

Regional Housing Delivery Options

Regional Housing Action Plan – Deliverable 4

Report for 22 March 2022 WRLC meeting



Background

In July 2021, the Wellington Regional Leadership Committee (WRLC) approved development of a Regional Housing Action Plan (RHAP) for the 2021/2022 work programme. The RHAP will deliver a stocktake of current localised activity and regional level actions that can be implemented in the short term to increase housing in the region across the housing continuum.

RHAP Objective 6: To provide an analysis and recommendation on how the councils and others in the region could be structured to better deliver housing requirements, to oversee regional policy development and work with other partners to implement large scale transformational projects.

This objective eventually became **Deliverable 4** of the RHAP Project: **Housing Delivery Model Options Paper**

This initial assessment report to the WRLC addresses **three key questions**: How can we best structure ourselves as a region to –

1. Better enable the housing growth we are expecting in the next 30 years?
2. Better prepare for the structural and procedural changes RMA reform will bring?
3. Gain the most resourcing and efficiency benefits?

This report looks at opportunities for a more joined-up approach to housing delivery, and clusters them into three distinct components of joint delivery. Analysis, benefits and recommendations are provided for these three components, which could be implemented concurrently, in different stages or not at all:

- A. Regional expertise and advice unit
- B. Regional housing delivery unit
- C. Joint consenting unit

The purpose of this report is to:

1. Describe the strategic context in which councils and others could be better structured to deliver housing, develop regional housing policy, and implement large scale transformational projects
2. Explore the case for change by identifying problems and benefits
3. Identify the purpose of any recommended change and assess its alignment with current regional and national activities
4. Identify key assumptions and risks

This report requires the WRLC to confirm which of the three components you would like us to prioritise implementing and/or investigating further

Interdependencies

This report and subsequent analysis will take into account the following interdependencies and considerations:

- **Local Government Reform** – how far should possible changes be taken given the review of the Future of Local Government i.e. we don't want to invest time and cost into setting up structures that may need to be undone once reform is implemented.
- **RMA Reform** – will there be changes to requirements for a Future Development Strategy (FDS) and the Housing and Business Assessments (HBAs) once RMA reform is implemented? Can we pre-empt the structural requirements of the RMA Reform by setting up regional structures early?
- **Law changes** – what changes can occur without a change to an Act i.e. the Building Act, and what requires change?
- Current and any proposed future planning and operational aspects within key partner organisations that might impact or be impacted by this report and its contents.

Recommendations

That the Committee:

1. **Agrees** that there are region-wide, multi-stakeholder opportunities and benefits available to optimise regional housing growth and establish the requirements under Resource Management Act (RMA) reform as outlined in this report and **Attachment 1**.
2. **Supports** the development of a detailed proposal for a “regional expertise and advice unit” as outlined in **this report** **which** will be provided to the WRLC CEO Group for signoff and then reported to the WRLC.
3. **Supports** further investigation into a “regional housing delivery unit” and a “joint building consenting unit”, as outlined in **this report** which will be undertaken after the regional expertise and advice unit proposal is complete and in time to inform 2024 Long Term Plans (LTPs).
4. **Supports** that following the Strategic Planning Act and the Natural and Built Environments Act being passed into law (expected 2023), a report be prepared for the WRLC on proposed options for a regional response to the development of the Regional Spatial Strategy and the Natural and Built Environment Plan, and in line with this a regional resource consenting unit.
5. **Notes** that the capacity of partners to participate in this work is highly dependent on them being resourced effectively to do so.

Strategic context



What current and future challenges can a regional approach to housing delivery address?

