



**Local Government
Commission**

Mana Kāwanatanga ā Rohe



Reorganisation of local government in Southland

Local Government Commission –
Investigation Process

October 2025

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Purpose of document

1. This document sets out the process the Local Government Commission (the Commission) intends to follow in its investigation into reorganisation of local government in Southland (the investigation). It has been prepared in accordance with Schedule 3 of the Local Government Act 2002 (the LGA).
2. This document reflects feedback on the draft process received from:
 - Environment Southland, Gore District Council, Invercargill City Council, Southland District Council; and
 - Te Ao Mārama Incorporated, on behalf of Ngāi Tahu ki Murihiku and Papatipu Rūnanga.

What is in this document?

3. This document sets out how the Commission intends to undertake the investigation, including:¹
 - The matters to be investigated
 - The affected area and the local authorities affected by the investigation
 - The procedure and timetable for the investigation
 - Each affected iwi or hapū, and how and when they will be given an opportunity to engage with the investigation
 - The key stakeholders, and how and when they will be given an opportunity to engage with the investigation
 - How and when members of the public will be consulted on the investigation and any proposed recommendations or reorganisation plans that may result
 - Any other matter the Commission considers relevant.
4. The Commission has considered reorganisation investigation principles in developing this draft process.² These principles are set out in full in Appendix A.
5. The Commission can amend this process document at any time during the investigation.³ Any amendments will be publicly notified.

¹ LGA, schedule 3, [clause 7\(2\)](#)

² LGA, schedule 3, [clause 7\(3\)](#)

³ LGA, schedule 3, [clause 7\(5\)](#)

Why investigate reorganisation in Southland now?

6. In February 2025 the Commission received a reorganisation initiative (the initiative) from Southland District Council, proposing the reorganisation of local government in Southland.
7. The Commission engaged with Environment Southland, Gore District Council, Invercargill City Council and Southland District Council,⁴ and Te Ao Mārama Incorporated, on behalf of Ngāi Tahu ki Murihiku.
8. The Commission considered all feedback received,⁵ and on 7 July 2025 agreed to undertake an investigation. A copy of the Commission's decision is available on the Commission's [website](#).

Acknowledging change in the local government sector

9. The Commission acknowledges that the investigation is occurring against the backdrop of extensive local government legislative reform. A high-level list of current or pending legislative reform as at October 2025 is included as Appendix B. The Commission also acknowledges the upcoming local elections taking place in October 2025.
10. The Commission will monitor the progress of legislative reform and, if necessary, report on how legislative change affects the investigation.
11. The Commission also acknowledges on-going statutory council activities that will continue throughout the investigation. These include (but are not limited to):
 - Preparation of Council Annual Plans 2026 (if required)
 - Preparation of Council Long Term Plans 2027-2037
 - Invercargill City Council's representation review ahead of the 2028 election
 - Preparation for water services delivery models ahead of 1 July 2027
 - Potential changes to council work programmes in anticipation of Resource Management Act reforms.
12. The Commission's statutory obligation is to complete its investigation within the notified timeline. However, where possible the Commission will avoid in-depth engagement on the investigation overlapping with statutory consultation periods on the above matters.

⁴ As required by LGA, schedule 3, [clause 5\(2\)](#)

⁵ Feedback was considered against the criteria set out in the LGA, schedule 3, [clause 6](#)

Investigation procedure and timetable

13. The proposed investigation procedure and timetable are set out in the table below.
14. Throughout the investigation process and any resulting reorganisation, the Commission will provide updates and copies of key documents on its website. Any required public notifications will also be via the Commission's website.

Estimated date	Investigation step
Oct-Nov 2025	Commission publicly notifies final investigation process
Nov 2025 – Mar 2026	Investigation phase 1 – Scoping exercise Objectives: • Issues definition • Identification of opportunities, constraints or exclusions of investigation • Consideration of criteria for assessing information • Understand community aspirations and priorities for local government in Southland Will include: • In-person meetings and ongoing, iterative engagement with councils and Te Ao Mārama Incorporated, on behalf of Ngāi Tahu ki Murihiku and Papatipu Rūnanga • Initial engagement with key stakeholders and wider community. Engagement opportunities may include in-person, virtual, and other opportunities to engage • At the end of phase 1, a Commission report setting out its findings on the objectives • If required, early close of investigation
Mar-Aug 2026	Investigation phase 2 – deep dive investigation Objectives: • Detailed understanding of issues as defined in scoping exercise • Detailed understanding of communities of interest • Detailed understanding of impact of potential options for Ngāi Tahu ki Murihiku and Papatipu Rūnanga • In-depth analysis of options against legislative factors (Appendix E)

