocation of the roles and functions is not a binary decision between being delivered centrally or locally. 13. That local and central government, in a Tiriti-consistent manner, review the future allocations of roles and functions by applying the proposed approach, which includes three core principles: the concept of subsidiarity 	included in past iterations of local government legislation and that perhaps the intended consequences were not achieved as there was not a similar legislative mandate for central government. Our concern with a non-binary approach to roles and functions is with the potential for a lack of ultimate responsibility and accountability. We support the three principles identified to review the future allocations of roles and functions. In our key messages we have highlighted the need for simplicity as a design principle.

Discussion areas	Recommendations/questions	WBOPDC response
	 local government's capacity to influence the conditions for wellbeing is recognised and supported te ao Māori values underpin decision-making. Questions What process would need to be created to support and agree on the allocation of roles and functions across central government, local government, and communities? What conditions will need to be in place to ensure the flexibility of the approach proposed does not create confusion or unnecessary uncertainty? What additional principles, if any, need to be considered? 	In regard to the proposed framework on page 110 0f the report we have the following questions: - Will decisions take longer under this model and what does this mean for achieving outcomes? - Who makes the decision to depart from a 'local' approach? - How does this model align with other recommendations for partnership and collaboration with other agencies who may not be at a local level? We think that the provision of housing is an area that local government should be involved in. This aligns with our potential roles in managing growth and landuse planning, as well as promoting intergenerational wellbeing. There would need to be funding provided from central government to support such housing provision and various partners in the process.

Discussion areas	Recommendations/questions	WBOPDC response
Local government as champion and activator of wellbeing	Recommendations 14. That local government, in partnership with central government, explores funding and resources that enable and encourage councils to: a. lead, facilitate, and support innovation and experimentation in achieving greater social, economic, cultural, and environmental wellbeing outcomes b. build relational, partnering, innovation, and co-design capability and capacity across their whole organisation	Recommendation 14 appears to identify what the Panel considers could be the role of local government. We assume that this is to align with the other recommendations responding to the need for partnership and achieving outcomes. A good example of local government as an activator of wellbeing is the waiving of financial contributions for Community Housing Providers and for Papakāinga developments in the Western Bay of Plenty. We support progressive procurement and supplier diversity and note that this could be a national approach that is applied at a local level i.e., not every Council has to have a different Procurement Policy. There still needs to be the opportunity to support local businesses in any procurement approach. We are concerned that the focus is only on initiatives, innovations and ideas. There still needs to be a focus and understanding of the daily tasks and roles that Councils undertake e.g., regulatory functions, maintaining levels of services for community facilities.

Discussion areas	Recommendations/questions	WBOPDC response
	c. embed social/progressive	
	procurement and supplier	
	diversity as standard practice in	
	local government with	
	nationally supported	
	organisational infrastructure	
	and capability and capacity	
	building	
	d. review their levers and assets	
	from an equity and wellbeing	
	perspective and identify	
	opportunities for strategic and	
	transformational initiatives	
	e. take on the anchor institution	
	role, initially through	
	demonstration initiatives with	
	targeted resources and peer	
	support	
	' '	

Discussion areas	Recommendations/questions	WBOPDC response
	f. share the learning and emerging practice from innovation and experimentation of their enhanced wellbeing role. Questions 1. What feedback do you have on the roles councils can play to enhance intergenerational wellbeing? 2. What changes would support councils to utilise their existing assets, enablers, and levers to generate more local wellbeing?	
A stronger relationship between central and local government	Questions	Creating a collaborative and genuine relationship between the different parts of government requires each party to understand what they can offer. This aligns with the comments above regarding understanding roles and functions. We think that central government also need to become more of an enabler and align central government priorities with local community aspirations particularly in areas such as climate

Discussion areas	Recommendations/questions WBOPDC response
	As we work towards our final report, adaptation and mitigation, housing, multi-model
	we want to consider the merits of the transport networks, health, and education. There are a
	different examples. We are interested myriad of strategies, plans, policies and processes
	in your views as to how to rewire the across central and local government that have
	system of central and local different objectives and competing demands.
	government relationships through We think that it would be beneficial for legislation to
	developing an aligned and cohesive create a specific obligation for central government
	approach to co-investment in local agencies to engage with local government. Our
	outcomes. experience is that too often decisions made locally
	are not progressed due to competing priorities at a
	2. To create a collaborative relationship central government e.g., the development of roading
	between central and local networks. This is despite central government
	government that builds on current representation at the decision-making table. We also
	strengths and resources, what are: think that central government planning horizons
	need greater longevity, similar to what is required
	a. the conditions for success and from local government in preparing Infrastructure
	the barriers that are preventing Strategies and Asset Management Plans.
	strong relationships?
	b. the factors in place now that We recognise the benefits of professional development, but we are concerned that a
	support genuine partnership? mandatory requirement may result in an excessive
	amount of money spent in this area
	c. the elements needed to build and
	support a new system?

