Table 1: Summary of submissions

Submitter name, number	Support or oppose	Reasons	Outcome sought	Officers' comments
1. Adam Douglas Canning	Oppose	Some areas are under-represented and others over represented. Constituencies should also recognise that residents have interests beyond where they live.	Elect 14 councillors, each representing approx. 17,000. Either abolish all constituencies and vote as one region (preferred option) or align boundaries to contain multiples of 17,000 and the following number of members: Horowhenua-Kairanga – 2 Manawatu-Rangitikei – 2 Palmerston North – 5 Ruapehu – 1 Tararua – 1 Wanganui - 3	Section 19E(1) LEA[1] states that "A region must be divided into constituencies for electoral purposes". See general comments below regarding the strong direction for boundaries to align with territorial authority and ward boundaries. Table 2 shows the distribution of population and compliance with fair representation criteria for 14 elected members, based on the existing constituency boundaries.
2. Annette Main	Support	Comfortable with the proposal.	Horizons encourages active relationships and communication between individual councillors and the district they represent.	It is officers' understanding that elected members are actively engaging with the districts they represent (both constituents and territorial authorities) through a variety of methods.
3. Mark K Chilcott	Oppose	a. Council is not placing sufficient emphasis on population and communities of interest [compared to alignment of electoral boundaries]	Place more emphasis on achieving 18,015 – 22,018 persons per constituency, and communities of interest.	See general comments below regarding the strong direction for boundaries to align with territorial authority and ward boundaries.
		b. Ruapehu, Tararua and Wanganui constituencies all fail to meet the required population / councillor ratio. Population is based on 30 June 2017 estimates and do not take into account population growth; Palmerston North will also fail to meet the ratio within 1-2 years.	Anticipate known population trends and plan accordingly.	The use of Statistics New Zealand population / census data underpins the representation review process; for example, the calculation of general and Māori electoral populations and the use of Statistics New Zealand meshblocks. The most recent available population estimates are supplied to all councils carrying out reviews by the LGC[2]; these are broken down to constituency, ward and subdivision level. There is no requirement in the LEA, and no advice in the LGC guidelines, that a review should take into account future population trends. Population projections are not available at constituency, ward and subdivision level to support such an approach.
		c. Levin and Feilding are obvious communities of interest and should have their own representative for effective and fair representation. No current councillors are from Levin or Feilding.	Make one each of the councillors for Horowhenua-Kairanga and Manawatu-Rangitikei representatives for Levin and Feilding.	This approach would be a shift in emphasis towards prioritising the Region's two secondary urban areas as distinct communities of interest. The Palmerston North constituency, the most urban-focused constituency in the Region, also includes areas of rural land and Ashhurst. The Wanganui constituency includes both the urban area and extensive areas outside the urban boundary. Using the Statistics New Zealand area units for Levin and Feilding as the basis for two separate constituencies would not fully comply with the LEA "fair representation" criteria, as follows:

[1] Local Electoral Act 2001
[2] Local Government Commission

Submitter name, number	Support or oppose	Reasons	Outcome sought	Officers' comments

				Deviation from regional average	
					No. of members	Avg population per member	Levin (20900)	Feilding (16550)
				12	20025	4%	17%
				13	18485	13%	11%
				14	17164	22%	4%

Officers have not established how the area unit compares with territorial and ward boundaries.

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		d. Report 18-36 to Council contains unsupported claims.	Explain: Where in the LEA a constituency of x km^2 is "unreasonable";	The LEA does not define a threshold for assessing what is a reasonable area for a single elected member to represent while meeting effective representation criteria. However, the LGC 2007 determination on Horizons' representation review stated (in relation to comparable circumstances associated with the Tararua constituency) "the demands on a councillor to service such a large area would be unreasonable".
			Who would be disadvantaged and how by a Wanganui constituency of 3 councillors;	The submitter appears to be referring to paragraphs 8.5 and 8.6 of report 18-36, which are discussing the implications of merging the current Ruapehu and Wanganui constituencies into a single constituency with three elected members, to overcome the current Ruapehu constituency's significant non-compliance with the fair representation criteria. Such a merger would combine two distinct communities of interest, a conclusion reached by the LGC in their 2007 determination; "a separate Ruapehu Constituency is also necessary to ensure effective representation of this community of interest". The LGC took the same approach in the 2013 determination.
			How the existing arrangement recognises the communities of Feilding and Levin.	Feilding and Levin are both secondary urban areas which lie in their entirety within the constituencies of Manawatu-Rangitikei and Horowhenua respectively. Should the boundary of the Feilding ward be adjusted through the Manawatu District Council's representation review, we have been advised by LGC that they would be likely to adjust Horizons' constituency boundary to reflect that.
		e. More councillors (8/12) should be representing towns and urban areas and constituencies. Not reconfiguring constituencies to achieve "fair representation" disadvantages some citizens and ratepayers.	Explain Council's failure to implement "effective and fair" principles of the LEA and maintain constituencies which are genuinely representative of the region's population.	Officers do not agree with the submitter that Council's initial proposal fails to implement effective and fair representation criteria. The proposal does not fully comply with the +/- 10% fair representation criteria; however, this is one of three factors that must be balanced (the others being communities of interest and effective representation).

Submitter name, number	Support or oppose	Reasons	Outcome sought	Officers' comments
4. Mayor Andy Watson	Oppose	Concerned with arrangement for Manawatu-Rangitikei constituency. Lack of certainty that one each of the two councillors will continue to be elected from Manawatū and Rangitikei.	Consider splitting the constituency so each district has a single member to ensure two distinct communities of interest are represented.	Officers presented a number of scenarios which separated the Manawatu and Rangitikei districts (including one which merged Manawatu and Horowhenua districts in their entirety) to members in the 28 February workshop. The scenarios, although recognising the communities of interest delineated by political boundaries, generally increased non-compliance with the LEA fair representation criteria.

General comments

Electoral boundaries

Section 19U of the Local Electoral At 2001 (LEA) states that, in determining the proposed number of constituencies, their name and boundaries, and number of members to be elected for each constituency, regional councils must ensure:

(a)   that the number and boundaries of constituencies will provide effective representation of communities of interest within the region; and

(b)   that constituency boundaries coincide with the boundaries of the current statistical meshblock areas determined by Statistics New Zealand and used for parliamentary electoral purposes; and

(c)   that, so far as is practicable, constituency boundaries coincide with the boundaries of 1 or more territorial authority districts or the boundaries of wards [emphasis added].

The Local Government Commission (LGC) Guidelines[3] state that

Where practicable, different types of electoral subdivision boundaries (ward, constituency, community board subdivisions, etc.) need to coincide as this:
·   supports communities of interest and local electors' identification with their area
·   may encourage participation, such as voting or standing as a candidate (para 5.18).

Taken together officers consider that, while not imperative, there is strong direction to align constituency boundaries with territorial authority or ward boundaries while meeting the criteria to provide for fair and effective representation.

Table 2: Submitter 1 – population distribution using existing boundari

CONSTITUENCIES	Total electoral population	No. of members	Population per member	Deviation from regional average	
Ruapehu constituency	12900	1	12900	4264	25%
Wanganui constituency	44500	3	14833	-2331	-14%
Manawatu-Rangitikei constituency	37400	2	18700	-1536	-9%
Palmerston North constituency	87300	5	17460	296	2%
Horowhenua-Kairanga constituency	40300	2	20150	2986	17%
Tararua constituency	17800	1	17800	-636	-4%
Manawatu-Wanganui region	240300	14	17164		

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[3] Local Government Commission (June 2017). Guidelines for local authorities undertaking representation reviews (6th ed)