



Kaipara te Orangahui  
**KAI PARA**  
DISTRICT  
Two Oceans Two Harbours

# TRUE NORTH

## THREE UNITARY AUTHORITY MODEL FOR NORTHLAND

**A PRACTICAL  
WAY FORWARD  
FOR NORTHLAND  
COMMUNITIES**



*Alternative Head Start Pathway Outline Proposal*

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## Purpose

The final Northland Head Start Outline Proposal; Northland local government – a staged path to reform (Northland proposal) has been developed following previous majority decisions of participating Northland councils and subsequent review by the cross-council Northland Local Government Reform Elected Member Steering Group.

The proposal would establish two unitary authorities, comprising Far North District Council and an amalgamated Whangārei and Kaipara district councils, with a transition to a single unitary authority over time.

While Kaipara District Council has unanimously resolved not to support the proposal and asked to be excluded, the Northland Head Start Outline Proposal continues to be supported by Whangārei District Council, Far North District Council and Northland Regional Council, and has been submitted to central government, meeting the 9 August 2026 deadline.

This alternative proposal for three unitary authorities is submitted to make sure that Kaipara District Council's position is clearly recorded and that Government has a credible reform option to consider alongside the current Northland Head Start Outline Proposal. It demonstrates Kaipara's willingness to engage constructively in reform, while addressing unresolved concerns about local representation, financial accountability, transition cost and complexity, community identity and the risk of smaller rural and remote communities being absorbed into larger governance structures.

Kaipara District Council believes a three unitary authority model is a practical middle path as it removes the regional council layer and creates unitary authorities, while preserving local democracy, financial accountability, and distinct communities and geographies of interest across Far North, Kaipara and Whangārei.

# 1. Context

Kaipara District Council remains open to exploring local government reform where it is evidence-based, delivers demonstrable benefits to ratepayers, protects local representation, and improves service delivery outcomes. However, Kaipara District Council does not support progressing through the Head Start pathway under the current Northland proposal and process.

Instead, Kaipara District Council is proposing that a three unitary authority model could be framed as an alternative to a two unitary transitional model. The proposed three unitary model would establish separate unitary authorities for Far North, Kaipara and Whangārei, with regional functions coordinated through regional collaboration arrangements where appropriate.

While the Northland proposal states that its Transition Model simplifies local government by reducing four councils to two, the proposed governance structure may not represent genuine simplification from a community, governance or operational perspective. Instead, it replaces four existing councils with two unitary authorities and a new Shared Regional Entity (SRE), creating a model that still relies on multiple organisations, unspecified local bodies, shared decision-making arrangements, and ongoing coordination mechanisms.

**Reducing the number of councils does not automatically reduce the complexity of governance.**

The Northland proposal acknowledges that the SRE would require its own governance arrangements, chief executive, staff, systems, funding framework, reporting processes and bespoke legislation to compel participation by the two unitary authorities. It also recognises that regional functions would continue to sit outside the unitary authorities and that decisions may require adoption by multiple entities.

For communities, elected members, staff and external stakeholders, accountability would continue to be shared between local and regional entities rather than being consolidated and simplified into a single point of responsibility.

The Northland proposal identifies six major workstreams that would continue throughout the transition period:

- local governance
- Māori participation and representation
- revenue and financing
- asset management and investment
- service delivery
- organisational systems

These issues remain unresolved and are intended to be worked through during one to three electoral cycles.

**If these matters are fundamental to the success of reform, does establishing a Transition Model before resolving them genuinely simplify local government, or defer complexity into a later phase?**

While both proposed models reduce the number of councils, the proposed Northland transition model introduces a new governance entity and additional coordination arrangements that increase complexity. By comparison, a three unitary authority model could deliver simplification through direct accountability to local communities while using existing statutory mechanisms for regional collaboration, avoiding the need for an additional regional organisation with separate governance, staffing and funding arrangements.

## 2. Kaipara District Council's proposed alternative model

| Element                       | Description                                                                                                                                                                      |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Structure</b>              | <b>Three unitary authorities: Far North, Kaipara and Whangārei.</b>                                                                                                              |
| <b>Regional council layer</b> | Removed, with regional functions transferred to unitary authorities or delivered through regional collaboration where appropriate.                                               |
| <b>Regional coordination</b>  | Shared regional functions framework using joint committees, statutory regional planning arrangements, shared services, CCOs or similar mechanisms.                               |
| <b>Core rationale</b>         | Balances local voice and community identity with regional integration for functions that operate at Northland-wide scale.                                                        |
| <b>Primary advantage</b>      | Achieves simplification without requiring Kaipara to merge into a larger Whangārei-Kaipara authority combining a largely urban center with a majority rural and remote district. |

### 3. Strategic reasoning

The Government's Head Start pathway seeks a simpler local government that preserves local representation. Kaipara District Council's alternative proposal of a three unitary model does this by removing the regional council layer, creating clear district accountability, and retaining local democratic voice and community identity.

