

SUBMISSION TO REPRESENTATION COMMISSION

April 2025

Overview

2 The Labour Party thanks the members of the Representation Commission for their work in drafting the next set of electorate boundaries for New Zealand.

3 We are pleased to see the Commission's stated approach is to seek only required change, a stance which we believe is appropriate and important in the current circumstance. Outside the changes we proposed below, we are comfortable with the proposed boundaries.

4 As a political organisation with deep ties into communities across the country the Labour Party has naturally been the recipient of significant feedback regarding the proposed boundaries. A number of communities have drawn our attention to some aspects of the proposed boundaries which negatively affect them. In this submission we detail these objections and suggest alternative courses of action available to the Commission. We also record one instance where the feedback we received actively supports a new boundary the Commission has drawn.

5 We hope this submission is of assistance to the Commission in making its final determinations.

6 The Labour Party hereby notifies the Commission that it would like to have a representative present in person to the Commission regarding this submission in each of these following areas:

- a. Auckland - Northcote
- b. Auckland - New Lynn
- c. Auckland - Wesley
- d. Auckland - Point England and Glen Innes
- e. Napier - Tukituki
- f. Hutt Valley
- g. Wellington - Broadmeadows
- h. Christchurch

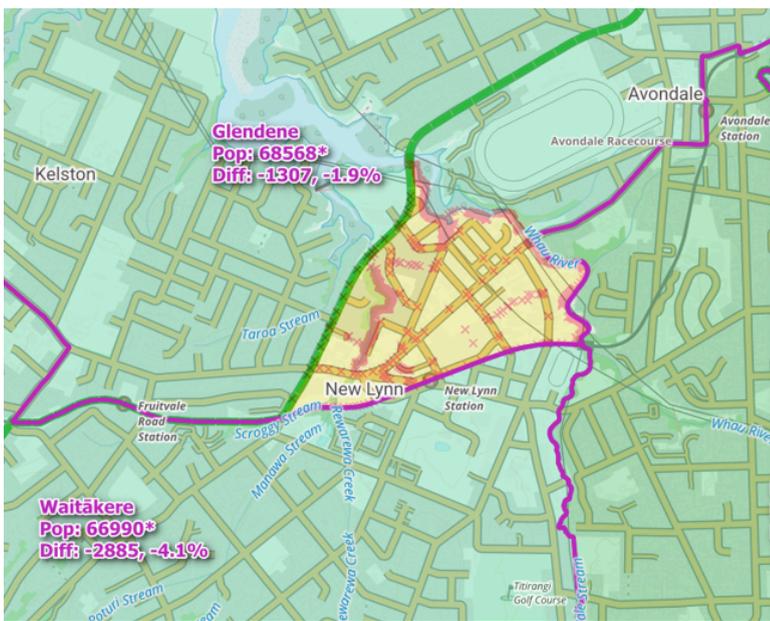
Auckland - Northcote

7 We received local feedback that the name of this electorate should be “Kapiātiki” rather than “Northcote”. This name has been used by tangata whenua and Auckland Council alike to refer to the coastal area in the northern Waitemātā that surrounds much of this seat. The boundary of the Parliamentary seat is substantially similar to the boundary of the Kaipātiki Local Board area in Auckland, which means there’s an existing association with the name for residents. The name change is also more inclusive for people who live in suburbs other than the suburb of Northcote (which itself accounts for less than 20% of the seat’s population). We submit that Kaipātiki is the appropriate name for this electorate, and request that the Commission adopt this name.

Auckland - New Lynn

8 We received feedback that the boundaries of the proposed Waitakere electorate should be extended to the north east to include all the New Lynn township within the electorate boundary. The township and suburb of New Lynn enjoys a natural boundary to the north of the Whau River, to the east along Portage Road, to the south, Golf Road taking in Hutchinson Avenue, and part way up Titirangi Road, and to the west along Croydon Road, roughly just past Fruitvale road. We propose that this should be the boundary.

