



Head Start Outline Proposal

Central Bay of Plenty (Rotorua) Unitary Authority

HEAD START OUTLINE PROPOSAL

1 Executive summary

Rotorua Lakes Council submits this document as the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council Head Start proposal. The joint proposal has two parts: a Western Bay of Plenty portion and a Central Bay of Plenty portion. Together, and when considered alongside the Eastern Bay of Plenty proposal, it contributes to a coherent Bay of Plenty solution that would replace the current regional and territorial authority structure with three unitary authorities.

At a Bay of Plenty scale, the joint Tauranga City Council and Rotorua Lakes Council proposal, considered alongside the Eastern Bay of Plenty proposal, would reduce the number of local authorities from seven to three unitary authorities, transfer or provide for the shared delivery of relevant regional council functions, and provide a coherent regional pathway for detailed design.

The Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal provides a practical pathway for Rotorua to take responsibility for both local and relevant regional functions, while maintaining a strong local voice, preserving Te Arawa and iwi/Māori relationships, and retaining regional collaboration where functions require scale or cross-boundary coordination.

Rotorua Lakes Council's position is that Rotorua should participate in Head Start through the joint Tauranga City Council and Rotorua Lakes Council proposal, with Rotorua forming the Central Bay of Plenty portion. Council does not support any alternative Head Start configuration involving Rotorua without the approval of Rotorua.

If boundary adjustment is required in future, Council's preferred pathway would be to consider the Kaituna Catchment and the wider Mai i Maketū ki Tongariro rohe as related but distinct matters. Any work would be subject to affected council, iwi, hapū, PSGE, community and stakeholder engagement.

This Head Start proposal is intended to retain a strong local Rotorua voice and identity, protect existing Treaty of Waitangi settlement rights and Te Arawa relationships, and provide a clearer platform for aligning local and relevant regional functions. It also recognises that some regional functions should continue to be delivered collaboratively where scale, catchments, specialist capability and/or regional consistency are required.

The term Central Bay of Plenty Unitary Authority reflects the geographic, economic and governance position of Rotorua within the wider Bay of Plenty reform model. While Rotorua is the district's principal urban centre, the Rotorua District also includes significant rural, farming, forestry, geothermal and lakes communities, including Reporoa, Waikite Valley, Ngakuru, Mamaku, Ngongotahā, Hamurana, Rotokawa, and the district's lakes communities. The proposed name is intended to reflect the wider sub-regional community served by the authority, rather than the city alone.

For the purposes of this outline proposal, the proposed authority is based on the existing Rotorua Lakes District boundaries. The proposal does not seek immediate boundary changes but recognises that future boundary or catchment adjustments may be considered through detailed design and any subsequent statutory process.

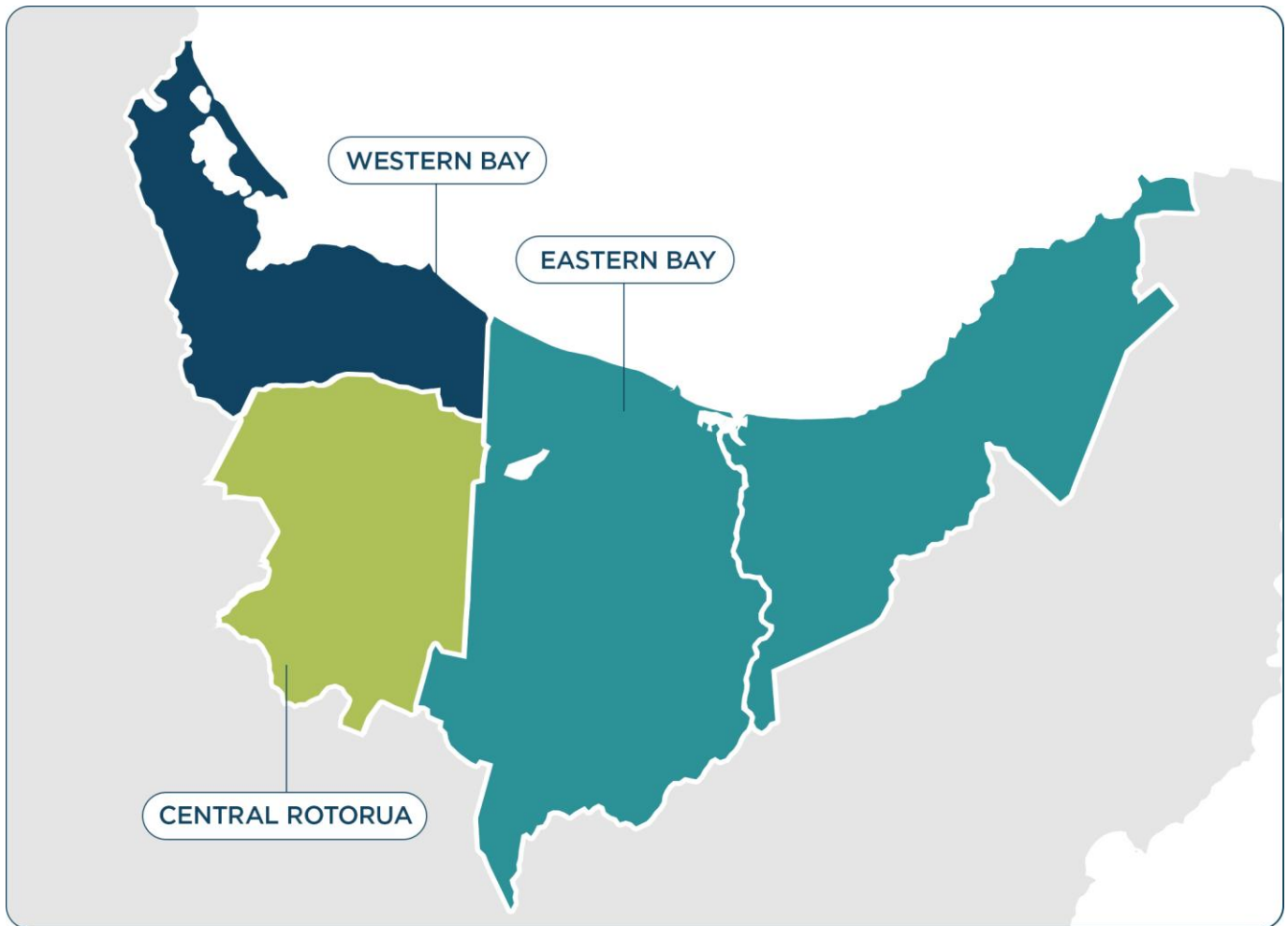
For clarity, this document is not intended to be assessed as a stand-alone Rotorua Lakes Council proposal. It is Rotorua Lakes Council's Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council Head Start proposal. That joint proposal consists of two parts: the Western Bay of Plenty portion and the Central Bay of Plenty portion. When considered alongside the Eastern Bay of Plenty proposal, it supports a coherent Bay of Plenty solution based on three unitary authorities. The proposal relies on the two parts of the joint Tauranga City Council and Rotorua Lakes Council proposal being read together, alongside the resolutions of participating councils and the related Eastern Bay of Plenty proposal.