A three unitary authority model balances local democracy with regional coordination, delivering simpler governance, clearer accountability and shared regional outcomes while preserving Northland's distinct communities.

Northland already collaborates successfully through Northland Waters, Civil Defence Emergency Management, regional transport planning, economic development partnerships and other shared programmes, showing regional outcomes can be achieved without removing local governance.

The Northland Head Start Outline Proposal recognises the region's districts differ in demographics, economies, growth pressures, infrastructure needs and priorities, and that communities value local voice, affordability and protection of rural and remote areas.

The three unitary model **reflects** these realities by ensuring that:

- Far North retains direct control over issues affecting Far North communities
- Kaipara retains control over its growth, infrastructure and financial priorities
- Whangārei retains responsibility for its urban growth and regional service centre functions.

This approach avoids smaller communities becoming subsumed within larger governance structures and preserves the close connection between local decisions and local communities.

Kaipara District Council's alternative proposal should not be framed as opposition to reform. It should be framed as a Northland-fit reform model that meets the Government's simplification objectives while avoiding risks associated with over-centralisation, cross-subsidisation, loss of local voice, and rushed structural integration.

## 4. Alignment with DIA Head Start guidance

| DIA assessment area                     | Kaipara District Council's alternative proposal<br>Three unitary model alignment and key evidence                                                                                                                                                                                                                                                                                                                                    | Northland Head Start outline proposal<br>Disadvantages of two unitary transitional model                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Eligibility</b>                      | <p>Reduces the number of local authorities overall by removing the regional council layer.</p> <p>Absorbs regional council functions. Continues regional planning.</p> <p>Avoids complexity and cost of two unitary authority transitioning to one.</p>                                                                                                                                                                              | <p>While the proposed two unitary authority model satisfies the technical eligibility requirements of the Head Start pathway, it does so as a transitional arrangement rather than a permanent governance solution. The model introduces a Shared Regional Entity requiring additional governance, legislative and funding arrangements, while many of the most significant questions relating to representation, financial integration, service delivery and accountability remain unresolved.</p> <p>As a result, the proposal meets the threshold requirements for consideration but does not fully demonstrate how it delivers the Government's broader objective of simpler, more enduring and more accountable local government arrangements.</p> |
| <b>Supports the new planning system</b> | <p>Allows and maintains regional spatial planning, catchment management, emergency management, biosecurity, transport planning, climate adaptation and environmental monitoring to be coordinated at Northland scale.</p> <p>Uses statutory or mandatory collaboration to protect region-wide outcomes.</p> <p>This alignment is also proposed in the Northland Head Start Pathway Outline Proposal for two unitary authorities.</p> | <p>No disadvantages identified.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| DIA<br>assessment<br>area              | Kaipara District Council's<br>alternative proposal<br>Three unitary model<br>alignment and key evidence                                                                                                                                                                                                   | Northland Head Start<br>outline proposal<br>Disadvantages of two unitary<br>transitional model                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Simplifies local<br/>governance</b> | <p>Clarifies accountability by making each unitary authority responsible for both regional and territorial functions in its area.</p> <p>Removes the regional council layer and creates unitary authorities.</p> <p>Avoids the cost, disruption and complexity of a full Northland-wide amalgamation.</p> | <p>The establishment of a Shared Regional Entity introduces an additional governance structure, shared accountability arrangements, mandatory coordination mechanisms and bespoke legislative requirements. Communities would continue to engage with multiple organisations responsible for different functions, while significant governance, representation and financial questions remain unresolved.</p> <p>Adding layers of local boards or community councils is an additional complexity and cost for local communities that would not be required under the three unitary model.</p> <p>A governance structure should be assessed not only on the number of councils it creates, but on how clearly it allocates responsibility, accountability and decision-making. Measured against that test, the transition model risks replacing duplication with complexity.</p> |

