

Submission Environment Canterbury 2024 Representation Review – Initial Proposal

PREPARED BY:	Ashburton District Council	SUBMITTED TO:	
	PO Box 94		PO Bo
	ASHBURTON		CHRIS
	<u>mayor@adc.govt.nz</u>		mailro

Environment Canterbury PO Box 345 CHRISTCHURCH 8140 <u>mailroom@ecan.govt.nz</u>

Key points

1. Ashburton District Council does not support the Initial proposal as adopted by Environment Canterbury on 24 July.

2. The reasons for not supporting this proposal are:

- We do not believe the proposal provides effective representation for our district, nor does it provide effective representation for the rural communities of Canterbury.
- We consider too heavy a weighting has been placed achieving fair representation, to the detriment of determining effective representation for communities of interest.
- Ashburton District makes a significant contribution to the regional economy and deserves better representation.
- The proposed option presents the risk that the Ashburton District will not be represented directly by the Regional Council.

3. Ashburton proposes that:

- Environment Canterbury reconsiders their proposal and alter the lens through which they consider the principles under the Local Electoral Act 2001. Effective representation should be the core lens through which future representation arrangements are being determined.
- That rural areas of Selwyn currently under the Ellesmere and Malvern wards are, and will continue to become, our recognised communities of interest, sharing similar perceptual, functional and political activities and challenges.
- Environment Canterbury should consider our alternative options, including our additional option of combining Ashburton District with Malvern Ward and Ellesmere Ward from Selwyn District to ensure these areas within Mid-Canterbury are guaranteed better representation.

4. It supports a model where:

- Communities of interest are better aligned to support rural communities and the ongoing urbanisation of Selwyn's Rolleston and Springs wards.
- Effective representation is the primary driver for considering proposed constituencies.

1.0 Introduction

- 1. Ashburton District Council (Council) welcomes the opportunity to submit on Environment Canterbury's 2024 Representation Review initial proposal.
- 2. Council notes that on 24th July 2024, Environment Canterbury reviewed its representation arrangements, and resolved that Option Three from the preliminary engagement of combining Ashburton District with the current South Canterbury / Ōtuhituhi Constituency is adopted as the Initial Proposal to apply for the triennial elections, being held in October 2025.
- 3. Council recognises that this option is preferred based on feedback received during preliminary engagement. We understand that Environment Canterbury believe this proposal is their best option for providing fair and effective representation in accordance with the constraints imposed by the Local Electoral Act 2001 (the Act).
- 4. While we acknowledge Environment Canterbury needs to address fair and effective representation for fast-growing communities within Selwyn District, Ashburton District Council does not support the proposed option as a viable solution for Ashburton District.
- 5. We do not believe the proposal provides effective representation for our district, nor does it provide effective representation for the rural communities of Canterbury. We urge Environment Canterbury to reconsider their proposal and alter the lens through which they consider the principles under the act. Effective representation should be the core lens through which future representation arrangements are being determined.
- 6. We also acknowledge that as no options that have been presented meet the fair representation requirements under the Act, the Local Government Commission will be the final decision-maker for this review, as under Section 19V(4) of the Act, Environment Canterbury is required to lodge this with the Commission.

2.0 Why does Ashburton District deserve better representation?

2.1 Ashburton District as a significant Regional Contributor

- 7. Council would like to take the opportunity to highlight our position as one of the most productive districts within rural Canterbury.
- 8. The Ashburton District has the third highest GDP in the region, with the second highest GDP per capita. Our district also has over double the number of cows than any other district, resulting in \$1.265M annual dairy payout. Our districts tourism sector also attracts the third highest level of international spending behind the Mackenzie and Kaikoura Districts.¹

Table 1

Comparisons of economic indicators

¹ (Infometrics, 2023)