1. Growth – demand is outstripping delivery

- The region has an existing housing shortfall and accelerated demand for more diverse housing, now and in the future.
- High living costs in the region's metro areas is seeing outward migration to other areas, putting demand pressures on communities already facing affordability problems.
- Despite increased demand across the region, private developers appear reluctant to depart from building what they know and are not delivering the typologies we need in the places and at the pace we need them.
- The region offers few incentives to deliver high performance, diverse housing and embrace 'innovative' equity models such as collective or cooperative housing

2. RMA Reform – a chance to align how we work with upcoming reforms

- Resource Management Reforms are driving planning in a regional direction through Regional Spatial Strategies and regional Natural and Built Environment Plans. The Bills for these pieces of the reform are expected to be introduced to Parliament in Q3 2022.
- A joined-up approach to delivery at both the policy and consenting level would provide a chance to align and unite existing local level structures and processes with the intent of the Resource Management reforms and provide agglomeration benefits.

3. Resourcing/efficiency – regional problems are being met with localised approaches

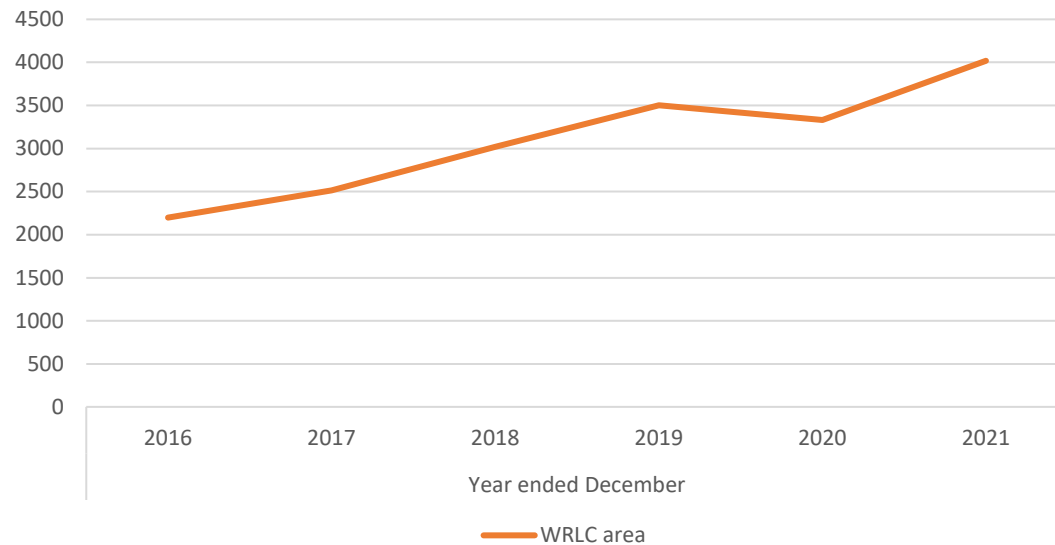
- Several immediate and longer-term housing challenges are regional issues that cross over council boundaries and are best dealt with collaboratively.
- Resources and knowledge bases that could be shared to maximise efficiency and consistency across the region are being kept separated.
- There is no consistent approach to accessing central government housing programmes and funds, and no regional picture of the need for them.
- Existing advocacy approaches on key regional housing matters are siloed and do not optimise the benefits of working together.

- Sense Partners data projects the need for 107,000 new homes for 250,000 people over the next 30 years in the WRLC region; this is 3,567 new homes each year for 30 years. This does not account for the current shortfall (i.e. we already don't have enough homes.)
- The region now has a 30 year regional spatial plan – an agreed regional direction for growth and investment.
- Councils and iwi across the region employ housing expertise and undertake housing developments to varying degrees:
 - Smaller councils might have less than 1FTE (sometimes none) dedicated to housing and implementing large scale transformational projects. Thus, council housing activity is often limited to undertaking District Plan changes and using tools such as remissions policies to influence housing typology and supply.
 - Urban Plus (the HCC housing CCO) manages social housing and undertakes a continued cycle of housing development and release, working with CHPs and iwi partners. Urban Plus is currently partnering with Ngati Kahungunu to develop 19 units in Lower Hutt.
 - Most smaller iwi are looking to partner to build on their whenua but have limited access to the right expertise.

