

Regional Spatial Planning Roadshow

Briefing Note 2: Implications for Council Managers of Head Start for Regional Spatial Planning Readiness

July - August 2026



2. Implications for Council Managers of Head Start for Regional Spatial Planning Readiness

This Briefing Note supports a RSP Roadshow presentation to chief executives, tier-two leaders, planning managers, reform leads, programme managers, and prospective RSP secretariat or committee support staff. Issues of organisational design, establishment choices, and key points for council managers, taking account of Head Start scenarios are covered.

This note draws on papers prepared to support Workshop presentations that are synthesised in this series of eight Briefing Notes on topics relevant to organisational readiness for regional spatial planning. It includes information and advice based on official sources prepared for Taituarā by Simon Markham Consulting Ltd as an advisory Briefing Note.

Its statutory framing is Planning Bill 235-3, as reported from the Committee of the whole House, on regional spatial plans, national instruments, process agreements, iwi consultation, spatial plan committees, public notification, hearings, adoption, implementation, and review. It considers what the current Bill and subsequent legal commentary mean for council managers, in light of existing spatial-planning collaborations and wider regional collaboration experience.

This Note is current to 14 September 2026. It integrates the July 2026 report-back changes into the substantive text and adds subsequent Committee-stage changes reflected in Planning Bill 235-3, together with relevant interpretation from the Regional Spatial Planning Legal Commentary Paper as at 14 September 2026 that accompanies this series of Briefing Notes. The Bill has completed Committee of the whole House consideration but has not yet received third reading or Royal assent. All update material is fully integrated into the main text.

1. Executive Summary

Head Start does not remove the need to establish Regional Spatial Plan (RSP) governance now. It makes that establishment task more demanding. Councils need to stand up RSP machinery while the future local-government geography itself may be under active review. The practical management conclusion is therefore not to wait, but to design RSP arrangements as transition-capable regional governance machinery.

The new DIA Guidance released in May 2026 strengthens this conclusion. Head Start does not pause, reset, or rebase first-generation RSP work. It makes the current-region RSP pathway the immediate statutory starting point, while requiring any outline proposal to show how reorganisation will support the new planning system and avoid/minimise disruption to spatial and natural environment planning work.

The Planning Bill assumes a clear regional container for each RSP: a defined region, participating local authorities, a process agreement, a spatial plan committee, a secretariat, evidence and options assessment,

notification, hearings, and adoption. Head Start introduces the possibility that the local-government map and governance arrangements may change during the same establishment period.

Proposals may create a full-region unitary authority, a subregional unitary authority, a cross-current-regional-boundary unitary authority, or multiple unitary authorities within one current region. Backstop arrangements may also come into play for those regions that do not participate in Head Start – potentially impacting the latter phases of the RSP process.

For outline proposals, that regional container should now be described as the current Bill-introduction region. Head Start can still affect future institutional succession and longer-term planning geography, but it should not be assumed to change the region for immediate RSP establishment unless later Head Start implementation legislation says so.

Section 74D is relevant where a territorial authority's district spans two or more regions. It must be a decision-maker in at least one relevant RSP process but may notify that it will not participate as a decision-maker in another. This is a participation and governance mechanism; it does not itself re-draw the statutory RSP geography.

For managers, the central message is that RSP readiness and Head Start readiness must be tested together. A region can make progress now, but only if its process agreement, committee terms of reference, secretariat model, evidence base, iwi/Māori partnering and participation arrangements, infrastructure interfaces, and regional-function links include explicit assumptions, review triggers, and continuity provisions.

The 235-3 architecture adds a further transition discipline: national standards can prescribe standardised RSP provisions and constrain the spatial or parameter choices left to a region. Head Start scenario design should therefore preserve a single evidence base and decision record that can be re-used even if institutional boundaries change, rather than embedding local drafting assumptions that later national standards may displace.

Planning Bill 235-3 now provides the first-RSP statutory clock: after the first Planning Act NPD is issued, each region must take reasonable steps to notify its draft RSP by the later of 21 months after Royal assent or 9 months after NPD has been issued under both the Planning and Natural Environment Acts, and councils must generally make and publish decisions within 9 months after notification. LUP/NEP notification then follows within a further 9 months. The timetable supports orderly establishment; it is not a reason to pause current-boundary work.

Planning Bill 235-3 is now the consolidated pre-third-reading baseline. The report-back RSP machinery remains, with later Committee-stage changes layered onto it. The separate Climate Change Response Amendment Bill remains a separate source stream; importantly, Planning Bill 235-3 itself now requires RSPs to identify priority areas for planning adaptation to the effects of climate change. The Bill has not yet been enacted.

The practical test for managers is now twofold: keep current-boundary RSP establishment moving; and ensure any Head Start outline proposal explains how the process will be continued through the transition. This may

include intended RSP governance arrangements (e.g., delegations) and regional function continuity (e.g., services provided to inform the RSP development).

For subregional proposals, outline proposals may also need to explain how RSP development will maintain catchment and transport integration, manage risks, identify trade-offs, and identify what will be resolved in detailed design.