	GDP	GDP per Capita	Exports	Cows	Dairy Payout	Productivity	Tourism Spending (international)
Hurunui	\$989.4M	\$71,696	\$214.5M	77,738	\$290M	\$152,968M	\$31.4M
District							
Waimate	\$555.3M	\$66,107	\$894.2M	99,863	\$347M	\$160,029M	\$4.0M
District							
Mackenzie	\$431.3M	\$75,800	\$126.2M	17,628	\$54M	\$152,080M	\$97.1M
District							
Timaru	\$3,674.8M	\$75,141	\$3,735.2M	125,744	\$446M	\$135,272M	\$30.6M
District							
Selwyn	\$3,574.8M	\$43,970	\$2,389.9M	169,725	\$573M	\$132,145M	\$26.0M
District							
Ashburton	\$2,863.8M	\$77,821	\$1,046.2M	352,439	1,265M	\$145,032M	\$35.2M
District							
Waimakariri	\$2,802.3M	\$40,613	\$472.5M	66,644	\$245M	\$125,856M	\$24.7M
District							
Waitaki	\$2,028.2M	\$83,465	\$569.4M	101,909	\$364M	\$167,081M	\$25.9M
District							
Kaikoura	\$237.1M	\$56,052	\$83.4M	8,582	\$31M	\$126,184	\$46.3M
District							

9. Ashburton District Council rates make up 17% of the total revenue sought from Environment Canterbury's general rates (2024/25) compared to other Canterbury District Councils.²

Table 2

General Rate Revenue Sought by Environment Canterbury

District	Rate Value	2024/25 Revenue Sought	% of Revenue
Selwyn District	\$39.65	\$14,348,630	29.2%
Waimakariri District	\$35.83	\$9,907,866	20.1%
Ashburton District	\$40.98	\$8,388,125	17%
Timaru District	\$47.01	\$6,999,880	14.2%
Hurunui District	\$37.34	\$3,912,990	7.9%
Mackenzie District	\$38.82	\$2,338,194	4.7%
Waimate District	\$38.19	\$2,224,860	4.5%
Kaikoura District	\$42.53	\$968,746	1.9%

10. Ashburton District has the highest land and capital value compared to other Canterbury District Councils.³

Table 3

Summary of Districts Property Values

District	Properties	Land Value (\$)	Capital Value (\$)
Ashburton District	16,419	\$13,816,650,150	\$20,690,571,850
Waimakariri District	28,678	\$8,132,116,450	\$18,344,467,400

² (Environment Canterbury, 2024, p. 175)

³ (Environment Canterbury, 2022, p. 127)

Timaru District	23,222	\$7,750,685,650	\$15,343,320,120
Hurunui District	8,749	\$4,929,732,200	\$7,745,438,300
Mackenzie District	5,414	\$3,045,416,200	\$5,307,980,120
Waimate District	4,535	\$3,216,885,700	\$4,981,530,900
Waitaki District	2,116	\$1,163,649,300	\$2,632,647,700
Kaikoura District	3,286	\$1,403,199,750	\$2,353,714,150

11. We urge Environment Canterbury to consider this when assessing effective representation across the region. The Ashburton District boosts the regional economy through our strong agricultural and tourism trade, cementing our position as a key player within the regions rural landscape, it is therefore critical that regional representation is reflective of this. To sustain this level of contribution to the region's economy, Ashburton District will need guaranteed representation from those who know our districts strengths and challenges.

2.2 Impact of ECan role on Ashburton District

- 12. As a rural powerhouse, Ashburton District has a significantly modified landscape that is subject to the plans, rules and requirements of Environment Canterbury.
- 13. Access to water is the foundation for Ashburton District's agricultural economy, regulated through Environment Canterbury.
- 14. Ashburton District has significant natural landscapes, also subject to these rules and regulations.
- 15. As the regional Council entity, Environment Canterbury has a substantial impact on individuals, farms, businesses and other organisations. This should be recognised in ensuring the ability to be represented by, nominate and elect representatives who know Ashburton District.