Discussion areas	Recommendations/questions	WBOPDC response
	 d. the best options to get there? e. potential pathways to move in that direction and where to start? f. the opportunities to trial and innovate now? 3. How can central and local government explore options that empower and enable a role for hapū/iwi in local governance in partnership with local and central government? These options should recognise the contribution of hapū/iwi rangatiratanga, kaitiakitanga, and other roles. 	
Replenishing and building on representative democracy	Recommendations 15. That the Electoral Commission be responsible for overseeing the administration of local body elections.	The future of democracy is a complex and interesting discussion, and one were there was not a shared view around the Council table. Democracy has evolved over time and should continue to do so. We expect there to be further discussions on this matter and for the purpose, roles, functions and structures of local governance to ultimately reflect what our

Discussion areas	Recommendations/questions	WBOPDC response
	16. That central government undertakes a review of the legislation to: a. adopt Single Transferrable Vote as the voting method for council elections b. lower the eligible voting age in local body elections to the age of 16 c. provide for a 4-year local electoral term d. amend the employment provisions of chief executives to match those in the wider public sector and include mechanisms to assist in managing the employment relationship.	communities need and want when participating in decision making that affects their everyday lives. We also think that effective democracy should provide for swifter decisions so that those who engage in these processes see the benefit of their input. We think there is value in considering a balance of elected and appointed representatives for local government. Part of this discussion needs to include identifying the key skills that a decision-maker needs. We support the recommendation that the Electoral Commission be responsible for overseeing the administration of local body elections. We do not support adopting Single Transferrable Vote as the voting method for council elections. We think that it makes the voting system more complicated and harder for people to understand. We do not support lowering the eligible voting age in local body elections to the age of 16.

Discussion areas	Recommendations/questions	WBOPDC response
Discussion areas	17. That central and local government, in conjunction with the Remuneration Authority, review the criteria for setting elected member remuneration to recognise the increasing complexity of the role and enable a more diverse range of people to consider standing for election. 18. That local government develops a mandatory professional development and support programme for elected members; and local and central government develop a shared executive professional development and secondment programme to achieve	Council was divided, but overall in support of providing for a 4-year local electoral term. Support amending the employment provisions of chief executives to match those in the wider public sector and include mechanisms to assist in managing the employment relationship? We support a review of criteria for the remuneration of elected members and the provision of mandatory professional development for elected members. We suggest that this review should not be undertaken until such time as decisions are made regarding the structure of local government including whether there should be a combination of elected and appointed members. We support the development and implementation of a professional development and secondment programme between local and central government.
	develop a shared executive professional development and secondment programme to achieve greater integration across the two	We support the development and implementation of a professional development and secondment programme between local and central government.
	sectors. 19. That central and local government:	We think that the suggestions in recommendation 19 need further examination in terms of the benefits that are anticipated by the proposed changes e.g., What would a health check of our democratic performance reveal? What are the potential costs of this process?

Discussion areas	Recommendations/questions	WBOPDC response
	a. support and enable councils to	Would it be necessary if some of the other
	undertake regular health checks	recommendations regarding decision-making and
	of their democratic performance	engagement were implemented?
	b. develop guidance and	We support retention of the option for Māori wards
	mechanisms to support councils	until such time as a better partnership approach is
	resolving complaints under their	developed and agreed and that is in line with other
	code of conduct and explore a	recommendations regarding Te Tiriti o Waitangi.
	specific option for local	
	government to refer complaints	
	to an independent investigation	
	process, conducted and led by a	
	national organisation	
	c. subject to the findings of current	
	relevant ombudsman's	
	investigations, assess whether the	
	provisions of the Local	
	Government Official Information	
	and Meetings Act 1987, and how it	
	is being applied, support high	
	standards of openness and	
	transparency.	

Discussion areas	Recommendations/questions	WBOPDC response
	20. That central government retain the	
	Māori wards and constituencies	
	mechanism (subject to amendment	
	in current policy processes) but	
	consider additional options that	
	provide for a Tiriti-based partnership	
	at the council table.	
	Questions	
	1. How can local government enhance	
	its capability to undertake	
	representation reviews and, in	
	particular, should the Local	
	Government Commission play a	
	more proactive role in leading or	
	advising councils about	
	representation reviews?	