2. Why Head Start changes RSP readiness - RSP establishment becomes a moving-target governance task

Without Head Start, councils would still face a demanding regional establishment task: agreeing a committee, process agreement, secretariat, evidence work programme, iwi/Māori participation arrangements and links to infrastructure and investment planning. Head Start adds a second-order design question: what happens if the region for which the RSP machinery is being built is not the same as the future local-government region?

The May 2026 Guidance reduces one ambiguity by confirming that, for outline-proposal purposes, the initial planning-system region is the current region. So “region” in the Planning Bill and Natural Environment Bill mean the region as it existed when the Bills were introduced, not a prospective Head Start boundary. The “moving target” is therefore less the immediate legal geography of the first RSP, and more the institutional succession, residual-region, cross-boundary, and regional-function architecture that may follow from a successful Head Start proposal. Councils must therefore continue current-boundary RSP readiness at pace while making Head Start proposals transition-capable.

That question matters because the RSP is not a stand-alone strategy. It is intended to guide or align with natural environment plans, land-use plans, regional transport planning, long-term planning, infrastructure investment, iwi/Māori participation arrangements, and other regional functions. A boundary decision that fragments catchments, transport networks, emergency-management geographies, water-service interfaces, or Treaty settlement relationships and arrangements can destabilise the very systems the RSP is meant to integrate.

Section 68 makes the downstream integration more concrete: LUPs and NEPs implement the RSP, RLTPs must be consistent with it, the GPS on land transport must take relevant RSPs into account, and LTPs must set out steps to implement or progress RSP actions for which a council is responsible. Head Start continuity therefore needs to protect not only plan-making machinery but the investment and delivery chain.

The Guidance makes this explicit for outline proposals by asking how proposals reflect integrated catchment management and requiring the implications, risks, and mitigations to be described if an existing catchment is split. It also links economies of scale to transport, catchment management, science, data, systems, capability, and emergency management rather than to savings alone. In summary Head Start implications for RSP readiness are set out below:

Head Start implication	Why it matters for RSP readiness	Managerial response
Future region may be uncertain	The RSP process is organised around a region, but Head Start may alter or reconstitute that geography.	Record the working planning geography and build review triggers into the process agreement.

Head Start implication	Why it matters for RSP readiness	Managerial response
Committee membership may become transitional	Councils participating in the first-generation RSP may not be the same entities after reorganisation.	Design terms of reference that can be reconstituted or deemed to continue if Head Start decisions proceed.
Secretariat continuity becomes critical	Evidence, records, assumptions, engagement commitments, and institutional memory must survive structural change.	Create a secretariat with document-control, transition-monitoring, and assumption-register responsibilities. Establish delegations and reporting arrangements that are sufficiently flexible to enable continued delivery of RSP during the transition.
Other regional functions may be fragmented	RSP relies on catchment, transport, emergency-management, water, air, coastal, etc., environmental science, and infrastructure inputs.	Maintain a regional functions interface map and require Head Start proposals to include an RSP/regional functions continuity note.
Iwi/Māori arrangements may cross future boundaries	Iwi rohe, PSGE geographies, statutory acknowledgements, joint-management arrangements, and customary marine title interests may not align with new UAs.	Map participation and settlement obligations before finalising committee and secretariat models. For those councils in Head Start, maintain communication with DIA on progress or changes to any relevant Treaty settlement arrangements. Update the continuity map for 235-3: Mana Whakahono ā Rohe will cease after Royal assent, while direct RSP consultation, Treaty-settlement duties, existing joint-management agreements, and any later iwi participation agreements require separate treatment.
Evidence may be prepared on a provisional map	Growth scenarios, infrastructure sequencing, and environmental limits may be developed for a geography that later changes.	Use scenario testing that includes institutional scenarios, not only land-use or growth scenarios. Tag evidence against likely national-standard methods and standardised RSP provisions so it remains transferable even if the institutional map changes.
Planning-system region now clarified for outline proposals	The Guidance states that references to “region” in the Planning Bill and Natural Environment Bill apply to the region at the time those Bills were introduced, not a proposed Head Start boundary.	Use current regional boundaries as the RSP establishment starting point; record assumptions and design transfer/reconstitution mechanisms for later Head Start decisions.
Outline proposals are strategic, not fully designed	The August proposal is tested for workability in practice. Detailed RSP process agreements, formal delegations and full plan-delivery programmes are not expected in the outline proposal.	Signal intended RSP governance and continuity arrangements, identify risks/trade-offs, and list the matters to resolve in detailed design.
National-standard overlay	The institutional map may change while national standards are also prescribing	Keep regional evidence, spatial alternatives, and decision provenance portable; do not

Head Start implication	Why it matters for RSP readiness	Managerial response
	RSP form, methodology and standardised provisions.	make a Head Start scenario dependent on locally invented RSP drafting that may be superseded.

3. Head Start scenarios x 4: the RSP organisational-design implications

The four scenarios below are the practical typology for managers. They are not equally disruptive. The more a proposal departs from a current regional-council geography, the greater the burden on the proposal and on interim RSP arrangements to preserve regional planning coherence.