3.0 Has fair representation been too heavily weighted in this proposal?

- 16. We acknowledge Environment Canterbury's commitment to ensuring their proposal is compliant in accordance with Section 19V(2) of the Act. However, the reality of our region is that whatever option is considered, there will ultimately be some form of non-compliance outside of the range of +/- 10%. This is largely due to the population density in urban areas versus rural areas, but also due to the ongoing and sustained growth within the Selwyn district.
- 17. While we acknowledge the constraints the fair representation provisions of the Act put on Environment Canterbury, we consider too heavy a weighting has been placed on this provision to the detriment of other provisions, namely step 3 – identifying communities of interest, and step 4 – determining effective representation for communities of interest⁴.
- 18. While the Act says that fair representation 'must' be achieved, it does give the Council some options to consider non-compliance, particularly where effective representation of communities of interest is threatened⁵.

⁴ Local Government Commission *Guidelines for local authorities undertaking representation reviews, July 2023* ⁵ Local Electoral Act, Section 19V(b)

19. Further, given that no proposal presented to date has been completely compliant with this provision, it is our view that Environment Canterbury should shift its focus to consider communities of interest and effective representation as stronger drivers for this representation review.

4.0 Does this proposal really achieve effective representation for everyone?

20. Regional Councils *must* ensure effective representation of communities of interest under Section 19U of the Local Electoral Act 2001. Factors to consider include the size, nature, and diversity of the district/region. It should also ensure suitable governance to represent the divergent interests between metropolitan and rural parts of the region. In Council's view, this proposal does not meet those tests. In assessing whether Environment Canterbury has considered these points, we have measured the proposal against the following considerations.

4.1 Accessibility, size and configuration of an area

21. Under the Commission guidelines, factors such as accessibility, size and configuration of an area **need** to be considered as far as practicable. These include factors such as reasonable access, an elected members ability to provide reasonably even representation across an area, and ability to effectively represent the views of the electoral area.

4.2 The population has reasonable access to its elected members and vice versa

- 22. Council would like to draw attention to Environment Canterbury's last representation review in 2018, in which similar issues were raised.
- 23. The South Canterbury Constituency at the time of the last review was the largest constituency by land size in Canterbury. During the previous representation review, Environment Canterbury initially proposed that only one representative be elected for the South Canterbury Constituency. This was heavily opposed on the basis that effective representation would be diminished due to the reduced ability of the population to have reasonable access to its elected members, and vice versa.
- 24. On this basis, it was resolved that South Canterbury would be represented by two elected members, with this decision supported by the Commission at the time, despite it not meeting the fair representation provisions under the Act.
- 25. Given that the geographical size of the current South Canterbury constituency previously raised questions around the ability to provide effective representation, Council questions why Environment Canterbury is now proposing to almost double the size of the constituency (29,822 sq. km) under the current proposal but opting to retain the same level of representation, effectively undermining the previous decisions made regarding effective representation in this area.
- 26. To illustrate the lack of "reasonable" access under the proposed constituency we refer to the table below, which demonstrates the travel time for elected members compared to the current largest Regional Council constituencies in New Zealand.

Table 4

Constituency	Land area (sq. km)	Population	Reps	Ratio	Distance in kms	Travel Time
Dunstan	18,652	78,800	3	26,267	Glenorchy to Millers Flat 196km	2 hours, 51 minutes
South Canterbury	17,620	65,000	2	32,500	Omarama to Geraldine 175km	2 hours, 5 minutes
North Canterbury	12,905	87,000	2	43,500	Kaikoura to Oxford 191km	2 hours 28 minutes
Mid Canterbury	12,562	118,100	2	59,050	Hinds to Arthurs Pass Village 208km	2 hours 30 minutes
Fiordland	12,332	4,660	1	4,660	Manapouri to Milford Sounds	1 hour 57 minutes
Molyneux	11,503	38,300	2	19,150	Balclutha to Hyde 146km	1 hour, 46 minutes
Ashburton + South Canterbury	29,822	101,720	2	50,860	Lake Coleridge to Omarama 291km	3 hours 30 minutes