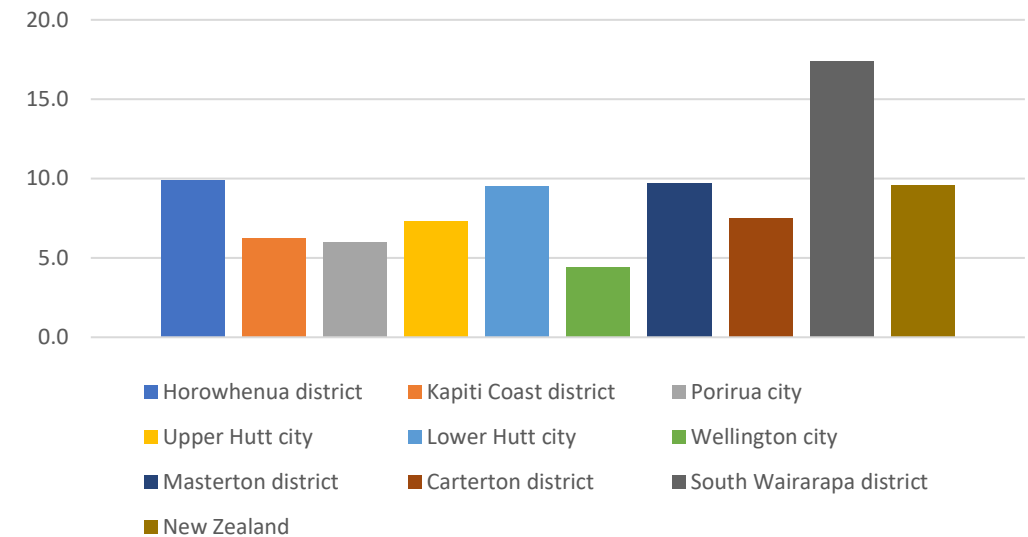
Strategic context: Growth

- **4,019 building consents** for new dwellings were issued in the WRLC region over the 12 months to December 2021 – the highest in 30 years and this level may not be enough to achieve the numbers above given not all dwellings consented are built. The region would need to issue building consents at this level or higher for each of the next 30 years to achieve the growth identified by Sense Partners.

Building consents for new dwellings



Dwelling building consents per 1000 residents - year ended December 2021



RMA reform – future system

The **Natural and Built Environment Act (NBA)** will be the primary replacement for the RMA and will set out how natural and built environments are to be protected and enhanced. The NBA will be an integrated statute for land use and environmental protection that works in tandem with the Strategic Planning Act.

The **Strategic Planning Act (SPA)** will provide strategic direction by requiring the creation of long-term RSSs.

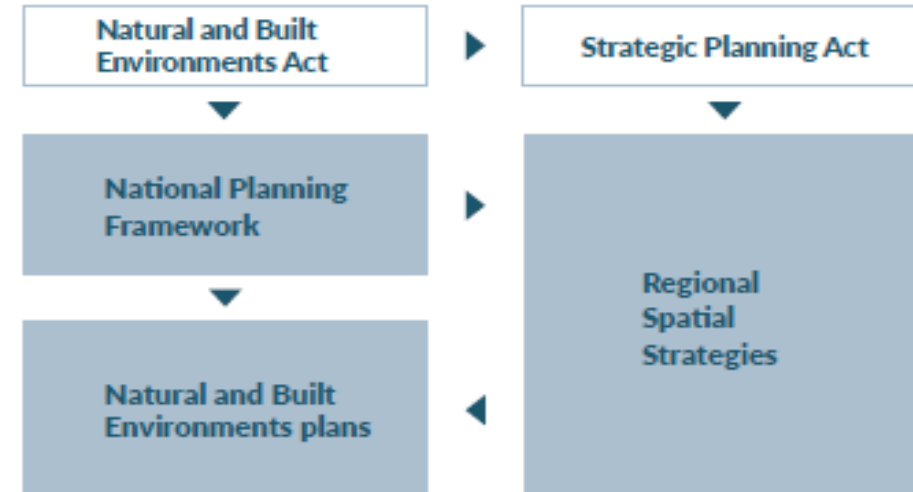
These will identify areas that:

- Are suitable for development
- need to be protected
- require infrastructure
- Are vulnerable to climate change effects and natural hazards.