The Guidance confirms that the full-region unitary remains the most straightforward pathway, while subregional and cross-boundary proposals are possible but carry a heavier whole-region justification. More than one unitary authority in a region is only likely to be approved if:

- the region is geographically large, contains a large number of territorial authorities and has significantly complex issues; and
- the proposal clearly meets the criteria and doesn't lead to the fragmentation of service delivery for key regional functions where collaboration or integration is required.

Scenario	Form	RSP readiness issue	Organisational design response
1. Full-region unitary authority	All local authorities in a current region combine into one unitary authority.	Least disruptive fit. The present regional planning geography can broadly remain intact; the issue is institutional succession rather than geographic mismatch.	Proceed with current-region RSP establishment; design transfer/succession clauses; retain evidence, staff, records, and committee decisions; consider mechanisms for protecting local voice. Identify actions or arrangements to deliver economies of scale applicable to planning.
2. Subregional unitary authority within a current region	A new UA is carved out of part of a current region, while the remainder is dealt with later or through a backstop pathway.	Creates an immediate mismatch between the new UA and the current RSP region. Who leads the RSP, what region it covers, and how the residual area participates become live questions. May Guidance clarification: any subregional unitary authority formed through Head Start must continue spatial planning at the regional level at the time the Planning Bill and Natural Environment Bill are enacted; subregional plans may feed into the broader RSP where necessary.	Use current-region RSP governance transitionally unless legislation says otherwise; build change-control and residual-area arrangements; avoid splitting catchment/evidence systems without an agreed continuity schedule. Avoid fragmentation of regional functions where integration is necessary for efficient delivery of plans and services. Do not assume the subregional proposal rebases first-generation RSP obligations. Include a whole-region and residual-region RSP continuity explanation. Identify actions or arrangements to deliver economies of scale

Scenario	Form	RSP readiness issue	Organisational design response
			applicable to planning, e.g., joint plans.
3. Cross-current-regional-boundary unitary authority	A new UA combines territorial areas from two or more current regional-council regions.	Most acute legal and operational geography problem. The new UA does not naturally fit either current RSP region, and parts of two RSP evidence bases may need reconciliation. Guidance clarification: cross-boundary eligibility does not remove the need to show how current-boundary RSP work will be preserved and how regional planning, transport and catchment management will remain coherent.	Require bespoke planning-geography direction in Head Start legislation; map affected RSP/NEP/RLTP/CDEM/water and Māori groups with interests; preserve work already under way through transfer or joint-planning mechanisms.
4. Multiple unitary authorities within one present region	A large or complex region is reorganised into two or more UAs.	High fragmentation risk. The region could either retain one shared RSP geography or split into multiple RSPs if each UA is treated as a region.	In first generation RSP, one shared statutory planning region for regional function coherence; This would benefit from a 'Regional Function Continuity Schedule' ¹ – e.g., for catchments, transport, science, biosecurity, emergency management, and iwi/Māori arrangements.

4. What council managers need to know now - Proceed, but proceed on a transition-aware basis

The first-generation RSP establishment task should continue. Head Start is not a reason to suspend process-agreement drafting, secretariat scoping, evidence gap analysis, iwi/Māori participation mapping, or committee design. It is a reason to make each of those workstreams explicit about assumptions, triggers, and continuity.

The Guidance is also a proportionality signal. Councils did not need to finalise a process agreement, detailed committee structure, full RSP programme or formal delegations for the 9 August outline proposal. They should, however, have shown the initial steps that will support a stable regional spatial planning process and identify what will be completed in detailed design. *Illustrating how the Head Start proposal supports the planning reforms and provides for a stable RSP process are important matters in the assessment process.*

The following table identifies establishment tasks that should inform Head Start proposals, but did not need to be fully completed for outline proposals.

¹ It is anticipated this is at an 'outline level' for the Head Start Outline proposal stage; with more detail in the Detailed design phase; and is focused on planning related matters.

Immediate establishment workstream	Transition-aware addition
Process agreement	Include a Head Start change-control section covering accepted, rejected, altered, or delayed Head Start proposals; specify who reviews the agreement and when.
Committee terms of reference	State the working region and current participating authorities; include a mechanism to reconstitute membership or continue decisions if successor entities are created.
Secretariat model	Give the secretariat responsibility for a Head Start/RSP assumptions register, regional functions interface map, evidence continuity log, and decision/records archive.
Evidence work programme	Tag evidence by geography, currency, source, confidence, and transferability; identify datasets that would need adjustment under each Head Start scenario. Include environmental-headroom/limit-risk, hazard/adaptation, strategic infrastructure, and nationally standardised methodology dependencies identified in the 11 September legal commentary.
Iwi/Māori participation	Map iwi authorities, PSGEs, settlement instruments, statutory acknowledgements, Mana Whakahono ā Rohe, joint-management agreements, customary marine title interests, and iwi planning documents against both current and plausible future geographies. Replace any assumption of MWAR transfer with a transition plan that separates direct RSP statutory duties, Treaty-settlement/JMA obligations, enduring relationships, and any future iwi participation agreement.
Infrastructure and water evidence	Maintain a register of water services strategies, WSDPs where still relevant, stormwater service areas, transport plans, major projects, and public-investment commitments.
Regional functions interface	Identify RSP-adjacent governance for natural environment planning, transport, public transport, emergency management, fast-track projects, City/Regional Deals, catchment/flood management, biosecurity, monitoring, and compliance.
Head Start outline proposal content	Include a concise “support for the new planning system” section: current-boundary RSP continuity arrangements, intended RSP governance and secretariat arrangements, effective regional function service delivery including integrated catchment management, any major risks, and detailed-design tasks.
Treaty and Māori participation	Provide for continuity during the transition of general iwi/Māori participation in decision-making and Treaty settlement redress. Identify existing relationship agreements and PSGE/Treaty arrangements for equivalent-effect treatment.
National instruments and review	Maintain an NPD/national-standard register, record which spatial choices remain open regionally, and set s 74 review triggers for major new national direction or improved evidence.