Summary of Constituency Sizes

- 27. We note that Dunstan constituency is the next largest in terms of land area but has three elected members representing close to half the population the elected members under the new proposed South Canterbury constituency would be expected to represent.
- 28. One recommendation would be to increase the number of elected members representing the proposed constituency to three. However, Environment Canterbury is already at its maximum number of elected members (14) as prescribed by the Act. Given the complexities of the Canterbury region, and the steadily increasing population in the Selwyn area, there would be no possible way to reallocate an elected member from another constituency without it resulting in under representation somewhere else in the region.
- 29. Therefore, based on reasonable access, Council considers that there is no feasible way to maintain effective representation should Environment Canterbury combine Ashburton District and South Canterbury constituency.

4.3 The elected members ability to effectively represent the views of their electoral area and to provide reasonably even representation across the area.

- 30. Our primary concern is that the proposed option does not guarantee effective representation of Ashburton District. The proposed option presents the risk that the Ashburton District will not be represented directly by the Regional Council. While Council recognises the vagaries of elections mean this result is possible under the current governance structure, the proposal accentuates the potential for it to occur, which could result in a proportion of the population and geographical area of the region not being directly represented by Environment Canterbury.
- 31. If the scenario should occur in which the two proposed representatives are elected from outside of the Ashburton District, Council questions the ability of those elected members to effectively

represent the views of Ashburton District, and to provide even representation across the entire constituency.

- 32. We refer to the Southern Canterbury Council's submissions in response to Environment Canterbury's preliminary engagement in which they commented that the areas of South Canterbury, and Mackenzie, are large enough and have issues in common but differ from Mid Canterbury. They prefer to keep their current structure, leaving Ashburton and Selwyn to run our own areas.
- 33. This commentary highlights the differing challenges that face each district, specifically around environmental challenges. By nature, the Ashburton District has challenges that most of the South Canterbury districts do not have. Our district has more mountains, lakes, and braided rivers than other districts. These land features, along with the differences in agricultural and industrial activities means that any members elected outside of the Ashburton District are unlikely to have in depth knowledge of our district's challenges, and consequently would be unable to effectively represent our districts views.
- 34. We also note that if this scenario were to occur, the elected members would likely be based in Timaru or further south, reducing the ability to provide reasonably even representation due to geographical location.

5.0 Does this proposal consider future needs of communities of interest?

- 35. Community of Interest is not defined by legislation. We therefore take guidance from the LGC guidelines which describe a community of interest using a three-dimensional concept of perceptual, functional and political interests. We note that under the Act;
 - Recognised communities of interest should not be split between electoral areas, and;
 - Two or more communities that have few common interests should not be grouped together.

5.1 Not splitting recognised communities of interest between electoral area

- 36. Council holds the view that our community of interest faces north and is strongly aligned with rural/ southern Selwyn rather than South Canterbury. Given the rapid urbanisation of Rolleston and Springs wards, Council would suggest that rural areas of Selwyn such as Hororata, Leeston, and Southbridge, currently under the Ellesmere and Malvern wards are, and will continue to become, our recognised communities of interest, sharing similar perceptual, functional and political activities and challenges.
- 37. We acknowledge comments made in Selwyn District Council's submission to Environment Canterbury's preliminary engagement in which they acknowledge that traditionally, they have been closely aligned with our Council but raised concerns that continued alignment of our communities of interest would unlikely deliver fair representation.
- 38. We understand Selwyn District's desire to received fair representation given the rapid pace in which their district is growing. Council would like to highlight that this growth isn't necessarily

even across the entire district. Rather, it is primarily localised to Rolleston and Springs ward⁶, indicating that rural / southern Selwyn areas may be at risk of losing the perceptual dimension of its community of interest as the urban and rural divide continues to grow within the Selwyn District.