| DIA<br>assessment<br>area     | Kaipara District Council's<br>alternative proposal<br>Three unitary model<br>alignment and key evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Northland Head Start<br>outline proposal<br>Disadvantages of two unitary<br>transitional model                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Economies<br/>of scale</b> | <p>Targets scale benefits through shared services, procurement, specialist capability and regional delivery where benefits are demonstrated.</p> <p>Northland Waters is one of the most significant examples of successful regional collaboration across Northland councils. The water services reform programme is already creating regional scale and capability while councils remain separate.</p> <p>Regional outcomes in Northland are already being delivered through partnership models. The issue is not whether collaboration can work, but where additional collaboration would create further value.</p> <p>A shared procurement service can achieve many of the purchasing and contracting benefits of amalgamation while allowing councils to retain local governance and accountability.</p> <p>Many of New Zealand's most successful shared-service arrangements operate across separate councils rather than through amalgamated structures.</p> | <p>The proposed two unitary authority transition model captures only a portion of the available economies of scale while introducing substantial transition costs and governance complexity.</p> <p>Many of the efficiencies identified in the Northland proposal arise from aligning systems, processes, procurement and specialist capability rather than from the governance structure itself.</p> <p>The model requires Northland to fund two major reorganisations, establish a new Shared Regional Entity, and maintain multiple governance frameworks before the full benefits of a single unitary authority can be realised. As a result, the timing, certainty and magnitude of economic benefits are unclear, while the costs and risks of transition are immediate and significant.</p> |

| DIA<br>assessment<br>area        | Kaipara District Council's<br>alternative proposal<br>Three unitary model<br>alignment and key evidence                                                                                                                                                                                                                                                                                                                                                                          | Northland Head Start<br>outline proposal<br>Disadvantages of two unitary<br>transitional model                                                                                                                                                                                                          |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Maintains<br/>local voice</b> | <p>Provides direct representation for Far North, Kaipara and Whangārei communities, avoiding dominance of one district over another.</p> <p>Preserves local voice and community identity.</p> <p>Recognises Far North, Kaipara and Whangārei as distinct communities of interest.</p> <p>Keeps decision-making closer to local communities.</p> <p>Reduces the risk of smaller rural and remote communities being overshadowed by larger urban populations.</p>                  | <p>There is insufficient clarity on how meaningful local representation would be guaranteed under proposed arrangements, or on how consistency could be achieved given such differing expectations, wants and needs.</p> <p>Added complexity of local bodies like local boards or community boards.</p> |
| <b>Deliverability</b>            | <p>Lower disruption because existing district boundaries and organisational identities largely remain intact.</p> <p>For a three unitary authority proposal, one of the strongest advantages is that implementation can be significantly simpler than the proposed Two Unitary Authorities plus Shared Regional Entity (SRE) model because it avoids creating an entirely new regional governance body with its own governance, staffing, funding and legislative framework.</p> | <p>The Northland proposal itself acknowledges that the SRE would require separate governance, compulsory participation, funding arrangements and bespoke legislation.</p>                                                                                                                               |
| <b>Treaty settlements</b>        | <p>Existing Treaty settlement arrangements will be maintained with the same or equivalent effect.</p>                                                                                                                                                                                                                                                                                                                                                                            | <p>Treaty settlement arrangements will need to be transferred twice per the transitional approach to the Northland proposal.</p>                                                                                                                                                                        |

## 5. Our concerns about two unitary authorities transitioning to one

The two unitary authority transitional model does not fully achieve the Government's objective of simplifying local government. While it reduces the number of councils, it introduces a Shared Regional Entity requiring separate governance, leadership, funding arrangements, reporting obligations and legislation. The result is a governance framework that continues to rely on shared accountability and coordination mechanisms.

From a community perspective, simplification should be measured not only by the number of organisations, but by the clarity of decision-making, accountability and service delivery. The complexity of a two unitary transitional model would be difficult for residents and ratepayers to understand and would create unnecessary upheaval, requiring records, information, communications and customer access arrangements to be transitioned twice.

**Communities, staff and systems would need to transition twice before reaching the final governance structure.**

A three unitary authority model provides a simpler and more transparent arrangement by retaining direct democratic accountability while using existing statutory mechanisms to coordinate regional functions where required.

**The three-unitary authority model delivers reform in a single step, without creating a new regional organisation or requiring a second restructure.**

The evidence suggests that many of the operational benefits attributed to amalgamation actually arise from shared services, common systems, pooled expertise and coordinated delivery. These outcomes can be achieved through a three-unitary authority model without sacrificing local democracy, community identity and direct accountability and avoids the significant financial costs of amalgamation.