5. Process agreements: the main continuity instrument

Schedule 2 clause 4 makes the process agreement binding and requires it to cover the council/committee working relationship, any division of decision responsibilities or consensus approach, consultation and identified stakeholder arrangements, establishment and management of the secretariat, and processes for applicable iwi-participation legislation and existing joint-management agreements. In a Head Start setting it should also record succession, transfer, reconstitution, evidence custody, implementation-plan responsibility, and review triggers.

For RSP readiness, the process agreement should be treated as more than a plan-making timetable. It is the main practical document through which councils can manage Head Start uncertainty related to RSP before bespoke legislation is settled. It should set out the present establishment pathway while also explaining how the region will respond if any changes to a Head Start proposal changes the planning related assumptions on which that pathway rests.

This should not be read as requiring a completed RSP process agreement to be attached to the Head Start outline proposal. The May Guidance expressly says detailed process agreements are not expected at outline stage. The managerial point is that a process-agreement workstream should still proceed as a no-regrets RSP readiness task and be signposted in the proposal.

Process agreement element	Head Start-sensitive content to include
Working geography	State whether the initial RSP is being prepared on current regional boundaries, or an explicitly transitional basis.
Participating authorities	List current local authorities and specify how successor authorities, residual areas or cross-boundary partners would be recognised if reorganisation proceeds.
Change-control triggers	Trigger review as a continuity mechanism if a Head Start outline proposal is lodged, accepted in principle, materially changed, rejected, converted into detailed design approved by Cabinet, or legislated.
Decision and escalation pathway	Set out how the committee, CE Forum, Mayoral Forum, and individual councils will respond to decisions from Head Start e.g., Geographic boundaries or membership changes.
Evidence continuity	Require all evidence and options work to be tagged so it can be retained, transferred, split, or reconciled if planning geography or service delivery arrangements change.
Iwi/Māori continuity	State how participation obligations, mana whenua relationships (including iwi authority and PSGEs), statutory acknowledgements, joint-management agreements, and consultation duties are protected through transition; and insert review trigger if Treaty settlement arrangements are altered through the Head Start process.
Regional functions interface	Identify the non-RSP regional functions and planning forums that must be aligned with RSP work and Head Start proposal design.
Legislative assumptions	Record if any legislative amendments that affect RSP might be sought via the Head Start process. Record 235-3 as the current baseline, the statutory first-RSP timing formula, national-standard dependencies, MWAR cessation, and the fact that the Illustrative NPD is not binding.
Outline-proposal proportionality	Record which matters are sufficiently settled for August, and which will be developed in the detailed design phase, especially RSP governance, process agreements, delegations, and plan-delivery programming.
National-standard change control	Specify how nationally prescribed RSP provisions/methods will be incorporated and how any Head Start reconstitution will preserve the region's spatial selections, evidence, and reasons.

6. RSP Committee design: avoid a passive default

The RSP Committee should be designed for continuity, legitimacy, and reconstitution. A standard committee model may work where a full-region UA proposal preserves the current regional planning geography. It may be

inadequate where the region is split, partially displaced or crossed by a proposed new UA. Managers should therefore ask not only “who sits on the committee now?”, but “what happens to this committee if the region changes?”

The May Guidance asks for intended RSP governance arrangements at a high level, but not detailed committee structures or formal delegations. That supports a staged approach: establish lawful and workable current-region arrangements now, document reconstitution assumptions, and defer detailed successor arrangements to the October 2026-March 2027 design phase if the proposal proceeds.

Committee design issue	Manager question	Preferred approach
Membership and mandate	Does membership reflect the current region, a plausible future region, or both?	Use current lawful membership but record successor/reconstitution assumptions and triggers.
Relationship to all councils	How do committee recommendations move to every current council and, later, any successor UA?	Create a common council-reporting pathway and decision log that can be inherited by successor entities. Where relevant, establish shared service arrangements and delegations that can support succession.
Sub-regional inputs	Are sub-regional workstreams needed for large or complex regions?	Use sub-regional working groups for evidence and engagement, but keep one integrated regional committee/programme.
Ministerial/CG interface	How are CG representatives or central agencies linked to Head Start and RSP discussions?	Keep CG /RSP interface distinct from political advocacy for reorganisation, while aligning evidence and implementation assumptions.
Iwi/Māori, Treaty settlement arrangements governance interface	Will there be committee membership, advisory structures, parallel forums, or joint workshops?	Make a deliberate design choice and ensure it does not replace statutory consultation duties.
Independent Hearings Panel link	How will committee advice and records withstand IHP scrutiny if boundaries change?	Maintain robust records, evidence provenance, and reasons for spatial choices from day one.
Outline-proposal governance statement	What is the minimum credible RSP governance signal for August?	State the current-region establishment pathway, intended governance direction and how successor or subregional authorities would be recognised later, without over-designing formal delegations.