- 39. We note Selwyn District Council's current 2024 representation review process also highlights the continued growth of the Springs and Rolleston wards, with adjustments proposed to these wards to bring them in line with the fair representation provisions (while reducing the overall number of Councillors). We consider that in an Environment Canterbury context, the Springs and Rolleston wards more closely align with Christchurch. This forms the basis for our alternative proposals as outlined below.
- 40. We highlight that our community of interest faces north for the following reasons:

Perceptual

- Selwyn and Ashburton district are the most similar in terms of land size and attributes
- For those who commute for work, our residents largely travel out of the district north rather than south

Functional

- Our Mid Canterbury sports teams largely compete in Christchurch based competition rather than with teams from South Canterbury
- Young people from our district more commonly complete tertiary study through Lincoln University and University of Canterbury rather than providers in South Canterbury
- Our produce is largely directed north towards Lyttleton Port for export rather than south to PrimePort Timaru
- 14 businesses from our district have offices based in Selwyn or Christchurch, more than those who have offices in South Canterbury.
- Our agricultural activity is more aligned with Selwyn with both districts having a strong focus on dairy and crop farming as opposed to South Canterbury.

5.2 All members, regardless of the area they are elected to represent, make the same declaration on coming into office to act in the best interests of the whole district.

- 41. Council has concerns that the proposed option could further exacerbate the existing rural- urban divide which exists within the Canterbury region. We note in the preliminary feedback, around ten responses stressed the need to balance rural and urban representation. Any governance structure must have regard to the divergent interests between metropolitan Christchurch and rural Canterbury. Ashburton Council endorses this feedback.
- 42. We note the issues experienced in rural Canterbury such as the receding water levels at Greenstreet Creek, and now Lake Camp, require decision making from elected members who understand the area and the importance of these water sources to the community and our districts biodiversity. As it stands, rural Canterbury has a diminished voice, being outnumbered and ignored by metropolitan representatives.

⁶ According Selwyn Councils <u>website</u> – Selwyn Central ward grew by 45%, Springs Ward grew by 34%, Malvern ward grew by 25% and Ellesmere ward grew by 12% since 2018.

43. We believe the proposed governance structure will only continue to diminish the rural voice. Grouping South Canterbury and Ashburton together, in our view, will not result in enhanced representation for rural communities. If anything, it will reduce the elected members ability to understand the issues on a local level, therefore decisions will continue to be made in the absence of true community interest.

6.0 Does this proposal take into account previous decisions?

- 44. Council questions Environment Canterbury's decision to include the merging of South Canterbury Constituency and Ashburton District as an option, given their own comments and the Commission's feedback on this proposal during the previous representation review in 2019.
- 45. We refer to Option 4A which was considered by Environment Canterbury prior to resolving the initial proposal in 2018/19, which would have seen Ashburton District grouped with South Canterbury Constituency.
- 46. The Commission's comments at the time noted that the geographical size of the constituency might impact effective representation of communities of interest. They believed the size of the constituency would impact on the ability of councillors to interact with residents and vice versa.
- 47. We note that Environment Canterbury also questioned whether this option adequately reflected communities of interest, particularly in relation to Ashburton. It was argued that Ashburton looked northwards to Christchurch rather than south towards Timaru. It was noted that the nature of Ashburton means there were some common interests between South Canterbury and Ashburton, but not enough to equate to a distinct community of interest.
- 48. We fail to see any significant changes within the South Canterbury and Ashburton areas that would alter the views held in 2019. In our view, all comments against this option in 2019 are still relevant to the current decision. It seems that the decision to rehash this proposal is based on an inability to successfully address the population growth in Selwyn and parts of Christchurch, and not on the basis that South Canterbury and Ashburton are true and distinct communities of interest.

7.0 Alternative Options

- 49. Council would like to take the opportunity to remind Environment Canterbury of the options we proposed during preliminary engagement.
- 50. While we acknowledge Environment Canterbury's comments in relation to these proposals, we believe these options haven't been thoroughly considered and would urge Environment Canterbury to consider our comments below.