RSSs will integrate with other relevant documents like NBA plans and the National Planning Framework.

The **National Planning Framework (NPF)** will provide strategic and regulatory direction from central government.

The NPF will play a critical strategic role, setting limits and outcomes for natural and built environments, as well as ways to enhance the wellbeing of present and future generations.







One NBA plan will be developed for each region. The plan will be prepared by a **joint committee** comprising representatives from hapū/iwi/Māori, local government, and potentially a representative appointed by the Minister of Conservation.

One regional spatial strategy will be developed for each region, with flexibility to address issues within and across regions. The strategy will be prepared by a **joint committee** comprising representatives from hapū/iwi/Māori, local and central government.

Consent activity classes and notification rules will be standardised, with key requirements set out in NBA plans rather than assessed on a case-by-case basis. This will increase certainty and efficiency and drive a reduction in the volume of resource consents.

Strategic Context: Three components

Possible activities to better deliver housing outcomes clustered into three components, which could be implemented at once or over time. These components describe aspects of delivery where a change to a regionally joined-up approach will add the most benefit: expertise and advice, property delivery, and shared consenting processes.

	Regional expertise and advice unit	Regional Housing Delivery Unit	Joint consenting unit
Purpose 	To create a centralised unit for region to undertake all national regulatory requirements and provide a regional centre of excellence on housing matters including data.	To enable the region to undertake and/or influence housing and urban development in a more efficient, effective and co-ordinated manner and that delivers on the requirements for the region.	To maximise the consenting resources available in the region to efficiently provide for increased housing demand in the region and provide benefits to customers/end users.
Growth Activities 	<ul style="list-style-type: none"> Undertake regional housing data collection, publishing and analytics Lead the implementation of the Regional Housing Action Plan Lead WRLC advocacy on housing matters Provide expertise and advice e.g., central government tools and funds, alternative housing typologies innovative equity models 	<ul style="list-style-type: none"> Undertake housing developments alone or with others e.g., CHPs, Kainga Ora. Undertake commercial developments alone or with others Purchase property to hold for strategic purposes e.g., future urban development Work with others to undertake urban regeneration but undertake no development itself e.g., Eke Punuku model 	<ul style="list-style-type: none"> Regional building consenting
RMA Reform Activities 	<ul style="list-style-type: none"> Lead development and monitoring of <u>new</u> requirements under the RMA reforms – the Strategic Plan and the Natural and Built Environment Plan 		<ul style="list-style-type: none"> Regional resource consenting
Resource & Efficiency Activities 	<ul style="list-style-type: none"> Lead development and monitoring of <u>current</u> regulatory requirements under the NPSUD – the Future Development Strategy and Housing and Business Assessment for the region 	<ul style="list-style-type: none"> Provide property technical advice Manage its own housing portfolio 	<ul style="list-style-type: none"> Regional delivery of LIMS

To progress this work, a key question for WLRC to consider is –

At what pace and scale does the WLRC want to implement the three proposed components?

This decision can be made throughout the process but would include considerations such as:

1. To what extent do we want to establish, resource and pay for new activities? e.g. collect and analyse regional housing data? Lead implementation of the Regional Housing Action Plan?
2. Do we want an entity that is active in the housing market? e.g. an entity responsible for building housing and/or working with developers on key sites? Are we willing and able to set this up?
3. Do we want to be able to influence what is built on (or not built) on key sites in the region by acquiring sites for strategic purposes and holding them?
4. Do we want to wait for required dates to implement RMA reform or do we want to “get ahead of the game”? i.e. by taking actions such as commencing our regional Natural and Built Environment Plan soon and aligning the completion with establishing a regional resource consenting unit.
5. Will we commit funding and resources to these activities?
6. Which of these components or parts of them would we prioritise over the others?