7. Secretariat design: the transition engine room

Head Start increases the importance of the RSP secretariat. The secretariat should be capable of supporting statutory planning, regional governance, and transition management at the same time. It should not be limited to minute-taking or meeting logistics. In a Head Start environment it needs to preserve institutional memory, protect evidence, track assumptions, support partner participation and keep the RSP programme aligned with other region-bound functions.

In light of the Guidance, the secretariat should also be able to support the Head Start assessment narrative: showing that the proposal makes the new planning system easier to deliver and operate, maintains continuity, and identifies the planning-system items reserved for detailed design.

Secretariat responsibility	Head Start-specific task
Assumptions register	Maintain a live record of assumptions about region, councils, committee membership, statutory process, national direction, Head Start status and infrastructure governance.
Regional functions interface map	Track NEP, RLTP, RPTP, CDEM/EM plans, catchment/flood arrangements, water services, biosecurity, science/monitoring, compliance/enforcement, fast-track projects and regional deals.
Evidence continuity log	Record what evidence is current-region specific, subregional, cross-boundary, or transferable to successor geographies.
Decision and records archive	Preserve decisions, reasons, papers, engagement records, meeting notes, risk registers, and issue logs so they can survive reorganisation.
Partner and iwi/Māori register	Maintain relationships and obligation registers, including PSGEs, iwi authorities, customary marine title groups, statutory acknowledgements, existing agreements, and key documents including iwi planning documents.
Scenario support	Ensure RSP scenario testing includes institutional scenarios alongside growth, land-use, infrastructure, and environmental scenarios.
Change-control administration	Prepare papers when review triggers are activated and support CE/Mayoral Forum decisions on RSP/Head Start alignment.
Outline-proposal evidence pack	Prepare a concise RSP continuity note, existing-evidence register, catchment/transport interface note, and list of detailed-design decisions needed if Cabinet agrees the proposal in principle.

8. Regional Function Continuity Schedule: a useful companion for non-full-region scenarios

For any Head Start outline proposal that does not simply create one UA coterminous with a current region, managers should consider developing an RSP and Regional Function Continuity Schedule. Such a Schedule is not a requirement for the Head Start process. But it is a discipline that keeps a proposal function-led rather than boundary-led. It should be concise at outline stage but concrete enough to demonstrate that the proposal will not fragment the regional systems the RSP depends on. The May Guidance suggests that this schedule may be especially useful for subregional proposals, and at the detailed design stage.

Schedule component	What it should cover for RSP readiness
Function inventory	RSP, NEP, land-use plan interfaces, RLTP, RPTP, CDEM/EM plans, catchment/flood management, water services, energy, air, coastal, natural hazard risk management, biosecurity, science/monitoring/data, and compliance/enforcement. Include environmental-limit/action-plan interfaces and long-lived water infrastructure inputs arising from the Natural Environment Bill settings that RSPs must integrate.
Functional geography map	Catchments, flood schemes, transport networks, public transport contracts, CDEM/EM areas, monitoring systems, water service areas, iwi/PSGE geographies and existing planning regions.
Future governance model	Whether each function is internalised in a UA, held in a shared statutory planning region, governed through a joint authority, delivered by a shared service, or subject to bespoke arrangements.
Statutory authority	Whether existing legislation suffices or Head Start implementation legislation must create arrangements for plan-continuity.

Schedule component	What it should cover for RSP readiness
Assets, liabilities, and funding	Regional assets, debt, reserves, contracts, rating mechanisms, insurance, capital commitments, and maintenance obligations.
Workforce and capability	Retention of planners, scientists, GIS/data staff, hydrologists, flood engineers, transport planners, compliance officers, and engagement capability.
Information systems	How data, models, telemetry, monitoring, spatial layers, consents, compliance records, and evidence libraries are preserved and governed.
Māori/Treaty arrangements	Settlement redress, partnership arrangements, Mana Whakahono ā Rohe, joint management agreements and participation arrangements. Distinguish continuing Treaty-settlement and JMA obligations from MWAR, which 235-3 would terminate after Royal assent, and from any later iwi participation agreement.
Transition pathway	What happens between outline proposal, Cabinet decision in principle, detailed design, enabling legislation and the 2028 elections.
Integrated catchment management	Identify any catchments or flood schemes split by the proposal and set out implications, risks, and mitigations.