Table 5

Commentary of Ashburton District Council's proposed Alternatives

ECan Analysis		ADC comments
ative 1:		
tituency stretching from the Rakitata R	iver	boundary to the Selwyn River boundary, electing
ouncillor. The remaining area could eithe	er re	main as its own constituency or be split between
rth Canterbury and Christchurch consti	tuen	icies.
e new 'Mid Canterbury' constituency	1.	This is correct if the constituency remained as its
ould be compliant with S19V(2)		own. If split – there would be potential for these
quirements		areas to be aligned with west or south Christchurch.
elwyn' constituency would be non-	2.	Noted.
mpliant - under-represented by 50.2%		
uth Canterbury constituency would be	3.	This has already been addressed based on effective
n-compliant - over-represented by		representation principle.
.7%		
ristchurch West/Ōpuna Constituency	4.	This is negligible and hasn't been successfully
ould be non-compliant - under-		addressed through any ECan proposal.
presented by 10.12%		
lwyn district communities of interest	5.	Areas proposed are within "rural" Selwyn –
ould be divided		perceptually closer aligned with Ashburton
esn't align with Territorial	6.	This is not an absolute rule. There are precedents
thority/ward boundaries		where this does not apply in Aotearoa New Zealand
		(e.g. Waikato Regional Council) ⁷
ative 2:		
tituency stretching from the Rakitata R	iver	boundary to include the Ellesmere Ward of the
		-
	nter	-
	1.	This is correct if the constituency remained as its
• • • • •		own. If split – there would be potential for these areas to be aligned with west or south Christchurch.
-		
	2.	This has already been addressed based on effective
		representation principle.
	-	
	3.	This is negligible and hasn't been successfully
-		addressed through any ECan proposal.
•		
	4.	Noted.
mpliant - under-represented by 42.5%	_	
lwyn district communities of interest	5.	
· · · · · · · ·		
ould be divided	-	perceptually closer aligned with Ashburton.
oposal aligns with ward boundaries	6.	Noted.
	6.	
	puncillor. The remaining area could either rth Canterbury and Christchurch constituency puld be compliant with S19V(2) quirements elwyn' constituency would be non- mpliant - under-represented by 50.2% uth Canterbury constituency would be n-compliant - over-represented by .7% ristchurch West/Ōpuna Constituency puld be non-compliant - under- presented by 10.12% lwyn district communities of interest puld be divided esn't align with Territorial thority/ward boundaries ative 2: tituency stretching from the Rakitata R n District, electing one Councillor. The re- tuency or be split between the North Ca e new 'Mid Canterbury' constituency puld be compliant with S19V(2) quirements uth Canterbury constituency would be n-compliant - over-represented by .7% ristchurch West/Ōpuna Constituency puld be non-compliant - under- presented by 10.12%	nuncillor. The remaining area could either reprint Canterbury and Christchurch constituencye new 'Mid Canterbury' constituency1.ould be compliant with S19V(2)1.ouirements2.elwyn' constituency would be non-2.mpliant - under-represented by 50.2%3.uth Canterbury constituency would be3.n-compliant - over-represented by37%4.vild be non-compliant - under-5.ould be non-compliant - under-5.ould be non-compliant - under-5.ould be divided6.esn't align with Territorial thority/ward boundaries6.ative 2:1.tituency stretching from the Rakitata River n District, electing one Councillor. The rema tuency or be split between the North Canter e new 'Mid Canterbury' constituency ould be compliant with S19V(2) quirements1.uth Canterbury constituency would be n-compliant - over-represented by .7%2.stituency stretching from the Rakitata River ould be compliant with S19V(2) quirements1.uth Canterbury constituency would be n-compliant - over-represented by .7%3.uth Canterbury constituency would be n-compliant - over-represented by .7%3.uth Canterbury constituency would be n-compliant - over-represented by .7%3.uth Canterbury constituency would be n-compliant - under-3.uth Canterbury constituency would be n-compliant - over-represented by .7%3.uth Canterbury constituency would be non-3.uth Canterbury constituency woul

⁷ (Waikato Regional Council, 2024)

Alternative 3:

Retain the Mid Canterbury constituency with three representatives. This option would move one of the current South Canterbury representatives to the Mid Canterbury constituency.