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3 Proposal snapshot

Item	Central Bay of Plenty proposal
Proposed authority	A new Central Bay of Plenty Unitary Authority based on the existing Rotorua District. This is the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal and contributes to a wider Bay of Plenty solution that would replace seven local authorities with three unitary authorities.
Type of reorganisation	A two-part joint Tauranga City Council and Rotorua Lakes Council proposal covering the proposed Western Bay of Plenty and Central Bay of Plenty unitary authorities. When considered alongside the Eastern Bay of Plenty proposal, it supports a wider Bay of Plenty solution involving three unitary authorities and the transfer or shared delivery of relevant regional council functions.
Geography	Rotorua District, including areas currently within both Bay of Plenty and Waikato regional council areas.
Bespoke arrangements	Bespoke legislative and funding arrangements are sought to protect Rotorua ratepayers, support fair transition of regional functions, enable appropriate contributions from Crown and visitor-related activity, and provide transition funding and governance support.
Principal unresolved issues	Regional function allocation, Waikato/Bay of Plenty planning alignment, Treaty settlement protection, iwi/Māori engagement, local voice, rural and lake communities, financial due diligence, transition resourcing, regional investment treatment, and bespoke Government support.
Proposal context	Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council Head Start proposal. The joint proposal has two parts: Western Bay of Plenty and Central Bay of Plenty. It is intended to sit alongside the Eastern Bay of Plenty proposal as part of a coherent Bay of Plenty solution.
Existing councils affected	Rotorua Lakes Council; Bay of Plenty Regional Council for regional functions; Waikato Regional Council for relevant regional functions
Possible future alignment	Future boundary or catchment alignment may include consideration of the Kaituna catchment and the wider Mai i Maketū ki Tongariro framework as related but distinct matters, if supported through affected council, iwi, hapū, PSGE, community and stakeholder engagement.
Core proposition	Rotorua should become a unitary authority as the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council Head Start proposal, while retaining strong local voice and participating in wider Bay of Plenty or cross-boundary delivery arrangements where functions require scale.
Detailed design priorities	Regional functions, planning-system continuity, Treaty settlement transition, iwi/Māori participation, representation, finance, assets and liabilities, staff and systems transfer, and community consultation.



4 Eligibility

Government guidance provides that two or more territorial and/or unitary authorities, except Auckland Council, may submit an outline proposal, including cross-boundary groupings, where the proposal represents a majority of either directly affected territorial authorities or the population across directly affected areas. Individual territorial authorities cannot submit alone and regional council support or contribution can be highlighted.

Rotorua Lakes Council recognises that a Rotorua-only unitary authority may present an eligibility question if assessed in isolation. This document is advanced as the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council Head Start proposal. Read together, the two parts of that joint proposal would reduce the number of local authorities overall, establish new unitary authorities, transfer or provide for the shared delivery of relevant regional council functions, and contribute to a coherent Bay of Plenty solution.

The Central Bay of Plenty portion is eligible because it forms part of the joint Tauranga City Council and Rotorua Lakes Council proposal. That proposal includes the Western Bay of Plenty and Central Bay of Plenty portions, reduces the total number of local authorities, and provides for regional council functions to be transferred or delivered through new unitary and regional arrangements. The two parts of the joint proposal should be assessed together.

If the two parts of the joint Tauranga City Council and Rotorua Lakes Council proposal are not treated together, or if detailed design shows the arrangement would not remain in Rotorua's interests, Council must retain the ability to reconsider its position before any further commitment, final submission or implementation.

4.1 Wider Bay of Plenty context

Rotorua Lakes Council has received central government advice indicating that a single council may become a unitary authority as part of a broader proposal that reduces the number of local authorities overall, but that Rotorua Lakes Council could not submit a stand-alone proposal to become a unitary authority.

When read as part of the joint Tauranga City Council and Rotorua Lakes Council proposal, and alongside the Eastern Bay of Plenty proposal, this document meets the intent of the Head Start pathway. It contributes to a Bay of Plenty solution that reduces the number of local authorities overall, establishes new unitary authorities and provides a coherent pathway for detailed design.

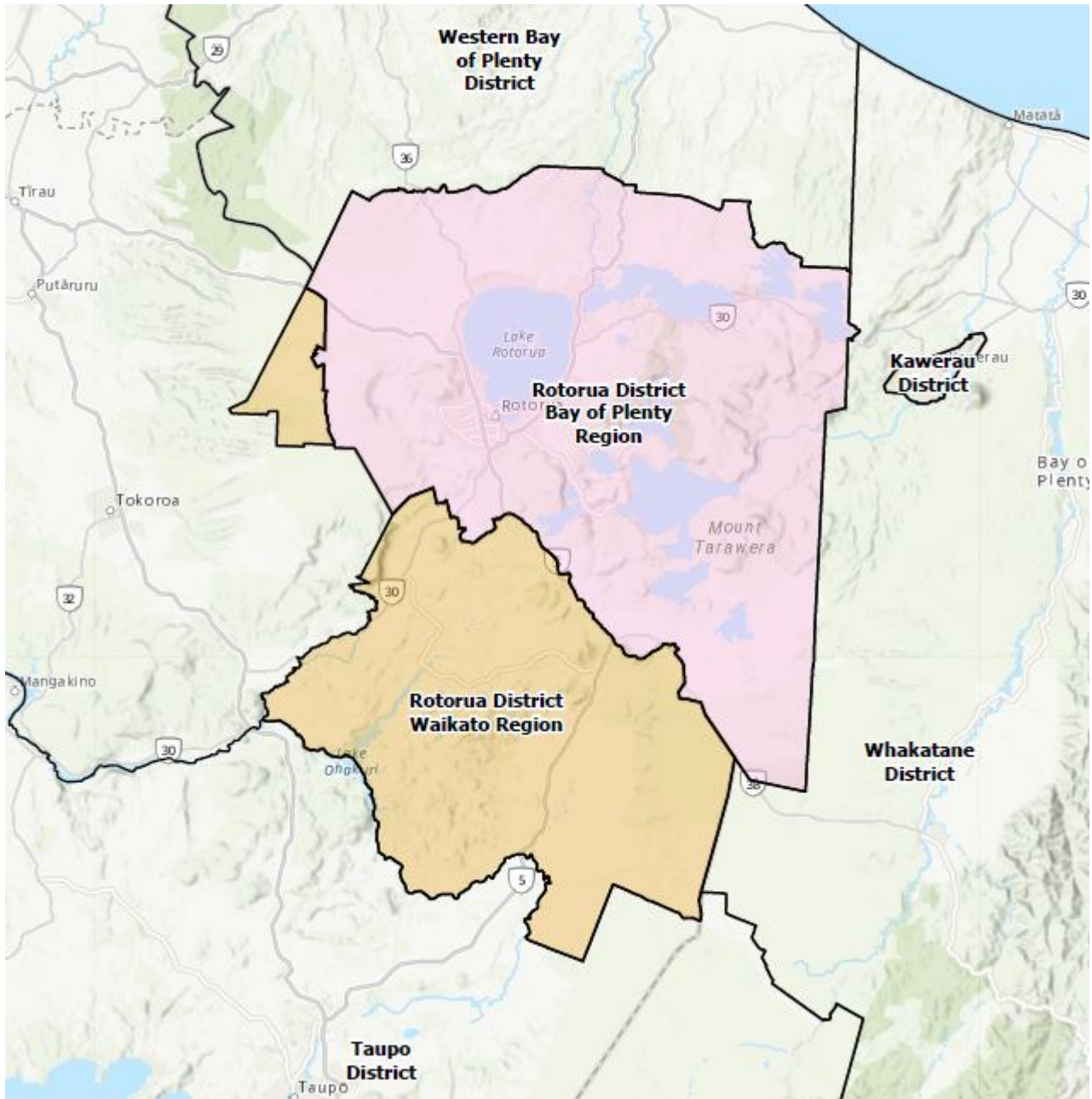
The Central Bay of Plenty Unitary Authority is advanced as part of the joint Tauranga City Council and Rotorua Lakes Council proposal and relies on the resolutions of each participating council. The related Eastern Bay of Plenty proposal is relevant to the wider Bay of Plenty solution and should be considered alongside, but not as a formal part of, the joint Tauranga City Council and Rotorua Lakes Council proposal. Bay of Plenty Regional Council and Waikato Regional Council will need to participate in transition planning where their functions, assets, staff, funding and/or statutory responsibilities are affected. Any future Kaituna catchment or other boundary matters will be addressed through detailed design or a later statutory process.