9. Scenario-by-scenario management implications

Scenario	Risk profile for RSP establishment	Manager priorities
Full-region UA	Lowest RSP geography risk. Existing regional plan geography can largely be preserved, but staff, assets, committee roles, iwi/Māori relationships, and implementation responsibilities still need succession.	Keep RSP establishment moving; design transfer/succession; preserve regional institutional knowledge; align RSP, NEP, RLTP, LTP and water/infrastructure strategies; build local voice mechanisms.
Subregional UA	High transitional ambiguity. The current region may remain the RSP geography while part of it prepares to become a UA, creating residual-area, committee, funding, evidence, and participation issues.	Use current-region RSP process unless legislation changes it; require residual-region and affected-council participation; document how subregional UA evidence will be integrated; avoid creating stranded planning capacity. May Guidance now frames this as a whole-region test, not only a benefit test for participating councils.
Cross-boundary UA	Highest statutory geography risk. The proposed UA may not match any current RSP/NEP/RLTP/EM planning geography, and evidence from two or more regions may need reconciliation.	Prepare a cross-boundary RSP impact map of any misalignment between boundaries for environment management responsibilities ; require explicit future-region proposal; use joint-planning powers as a bridge; identify where bespoke legislation is required; protect iwi/Māori and Treaty arrangements across both source regions.
Multiple UAs within one present region	High fragmentation risk. Growth, infrastructure, catchment, transport, environmental, science and	Consider a Regional Function Continuity Schedule; create joint statutory bodies where needed; ensure each UA has duties to support regional spatial coherence.

Scenario	Risk profile for RSP establishment	Manager priorities
	emergency-management systems may be split unless one shared planning region or strong joint architecture is retained.	May Guidance indicates more than one UA in a region is exceptional and must not fragment key regional functions.

10. Matters that remain uncertain

Uncertain matter	Why it matters for managers
Final form of the Planning Bill and regulations	Committee, secretariat, chairing, Ministerial appointment, evidence, and process detail may change. Interim arrangements must be adaptable. As at 14 September, 235-3/234-3 are the consolidated Committee-stage texts and the best current legal baseline, but they remain Bills pending third reading and Royal assent.
Whether each new UA becomes a region for planning purposes	This determines whether the RSP geography follows UA boundaries, a shared planning region, or a reconstituted region. May Guidance clarification: this is not to be assumed for outline proposals. Current Bill-introduction regions remain the starting point; future planning-region succession remains a detailed-design/legislative issue.
How first-generation RSP work transfers to second-generation if boundaries change	Evidence, engagement, committee recommendations, draft plans, and IHP processes may need continuation, transfer, splitting, or reconciliation.
Extent of bespoke 2027 Head Start legislation	Existing joint-planning mechanisms may not be enough for plan succession, statutory authority, assets, rating, catchments, and regional function governance.
National direction timing and content	RSP evidence and options cannot be fully scoped until national direction and standards are clearer. The statutory timing formula is now clear, but the dates still depend on Royal assent and issuance of NPD under both Acts; national standards may also prescribe RSP structure/content.
Funding and rates constraints	RSP establishment, Head Start design, regional function continuity and digital/evidence systems all require capacity and budget during Annual Plan/LTP cycles.
Central government role in RSP and Head Start	CG roles in committees, infrastructure investment, transport, fast-track projects and Head Start decisions need coordination without confusing accountabilities.
Iwi/Māori and Treaty settlement transfer arrangements	Participation, relational, and settlement-linked obligations and arrangements may not transfer automatically if boundaries or institutions change. MWAR cessation is now in 235-3 rather than a Ministerial proposal. Transition design should separately address Treaty redress, existing joint-management agreements, direct RSP duties and any requested iwi participation agreements.
Water services and infrastructure governance	Water organisations, statements of expectations, service areas and water strategies may be built around current councils while Head Start proposes new UAs.
Scope of the detailed design phase now clearer	The Guidance indicates that detailed design is likely to cover RSP timing alignment, full regional function/service mapping, interim planning compliance and enforcement,

Uncertain matter	Why it matters for managers
	cost-benefit analysis, representative structures, transition bodies, personnel/assets/CCOs/debt, iwi/Māori engagement, and community engagement.
RSP standardisation during structural change	National standards may determine RSP provisions and methods while Head Start changes institutions. Preserve a region-wide evidence/decision architecture that can survive both changes.

11. Immediate work programme for managers

Managers should treat the following as no-regrets actions even while final statutory and Head Start decisions remain unsettled:

- Prepare an RSP establishment charter that states the working geography, establishment assumptions, sponsor, governance pathway, secretariat model, and Head Start review triggers.
- Draft a process agreement with a specific Head Start continuity and change-control section.
- Depending on relevant Head Start scenario, create an RSP/regional functions interface map covering NEP, transport, public transport, CDEM/EM, catchment/flood, water, biosecurity, monitoring/science, compliance/enforcement, fast-track and City/Regional Deal interfaces.
- Consider preparing a Regional Function Continuity Schedule for any Head Start proposal that departs from a full-region UA model, noting this is not a requirement for a Head Start outline proposal.
- Depending on relevant Head Start scenario, map RSP relevant iwi/Māori participation, Treaty settlement, legislative, and relationship based arrangements against both current regional boundaries and plausible future Head Start geographies.
- Build a common evidence register that identifies whether each evidence layer is current-region specific, subregional, cross-boundary or transferable.
- Brief elected members that RSP and Head Start are now linked reforms; Head Start must support the planning reforms.
- Prepare a current-boundary RSP governance and deliver continuity proposal or intended arrangement for inclusion in any Head Start outline proposal, explaining how RSP work continues irrespective of Head Start outcomes and how the proposal will make coordination for the planning system easier.
- Identify what planning aspects will need to be resolved in the detailed design phase.
- Focus on what new and also existing relationships need to be sustained or forged during any transition relating to a Head Start proposal, which remains relevant to RSP continuity.
- Use the Guidance to avoid over-designing the August proposal: identify the case for change, risks, trade-offs, and detailed-design work programme rather than attempting full RSP process design or detailed financial modelling.