1.	Reduces South Canterbury/Ōtuhituhi Constituency representation by 1 member	1.	Arguably, this outcome is no different to the proposed option – would provide the same level of representation from an effective representation perspective.
2.	Add 1 member to Mid-Canterbury/	2.	Noted
	Ōpākihi Constituency		
3.	Aligns with existing boundaries	3.	Noted
4.	New Mid-Canterbury constituency would	4.	Population modelling suggests that Selwyn area will
	by non-compliant - over-represented by		grow enough to mitigate this by the next
	17.28%		representation review.
5.	South Canterbury constituency would be	5.	From a mathematical perspective. However, from a
	non-compliant - over-represented by		geographical perspective this is required for effective
	36.58%		representation.
6.	Christchurch West/Ōpuna	6.	This is negligible and hasn't been successfully
	Constituency would be non-compliant		addressed through any ECan proposal.
	- under-represented by 10.12%		

<u>Additional Alternative Option 4</u> – Combine Ashburton District with Malvern Ward and Ellesmere Ward from Selwyn District. The remaining Rolleston and Springs ward could be moved to South or West Christchurch Constituencies.

51. This option would mean that the rural areas of Mid Canterbury are guaranteed one Council representative on Environment Canterbury.

Table 6

Additional Option – Population Breakdown

New "Rural" Mid Canterbury		Christchurch West + Urban	Selwyn
Western Ward	7,860	Christchurch West	104,800
Eastern Ward	7,660	Rolleston Ward	30,000
Ashburton Ward	21,200	Springs Ward	22,300
Malvern Ward	15,500	Total	157,100
Ellesmere Ward	13,450		
Total	65,670	_	

North Canterbury/Ōpukepuke Constituency	87,000	2	43,500	-4,084	-8.58
Christchurch West/Ōpuna Constituency	157,100	3	52,367	4,783	10.05
Christchurch North East/Örei Constituency	102,000	2	51,000	3,416	7.18
Christchurch Central/Ōhoko Constituency	101,100	2	50,550	2,966	6.23
Christchurch South/Ōwhangai Constituency	88,300	2	44,150	-3,434	-7.22
Mid-Canterbury/Ōpakihi Constituency	65,670	1	65,670	18,086	38.01
South Canterbury/Ōtuhituhi Constituency	65,000	2	32,500	-15,084	-31.70
Total	666,170	14	47,584		

52. We note that these numbers do not take into account the potential changes that could occur due to Selwyn Council's current representation review. We have included modelling based on their initial proposal in Appendix 2 but note that either option provides fairly similar outcomes of

Christchurch West/Ōpuna Constituency and Mid-Canterbury/Ōpakihi Constituency being underrepresented.

53. Although the alternative options we have presented are not fully compliant under the act +/-10% rule, we do believe that they better address the balance of fair representation, with effective representation. It is very unlikely that any option, including Environment Canterbury's proposed option, will be completely compliant. Therefore, we see the need to assess effective representation in the first instance, followed by fair representation.

8.0 Additional Comments

- 54. Should the Initial Proposal be confirmed as the Final Proposal, we strongly disagree with the proposal's naming of the Mid Canterbury/Ōpākihi Constituency (i.e. Ashburton District is known as Mid Canterbury, and this is especially evident within our representative sporting community. We believe retaining this name without the inclusion of Ashburton District within the constituency will only cause confusion and be detrimental to community groups in Ashburton who currently include Mid Canterbury in their title. We request that should Environment Canterbury proceed with the proposed option, that the name of the constituency be changed to "Selwyn Constituency".
- 55. Ashburton District Council thanks Environment Canterbury for the opportunity to provide this feedback. We wish to speak to our submission.

Neil Brown.

NEIL BROWN Mayor

Hail hil.