Rotorua is not a simple stand-alone territorial authority. The district sits within two regional council areas across three parts of the district, has significant Treaty settlement, iwi, catchment and lake governance arrangements, and has regional functions that intersect with Bay of Plenty, Waikato and central North Island systems.

A Central Bay of Plenty Unitary Authority would reduce, not increase, complexity for Rotorua communities by bringing local authority functions and relevant regional functions into one accountable local authority. It would simplify the current interface between Rotorua Lakes Council, Bay of Plenty Regional Council and Waikato Regional Council, while preserving regional collaboration where functions require scale, specialist capability and/or catchment-wide coordination.

The case for the Central Bay of Plenty Unitary Authority is based on managing complexity at the right level: local accountability for Rotorua-specific decisions, regional alignment for regional functions, and direct protection of Treaty settlement and iwi/Māori arrangements.

Progression through detailed design is conditional on the final proposal remaining in the interests of Rotorua. If detailed design identifies material financial, legal, Treaty settlement, representation, regional-function, asset/liability or community risks that cannot be adequately resolved, Council must retain the ability to reconsider its position before any final proposal is submitted to Government or implemented through legislation.



The orange areas indicate the portions of the Rotorua District within the Waikato Regional Council boundaries and the pink area indicates the portions of the Rotorua District in the Bay of Plenty Regional Council boundaries.

4.2 Te Arawa input and support for this proposal

Iwi/Māori input has been central to the development of the Central Bay of Plenty Unitary Authority proposal. Rotorua's local government arrangements are closely connected to Te Arawa Treaty settlements, statutory acknowledgements, Māori representation, iwi relationships, and catchment-based governance. For that reason, the proposal has been shaped around a clear principle: any new Central Bay of Plenty Unitary Authority must protect existing Treaty settlement rights, statutory roles, relationship agreements, Te Arawa partnership mechanisms, iwi data, mātauranga, and the ability of iwi and hapū to influence decisions affecting their rohe.

The Rotorua landscape is shaped by 17 iwi, 31 Treaty settlements and more than 60 hapū, alongside complex Māori landownership arrangements that intersect with Council infrastructure, water services, gifted reserves and Central North Island Iwi Collective (CNI) land. These relationships are layered across lakes, geothermal systems, catchments, historic settlement areas and enduring ownership interests. Through processes such as Local Water Done Well, iwi have consistently emphasised the importance of retaining direct, locally grounded relationships with Council. This makes Rotorua a distinct governance community, best served by a unitary structure capable of protecting those relationships and enabling genuinely place-based decision-making.

Rotorua's local government arrangements are inseparable from Te Arawa land, water, settlement, infrastructure and economic interests. Māori land, Central North Island Iwi Collective landholdings, Ngāti Whakaue reserves, Te Arawa Lakes settlement interests, Pukeroa settlement assets, Māori-owned springs, wastewater and recovered-water infrastructure, forestry interests, tourism assets, commercial landholdings and iwi-owned business interests all intersect with Council functions. These interests are not peripheral to local government in Rotorua; they are part of the district's operating reality and must be deliberately preserved and protected in any new unitary authority model.

This proposal has been informed by direct engagement with Te Arawa and iwi representatives through the Head Start process, including through the Mayoral Working Group, Te Arawa and Iwi Chairs engagement, hui ā-iwi, and Te Arawa working group material. This input has reinforced the importance of a Central Bay of Plenty Unitary Authority that protects local voice, maintains existing Treaty and partnership arrangements, and avoids Rotorua being absorbed into a wider coastal or metropolitan authority in a way that could dilute Te Arawa relationships or reduce the practical effect of existing arrangements.

The Central Bay of Plenty Unitary Authority aligns with the position advanced by Te Arawa in support of Mai i Maketū ki Tongariro. That direction reflects Te Arawa Treaty settlement boundaries, the significance of the Tarawera, Kaituna, Upper Waikato and Te Arawa Lakes catchments, and the importance of keeping catchment governance coherent. The proposal gives effect to that direction by preserving Rotorua as the core of the Central Bay of Plenty Unitary Authority, recognising the importance of the catchments and Mai i Maketū ki Tongariro, and providing a pathway for future boundary or catchment-based adjustments where they are supported by affected councils, iwi, hapū, communities and stakeholders.

Te Arawa Iwi Chairs support reform options that recognise both Te Arawa aspirations and the wider public interest. In particular, they have identified support for Mai i Maketū ki Tongariro and a Bay of Plenty model structured around Western, Central and Eastern areas. This strengthens the Central Bay of Plenty Unitary Authority proposal because it confirms that the proposal is not simply an administrative boundary option. It reflects local identity, Treaty context, catchment relationships and the need for meaningful iwi/Māori participation in future local government arrangements.

The proposal incorporates the following iwi/Māori design principles:

1. Existing Treaty settlement rights, statutory acknowledgements, relationship agreements and statutory roles must be preserved with the same or equivalent effect.
2. Existing Te Arawa partnership mechanisms must be retained and carried into any successor authority.

3. Māori representation must be treated as a core governance matter in detailed design.
4. Te Arawa Lakes, Tarawera, Upper Waikato and Kaituna catchment arrangements must be protected and integrated into the design of regional functions.
5. Iwi data, mātauranga, tikanga-based processes and iwi relationship arrangements must be safeguarded.
6. Any boundary, catchment or regional-function changes affecting iwi, hapū, Post-Settlement Governance Entities (PSGEs) or settlement arrangements must be developed through direct engagement.
7. Bespoke legislative protections may be required to ensure there is no diminution of existing Treaty settlement rights, statutory roles or relationship commitments.