Planning Bill 235-3 itself now requires RSPs to identify priority areas for planning adaptation to climate-change effects. A Head Start transition plan should preserve the hazard/exposure evidence, location rationale, partner commitments, and implementation/funding assumptions needed for that work so that any successor authority can inherit a coherent regional evidence base. The separate Climate Change Response Amendment Bill remains a related but distinct stream.

12. Key points for council managers to note

Suggested framing: “Head Start does not pause RSP readiness; it changes the design test. Build RSP arrangements now, but make them transition-capable.”

No.	Briefing point	Talk-to note
1	Start with the core proposition.	RSP establishment is now a moving-target governance problem. The region needs to proceed, but with explicit assumptions, change-control triggers, and continuity arrangements.
2	Do not treat Head Start and RSP as separate workstreams.	Any Head Start proposal is also a proposal about future RSP geography, committee continuity, regional functions, iwi/Māori partnering/participation, and infrastructure evidence. They are parallel but integrated work programmes and need to speak to each other.
3	Note the four scenarios and what is relevant to your region.	Managers should note the full-region UA, subregional UA, cross-boundary UA, and multiple UAs within one region scenarios and consider which of those are relevant and their RSP consequences.
4	Full-region UA is the simplest RSP fit.	It preserves the current regional planning geography. The task is succession, not major geographic reconciliation.
5	Subregional and cross-boundary models carry a higher design burden.	They create questions about which “region” the RSP is for, who leads plan preparation, and how evidence, participation and decision-making rights are preserved.
6	Multiple UAs within one region need to consider regional-function architecture.	The design must consider fragmenting of catchments, transport, environmental monitoring, science, biosecurity, emergency management, and regional infrastructure planning. Some form of sub-regional RSP then merged/amalgamated into a regional RSP may be possible unless legislation is changed to recognise a proposed UA as the region for the purposes of RSPs.
7	The process agreement is the continuity spine.	It should include working geography, triggers, escalation, evidence continuity, iwi/Māori partnering/participation, regional function interfaces, and legislative assumptions.
8	The secretariat must manage transition.	It needs an assumptions register, evidence log, regional functions map, decision archive, and partner/obligations register.
9	Non-full-region proposals should consider the value of a Regional Function Continuity Schedule.	This could where relevant to RSP, identify future geography, governance, assets, funding, capability, data, Treaty arrangements, and transition pathway for affected regional functions.
10	Iwi/Māori partnering and participation needs early mapping.	Future UA boundaries may impact iwi rohe, PSGE geographies, statutory acknowledgements, customary marine title interests, and existing participation agreements.
11	Infrastructure evidence must be governance-aware.	Water services strategies, transport plans, public investment commitments, and major projects may be based on current structures that Head Start could alter.
12	Reflect the new Guidance’s proportionality message.	The August outline proposal should be light-touch, high-level and strategic. It should explain workability, continuity, trade-offs, and detailed-design needs, not try to settle every RSP design question.
13	Emphasise current-boundary RSP continuity.	The latest Guidance says Planning Bill and Natural Environment Bill references to “region” apply to the region at introduction. Councils must keep current-boundary RSP work moving.
14	The bottom-line message for managers.	Proceed with RSP establishment now, but build an adaptive regional operating model that can absorb Head Start decisions without losing momentum or legitimacy.

No.	Briefing point	Talk-to note
15	National standards are another transition variable.	Head Start governance should preserve region-wide evidence and spatial decisions while allowing standardised RSP provisions and nationally prescribed methods to be inserted without redesigning the institutional model.
16	The implementation chain must survive reorganisation.	Section 68 links the RSP to LUP/NEP, RLTP, GPS and LTP implementation. Head Start continuity arrangements should preserve responsibility for those downstream actions as well as the RSP document itself.

14. Bottom line for managers

Councils should proceed with RSP readiness and establishment now. Current-boundary RSP readiness is the confirmed immediate path. But they should not design the process agreement, committee, secretariat, or evidence programme as if current regional boundaries are immovable. Head Start makes regional planning geography a live implementation variable, even though current-boundary RSP establishment remains the immediate starting point. The best managerial response is to build RSP machinery that is clear enough to start, disciplined enough to support statutory plan-making, and flexible enough to absorb future Head Start decisions without losing evidence, legitimacy, participation arrangements, or regional-function coherence.