	Will include: • Ongoing, iterative engagement with councils and Te Ao Mārama Incorporated, on behalf of Ngāi Tahu ki Murihiku and Papatipu Rūnanga • In-depth engagement with key stakeholders and wider community. Engagement may include in-person, virtual and other opportunities to engage • Cost-benefit analysis of potential reorganisation options, alongside the other legislative factors relating to reorganisation (Appendix E) • At the end of phase 2, a Commission report setting out its findings on the objectives. This may include the release of a draft reorganisation plan (triggering the commencement of phase 3 and associated consultation period) • If required, early close of investigation
Sep 2026 – Feb 2027	Investigation phase 3 – draft reorganisation plan (if required) Objectives: • Draft reorganisation plan released • Formal consultation process Will include: • Commission explanation of contents of draft reorganisation plan⁶ • Formal submissions period • Meetings and/or hearings, with in-person and virtual options • If required, early close of investigation
Mar – Aug 2027	• Close of investigation • Final reorganisation plan (if required) • Poll of electors held, if required (to be held approximately 3 months after notice is given to the electoral officer) • Next steps are set out below

⁶ LGA, Schedule 3, [clause 14](#)

Matters to be investigated

15. The investigation is focused on identifying the structure that will best promote good local government in Southland, by enabling and facilitating improvements to local governance.⁷

What might reorganisation look like?

16. The Commission acknowledges that the initiative seeks two unitary authorities for Southland. It also acknowledges feedback received from Southland Councils and Te Ao Mārama Incorporated, which included a focus on identifying options for efficient and effective local government in Southland. Some feedback specified a preference for a single unitary authority for Southland.
17. The Commission is starting the investigation without a particular structure of local government in mind. Instead, it will consider a broad range of matters relating to local governance in Southland. This will include a deep dive into the responsibilities, duties, powers and functions of each council, alongside wide-ranging community engagement.
18. Matters to be considered include (but are not limited to):
 - Financial management and council-specific financial issues
 - Rating policies
 - Governance and risk management
 - Infrastructure planning and service delivery
 - Asset and activity management
 - Planning and regulatory frameworks
 - Resource and environmental management
 - Emergency management
 - Relationships with Ngāi Tahu ki Murihiku and Papatipu Rūnanga
 - Opportunities for Māori to contribute to council decision-making processes
 - Identification of communities of interest across the region, and appropriate representation arrangements
 - Cross-boundary shared services and council-controlled organisations

⁷ This is the over-arching purpose of local government reorganisation, as set out in [section 24AA](#) of the LGA.

19. Outcomes open to the Commission include the potential union or disestablishment of current local authorities and the potential establishment of new local authorities. A full list of potential outcomes is included in Appendix C.⁸ The Commission can also consider whether to include a system of communities and community boards in any outcome.⁹

Who is affected by the investigation?

Affected areas

20. An affected area means an area affected, or potentially affected, by one or more of the matters to be investigated.¹⁰ For this investigation, the affected areas include all land, coastal waters and any associated infrastructure within the Southland region.
21. If it becomes apparent during the investigation that areas beyond Southland should be considered affected areas, this process document will be amended accordingly and publicly notified.

Affected local authorities

22. An affected local authority is one whose district or region contains an affected area.¹¹ The affected local authorities for this investigation are:
- Environment Southland
 - Gore District Council
 - Invercargill City Council
 - Southland District Council
23. Neighbouring councils, including Clutha District Council, Central Otago District Council, Queenstown-Lakes District Council and Otago Regional Council are considered key stakeholders. If it becomes apparent during the investigation that any additional councils should be considered affected local authorities, this process document will be amended accordingly and publicly notified.