9 Importantly, the township of New Lynn is next door to the New Lynn Transport Hub, which shares both rail and bus services as a transport centre to and from Tamaki Makaurau. It makes sense to include the “northern” portion of the New Lynn township – up to the Avondale racecourse - in the Waitakere Electorate, given the shared community of interest in both shared services within the township of New Lynn, the community centre/transport hub.



10 Our understanding is that this change would not take either Waitakere or Glendene outside the population tolerance. Our proposed boundary is illustrated on the map above.

Auckland - Wesley

11 We received local representations expressing concern about the proposed move of portions of Wesley from Mt Roskill to Mt Albert. As the Commission knows, Wesley has formed part of the Mt Roskill electorate for nearly all of its existence. One of the statutory criteria is the existing electorate boundaries, and we submit that this criteria should steer the Commission to prefer maps that keep previously co-represented communities together wherever possible. The current draft splits some Wesley residents who have a strong connection with Mt Roskill from its neighbouring suburbs to the south and east in a way that we believe may harm their representation and is avoidable.

12 Many people in the suburb of Wesley has strong communities of interest with nearby suburbs that remain in Mt Roskill, including:

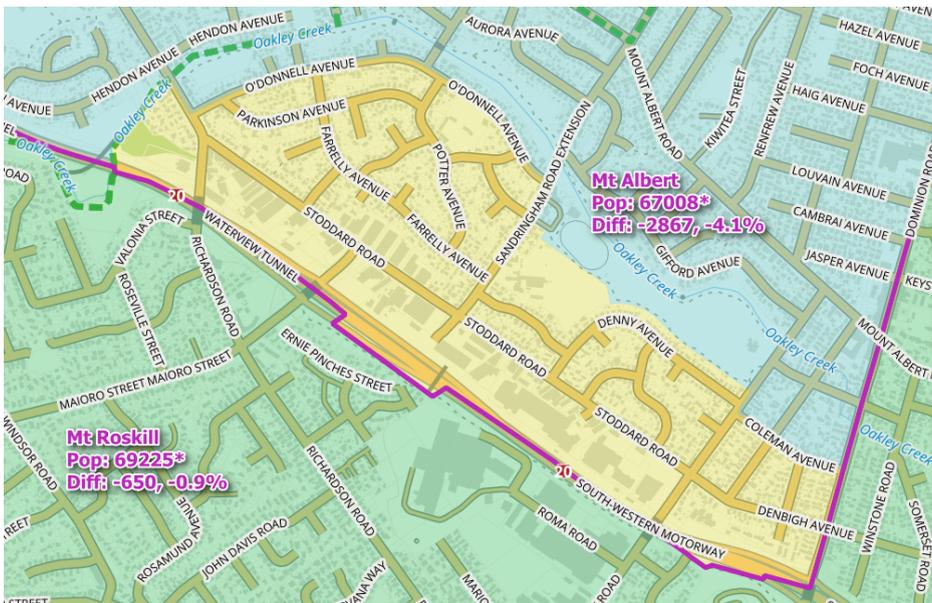
- a. The portion of Wesley south of Oakley Creek/Te Auaunga sits alongside other Mt Roskill communities in the Puketāpapa Local Board area. This area has continuously been associated with the Puketāpapa Local Board since its inception in 2010, and prior to that the Mt Roskill Community Board. Notably the area includes important civic facilities overseen by the Local Board such as the Wesley Community Centre, Roskill Youth Zone, the Mt Roskill War Memorial Hall, and the historic Lovelock track. These are facilities that are connected to, and well used by the broader Mt Roskill Community – for example the large annual Mt Roskill Anzac Service at the Mt Roskill War Memorial Hall and the twice weekly Wesley Markets which attracts people from across Mt Roskill.
- b. The enrolment zone for Wesley Intermediate School, which is located very near the draft electorate boundary, takes in areas of Wesley and also other areas south of the motorway within the Mt Roskill draft boundary.
- c. The connection between Wesley and the broader Mt Roskill community goes back to early periods of Auckland’s urban growth. The community is named for the Wesleyan Church, which had large land-holdings across Mt Roskill and ran the Wesleyan Native Institute in Three Kings. These communities are therefore connected by a common history and pattern of development.
- d. From the 1940s onwards Wesley was developed as a substantial state housing suburb. Around 75% of the current housing stock is owned by Housing New Zealand and there are associated high needs within the community. Much of the social support for people living in Wesley is in the Mt Roskill area including foodbanks, budgeting services, the Three Kings MSD office, and local electorate and List MP offices.
- e. More broadly, the character and connections of Wesley are intimately connected to the broader Mt Roskill community. One of Mt Roskill’s distinguishing features is that it is one of the most culturally and ethnically diverse communities in New Zealand and a part of this identity is the mix of communities in Wesley. It has been common for television news stories focussed on Mt Roskill to go to the shopping area at the intersection of Richardson

