



## Submission to Environment Canterbury

### *Representation Review Initial Proposal*

2 September 2024

#### **Introduction**

This submission is made jointly by the Mayors of the South Canterbury Councils:

Mackenzie District Council

Mayor Anne Munro

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Timaru District Council

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Waitaki District Council

Mayor Gary Kircher

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The Mayors thank Environment Canterbury for the opportunity to submit on their Representation Review Initial Proposal.

We wish to speak to this submission.

The contact person regarding this submission is Mayor Nigel Bowen.

## Comments

The Mayors of the South Canterbury Councils:

- (i) submit in opposition to the Initial Proposal;
- (ii) reaffirm the views expressed in our pre-engagement submission dated 23 May 2024;
- (iii) provide the following additional comments.

First, we consider it imperative that rural and provincial residents have adequate representation on regional councils. However, in Canterbury, the voice and influence of these areas is being eroded at the regional level. The proposed changes further centralize and urbanize ECan's representation, giving more power to urban areas like Christchurch and meaning that rural and provincial residents are increasingly shut out of the decision-making.

We believe that urban councillors in general do not often have a good understanding of rural provincial and urban communities. In this particular instance, we believe that Environment Canterbury Councillors elected from outside South Canterbury do not understand, and cannot effectively represent, our residents. The current Environment Canterbury Draft Regional Policy Statement – which we strongly oppose – evidences this.

Second, we acknowledge the context and legislative framework that Environment Canterbury must operate within throughout the Representation Review. Most notably, these are the population increases in the Selwyn District since the last review, that the process is predominately driven by population considerations, and that the maximum permitted number of Councillors is 14.

If, given this context and legislative framework, it is not possible for rural and provincial South Canterbury residents to be adequately represented through Environment Canterbury, the South Canterbury Councils will explore available options to address this. This includes potentially advocating for a different set of governing arrangements, such as a second regional authority for Canterbury.

Third, we state that the current South Canterbury constituency is a distinct community of interest, based on its history, geography and unique economic and environmental characteristics. For instance, Mackenzie has a unique environment with the Mackenzie Basin recognised as an outstanding natural landscape. There are many unique issues in the Mackenzie district such as the importance of the eradication of wilding pines and pest control (wallabies and rabbits) to protect our indigenous biodiversity.

We hold that Councillor/s elected from the Ashburton District could not effectively represent the current South Canterbury constituency. Additionally, we note that Ashburton District Council, as stated in their own pre-engagement submission, consider themselves outside the South Canterbury community of interest and more closely aligned to the north (Greater Christchurch area).

Fourth, we strongly hold that the Initial Proposal compromises the effective representation of this South Canterbury community of interest. It artificially unites two distinct communities of interest, and means there is no guarantee that either community of interest will be represented at the regional level. Further, it will increase the existing challenge for elected councillors to logistically engage with all areas of the constituency because it will have increased in geographical size by approximately one-third.

Fifth, we support Environment Canterbury resolving Option One in the Initial Proposal report dated 24 July 2024, and seeking a Local Government Commission determination. Whilst this option is imperfect with wards outside the +/- 10% threshold, we believe that it is the best available option and is more consistent with the spirit of the Local Electoral Act 2001 than the Initial Proposal. This is because it gives primacy to effective representation where that and fair representation cannot both be achieved.

As Environment Canterbury is tasked with the protection of the environment, the initial proposal of representation by population base is not the best way to achieve this. It is important that geographical size as well as workload is taken into consideration when determining representation arrangements.

### **Conclusion**

Thank you again for the opportunity to submit on the Initial Proposal. Please do not hesitate to contact us if you have any questions.

We look forward to discussing this further with you at the Hearing.

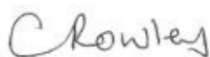
Ngā mihi



Anne Munro  
**Mayor, Mackenzie District**



Nigel Bowen  
**Mayor, Timaru District**



Craig Rowley  
**Mayor, Waimate District**



Gary Kircher  
**Mayor, Waitaki District**