Component 1: Regional Expertise & Advice Unit



Regional Expertise & Advice Unit: Problem and benefit analysis

The analysis below outlines the current problem/s that could be resolved through a regional expertise and advice unit and benefits that could be achieved. This is a high-level analysis, if this component was investigated further, a more detailed analysis would be undertaken.

Component	Problem	Benefit
Regional expertise and advice unit	Some mandatory regulatory requirements (e.g., HBA's, FDS's) are carried out at the local level, resulting in resource duplication.	Regional approach avoids duplication and results in efficiencies of time and cost. Regulatory requirements align with WRGF region and provide regional view
	There is no regional "one source of the truth" for housing data. Multiple entities source the same data and analyse and repackage it in different ways for their own uses. The result has been a lack of high quality, consistent data for the housing and urban development sectors that is well-analysed and understood.	One source of the truth provided to the region on a regular basis (i.e. via wrlc.org.nz) Analytics and scenario planning undertaken at a regional and project/local level We can commence collecting new regional data e.g. no. of houses built (as distinct from consented), information on new technologies
	The region as a whole is not making the most of central government programmes and tools targeted at increasing housing options. Multiple entities across the region try to understand and access these programmes in isolation, resulting in a duplication of resources and no shared understanding of regional need.	A regional view of the need for each programme and fund. Entities throughout the region (including CHPs and iwi providers) better understand how to access central government programmes/tools Efficiencies of time and cost.
	Each council aligns their district planning to the WRGF individually. Because there is no uniform approach, CHPS, iwi housing providers and private developers who intend to develop across the region face inconsistencies. There is no unified regional approach to transitioning to the planning changes RM reform will bring.	Can pre-empt the possible structure, process and form (i.e. regional planning standards) of the RMA Reform and get ahead of this change. District Plan policies and rules will align with the WRGF in the short term. Efficiencies of time and cost.

Regional Expertise & Advice Unit: Analysis

The table below provides an initial high-level analysis of possible activity that could be undertaken in a “regional expertise and advice unit” within the region covered by the WRGF and WRLC.

Activity	Mandatory or optional	Who does it serve?	Examples	How to fund	Costs?
Regulatory requirements e.g. SP, FDS, HBA	Mandatory	Councils, MfE		These services could collectively be paid for by a mix of local government, central government and possibly iwi funding. Consideration needs to be given to whether some services should/could be on a fee for service basis	People resource HBA model development and maintenance + data
Undertake regional planning/align regional planning in line with RMA Reforms	Mandatory/optional	Councils			People resource
Undertake regional housing data collection, publishing and analytics	Optional	WRLC online – anyone Possible ability to have fee for service	Regional Transport Analytics Unit Horowhenua NZ Trust		People resource Dashboard setup, data purchase
Lead the implementation of the RHAP	Required once RHAP signed off	WRLC and partners/stakeholders			People resource Possible legal + technical expertise
Lead WRLC advocacy on housing matters	Optional	WRLC			People resource
Provide expertise and advice e.g., central government tools and funds, alternative housing typologies innovative equity models	Optional	Councils, Community Housing Providers, Iwi/Māori Housing providers, private developers	UK example – Eastern Community Homes		People resource

Next steps and timing with regards to the **Regional Expertise and Advice Unit** are as follows:

1. Agreement from the WRLC to establish a unit
2. Determine in more detail what will be delivered by the unit on both an ongoing and one off point of view
3. Determine in more detail the level and type of people resource required and for what length of time e.g. contract, full time, number of FTE
4. Develop budget for setup and ongoing work and funding proposal i.e. who pays
5. Develop programme and timetable for setup of Unit
6. Develop year 1 work programme and deliverables
7. Provide business case to a future round of meetings for approval

Component 2: Regional Housing Delivery Unit



Regional Housing Delivery Unit: Problem / benefit analysis

The analysis below outlines the problem/s that currently exist that could be resolved with a regional housing delivery unit and the benefits that could be achieved. This is a high-level analysis, if this component was investigated further, a more detailed analysis would be undertaken.