## 6. Key benefits of the three-unitary authority model

### **Builds on existing successful collaboration**

- Leverages collaborative arrangements already operating across Northland.
- Supports a shared-services-first pathway before committing to deeper structural change.

### **Lowers implementation risk**

- Existing district boundaries remain unchanged.
- Less organisational integration is required than under a two-unitary or single-unitary model.
- Service continuity is easier to maintain through transition.

### **Protects Kaipara ratepayer interests**

- Retains stronger local control over rates, debt, asset management, service levels and investment priorities.
- Reduces concerns about debt equalisation and cross-subsidisation.

### **Delivers scale benefits where they exist**

- Targets efficiencies through procurement, IT, regulatory systems, technical expertise and corporate support.
- Avoids relying on the assumption that larger councils automatically lead to lower costs.

### **Better reflects Northland's diversity**

- Allows each authority to respond to different growth, infrastructure, economic and community priorities.
- Recognises that Northland is not one homogeneous community.

## 7. Matters for detailed design

| Work area                      | Questions to resolve in phase 2 – Detailed Design                                                                                                                  |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Regional functions</b>      | Post legislation, analysis and identification of which functions sit within each unitary and which are delivered through mandatory regional collaboration.         |
| <b>Planning system</b>         | Northland is able to maintain one stable regional spatial planning process and integrated natural environment planning through collaboration and shared resources. |
| <b>Catchment management</b>    | Cross-boundary catchments, environmental monitoring and biosecurity to be determined.                                                                              |
| <b>Transport</b>               | Explore how regional land transport planning and funding can be managed and leveraged across three authorities.                                                    |
| <b>Financial arrangements</b>  | Explore how assets, liabilities, debt, reserves and rating impacts are treated post disestablishment of regional territorial authority.                            |
| <b>Shared services</b>         | Explore how services should be delivered regionally, and what evidence demonstrates benefit.                                                                       |
| <b>Representation</b>          | Demonstrate that rural, remote and smaller communities remain visible in decision-making.                                                                          |
| <b>Iwi/Māori participation</b> | Maintain existing relationships, representation mechanisms and settlement commitments                                                                              |
| <b>Legislation</b>             | Implement and embed the statutory powers required to mandate collaboration and prevent regional service fragmentation.                                             |
| <b>Transition</b>              | Identify an establishment pathway that allows change to occur with minimal disruption before the 2028 local elections.                                             |

## 8. Conditions for Kaipara District Council to be part of future reforms

### 1. Demonstrated financial benefit for Kaipara ratepayers

Kaipara District Council requires independent, locality-specific financial modelling demonstrating that any proposed reform will provide clear, measurable, and enduring benefits to Kaipara ratepayers. Current analysis has not adequately demonstrated that amalgamation would improve Kaipara's financial position or deliver better value for money. Kaipara is projected to have low levels of debt following the transfer of water-related debt to Northland Waters, while other councils within the region carry substantially higher debt levels. Any proposal must clearly identify:

- how existing debt will be treated
- whether debt will be equalised across communities
- the impact on future rates and borrowing capacity
- the distribution of financial benefits and costs between districts
- transition and implementation costs.

No proposal should proceed unless Kaipara communities can be assured they will not subsidise historical debt or investment decisions made elsewhere.

Kaipara District Council has consistently expressed concerns that the financial case for amalgamation has not been proven and that benefits may be diluted through regional debt equalisation.

Kaipara enters this discussion from a position of strength. With approximately 173 FTE council staff, a reputation for efficient service delivery, and the lowest debt profile in Northland, Kaipara District Council has yet to see evidence that amalgamation would improve upon the performance, financial discipline, and value currently being delivered to Kaipara ratepayers.

### 2. Evidence of economies of scale and service improvements

Any reform proposal must provide credible evidence that economies of scale will translate into reduced costs, improved services, or both. Larger organisational size alone is not sufficient justification.

Evidence should include:

- benchmarking against comparable New Zealand local government models
- quantified operational efficiencies
- service delivery improvements
- performance measures and accountability mechanisms.

Kaipara District Council does not accept the assumption that larger councils automatically produce better outcomes. In fact, there could be additional costs or "dis-economies of scale" once amalgamation costs are considered.

The current reform process has not demonstrated that larger entities will deliver lower costs, better services, or improved accountability.

### **3. Shared services must be fully assessed before structural reform**

Kaipara District Council supports exploring shared service arrangements as a practical and lower-risk pathway to achieving regional efficiencies.