⁸ As set out in [section 24](#) of the LGA

⁹ LGA, schedule 3, [clause 19](#)

¹⁰ LGA, schedule 3, [clause 2](#)

¹¹ LGA, [section 5](#)

Engagement with affected local authorities

24. The Commission will work constructively, and in an open and transparent manner, with affected local authorities throughout the investigation. The primary role of councils through the investigation will be providing information to the Commission. It is expected that affected local authorities engage willingly with the investigation and provide information to the Commission where required.¹²
25. The Commission's engagement with affected local authorities may need to take different forms over the course of the investigation. The Commission acknowledges affected local authorities' preference for engagement to be in person (kanohi ki te kanohi). In-person engagements will be prioritised early in the scoping exercise and throughout the investigation where possible. Additional engagements may be held virtually, or through the provision of written feedback where required and/or appropriate. Engagement is expected to be on-going, with iterative opportunities for input.
26. Engagement activities may include both individual opportunities for input, or on a collective basis with all councils participating along with Te Ao Mārama Incorporated, on behalf of Papatipu Rūnanga. Where appropriate, this may include using existing forums such as the Southland Mayoral or Chief Executive Forums for engagement, along with other established groups such as Te Rōpū Taiao.
27. Where possible, the Commission intends to avoid engagement overlapping with local authority consultation activities. While it may not be possible to avoid all individual council community engagements, the Commission will endeavour to avoid in-depth community engagement relating to the investigation overlapping with:
- Consultation on Council Annual Plans (where required) – April/May 2026
 - Consultation on Council Long Term Plans – April/May 2027
 - Consultation on Invercargill City Council's initial representation review proposal (around mid-2027 – timetable to be provided by Invercargill City Council)
28. The Commission may request to utilise affected local authorities' websites and existing communications channels to help provide information about and support public awareness and understanding of the investigation.

¹² LGA, schedule 3, [clause 8](#)

Affected iwi and hapū

29. An affected iwi or hapū is an iwi or hapū with interests within the affected area.¹³ The entire Southland region is within the rohe of Ngāi Tahu. The Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 recognise the status of Papatipu Rūnanga as kaitiaki and mana whenua of the natural resources within their takiwā boundaries.
30. Papatipu Rūnanga within the rohe of Murihiku are:
- Te Rūnanga o Awarua
 - Hokonui Rūnanga
 - Te Rūnanga o Oraka Aparima
 - Waihōpai Rūnanga
31. During the investigation, if any additional areas or local authorities are considered to be affected, the Commission will confirm with Ngāi Tahu whether any additional Papatipu Rūnanga should be considered affected hapū.

Engagement with affected iwi and hapū

32. Te Ao Mārama Incorporated is authorised to represent the four Murihiku Papatipu Rūnanga in Resource Management Act and Local Government Act matters. The Commission will work with Te Ao Mārama Incorporated throughout the investigation to facilitate engagement with Ngāi Tahu ki Murihiku and Papatipu Rūnanga in each phase of the investigation.
33. There are two strands to the Commission's engagement with Ngāi Tahu ki Murihiku and Papatipu Rūnanga, which may overlap throughout the investigation. These are:
- To understand the aspirations and expectations of Ngāi Tahu ki Murihiku and Papatipu Rūnanga in relation to how local government is structured and operated in Southland;
 - To understand the effect that potential models of local government may have on the relationship of Ngāi Tahu ki Murihiku and Papatipu Rūnanga with their ancestral land, water, sites, wāhi tāpu, valued flora and fauna, and other taonga, or with local authorities.¹⁴

¹³ LGA, schedule 3, [clause 2](#)

¹⁴ LGA, schedule 3, [clause 7\(4\)\(b\)](#)

34. The Commission acknowledges Te Ao Mārama Incorporated's preference for an iterative and adaptive approach to the investigation. The Commission will prioritise kanohi ki te kanohi engagement with Ngāi Tahu ki Murihiku and Papatipu Rūnanga throughout the investigation, complementing existing Te Ao Mārama Incorporated meeting schedules where possible. Additional forms of engagement, such as virtual meetings or written feedback may be utilised where appropriate. Engagement is expected to be on-going, with iterative opportunities for input.
35. Engagement activities may include specific opportunities for input by Te Ao Mārama Incorporated, on behalf of Ngāi Tahu ki Murihiku and Papatipu Rūnanga, or collective engagement alongside councils. Where appropriate, this may include using existing forums such as Te Rōpū Taiao for engagement.