Component	Problem	Benefit
Joint urban development entity	There is no regional approach to participating in or influencing the housing market across the continuum.	Regional housing targets can be set for joint entity and partners would work to achieve this e.g., 1000 more affordable homes, Progressive Home Ownership homes.
	No regional public housing plan has meant no joined-up assessment of whether public housing meets local need across the region, and no regional approach to supporting community and iwi housing providers to upscale provision.	Improved support to CHPs and iwi housing providers wanting to undertake their own housing development, working in partnership to encourage and accelerate these projects.
	WRLC partners have limited ability to acquire land for strategic purposes for large urban development projects underway or coming online e.g., LGWM, RiverLink.	Ability to establish regional resource (people and funds) and procure property for strategic purposes whilst utilizing local government borrowing rates and powers.
		Central expertise which can be utilized across multiple projects in the region.
	We are not building the right types of houses at the right densities across the region, and not supplying new houses fast enough. There is limited capacity and incentives/willingness for developers to deliver the housing typology we need in some areas.	Can build demonstration housing (alone or in partnership) to showcase the preferred density, affordability, low emissions-profile and target markets in places where the private developer will not.
	New technologies and housing models are not being delivered by the market e.g. modular homes, collective housing. Some new models are being developed but are not engaged at a large scale. One reason is that individual projects or agencies lack the capacity to do so.	Can build and/or promote new technologies and/or housing models and work with partners to do so.

Regional Housing Delivery Unit: Possible activity

The table below provides an initial high-level analysis of possible activity that could be undertaken in a “regional housing delivery unit” within the region covered by the WRGF and WRLC.

What	What is this/could this be	Examples	Comments
Undertake housing development alone or with others	Purchase land, develop and sell on Work with CHPs, iwi providers and/or private developers	Urban Plus CHPs Iwi organisations	
Undertake commercial developments alone or with others e.g. purchase land, develop and sell on	Purchase land, develop and sell on		
Purchase property to hold for strategic purposes e.g., future urban development	Purchasing land ahead or time to gain a level of control about future developments e.g. density, choice	Various councils e.g. HCC for RiverLink. Could work for examples like LGWM	Public Works Act possibility here
Work with others to undertake urban regeneration but undertake no development itself	Urban development at key sites e.g. train stations. Other parties undertake development. Use of excess council and other land.	Eke Panuku Horowhenua NZ Trust Build Wellington	
Provide property technical advice	Centre of excellence and provision of advice as needed	Urban Plus	This could/would include the regional expertise and advice component
Manage its own housing portfolio	Own/hold housing and manage the portfolio and tenants	Urban Plus, Wellington City Council, Dwell Housing and other CHPs Te Ahuru Mowai, Kainga Ora	

Regional Housing Delivery Unit: Some options for who to involve

This analysis explores options for **who** the shareholders/partners in a Regional Housing Delivery Unit could be. These options need to be considered in conjunction with the structure options on the next page. E.g. having all partners involved in a working party would be easier than having all parties as shareholders in a formal entity such as a company or CCO.

Options	advantages	disadvantages	Other
Councils only	Examples already exist of informal and formal structures for councils working together e.g., working groups, Wellington Water.	Councils only do or can only play a certain part in the housing market. Key players such as CHPs would not have their views shared and we would not have the full picture.	LGA provides for formal structure of a CCO or CCTO if just councils Non council entities could operate as partners in developments as happens now.
WRLC partners	Easy to do this at the working group level and possible as a service Grouping consistent with the WRLC setup – more inclusive. All partners working on housing delivery together.	Considering a preferred legal structure and funding and resourcing likely to be more complicated if all partners involved Likely to take longer to set up a formal structure with this range of stakeholders than just councils May be harder to determine a common purpose – more so for formal structures than working groups.	
WRLC partners and others e.g., Community Housing Providers	Easy to do this at the working group level and possible as a service Grouping would be more aligned with those entities that have an impact on the housing market.	Considering a preferred legal structure and funding and resourcing likely to be more complicated if all partners involved Likely to take longer to set up a formal structure with this range of stakeholders than just councils May be harder to determine a common purpose – more so for formal structures than working groups.	