Before amalgamation options are advanced, Government should require a comprehensive assessment of shared service opportunities including:

- civil defence and emergency management
- information technology
- procurement and contract management
- economic development
- regulatory functions where appropriate
- catchment and environmental management services
- corporate and back-office functions

Shared services should be evaluated against amalgamation using consistent measures of cost, benefit, risk, and implementation complexity.

Shared services may deliver many reform objectives without removing local governance structures. The success of Northland Waters demonstrates that collaborative service delivery models can be established without political amalgamation.

### **4. Asset ownership and management models must be clearly defined**

Kaipara District Council requires detailed analysis of how assets would be owned, managed, funded, and renewed under any future structure.

This analysis must include:

- transportation assets
- stormwater and flood protection infrastructure
- community facilities
- parks and reserves
- strategic property assets

The proposal should demonstrate how asset investment decisions will remain responsive to local needs and how rural and remote communities will continue to receive equitable investment.

Kaipara District Council considers the current options analysis insufficiently developed regarding asset ownership, governance and investment prioritisation.

## 5. Legislative framework must be established before structural decisions

Kaipara District Council does not support progressing major governance reform through a voluntary process where the final legislative framework remains uncertain.

Before regional proposals are considered, Government should provide:

- clear enabling legislation
- governance requirements
- representation requirements
- financial transition arrangements
- asset transfer provisions
- community consultation obligations

Significant structural reform should not proceed without certainty regarding the legal framework within which future entities will operate.

Participation in the Head Start Pathway is currently voluntary and lacks a defined statutory framework.

## 6. Protection of local representation and community voice

Any future structure must guarantee meaningful local representation and decision-making authority for Kaipara communities.

Kaipara District Council requires:

- representation arrangements reflecting rural and remote communities
- protected local decision-making functions
- representation ratios that ensure Kaipara communities are not marginalised within larger urban populations.

Local identity, community connection, and responsiveness to local priorities must not be sacrificed in pursuit of structural efficiency.

Elected members have consistently raised concerns regarding the loss of local voice, local identity, and responsiveness to community needs.

## 7. Reform must reflect Northland's diverse communities and economies

Kaipara District Council does not support a governance model that assumes Northland functions as a single community of interest.

Any proposal must acknowledge:

- significant differences between urban Whangārei and rural Kaipara communities
- different economic drivers and priorities
- distinct land-use patterns, particularly Kaipara's strong agricultural focus
- different infrastructure and service requirements.

Governance arrangements should be designed around communities of interest rather than population size alone.

Kaipara's needs, priorities and growth patterns differ significantly from larger urban centres and require tailored governance solutions.

## **8. A staged pathway must not predetermine amalgamation**

Kaipara District Council does not support a staged approach where successive reform steps effectively lock communities into eventual amalgamation outcomes.

Any staged reform programme must:

- allow councils to opt in or out at defined decision points
- require fresh evidence and community consultation before progressing to the next phase
- demonstrate measurable benefits before further integration occurs
- preserve genuine local choice.

Reform should be evolutionary and evidence-led, not a predetermined pathway to amalgamation.

## **9. Comprehensive community consultation must occur before decisions are made**

Kaipara District Council believes communities should be asked to consider reform options only once sufficient information is available.

Future consultation must include:

- detailed governance models
- financial analysis
- service delivery impacts
- representation arrangements
- risks and implementation costs
- alternative options, including shared service models

Communities should be provided adequate time to review information and express informed preferences before irreversible decisions are taken.

Councillors have expressed concern that current timeframes and information availability do not support informed community participation.

## 9. Decision sought

That Government approve progression to the detailed proposal phase under an alternative Head Start Pathway for a Northland governance model comprising three unitary authorities: Far North, Kaipara and Whangārei, supported by statutory regional collaboration arrangements for regional spatial planning, catchment management, transport planning, civil defence emergency management, environmental monitoring, biosecurity and other shared regional responsibilities.

**A three unitary authority model provides Northland with a practical, enduring and locally led reform pathway that aligns with the intent of the Head Start programme.**

It simplifies governance by removing duplication between regional and territorial functions, while preserving strong local representation, clear accountability and community identity. By combining local decision-making with mandated regional collaboration, the model ensures Northland can continue to address region-wide challenges collectively without introducing additional layers of governance or requiring a further round of structural reform.

**This approach offers a balanced solution that supports effective regional outcomes, protects local voice, and provides a sustainable governance framework for the future of Northland.**