Discussion areas	Recommendations/questions	WBOPDC response
	2. To support a differentiated liberal citizenship, what are the essential key steps, parameters, and considerations that would enable both Tiriti- and capability-based appointments to be made to supplement elected members?	
Building an equitable, sustainable funding and financing system	Recommendations 21. That central government expands its regulatory impact statement assessments to include the impacts on local government; and that it undertakes an assessment of regulation currently in force that is likely to have significant future funding impacts for local government and makes funding provision to reflect the national public-good benefits that accrue from those regulations.	We were surprised that central government regulatory impact statement assessments didn't already include the impacts on local government. We support the recommendation that these assessments be completed moving forward. We suggest that the assessment of regulation and required funding should be undertaken on completion of the discussion (and decision) on roles, responsibilities and structure. We recognise the benefits and challenges of funding for climate change adaptations and mitigations. However, we do not support a central government intergenerational fund for climate change. It is unclear how this would be taxed for and how creating a fund would be different from how central

Discussion areas	Recommendations/questions	WBOPDC response
	 22. That central and local government agree on arrangements and mechanisms for them to coinvest to meet community wellbeing priorities, and that central government makes funding provisions accordingly. 23. That central government develops an intergenerational fund for climate change, with the application of the fund requiring appropriate regional and local decision-making input. 24. That central government reviews relevant legislation to: a. enable councils to introduce new funding mechanisms 	government budgets are currently allocated. We are also concerned that local needs would not be accurately reflected. There is an opportunity for funding mechanisms at a national level to fund local activities vs the use of rating per district. This could include having revenue and financing policy settings that apply nationally. This would also reduce the need for consultation and audit of these matters. There is also a need to simplify the Rating Act whilst being mindful of local matters when it comes to rating e.g., rating for orchards and some of the other local implications of creating a rating system. We support central government agencies paying local government rates and charges on all properties. This is also a proposed submission point for the Water Services Legislation Bill.

Discussion areas	Recommendations/questions	WBOPDC response
	b. retain rating as the principal mechanism for funding local government, while redesigning long-term planning and rating provisions to allow a more simplified and streamlined process.	
	25. That central government agencies pay local government rates and charges on all properties. Question	
	What is the most appropriate basis and process for allocating central government funding to meet community priorities?	
Designing the local government system to	Recommendations	As outlined above, we think that form should follow function. The roles, responsibilities and functions of local government, in partnership with Māori and central government, need to be confirmed before

Discussion areas	Recommendations/questions	WBOPDC response
enable the change we need	 26. That central and local government explore and agree to a new Tiriticonsistent structural and system design that will give effect to the design principles. 27. That local government, supported by central government, invests in a programme that identifies and implements the opportunities for greater shared services collaboration. 28. That local government establishes a Local Government Digital Partnership to develop a digital transformation roadmap for local government. Questions 1. What other design principles, if any, need to be considered? 	decisions are made regarding the most appropriate structure. There also needs to be an alignment with the structural proposals anticipated in the Three Waters and Resource Management Act reform. As such we do not have a view on any of the proposed models at this point in time. There was support from some around our Council table for unitary authorities, noting that there does seem to be a certain population size where these become unwieldy. We suggest that communities of interest may be a better approach when determining size and areas for a unitary authority. There was also general support for the continuation of community boards. We think that a community outcomes framework with Council as the backbone organisation and kaitiaki of the framework could be considered when designing the local government system. This would also align with the recommendations for local government to be a champion and activator of wellbeing. We have considered the Statutory Authority idea included in the report. We can see that there may be some benefits from this model, but we are unclear how it would interact with the current or future

Discussion areas	Recommendations/questions	WBOPDC response
	What feedback have you got on the structural examples presented in the report?	structures of local government, Taumata Arowai, the water service entities and the National Māori Entity contemplated through the RMA reform. It is also unclear how the annual co-investment decision would align with other funding processes e.g., the Annual Plan (if this still existed).
		We note that there are a number of examples of shared services across the country. There has been ongoing work in this space although it has not necessarily been helped with the requirements in section 17A of the Local Government Act. We also question whether this recommendation is required if some of the more fundamental recommendations are implemented.
		In respect of establishing a Local Government Digital Partnership we would like to highlight the ongoing work and mandate of Association of Local Government Information Management (ALGIM). ALGIM is already looking at how it could regionalise digital services and generally don't support a centre of excellence approach.

Discussion areas	Recommendations/questions	WBOPDC response
System stewardship and support	Recommendation 29. That central and local government considers the best model of stewardship and which entities are best placed to play system stewardship roles in a revised system of local government. Questions 1. How can system stewardship be reimagined so that it is led across local government, hapū/iwi, and central government? 2. How do we embed Te Tiriti in local government system stewardship?	Agree that system stewardship is important and will assist in supporting the changes that may be implemented.

Discussion areas	Recommendations/questions	WBOPDC response
	3. How should the roles and responsibilities of 'stewardship' organisations (including the Secretary of Local Government (Department of Internal Affairs), the	
	Local Government Commission, LGNZ, and Taituarā) evolve and change?	

Yours sincerely,

James Denyer

James Denyer

Mayor

Western Bay of Plenty District Council