Regional Housing Delivery Unit: Some options for structure

This table identifies a range of structural options for a regional housing delivery unit and identifies high-level considerations for each. Options range from minimal effort/minimal gains options to set up of an entirely new joint entity. This list is not exhaustive.

Structure option	Examples where this occurs/occurred	Time to establish	Key steps required	advantages	disadvantages
Run under a working party arrangement	Christchurch Building Consent Working Party	Minimal – circa 2 months	Agree TOR, Chair and members Hold first meeting	Minimal effort to establish Could easily include a wide range of members	Minimal gain – coordination opportunity only
Urban Plus (or some other entity) operate this activity for others as a service	WellingtonNZ	Circa 2-6 months depending on activity and funding requirements	Becomes a business relationship between the two parties Agree funding and resourcing requirements and sources Formal/legal agreements	Utilises expertise already available in the region No formal entity set up required Could “test” the idea of a housing delivery unit through this in the shorter term	Need to find an entity to do this May be capacity issue in the existing entity Does not provide the regional focus on what to deliver/what is important
Take an existing entity and expand to regional delivery unit	Capacity to Wellington Water	12 months est.	Agreeing partners/shareholders Partnership agreements Resourcing and funding requirements Expand organization i.e. recruit, offices Engagement required/wanted?	Takes an entity that already has processes and skills and expands this Could do one shareholder at a time as ready	Process inefficient to do one shareholder at a time May not be politically acceptable Does not provide the regional focus on what to deliver/what is important if not all involved
Set up new joint entity	Capacity LGWM	18 months est	Agreeing partners/shareholders Partnership agreements Resourcing and funding requirements Set up organization and processes/practices Engagement required/wanted?	Can set up from new with new stakeholders and goals/objectives Can provide all aspects required in housing delivery unit and may provide regional focus Could be established with some shareholders initially	Will take longer to establish Cost likely to be higher than other options. More complex to establish – need to work out who funds and how profits distributed, how to involve iwi using CCO model, etc

A high-level overview of next steps with regards to the Regional Housing Delivery Unit are as follows:

1. Agreement from the WRLC to undertake further investigation into a “Regional Housing Delivery Unit”
2. Determine which structural options are suitable for further investigation and analysis
3. Determine the governance structures, partners involved, and scope of activities associated with each option
4. Determine in more detail the potential benefits and risks associated with delivering suitable structural options
5. Recommend preferred option based on analysis to WRLC
6. If agreed, proceed to develop full business case

Component 3: Joint Consenting Unit



Joint consenting unit: Problem / Benefit Analysis

This analysis outlines the current problem/s that could be resolved by a joint consenting unit, and the benefits it could be achieved. This is a high-level analysis, if this component was investigated further, a more detailed analysis would be undertaken.

Component	Problem	Benefit
Joint consenting unit	Councils are currently at capacity for issuing both resource and building consents.	Improved ability to meet statutory timeframes.
	We do not have enough building consent officers to issue the number of consents needed to meet projected housing numbers for the next 30 years.	Reduced costs e.g. training, career development, recruitment
	Building consent teams are competing with one another for a relatively small pool of officers resulting in longer processing times.	Sharing rather than poaching of consenting staff
	Each Council's consenting unit has different approaches and processes. Complicates application for cross-boundary developers.	Uniform consenting processes and expectations across the region simplifies application process and benefits developers, builders etc
	Each Council incurs individual costs from carrying out BCA policy, procedure and audit requirements.	Reduced costs for same level of activity i.e. reduced BCA compliance costs
	New building tools and techniques are emerging and not being taken up by councils/BCAs due to lack of resource e.g. Building Information Management (BIM)	Scale and focus to enable adoption of new building tools and techniques, or explore the use of consenting incentives to support improved housing supply and quality. At scale could hire resource to focus on this particularly.