The Central Bay of Plenty Unitary Authority is strongly aligned with iwi/Māori input received through the Head Start process. It protects the Rotorua Treaty and partnership context, supports a Bay of Plenty model structured around Western, Central and Eastern areas, recognises Te Arawa aspirations for Mai i Maketū ki Tongariro, and provides a disciplined path for detailed design with affected iwi, hapū and PSGEs.

The detailed design phase should protect Māori representation consistent with Rotorua's current direction, including the Māori ward approved through the 2025 binding referendum, subject to any applicable legislative requirements.

5 Proposed structure and high-level governance arrangements

The Central Bay of Plenty Unitary Authority would combine Rotorua's territorial authority functions with the relevant regional council functions for the district.

5.1 Proposed structure

The proposal is to establish a Central Bay of Plenty Unitary Authority based on the existing Rotorua District boundaries. The new authority would combine existing territorial authority functions with the relevant regional council functions currently exercised in Rotorua by Bay of Plenty Regional Council and Waikato Regional Council.

The Central Bay of Plenty Unitary Authority would be responsible for local governance, local infrastructure, local services, district planning, and those regional functions that are most appropriately delivered at a Central Bay of Plenty scale. Regional or cross-boundary functions that are best delivered at wider scale would be managed through detailed design and may be delivered through joint committees, shared service arrangements, council-controlled organisations, regional service vehicles or other agreed mechanisms.

5.2 Local governance

The detailed governance model will maintain or strengthen the local Rotorua voice. It will reflect urban, rural, lake, Māori and other communities of interest, and will consider whether local boards, community boards, delegated decision-making or other place-based mechanisms are needed.

The detailed representation model will be developed during detailed design and reflected in the final proposal. The Central Bay of Plenty Unitary Authority will retain Māori representation consistent with Rotorua's current direction, including the Māori ward approved by Rotorua through the 2025 binding referendum for the next two terms. Local representation arrangements, including the existing community board structure, will also be reviewed to ensure they remain effective for a unitary authority with regional functions.

5.3 Regional governance and delivery

The Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal recognises that many regional council functions operate beyond district boundaries. Rivers, catchments, air, water, pests, flooding, storms, transport and infrastructure networks cross territorial boundaries. Fragmentation can create inconsistent rules, upstream/downstream conflict, duplication, service gaps and uneven investment.

The detailed Central Bay of Plenty Unitary Authority proposal will determine which regional functions should transfer directly to the new unitary, be delivered jointly with the Western and Eastern authorities, be delivered at wider Bay of Plenty scale, require coordination with Waikato regional arrangements, or require bespoke statutory, funding or governance mechanisms.

Detailed design will confirm both transitional and final regional governance arrangements, including temporary governance for Bay of Plenty Regional Council functions. It will also determine whether particular regional functions should sit directly with each unitary authority or be delivered through a shared service council-controlled organisation, a regional service vehicle or another agreed mechanism.

Any shared governance arrangement will need clear terms of reference and agreed delegations, approved through participating council decisions.

Any regional governance or shared-service mechanism must protect our Rotorua voice. It should not be based solely on population if that would allow larger areas to dominate decisions affecting the Central Bay of Plenty Unitary Authority's regional functions, catchments, infrastructure or funding. The final model must balance population, place, catchment, Treaty relationships and functional impacts, and must not erode benefits to the wider region.

5.4 Regional function allocation principles

Detailed design will determine the final allocation and delivery of regional council functions. The following principles should guide that work:

1. Place-based functions should transfer to the Central Bay of Plenty Unitary Authority where they primarily affect Rotorua communities, infrastructure, land use, catchments or local service outcomes.
2. Functions requiring scale, specialist capability, regional consistency, science, monitoring, emergency management or catchment-wide coordination may be delivered through wider Bay of Plenty, Waikato or cross-boundary arrangements.
3. Funding should follow function, benefit and risk, so Rotorua ratepayers are not left carrying unfair costs or liabilities for regional decisions, assets or obligations.
4. Treaty settlement rights, statutory bodies, iwi relationships and existing partnership arrangements must be protected with the same or equivalent effect.
5. Service continuity must be maintained through transition, particularly for planning, consenting, compliance, civil defence, transport, environmental monitoring, biosecurity, lake and catchment management.
6. Any shared delivery model must include clear governance, accountability, voting, funding, reporting and dispute-resolution arrangements.
7. Final allocation of regional functions should be resolved through detailed design before implementation, with explicit decision points for participating councils.

5.5 Transition governance arrangements

The transition to the proposed Bay of Plenty solution will require clear governance before, during and after the 2028 local elections. The Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal seeks a structured transition model that protects service continuity, gives effect to Council decisions, and provides a clear pathway for allocating regional council functions, assets, liabilities, staff, systems and obligations. One option is a temporary Regional Transition Committee comprising the Mayors of the six territorial authorities, with alternates as required, subject to agreement by participating councils and Government.

The proposed approach is that Government and participating councils establish a transition mechanism once Cabinet agrees the joint Tauranga City Council and Rotorua Lakes Council proposal may move into detailed design. That mechanism would not replace elected councils during this triennium. Its role would be to support joint staff work, coordinate detailed design, manage transition risks, and prepare

the final implementation model for Cabinet and councils. Final approval of detailed proposals should remain with each elected council unless and until enabling legislation provides otherwise.

A Regional Transition Committee or equivalent mechanism should include representation from the proposed Western, Eastern and Central Bay of Plenty Unitary Authorities as decision-makers within its agreed delegations. Bay of Plenty Regional Council, Waikato Regional Council, iwi/Māori representatives and central government may participate in an advisory capacity where their functions, interests or responsibilities are affected. Its work should be supported by the chief executives of the six territorial authorities and specialist legal, financial, Treaty settlement, regional functions, workforce, planning and implementation advice.

The transition mechanism would be responsible for:

1. Considering which regional functions transfer to the three Bay of Plenty Unitary Authorities and which are best delivered regionally or jointly;
2. Developing the regional asset, liability, staff, contract, data and systems transfer model;
3. Overseeing service continuity for planning, consenting, compliance, catchment management, civil defence, transport, environmental monitoring, science, biosecurity and regional investment functions;
4. Preparing a Treaty and iwi/Māori transition plan;
5. Designing any joint committees, shared services, CCOs, regional service vehicles or statutory boards needed for regional functions;
6. Preparing the financial transition model, including rates, debt, transition costs, investment income, regional assets and liabilities;
7. Identifying bespoke legislative provisions and Government funding required for implementation; and
8. Overseeing public, iwi/Māori and stakeholder engagement during detailed design.

Any transition mechanism should be established early enough to guide the detailed design phase from November 2026 to March 2027. Its work would inform the final proposal to Government, Cabinet decisions in 2027, enabling legislation in 2028, and implementation ahead of the 2028 local elections.

This approach is intended to reduce transition risk. It would give Government and councils a clear mechanism to resolve complex regional issues, while preserving local democratic accountability until the new unitary authorities are legally established.