Appendix: Practical checklist for council managers

Checklist area	Question for managers
Working geography	Have we considered the implications of preparing the RSP on current regional boundaries?
Head Start scenario testing	Have we considered relevant scenarios: full-region UA, subregional UA, cross-boundary UA, and multiple UAs within one region?
Process agreement	Does the agreement contain Head Start triggers, change-control, escalation, evidence continuity, and review clauses?
Committee design	Can committee terms of reference survive accepted, rejected or altered Head Start proposals?
Secretariat capability	Does the secretariat have named responsibility for assumptions, evidence continuity, regional functions mapping and transition monitoring?
Regional functions map	Have we mapped NEP, RLTP, RPTP, CDEM/EM, catchment/flood, water, biosecurity, monitoring/science, and compliance/enforcement interfaces?
Regional Function Continuity Schedule	Is a schedule being prepared for any proposal that is not a simple full-region UA? Note this is a recommended tool to assist RSP, not a requirement for Head Start outline proposals.
Iwi/Māori and Treaty arrangements	Have iwi authorities, PSGEs, settlement arrangements, statutory acknowledgements, customary marine title interests, and participation agreements been mapped against current and possible future geographies?
Infrastructure evidence	Have water services strategies, WSDPs, stormwater service zones, transport plans and major projects been captured in the evidence register?
Legislative assumptions	Have we identified which matters can be handled under current law and which likely require bespoke 2027 Head Start legislation?
Current-boundary RSP continuity	Does any Head Start proposal explicitly state that current-region RSP work continues and explain how reorganisation will avoid or minimise disruption?
Outline proposal proportionality	Have we avoided over-designing August material while identifying the case for change, risks, trade-offs, and detailed-design work programme?

Checklist area	Question for managers
National-standard resilience	Can evidence, spatial options, records and implementation responsibilities transfer to successor entities if national standards also change RSP methods or standardised provisions?
First-RSP programme	Does the transition plan preserve the 21-month/9-month statutory notification trigger, the 9-month decision period and the following LUP/NEP notification milestone?

Source documents and official references

Primary source documents (prepared by SMConsulting)

1. Info Paper - Executive Summary - RSP and Head Start - RSP Establishment and Governance, 18 May 2026
2. Info Paper - RSP and Head Start Pathway Implications, 18 May 2026
3. Info Paper - Head Start Guidance - New or Different to Previous Releases and Documents, 18 May 2026 Info Paper –
4. Info Paper - Head Start and Regional Functions - Issues and Options, 19 May 2026
5. Briefing Note - Working Regionally for Regional Spatial Planning – Issues and Options for Council Managers, 25 May 2026
6. Regional Spatial Planning under the Planning Bill and Natural Environment Bill - Legal commentary and implementation implications, as at 11 September 2026: current synthesis used for the further interpretive and organisational edits in this Note.

Official references

7. Department of Internal Affairs, Simplifying Local Government - Head Start pathway - <https://www.dia.govt.nz/simplifying-local-government>
8. Department of Internal Affairs, Guidance for Head Start outline proposals: Simplifying Local Government - [https://www.dia.govt.nz/diawebsite.nsf/Files/Local-Government-2026/\\$file/Guidance-for-Head-Start-outline-proposals.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Local-Government-2026/$file/Guidance-for-Head-Start-outline-proposals.pdf)
9. Department of Internal Affairs, Proactive release: Cabinet materials related to the Head Start pathway for Simplifying Local Government - <https://www.dia.govt.nz/Proactive-Releases>
10. New Zealand Legislation, Planning Bill 235-3, as reported from the Committee of the whole House, 25 August 2026 - <https://www.legislation.govt.nz/bill/government/2025/235/en/latest/>
11. New Zealand Legislation, Natural Environment Bill 234-3, as reported from the Committee of the whole House, 25 August 2026 - <https://www.legislation.govt.nz/bill/government/2025/234/en/latest/>
12. Ministry for the Environment, Resource management reforms - <https://environment.govt.nz/what-government-is-doing/areas-of-work/rma/rmreform/>
13. Ministry for the Environment, Better planning for a better New Zealand - <https://environment.govt.nz/publications/better-planning-for-a-better-new-zealand/>

September 2026 legislative-update status and sources

14. Planning Bill 235-3, as reported from the Committee of the whole House, 25 August 2026: consolidated current pre-third-reading text incorporating the report-back and Committee-stage amendments - <https://www.legislation.govt.nz/bill/government/2025/235/en/latest/>
15. Climate Change Response Amendment Bill 2026 (Bill 334-1), introduced 15 July 2026, remains a separate legislative source stream. For this RSP briefing, Planning Bill 235-3 is now the primary statutory baseline and itself requires priority areas for planning adaptation to climate-change effects.
16. Planning Bill 235-3, Schedule 1 clause 21 and sections 198A-198E: all existing and initiated Mana Whakahono ā Rohe cease to have legal effect on the day after Royal assent; one or more iwi authorities may request one or more local authorities to enter iwi participation agreements, with hapū able to join as parties. Direct RSP consultation and Treaty-settlement duties remain separate.

17. MCERT, New Zealand's New Planning System - Testing the Approach to National Policy Direction, 25 August 2026: illustrative material, expressly not Government policy, used only as an implementation signal for likely RSP emphasis on growth/infrastructure sequencing, natural hazards, environmental/cultural values, and conflict resolution.