Rd and Stoddard Rd for footage because its diverse mix of people and street life is understood to represent the multicultural character of Mt Roskill.

- f. The community has a substantial Pasifika population as well as large communities of migrants and former refugees. Over time these communities have built strong links with institutions across Mt Roskill including churches and mosques. Key community facilities that provide important support to these communities include the Three Kings library and CAB, the Three Kings MSD, the Fickling Convention Centre which is often used for large community meetings, and most importantly the Mt Roskill campus which includes Mt Roskill Grammar School. The main local industrial/employment zone in this area is the Carr Road corridor which many people in Wesley travel to for work and accessing important services and shops. The main local public transport service is the 24 bus which runs on a north/south basis through Blockhouse Bay, Roskill South, and Wesley and then into the central city.

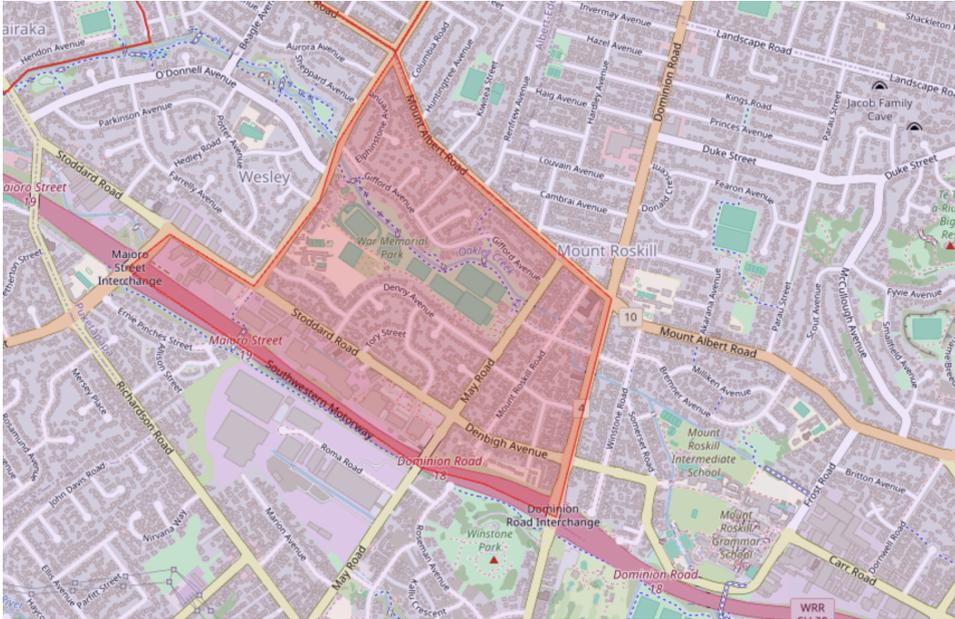
13 We submit that returning the south-eastern portion of Wesley to Mt Roskill will improve the representation of those residents. But we're aware that Wesley is a large suburb and shifting most or all of it would take both Mt Roskill and Mt Albert a long way outside the tolerance around the population quota, necessitating a long and difficult chain of knock-on changes. We don't propose that.