Until any formal transition body is established, existing regional leadership arrangements may provide a practical mechanism for maintaining alignment between participating councils. If Cabinet agrees that the joint Tauranga City Council and Rotorua Lakes Council proposal may proceed to detailed design, Rotorua Lakes Council seeks the establishment of a Regional Transition Committee or equivalent formal transition mechanism. That mechanism should support regional coordination but not displace the statutory decision-making authority of participating councils.

Phase	Governance lead	Main decisions	What remains unresolved
Outline proposal to September 2026	Participating councils and existing regional leadership arrangements	Joint Tauranga City Council and Rotorua Lakes Council proposal, Western Bay of Plenty and Central Bay of Plenty portions, and broad principles for a wider Bay of Plenty solution	Detailed design, function allocation, assets/liabilities
Detailed design to March 2027	Regional Transition Committee or equivalent transition mechanism	Regional functions allocation principles, Treaty/iwi transition plan, financial due diligence, representation framework	Final legislative settings, Crown decisions
Cabinet and legislation 2027 to early 2028	Government, councils and transition body	Enabling legislation, final transfer mechanisms, implementation plan	Operational implementation details
2028 elections and implementation	New unitary authorities / transitional arrangements	Governance commences, staged transfer if required	Ongoing integration and service optimisation

6 Case for change and assessment criteria

The Government's Head Start pathway provides a voluntary and streamlined process for groups of councils to submit outline proposals for reorganisation into new unitary authorities. The Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal responds to that opportunity by setting out a Rotorua-centred pathway that is locally accountable, regionally coherent and capable of detailed design.

Rotorua has strong relationships in several directions, including with the Western Bay, Eastern Bay, Waikato and wider central North Island. The proposal does not reduce those relationships to a single axis. It recognises the Rotorua district's central position and preserves collaboration across boundaries where regional functions, catchments, infrastructure or communities of interest require it.

The Central Bay of Plenty Unitary Authority proposal responds to a practical governance question: how Rotorua can participate constructively in regional reform while retaining its local voice, Treaty relationships, economic identity, and ability to influence regional functions that directly affect its district.

A single Bay of Plenty authority may offer the greatest formal simplification, but it would risk diluting Rotorua local voice and Te Arawa-centred governance arrangements. Conversely, a fragmented sub-regional model would not be acceptable if it weakened regional functions or created service gaps. A Central Bay of Plenty Unitary Authority seeks a practical middle path: local unitary accountability for Rotorua, combined with deliberate regional collaboration where functions require scale, catchment coherence or specialist capability.

Section 4.1 sets out the complex governance context in Rotorua. The case for change is that the Central Bay of Plenty Unitary Authority would manage that complexity at the right level. It would bring local

authority functions and relevant regional functions into one accountable local authority for most Rotorua-specific decisions, while retaining wider Bay of Plenty or cross-boundary delivery where functions require scale, specialist capability, regional consistency or catchment-wide coordination.

In practical terms, this would simplify the current interface for Rotorua communities by moving from separate local and regional council arrangements involving Rotorua Lakes Council, Bay of Plenty Regional Council and Waikato Regional Council to one accountable local authority for most Rotorua-specific local and regional functions. It would also provide clearer accountability for decisions affecting urban, rural, lakes, geothermal, forestry, visitor economy and central North Island communities, without requiring Rotorua to be absorbed into a larger coastal or region-wide authority.

6.1 Assessment criterion: supports the new planning system

The proposed Central Bay of Plenty Unitary Authority supports the new planning system by aligning Rotorua district planning, infrastructure planning and relevant regional planning responsibilities within a single authority, while continuing to participate in wider Bay of Plenty and cross-boundary planning arrangements.

Detailed design will ensure that the Central Bay of Plenty Unitary Authority does not disrupt current work on regional spatial planning. A planning system continuity plan will cover regional spatial planning, district planning, future land-use planning, natural environment planning, catchment governance, freshwater implementation, compliance and enforcement transition, transport planning and cross-boundary planning with Waikato.

6.2 Assessment criterion: simplifies local governance

The proposal simplifies local governance by replacing the current two-tier arrangement for Rotorua with a unitary authority responsible for both local and relevant regional functions. At the Bay of Plenty scale, the joint Tauranga City Council and Rotorua Lakes Council proposal, considered alongside the Eastern Bay of Plenty proposal, supports a wider solution that would reduce the number of councils from seven to three.

The proposal recognises that simplification must be practical, not merely structural. The Central Bay of Plenty Unitary Authority will simplify accountability locally but not fragment regional functions. The proposal includes consideration of regional service design for transport, planning, catchment management, civil defence, environmental monitoring, regional investment and other functions that require scale.

6.3 Assessment criterion: economies of scale

A Central Bay of Plenty Unitary Authority improves economies of scale by combining local authority functions with the regional functions that most directly affect Rotorua, while retaining shared regional delivery where wider scale is needed. This gives Rotorua clearer accountability for local infrastructure, planning, regulation, transport input, catchment management and asset stewardship, without assuming that every regional function should transfer to the new authority on day one. With nearly 80,000 residents, Rotorua has sufficient scale to operate as a unitary authority and provide a stable base for the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal. The Central Bay of Plenty Unitary Authority would be the second largest of the proposed Bay of Plenty sub-regional unitary authorities.

The proposal's scale benefits are therefore practical rather than purely structural. The Central Bay of Plenty Unitary Authority would be able to make more integrated decisions about land use, infrastructure, environmental management and local services. At the same time, functions requiring specialist capability, regional consistency, catchment-wide management or significant scale could continue to be delivered through joint committees, shared services, council-controlled organisations, regional service vehicles or other agreed arrangements with the Western and Eastern Bay authorities.

This approach provides a stronger value-for-money platform than the current two-tier arrangements for Rotorua. It reduces duplicated governance interfaces, clarifies accountability, improves alignment between local and regional decisions, and allows shared access to specialist regional capability in areas such as science, monitoring, emergency management, regulation, transport planning and environmental management.

The proposal does not rely on untested savings claims. At outline stage, the financial case is that the Central Bay of Plenty Unitary Authority is plausible and worth progressing to detailed design. Detailed financial work will be required on rates, debt, transition costs, service levels, regional function costs, staff and systems transfer, regional investment income, assets and liabilities, and long-term financial sustainability.

On that basis, a Central Bay of Plenty Unitary Authority satisfies the economies of scale criterion for outline proposal purposes. It provides a credible pathway to improve capability, value for money and financial resilience, while preserving Rotorua local voice and avoiding unnecessary disruption to regional functions that are better delivered at wider scale.

A core detailed design issue is the treatment of Bay of Plenty Regional Council assets, liabilities, reserves, investment income and regional investment arrangements, including Quayside-related arrangements. Rotorua Lakes Council does not seek to resolve those matters at outline stage. However, it considers that asset, liability and revenue allocation must be transparent, fair, evidence-based, and resolved far enough in advance of implementation to allow councils, communities and Government to understand the rates, debt and service-level consequences of any final proposal.