Engagement – key stakeholders and community

36. The investigation addresses local governance in the entire Southland region – a matter that touches on all aspects of daily life for residents in Southland. It is appropriate that the Commission's engagement be wide-ranging and in-depth.
37. Key stakeholders have been identified from different sectors of the Southland community, including (but not limited to):
 - Government/Local government entities
 - Māori entities
 - Business sector
 - Rural/environmental sector
 - Community sector
 - Education sector
38. An indicative table of key stakeholders is included at Appendix D. The Commission may identify and engage with additional key stakeholders at any time during the investigation.
39. The Commission acknowledges that a 'one-size-fits-all' community engagement approach will not be appropriate for an investigation of this scale. The Commission acknowledges the preference for engagement with key stakeholders and the community to be in-person (kanohi ki to kanohi) where possible. Where in-person engagement is not possible, a variety of different engagement approaches will be used throughout the investigation.
40. Engagement approaches used throughout the investigation may include (but are not limited to):
 - In person engagement, such as community meetings, meetings with key stakeholders (individually or in groups), focus groups/workshops/drop-in sessions, presence at community events, and in-person formal hearings;

- Virtual engagements, such as online information sessions/webinars/drop-in sessions, the provision of recorded information, and virtual formal hearings
 - Written or other forms of feedback, such as media releases, online/phone surveys, letter drops, and formal written submissions.
41. Where possible, the Commission intends to avoid engagement overlapping with constraints on the Southland community calendar. The proposed investigation phases have accounted for times when sectors of the Southland community may be focused on other matter such as:
- Tītī season – end-March to end-May
 - Duck season opening weekend – May
 - Moving Day - June
 - Lambing/calving season – August-September
 - Silage/mowing – October-November

Completion of investigation and next steps

42. Throughout the investigation the Commission may issue reports or make recommendations to any of the councils on any matter relating to the investigation.¹⁵
43. The Commission will publicly notify the completion of its investigation. The Commission may complete its investigation:
- At the end of the investigation process; or
 - At an earlier point, if it becomes evident that continuation of the investigation process is no longer feasible.
44. Reasons for completion of the investigation prior to the end of the investigation process include (but are not limited to):
- The Commission receiving sufficient information and evidence to support adoption of a reorganisation plan at an earlier stage;
 - The Commission's investigation establishing that the current local government arrangements best promote good local government in Southland;
 - The Commission having evidence of widespread community opposition to alternative local government arrangements, such that polling on a reorganisation plan would be likely to fail;
 - Significant changes to the parameters of the investigation that indicate that continuation is not feasible.

¹⁵ LGA, schedule 3, [clause 9](#)

45. The Commission may adopt a reorganisation plan at any time during, or at the completion of the investigation. In doing so, the Commission must consider the objectives and factors set out in Appendix E.¹⁶
46. A poll of electors will be held if the investigation results in a reorganisation plan providing for:¹⁷
- The union of districts or regions
 - The constitution of a new district or region, or new local authority
 - The abolition of a district or region, or dissolution of a local authority
 - The assumption by a territorial authority of the powers of a regional council as a unitary authority
47. If a poll is held and more than 50% of votes cast support the reorganisation plan:
- an Order in Council will be made to give effect to the reorganisation plan;
 - A transition body will be established;
48. The Commission, with assistance from the transition body, will develop a reorganisation implementation scheme, setting out in detail how the reorganisation will be implemented. Next steps include:
- An Order in Council to give effect to the reorganisation implementation scheme;
 - The transition body undertaking the steps set out in the reorganisation implementation scheme.

¹⁶ LGA, schedule 3, clauses [10](#) and [12\(2\)](#)

¹⁷ LGA, schedule 3, [clause 23](#)

Appendix A: Reorganisation Investigation Principles

In determining its investigation process and in undertaking its investigation, the Commission must have regard to the following principles (clause 7(3), Schedule 3, LGA):

- (a) Early information should be available to the public and stakeholders about the issues to be investigated, the process to be followed, and the opportunities for public input; and
- (b) The process should be in proportion to the scale, scope, and potential impact of the identified issues and of any reorganisation plan that may result from the investigation; and
- (c) The process should recognise the relevant evidence and information that the Commission already holds; and
- (d) The process should recognise and reflect the nature and extent of the interests of affected iwi or hapū in the outcome of the investigation; and
- (e) The process should provide persons, entities, and organisations who wish to have their views on the subject matter of the investigation considered by the Commission with a reasonable opportunity to present those views to the Commission; and
- (f) The extent and nature of public and stakeholder engagement should –
 - (i) Reflect the degree of public interest (including of each affected iwi or hapū) in the issues and in any reorganisation plan that may result from the investigation; and
 - (ii) Reflect the importance of –
 - (A) Stakeholder input; and
 - (B) Community engagement; and
 - (C) Public acceptance of the process and the potential outcome; and
 - (iii) Appropriately balance the costs and benefits of different processes

Appendix B: Local government legislative reform

This draft process has been developed under the LGA, current as of August 2025.