HAMISH RIACH Chief Executive

Appendix One – ADC proposed options

<u>Option 1</u> - A constituency stretching from the Rakitata River boundary to the Selwyn River boundary electing one Councillor

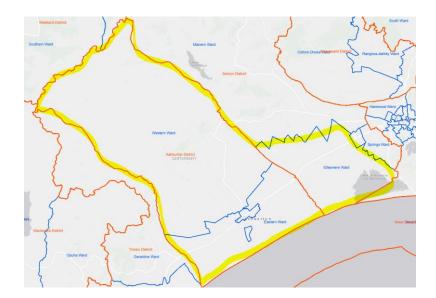
- 1. This option would mean that this area is guaranteed one Council representative on Environment Canterbury.
- 2. The remaining area could be either remain as its own constituency or be split between the North Canterbury and Christchurch constituencies.



Option 1 - New Mid Canterbury		New name	
Ashburton District	36,720	Rest of Selwyn	71470
333800 Glenroy-Hororata	1340		
334200 Bankside	1900		
335400 Southbridge	2720		
335800 Irwell	1390		
336200 Leeston	2430		
	46,500		71470

<u>Option 2</u> - A constituency stretching from the Rakitata River boundary to include the Ellesmere Ward of the Selwyn District electing one Councillor

- 1. This option would mean that this area is guaranteed one Council representative on Environment Canterbury.
- 2. This option is likely to be administratively simpler than option 1 given the ward boundaries already exist and will meet the effective criteria rule.
- 3. The remaining wards could be either remain as its own constituency or be split between the North Canterbury and Christchurch constituencies.



Option 2 - New Mid Canterbury		New name	
Western Ward	7,860		
Eastern Ward	7,660	Malvern Ward	15 <i>,</i> 500
Ashburton Ward	21,200	Rolleston Ward	30,000
Ellesmere Ward	13,450	Springs Ward	22,300
	50,170		67,800

Option 3 - Retain the Mid Canterbury Constituency with three representatives

1. This option would move one of the current South Canterbury representatives to the Mid Canterbury constituency. While this would initially result in overrepresentation for Mid Canterbury, given the current and ongoing growth of this area, this better aligns with the likely future direction of population growth.

<u>Additional Alternative Option 4</u> – Combine Ashburton District with Malvern Ward and Ellesmere Ward from Selwyn District. The remaining Rolleston and Springs ward could be moved to South or West Christchurch Constituencies.</u>

1. This option would mean that the rural areas of Mid Canterbury are guaranteed one Council representative on Environment Canterbury.

North Canterbury/Ōpukepuke Constituency	87,000	2	43,500	-4,084	-8.58
Christchurch West/Ōpuna Constituency	157,100	3	52,367	4,783	10.05
Christchurch North East/Ōrei Constituency	102,000	2	51,000	3,416	7.18
Christchurch Central/Ōhoko Constituency	101,100	2	50,550	2,966	6.23
Christchurch South/Ōwhangai Constituency	88,300	2	44,150	-3,434	-7.22
Mid-Canterbury/Ōpakihi Constituency	65,670	1	65,670	18,086	38.01
South Canterbury/Ōtuhituhi Constituency	65,000	2	32,500	-15,084	-31.70
Total	666,170	14	47,584		

Appendix Two – ADC proposed option based on Selwyn Council's Representation Review Options.

Numbers are based on Environment Canterbury numbers except for wards under the Selwyn District which have taken into the numbers used in Selwyn Councils current representation review.

North Canterbury/Ōpukepuke Constituency	87,000	2	43,500	-4,083	-8.58
Christchurch West/Ōpuna Constituency	165,600	3	55,200	7,617	16.01
Christchurch North East/Ōrei Constituency	102,000	2	51,000	3,417	7.18
Christchurch Central/Ōhoko Constituency	101,100	2	50,550	2,967	6.24
Christchurch South/Ōwhangai Constituency	88,300	2	44,150	-3,433	-7.21
Mid-Canterbury/Ōpakihi Constituency	57,160	1	57,160	9,577	20.13
South Canterbury/Ōtuhituhi Constituency	65,000	2	32,500	-15,083	-31.70
Total	666,160	14	47,583		