6.4 Assessment criterion: maintains local voice

Local voice is one of the central reasons for submitting the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal. Community engagement consistently raised concern that reform could reduce Rotorua identity, representation and local decision-making. The proposal responds by keeping Rotorua as the core decision-making community of the Central Bay of Plenty Unitary Authority.

Detailed design will confirm the best way to protect local voice, including representation options, Māori representation, local boards or community boards, rural and lakes community representation, local service access, local delegations, and budget mechanisms. The core test will be whether Rotorua communities can continue to influence the decisions that most directly affect them.

Early engagement shows that residents place significant weight on local voice, representation, financial sustainability, communities of interest and economic alignment. While the current joint Tauranga City Council and Rotorua Lakes Council proposal is the proposal now available within the Head Start timeframe, detailed design should continue to test community views, including inland, lakes,

geothermal, forestry and central North Island connections, alongside Bay of Plenty regional relationships.

It is considered that if Cabinet agrees the proposal in principle, formal consultation and further targeted engagement will be required before a detailed proposal is submitted.

6.5 Assessment criterion: deliverability

The proposal is deliverable because it starts from the existing Rotorua District boundaries rather than requiring the immediate amalgamation of multiple territorial authorities. That gives the Central Bay of Plenty Unitary Authority a clear administrative base, preserves existing local accountability, and reduces the organisational disruption that would arise from a larger first-stage merger. It also builds on Rotorua Lakes Council's existing systems, staff capability, statutory relationships, community identity and established Te Arawa partnership arrangements.

Rotorua Lakes Council has a strong organisational foundation, including established asset management systems, corporate capability and financial capacity, providing a sound platform for assuming the relevant regional council functions and supporting a successful transition to unitary authority status.

Deliverability is further strengthened because the proposal does not assume that every regional function must transfer to the Central Bay of Plenty Unitary Authority on day one. It proposes a practical transition in which Rotorua becomes a unitary authority while continuing to work with Western Bay, Eastern Bay, Bay of Plenty Regional Council, Waikato Regional Council where relevant, iwi/Māori partners and central government on regional functions that require scale, catchment-wide management, specialist capability, shared funding or regional consistency. This provides a more workable pathway than either folding Rotorua into a larger regional authority or fragmenting regional functions without a clear delivery mechanism.

7 Treaty settlements, iwi/Māori relationships and PSGE engagement

Treaty settlement protection, iwi/Māori partnership and Te Arawa relationships are central to this proposal. Rotorua local government arrangements sit within a dense Treaty settlement, statutory acknowledgement, and rich council-iwi relationship landscape. Any new unitary authority must preserve those arrangements with the same or equivalent legal and practical effect.

Rotorua Lakes Council has worked through the Head Start process alongside Te Arawa and iwi representatives, including through a Mayoral working group and hui ā-iwi process. The non-negotiables identified through that process are reflected in this proposal: existing Treaty settlements must be protected, statutory acknowledgements retained, existing arrangements upheld, Māori representation addressed, and there must be no diminution of existing rights, relationships or commitments.

Te Arawa Iwi Chairs have supported a Bay of Plenty model structured around Western, Central and Eastern areas, with Rotorua forming the Central Bay component. This support strengthens the proposal because it aligns with a model that preserves local voice, protects Te Arawa relationships, and avoids Rotorua being absorbed into a wider regional authority that may dilute existing Treaty settlement and partnership arrangements.

Te Arawa has also formally supported Mai i Maketū ki Tongariro as its preferred direction. That position reflects Te Arawa Treaty settlement boundaries with the Crown and the importance of keeping the Tarawera, Kaituna and Te Arawa Lakes catchments whole. The proposal therefore recognises Mai i Maketū ki Tongariro and Kaituna Catchment considerations as matters that must be carried through detailed design and any later boundary process.

The Central Bay of Plenty Unitary Authority proposal is consistent with that direction because it preserves Rotorua as the core of the Central Bay of Plenty Unitary Authority while maintaining flexibility for future catchment-based boundary adjustments where those are supported by affected councils, iwi, hapū, communities and stakeholders. It also provides a practical pathway for regional collaboration across the Bay of Plenty where regional functions are best delivered at scale.

Detailed design will include a Treaty and iwi/Māori transition plan. That will confirm how Treaty settlement rights, statutory acknowledgements, joint management agreements, relationship agreements, Māori representation, Te Arawa partnership mechanisms, iwi data, mātauranga, catchment governance and statutory bodies will be preserved or transitioned. Direct engagement with mana whenua, iwi, hapū and PSGEs must occur where settlement arrangements, catchments, representation or local authority relationships may be affected.

Relationships and arrangements requiring specific protection include Te Arawa Lakes Trust, Te Arawa River Iwi Trust, Te Maru o Kaituna River Authority, the Rotorua Te Arawa Lakes Strategy Group, the Tarawera Awa Restoration Strategy Group, recognised PSGEs, protocol agreements and relevant statutory acknowledgements. The Rotorua Township Agreement must also be considered in detailed design as a foundational local arrangement.

8 Subregional and cross-boundary considerations

The Central Bay of Plenty Unitary Authority proposal recognises that Rotorua is not defined by a single sub-regional relationship. Rotorua has strong functional, economic, cultural, Treaty settlement and catchment relationships that extend beyond existing local authority boundaries. The proposal uses the Rotorua District as the practical base for the Central Bay of Plenty Unitary Authority, while preserving flexibility for future catchment-based boundary adjustments and cross-boundary arrangements where they are supported by affected councils, iwi, hapū, communities and stakeholders. This is particularly important for catchments and for the parts of the Rotorua district currently connected to Waikato regional functions. The proposal also recognises that some regional functions should continue to be delivered at wider Bay of Plenty or cross-boundary scale. This approach avoids treating Rotorua as isolated, while also avoiding the loss of local voice that could occur if Rotorua were absorbed into a larger coastal or metropolitan authority.

The proposal must also address specific cross-boundary catchment issues. These include the Kaituna catchment, Tarawera awa, Upper Waikato River and related restoration arrangements, the Te Arawa Lakes catchments, and the part of the Rotorua District that sits within the Waikato catchment. Approximately 3,900 Rotorua district residents are connected to the Waikato regional catchment context. Detailed design will need to confirm how regional planning, river authority arrangements, iwi relationships, rating, service delivery and environmental responsibilities will apply to those communities.

For the outline proposal, Rotorua Lakes Council proposes that the Central Bay of Plenty Unitary Authority be based on current Rotorua District boundaries. The proposal does not require immediate boundary changes and does not seek to include any other district, community or catchment area without appropriate statutory process, affected council agreement where required, and iwi, hapū, community and stakeholder engagement.

During detailed design, Rotorua Lakes Council seeks the ability to explore potential boundary, catchment and regional-function adjustments where those adjustments would better align governance with catchments, Treaty settlement arrangements, communities of interest or regional service delivery. This includes further work on the Kaituna catchment, Mai i Maketū ki Tongariro, Tarawera, Te Arawa Lakes, the upper Waikato / Taupō catchment interface, and those parts of the Rotorua Lakes District currently within the Waikato Regional Council area.