Local government legislative reforms that are either underway or signalled for the near future as of October 2025 include (but are not limited to):

- Local Government (Systems Improvement) Bill – Select Committee stage
- Development Levy System – Bill indicated for introduction late 2025
- Infrastructure Funding and Financing – Bill indicated for introduction late 2025
- Resource Management – Bill indicated for introduction late 2025
- Emergency Management Bill – Bill indicated for introduction during the current term of Parliament
- Reform relating to council rates setting – Cabinet paper indicated late 2025

Appendix C: Potential reorganisation outcomes

Local government reorganisation may provide for 1 or more of the following matters (section 24, LGA):

- (a) The union of districts or regions
- (b) The constitution of a new district or region, including the constitution of a new local authority for that district or region
- (c) The abolition of a district or region, including the dissolution or abolition of the local authority for that district or region
- (d) The alteration of the boundaries of any district or region
- (e) The transfer from one local authority to another of –
 - i. A responsibility, duty, or power conferred by an enactment; or
 - ii. A discretionary function
- (f) The assumption by a territorial authority of the responsibilities, duties, and powers of a regional council as a unitary authority
- (g) The performance and exercise by a local authority of both-
 - i. The responsibilities, duties and powers of a regional council in respect of a region; and
 - ii. The responsibilities, duties, and powers of a territorial authority in respect of a district that constitutes a part only of that region
- (h) The establishment of 1 or more joint committees and the delegation of responsibilities, duties, and powers to those committees
- (i) The establishment of a local board area, including the establishment of a local board for that area;
- (j) In relation to a local board, other than a local board established under the Local Government (Auckland Council) Act 2009,-
 - i. The means by which the chairperson is elected; and
 - ii. Whether the local board may include appointed members
- (k) The abolition of a local board area
- (l) The alteration of the boundaries of a local board area
- (m) The union of 2 or more local board areas.

Appendix D: Indicative list of key stakeholders

The Commission may identify and engage with additional key stakeholders throughout the investigation.

Government / Local Government Entities	
Ardlussa Community Board	NZ Transport Agency Waka Kotahi
Bluff Community Board	Northern Community Board
Central Otago District Council	Officers of each council
Clutha District Council	Ōraka Aparima Community Board
Department of Conservation	Ōreti Community Board
Department of Internal Affairs	Otago Regional Council
Elected members of each council	Queenstown-Lakes District Council
Emergency Management Southland	Southland Chief Executives Forum
Environment Southland	Southland District Council
Fiordland Community Board	Southland Mayoral Forum
Fire and Emergency NZ Southland	Southland Members of Parliament
Gore District Council	Stewart Island/Rakiura Community Board
Gore Health	Te Puni Kōkiri
Great South (Southland Regional Development Agency)	Te Whatu Ora Health NZ
Hato Hone St John South Island Region	Tuatapere Te Waewae Community Board
Invercargill City Council	Waihōpai Toetoe Community Board
Invercargill City Holding Company	Wallace Takitimu Community Board
Lifeline Utilities Group	WasteNet Southland
Mataura Community Board	Water entities/CCOs (once established)
Ministry of Social Development	Well South – Southern Primary Health Network
New Zealand Police (Southern Police District)	

Māori Entities

Hokonui Rūnanga	Te Rūnanga o Awarua
Ngā Hau e Wha Marae (māta waka)	Te Rūnanga o Ngāi Tahu
Ngāi Tahu ki Murihiku	Te Rūnanga o Oraka Aparima
Te Ao Mārama Incorporated	Te Tomarangī Marae (māta waka)
Te Rōpū Taiao	Waihōpai Rūnanga

Business Sector

Affco NZ (Southland)	Mataura Valley Milk
Alliance Group	Meridian Energy
AML Limited	Mercury Energy (Kaiwera Wind Farm)
Balance	New Zealand Aluminium Smelter
Beef+Lamb	Niagara Sawmilling Company
Blue Sky Meats	Open Country
Calder Stewart	Powernet
Civil Contractors New Zealand – Southland branch	Prime Range Meats
COIN South	Queenstown Airport Corporation Limited
Contact Energy	Ravensdown
Daiken Southland	Real NZ
Dairy NZ	Road Transport Association – Southland
Distinction Hotel Group	Silver Fern Farms
ENGAGE Southland	Skeggs
Fiordland Business Chamber	Southland-based tourism industry
Fonterra	Southland Business Chamber

