

27 July 2018

The Chairperson
Environment Canterbury
PO Box 345
Christchurch 8140

Dear Steve

Timaru District Council Submission to Environment Canterbury Representation Review 2018

Thank you for the opportunity to comment on the Environment Canterbury Representation Review 2018.

The Timaru District Council does wish to speak to its submission.

What we support

Timaru District Council support a return to a fully democratically elected Council that represents the entire Canterbury region. We also support the approach taken to mana whenua representation for Environment Canterbury, and the proposal to have dual English/Māori names for each constituency.

We acknowledge the initial proposal, as it currently stands to have 13 members elected from seven constituencies - North, Mid and South Canterbury and Christchurch North, West, Central and South. We support the division of Environment Canterbury's representation model into the proposed constituencies as outlined.

What we oppose

Timaru District Council does not support the proposed single elected member for the South Canterbury constituency.

We request that the number of elected members for the South Canterbury Constituency be increased to two members.

We offer the following comments for the Council's consideration.

Why should the South Canterbury Constituency have two elected members?

By land area, the South Canterbury constituency represents the largest constituency of those proposed, yet will receive only half the representation under the proposal. It has significant and complex resource management issues across its diverse landscapes and waterways, including water allocation and management, biodiversity, air quality, landscape protection, stormwater quality, natural hazard management and contaminated land. To help manage these issues, Environment Canterbury currently operates a significant base from Timaru

emphasising its size and complexity. Timaru District and South Canterbury continues to grow and innovate, and these challenges are only likely to expand.

We would argue there is more than sufficient reason for the population-based model to be overlooked in this circumstance. If, in the context of the Local Electoral Act, a proposal to be under-represented by 30% is acceptable, we fail to understand why a proposal to be over-represented by 30% is any less acceptable. Apart from the population size criteria, we fail to understand why South Canterbury is any different to other rural-based constituencies in relation to the complexity and nature of the issues faced by this part of the Canterbury region. In this context, we believe that fair representation should be matched by over-representation rather than under-representation.

In a New Zealand context, Council does not believe that a return to 14 Councillors for the Canterbury Regional Council is excessive. Canterbury has the largest population of all Regional Councils in NZ (estimated 612,100)¹. Many other Regional Councils (e.g. Waikato, Bay of Plenty, Wellington) have at least 13 elected members. If the current proposal stands, the Canterbury region population will be the most-under represented regional Council population in New Zealand (based on current Council representation models). Each Councillor will represent 47,085 people.

Prior to the 2010 changes there was a 14 member Regional Council. We believe a return to 14 elected members would ensure representation across Canterbury better reflects the rural communities of interest in geographically large but sparsely populated areas, and ensure more effective representation of their resource management interests.

Enabling a greater sharing of workload amongst more Councillors can only provide benefit to the governance of Environment Canterbury and quality of South Canterbury environment and communities.

Legislative Constraints

The Council acknowledges the limitations of the Local Electoral Act when considering representation reviews, particularly the need to match boundaries to communities of interest and follow territorial and ward boundaries, the requirement to comply with the +/-10% rule and the restriction on the total membership of a Regional Council of 6-14 members.

However, the Council considers that the flexibility now offered via the Act for exceptions to these rules has not been fully utilised relating to the South Canterbury constituency.

The Initial Proposal does not clearly indicate the reasons for Environment Canterbury's decision in the context of the Local Electoral Act, particularly relating to its decision for non-compliance with the +/-10% rule. Reasons stated in the Act under Section 19V(3)b are:

'If the regional council considers that effective representation of communities of interest so requires, constituencies may be defined and membership distributed between them in a way that does not comply with subsection (2)'

Consultation

While acknowledging the limitations of the Local Electoral Act, we are disappointed that in the context of the last eight years of the central government influence over the makeup of Environment Canterbury, the Council has not been able to determine their own destiny via the

¹ Local Government Commission 2018 Representation Tables 2017 estimates.xlsx, www.lgc.govt.nz/representations-reviews/about-representation-reviews

Representation Review process. There has been no opportunity to pre-engage over this issue prior to the release of the Initial Proposal, despite considerable attention to the makeup of Environment Canterbury over the last eight years.

In closing

We acknowledge that the Local Government Commission, under Section 19V of the Local Electoral Act, will make the final decision on Environment Canterbury representation, due to the inability to align with the Act's requirements.

We would implore you to side on a solution that fully represents all communities fairly in Canterbury, and gives South Canterbury two elected representatives.

Your current website slogan is – “We champion – Canterbury and our communities”. We would urge you to champion our community.

Yours sincerely



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Mayor

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