For clarity, this does not mean Rotorua Lakes Council is seeking to include Taupō District or any other district within the Central Bay of Plenty Unitary Authority as part of this outline proposal. Any future boundary adjustment would require the appropriate statutory process, affected council engagement, iwi and hapū engagement, community input and Government decision-making.

9 Government support and bespoke legislative requests

The Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal will require bespoke arrangements to ensure that the transition to a Rotorua-based unitary authority is fair, financially sustainable, and capable of being implemented without creating unintended liabilities, service gaps or funding inequities. These arrangements are not ancillary to the proposal. They are necessary safeguards that will allow the Central Bay of Plenty Unitary Authority to take on relevant regional functions while protecting Rotorua ratepayers, preserving service continuity and enabling the wider Bay of Plenty solution to operate effectively.

The proposal seeks Government agreement to develop the following bespoke arrangements through detailed design and, where required, to provide for them in enabling legislation.

9.1 Protection from inherited regional council liabilities

The Central Bay of Plenty Unitary Authority should not inherit historic, contingent or unresolved liabilities of the Bay of Plenty Regional Council, or any other regional entity, without clear allocation, analysis and agreement. This includes legal, contractual, environmental and employment-related liabilities, borrowing, asset-related liabilities and any exposure arising from past decisions or litigation.

A bespoke legislative or Crown-supported mechanism is required to ensure that Rotorua ratepayers are not made worse off by inheriting liabilities that were not incurred by Rotorua Lakes Council and that have not been properly assessed through detailed design. That mechanism should include:

1. identification of all regional council assets, liabilities, contracts, revenue streams, reserves and contingent risks relevant to the Central Bay authority;
2. agreed allocation principles for regional assets and liabilities;
3. protection from historic or unrelated regional council legal liabilities;
4. Crown underwrite or indemnity where allocation cannot be safely resolved before transition;

5. transitional arrangements for insurance, legal proceedings and asset management obligations; and
6. a clear principle that no community should be left with disproportionate liabilities as a result of reorganisation.

9.2 Rating of Crown property

Rotorua has a significant concentration of Crown-owned or Crown-related land, assets and facilities that use local infrastructure and services but do not always contribute to the cost of those services in the same way as other rateable properties. The establishment of the Central Bay of Plenty Unitary Authority creates an opportunity to address this long-standing funding imbalance.

The proposal seeks authority, through legislation or agreement with Government, for agreed Crown properties to be subject to appropriate rating or service-charge powers where those properties consume local authority services. This may include services such as roading, stormwater, emergency management, regulatory activity, visitor-related infrastructure, parks and reserves, place management and local amenity investment.

The purpose is not to impose a general or automatic charge on all Crown land. It is to provide a fair mechanism for agreed Crown properties or activities to contribute to the cost of services they use or generate demand for. Detailed design will identify which properties and services are in scope, the appropriate rating or charging mechanism, and any exemptions or Crown funding alternatives.

9.3 Government Gardens and other Crown-related property arrangements

The proposal recognises that some Rotorua assets and places have a distinctive Crown, local, Treaty, heritage or gifted-reserve context. Government Gardens is the most significant example. These assets require bespoke treatment because ordinary asset-transfer rules may not properly reflect their history, ownership, public value, cultural and historic value to mana whenua, maintenance obligations or future funding requirements.

The proposal seeks detailed design with Government on whether ownership, administration, funding responsibility or long-term stewardship of agreed Crown-related properties should transfer to, or be shared with, the Crown. Any such arrangement should include:

1. clear ownership or administration responsibilities;
2. agreed asset management obligations;
3. service-level standards;
4. funding arrangements for renewals, maintenance and improvements;
5. treatment of gifted reserve obligations and statutory restrictions;
6. continued local operational involvement where appropriate; and
7. Treaty, heritage and community considerations.

The objective is to ensure that nationally significant or Crown-related assets are not left as an unfunded burden on the Central Bay of Plenty Unitary Authority, while preserving appropriate local access, use and identity.

9.4 Destination levy and accommodation provider registration

Rotorua is a major visitor destination. Visitor activity places additional demand on local infrastructure, public amenities, regulatory services, transport networks, event support, emergency management, public places and destination management. Those costs are not fully met through the existing rating base.

The proposal seeks legislative authority for the Central Bay of Plenty Unitary Authority to require accommodation providers to register with the authority and enable collection of a local destination levy from visitors. The levy would provide a dedicated funding tool for visitor-related infrastructure, destination management, environmental protection, events, public realm investment and services that support the Rotorua visitor economy.

Detailed design will determine the scope of accommodation providers covered, whether the levy applies to commercial accommodation, short-stay accommodation, peer-to-peer accommodation or other visitor accommodation, the collection mechanism, exemptions and compliance arrangements, how levy revenue would be ring-fenced, governance and reporting requirements, and how the levy would support both residents and visitors.

The destination levy would help align the cost of visitor demand with a fair funding source, reducing pressure on Rotorua ratepayers while supporting the long-term sustainability of Rotorua's visitor economy.

9.5 Transitional governance for Bay of Plenty Regional Council functions

The transition from six territorial authorities and one regional council to three unitary authorities in the Bay of Plenty will require careful governance of regional council functions, staffing, assets, liabilities, systems and service continuity. These matters should be managed through a deliberate transition process supported by participating councils, Government and relevant regional entities.

The proposal seeks a bespoke transitional governance model for Bay of Plenty regional council functions. This will include both interim and final-state arrangements. During detailed design, the participating councils, Government and relevant regional entities should determine:

1. the temporary governance arrangements for Bay of Plenty Regional Council functions after the 2028 local elections;
2. whether a transition board, committee of mayors, statutory transition body or other mechanism is required;
3. how the Western, Eastern and Central Bay authorities will participate in transition decisions;
4. how voting, accountability and reporting arrangements will operate;
5. which regional functions will transfer directly to each unitary authority;
6. which functions will remain jointly governed or delivered at regional scale;
7. whether any functions should be delivered through a CCO, shared service, statutory board or regional service vehicle; and
8. how staff, systems, assets, liabilities, data and contracts will transfer or be shared.

The transitional governance model should be established early enough to guide detailed design, provide accountability to participating councils, protect service continuity, and support final Government decisions.

Existing regional leadership arrangements have provided a mechanism for coordinating the outline proposal, maintaining alignment between participating councils, and supporting the wider Bay of Plenty solution. Their role should continue only until a formal transition mechanism is established.

If the proposal proceeds to detailed design, a Regional Transition Committee or equivalent formal mechanism should include the mayors of the six territorial authorities, or their appointed alternates. Bay of Plenty Regional Council, Waikato Regional Council, iwi/Māori representatives and central government should participate where their functions, interests or responsibilities are affected. The mechanism should coordinate detailed design, regional function allocation, asset and liability work, Treaty and iwi/Māori transition planning, financial modelling, service-continuity planning and implementation advice. Final decisions during detailed design should remain with participating councils unless and until enabling legislation provides otherwise.