Fortuna	Southland Disability Enterprises Limited
HW Richardson Group	Southport
IFS Growth	South Wood Export
Invercargill Airport Limited	Talley's NZ (Southland)
Invercargill Licensing Trust	Triflor NZ
Mataura Licensing Trust	Tuatapere Promotions

Rural / Environment Sector

Aparima Community Environment (ACE) catchment group	Predator Free Rakiura
Aquaculture Pathway Network (Great South)	Reforest Southland
Bluff Hill/Motupohue Environment Trust	Rural Contractors NZ
Catchment Liaison Committees	Rural Support Trust
Federated Farmers Southland	Rural Women New Zealand – Lower South Island
Fiordland Marine Guardians	Southland Rural Support Trust
Forest and Bird Southland	South Coast Environment Society
Groundswell	Southland Conservation Board
Guardians of Lakes Manapouri, Monowai and Te Anau	Southland Fish and Game
Livestrands	Stewart Island/Rakiura Community & Environment Trust
NZ Young Farmers – Otago/Southland	Thriving Southland (37 catchment groups)
Otatara Landcare Group	Waiau River Working Group
Pest Busters (Riverton)	Weed Busters (Manapouri)

Community Sector	
AA (Automobile Association) Southland	Pacific Island Advisory Charitable Trust
Active Southland	South Alive
Age Concern Southland	Southland Community Housing Group
Arts Murihiku	Southland Community Law
Arts Working Group	Southland Foundation
Citizens Advice Bureau Invercargill	Southland Interagency Forum
Colac Bay Progress League	Southland Lions Clubs
Combined Disability Network	Southland Multicultural Council
Community Trust South	Southland Museum Trusts
Connected Murihiku	Southland places of worship
Disabilities Resource Centre Southland	Southland Rotary Clubs
Fiordland Community House	Southland sporting groups
Grey Power Southland	Southland Women's Refuges
IC2 Trust	The Number 10 Southland Youth One Stop Shop
Invercargill Friendship Group (U3A)	The Ratepayers Association
Koha Kai	Total Mobility Group
Migrant Settlement Network	Waikaia Progress League
Murihiku Kai	Youth Network

Education Sector	
Murihiku Regeneration	Southland schools
Southland Institute of Technology	Te Rourou, One Aotearoa Foundation - Murihiku
Southland Principals Association	

Appendix E: Objectives and factors to consider for reorganisation plan

In assessing options for reorganisation, the Commission must consider how best to achieve:¹⁸

- (a) Better fulfilment of the purpose of local government as specified in section 10; and
- (b) Productivity improvements within the affected local authorities; and
- (c) Efficiencies and cost savings; and
- (d) Assurance that any local authority established or changed has the resources necessary to enable it to effectively perform or exercise its responsibilities, duties and powers; and
- (e) Effective responses to the opportunities, needs and circumstances of the affected areas; and
- (f) Enhanced effectiveness, efficiency, and sustainability of local government services; and
- (g) Better support for the ability of local and regional economies to develop and prosper; and
- (h) Enhanced ability of local government to meet the changing needs of communities for governance and services into the future; and
- (i) Effective provision for any co-governance and co-management arrangements that are established by legislation (including Treaty of Waitangi claim settlement legislation) and that are between local authorities and iwi or Māori organisations.

Before adopting a reorganisation plan, the Commission must consider:¹⁹

- (a) The scale of the potential benefits of the proposed changes in terms of the objectives set out in clause 10 and the likelihood of those benefits being realised; and
- (b) The financial, disruption, and opportunity costs of implementing the proposed changes at the proposed time; and
- (c) The risks and consequences of not implementing the proposed changes at the proposed time; and
- (d) Existing communities of interest and the extent to which the proposed changes will maintain linkages between communities (including iwi and hapū) and sites and resources of significance to them; and
- (e) The degree and distribution of demonstrable public support for the proposed changes within communities in the affected area; and
- (f) The degree and distribution of any public opposition to the proposed changes within communities in the affected areas.

¹⁸ LGA, schedule 3, [clause 10](#)

¹⁹ LGA, schedule 3, [clause 12\(2\)](#)