Joint consenting unit: Some options for structure

This table identifies a range of structural options for a regional consenting unit and identifies high-level considerations for each. This list is not exhaustive and further work can be done on possible options and analysis of these in the next stages.

Service	Structure options	What is this	Examples	Estimated time to establish (*)	Indicative key steps required
Building consents, resource consents or LIMs	Formal working party	Form a working party to share stories, practices and resources as needed	Christchurch councils (11) Wellington regional BCA cluster group	Minimal – circa 1 month if changes required to cluster group	Agree TOR, Chair and members Agree one working party (i.e. covering all of BC, RC and LIMS) or a number
	Online front end	Regional portal for information. BCs/RCs/LIMS undertaken by each council still.	Build Waikato – see Home - Build Waikato	Est. 3-6 months	Determine online requirements Build website
	One council formally provides service on behalf of some/all	The Building Act allows for this with regards to BCA. Formal change rather than just adhoc arrangements		Est 12-18 months	Determine which council and legal requirements Determine processes and practices Determine liability issues Establish services
	New joint BCA, Resource Consent entity, LIM entity	Set up service from new with collective ownership	Kainga Ora BCA	Est 18-24 months	Determine legal and liability requirements/issues Determine processes and practices Set up new entity Establish services and transition to new entity
	Regional key account model	Top 20/30 (TBC) builders/developers have their BCs and/or RCs managed from centrally rather than by each council		Est 12 months	Determine which council would act as central entity and legal requirements Determine processes and practices Determine liability issues Establish services include determining key accounts
(*) High level estimate only. No work has been undertaken at this stage on more detailed timing					

Next steps regards to the Joint Consenting Unit are as follows:

1. Agreement to undertake further investigation into a “Joint consenting unit”
2. Determine which structural options are suitable to investigate further and undertake analysis
3. Seek legal advice on how a joint unit could be set up/structured
4. Determine in more detail the potential appetite for change, benefits, and risks associated with delivering structural options
5. Recommend preferred joint-services and structural options to set up to WRLC

Assumptions and Risks



Key assumptions of this report are:

- RMA reforms will be undertaken in line with direction already outlined by central government and in the timeframes indicated (the Natural and Built Environments Bill and Strategic Planning Bill to be introduced to Parliament quarter 3 2022).
- There is a willingness for partners to the WRLC to work together on the aspects in this report and consideration will be given about how all partners (not just local government) could be included in the components outlined in this report.
- There will be a cost to establishing and maintaining any change to current arrangements and partners to the WRLC are willing to fund this – noting that these costs have yet to be determined and agreed.
- That any change should fit with any other timing changes where appropriate e.g. RMA Reform.
- That changes could be “staged” or established in one hit.

Risks related to the decisions in this report

Key risks identified are:

- A high number of components in this report are prioritised and we don't have the resource to undertake the work in the timeframe required.
- Further work on investigation into a Regional Housing Development Unit and a Regional Consenting Unit will require funding i.e. for a consultant to either lead or input into the work, for legal advice. This work is currently not budgeted.
- Iwi may have limited capacity to engage in the investigation and consultation processes following agreement
- Iwi partners may have limited capacity to participate in governance structures where needed if not resourced properly, risk breaching partnership commitment
- Political appetite to progress or maintain these structural changes could change in future with change in local or central government
- Role of new entities must be clearly defined based on evidence of need and communicated, or risk duplication of activities and resources (i.e. regional expertise unit carries out same data gathering as council unit)
- Several significant legislative reform processes (RM, LG, three waters) ongoing in the next few years mean this work will progress with a degree uncertainty of the future.
- Undertaking regional structural changes, even if minor, may give impression of further destabilisation and centralisation of local government functions.