9.6 Planning, LTP and rating transition relief

The Central Bay of Plenty Unitary Authority will need to assume new regional functions while also maintaining core local authority services, preparing for elections, aligning planning documents, managing budgets, and integrating staff and systems. Without transitional relief, the new authority may face overlapping statutory obligations that are difficult to meet safely within the Head Start timeframe.

The proposal seeks Government support for targeted transition relief or alignment in relation to long-term plan timing and content, annual plan and rating-cycle requirements, representation review timing, audit requirements, planning instrument transition and reporting obligations.

This relief should not reduce transparency or accountability. It should provide a workable statutory pathway so the Central Bay of Plenty Unitary Authority can transition safely, consult properly, and avoid imposing unnecessary cost or process risk on ratepayers.

9.7 Transition funding and specialist implementation support

The Central Bay of Plenty Unitary Authority proposal is not deliverable without detailed design and transition funding support. We seek Government support for legal advice, financial modelling, asset and liability allocation, Treaty settlement protection, iwi and hapū engagement, PSGE engagement, regional function design, transition governance, workforce planning, systems integration, community consultation and programme management.

The proposal seeks a Government contribution to detailed design and transition costs. This support is justified because the Head Start pathway is a Government reform process with region-wide implications and material transition obligations. A funded and disciplined transition programme will reduce implementation risk, support better decision-making, and ensure that any final proposal put to Cabinet is robust, tested and capable of implementation.

9.8 Exemption from rates capping during transition

The transfer of regional council functions to the Central Bay of Plenty Unitary Authority will place significant pressure on Rotorua ratepayers during transition. The participating councils have begun assessing these impacts, but detailed analysis of potential efficiencies, cost allocation and service models has not yet been completed.

Current preliminary information indicates that, without the benefit of the Quayside subsidy, continuing the current Bay of Plenty Regional Council work programme within the Rotorua district could require approximately \$20 million per year in additional rates funding. While efficiencies may be available through a simpler planning and delivery system, they should not be assumed before detailed financial modelling is complete.

For this reason, the proposal seeks an exemption from any proposed rates-capping policy for the Central Bay of Plenty Unitary Authority until the new Council has completed its first long-term plan in 2030. This would allow regional function costs, lake and catchment investment, transition costs and any cross-regional funding arrangements to be properly tested before permanent settings are locked in.

9.9 Status of bespoke arrangements sought

	Bespoke arrangement	Purpose	Status	Detailed design requirement
1	Protection from inherited regional council liabilities	Prevent Rotorua ratepayers inheriting historic or unrelated regional council liabilities without due analysis	For detailed design	Asset, liability, contract, litigation and contingent-risk review; allocation principles; Crown underwrite or indemnity if required
2	Crown property rating or service contributions	Ensure agreed Crown properties contribute fairly to local services they use	For detailed design	Identify properties, services, legal mechanism, exemptions and collection approach
3	Government Gardens and Crown-related properties	Resolve ownership, administration, funding and stewardship of significant Crown-related assets	For detailed design	Legal review, gifted reserve analysis, service-level agreement, asset management and funding model
4	Destination levy and accommodation registration	Provide a fair funding tool for visitor-related demand	For detailed design	Legislative mechanism, provider scope, levy design, compliance, revenue ring-fencing and governance
5	Transitional governance for regional functions	Maintain service continuity and accountability during transition from regional council to unitary authorities	For detailed design	Transition body, voting model, function allocation, shared services, CCO or regional vehicle design
6	Planning, LTP and rating relief	Avoid unsafe overlap of statutory obligations during transition	For detailed design	Legislative relief or alignment for LTP, representation review, audit, planning and rating obligations

Bespoke arrangement		Purpose	Status	Detailed design requirement
7	Transition funding and specialist support	Enable robust detailed design and implementation	For detailed design	Government funding for legal, financial, Treaty, engagement, systems, workforce and programme support
8	Exemption from rates capping during transition	Continue BoPRC functions while developing future service models	For detailed design	Quantify the likely funding gap, cross-regional subsidy requirements and any Crown support needed during transition.
9	Off-ramp based on detailed due diligence and response to items 1-8 above	Protect Council from being locked into a final proposal that is financially, legally, operationally or constitutionally unacceptable for Rotorua	Core condition	Define Council decision points, minimum financial and legal tests, Treaty and representation safeguards, asset/liability thresholds, Government response requirements, and the point at which Council must decide whether to proceed to final proposal or implementation

Core condition means Council's continued support depends on detailed design confirming that the final proposal remains in the interests of Rotorua and that material risks can be adequately resolved before final submission or implementation.

For detailed design means the arrangement is sought to support a fair, funded and workable transition, but its final form should be developed with Government and participating councils during detailed design.

These bespoke arrangements are essential to the credibility and deliverability of the Central Bay of Plenty portion of the joint Tauranga City Council and Rotorua Lakes Council proposal. They ensure the proposal creates a fair, funded and legally workable pathway for Rotorua to become the Central Bay of Plenty Unitary Authority, while supporting a coherent Bay of Plenty solution and the Government's Head Start policy objectives.

Rotorua Lakes Council's support for progressing to detailed design is subject to the final proposal remaining in the district's interests. If detailed design identifies material financial, legal, Treaty settlement, representation, regional-function, asset/liability, service continuity or community risks that cannot be adequately resolved, Council must retain the ability to reconsider its position before any final proposal is submitted to Government or implemented through legislation.

10 Detailed design & transition planning work programme

Detailed design will resolve the matters that cannot be settled at outline proposal stage. The work programme will focus on regional functions, planning-system continuity, financial sustainability, representation and local voice, Treaty settlement protection, iwi/Māori engagement, transition planning, community consultation and implementation support.

Workstream	Detailed design & transition planning questions	Inputs needed	Output
Regional spatial planning	How will current Bay of Plenty/Waikato planning regions and new unitary boundaries interact?	Planning legislation analysis, regional plan boundaries, council planning teams	Planning continuity plan
Functional review of all services that can be shared	Cross-regional work to determine which functions should be done at which level	Functional analysis supported by data and evidence	Multi-layer functional plan for governance & delivery
Discussions with Crown on bespoke requests	Details of bespoke arrangements to be agreed with the Crown	Crown views	Bespoke legislative or mutually agreed outcomes
Regional council functions and services	Which functions transfer, remain regional, or are jointly governed?	Function map, assets/liabilities, staff and systems data	Regional functions allocation model
Financial due diligence	What are transition costs, debt/rates/service-level effects and long-term sustainability?	Financial models, asset condition, LTPs, water services model	Financial due diligence report
Representation and local voice	How will wards/local boards/community boards/Māori representation work?	Population data, community-of-interest evidence, engagement	Representation framework
Treaty settlements and iwi/Māori	How will settlements and relationships transfer with equivalent effect?	PSGE engagement, Crown advice, legal review	Treaty and iwi relationship transition plan
Implementation planning	How will people, assets, systems, contracts and CCOs transition?	HR, IT, legal, procurement, asset registers	Transition plan and milestones
Community engagement	What feedback is required before final proposal?	Engagement plan, materials, summary of feedback	Engagement report