14 Proposal: Instead, we propose only to move a portion of Wesley to the south of Oakley Creek/Te Auaunga. This would keep the majority of the area including key local schools and community facilities connected with the broader Mt Roskill community. Oakley Creek/Te Auaunga is a well understood and legible local boundary that is surrounded on both sides by a long contiguous string of parks. We propose that this area, illustrated on the map below, move from Mt Albert to Mt Roskill.

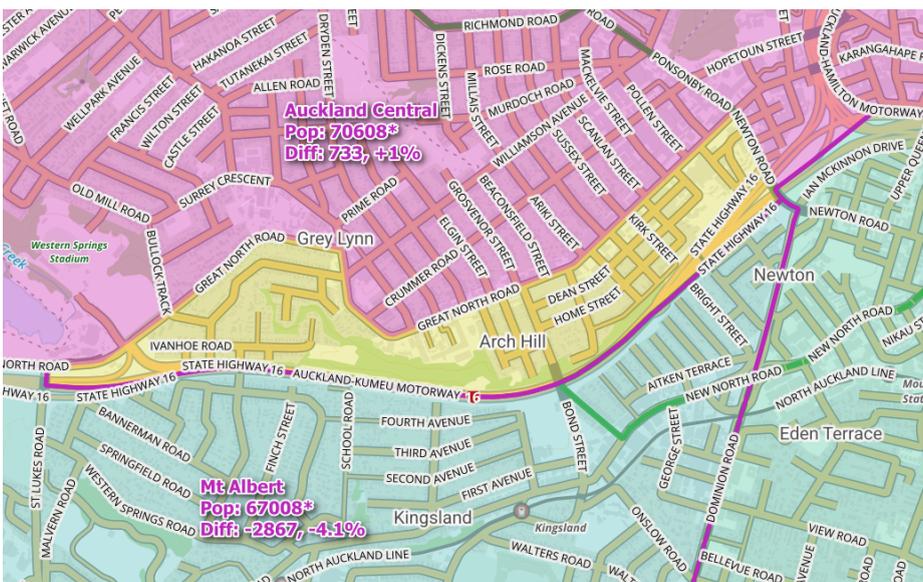


15 In making this proposal, we are aware that sometimes the Commission prefers natural features to form electorate boundaries, and at other times it prefers major roads. If the Commission would prefer to use major roads in this instance, there is an alternative proposal that achieves substantially the same

outcome but uses Mt Albert Road, Sandringham Road, Stoddard Road, and Maioro Street as the boundary instead of using Oakley Creek. While the arguments for each version of this boundary are broadly similar, there are some distinctions. For example our original creek-based proposal used more of the existing electorate boundary than this alternative proposal does, but the alternative road-based proposal keeps more of the area associated with Ōwairaka in Mt Albert. We've illustrated this alternative on the map below.



16 This change (and also the alternative we offered above) keeps Mt Roskill within tolerance, and takes Mt Albert only moderately outside the tolerance, requiring one knock-on alteration to the draft boundaries. We submit that the most appropriate area for that shift is the strip of Arch Hill north of the motorway and south of Great North Road, illustrated in the map below. If returned from Auckland Central to Mt Albert, where the area has been represented up to now, it would bring Mt Albert back within tolerance without sending Auckland Central outside the tolerance.



17 Arch Hill has been represented through the Mt Albert electorate up to now, and this change would return it to its current electorate. While we acknowledge the urban motorway is one appropriate potential boundary, we submit that the major arterial route of Great North Road is also a helpful boundary line. Further, most of the area north of the motorway but south of Great North Road is in the enrollment zone for Kowhai Intermediate School. The school itself is located in the Mt Albert draft boundaries and its zone also takes in a significant proportion of the Mt Albert electorate.

18 We submit that returning a portion of Wesley to Mt Roskill, and returning a portion of Arch Hill to Mt Albert, has the additional benefit of reducing the number of Auckland residents who are shifting electorates as a result of the boundary review. This provides those residents remaining with their current electorate better continuity of representation.

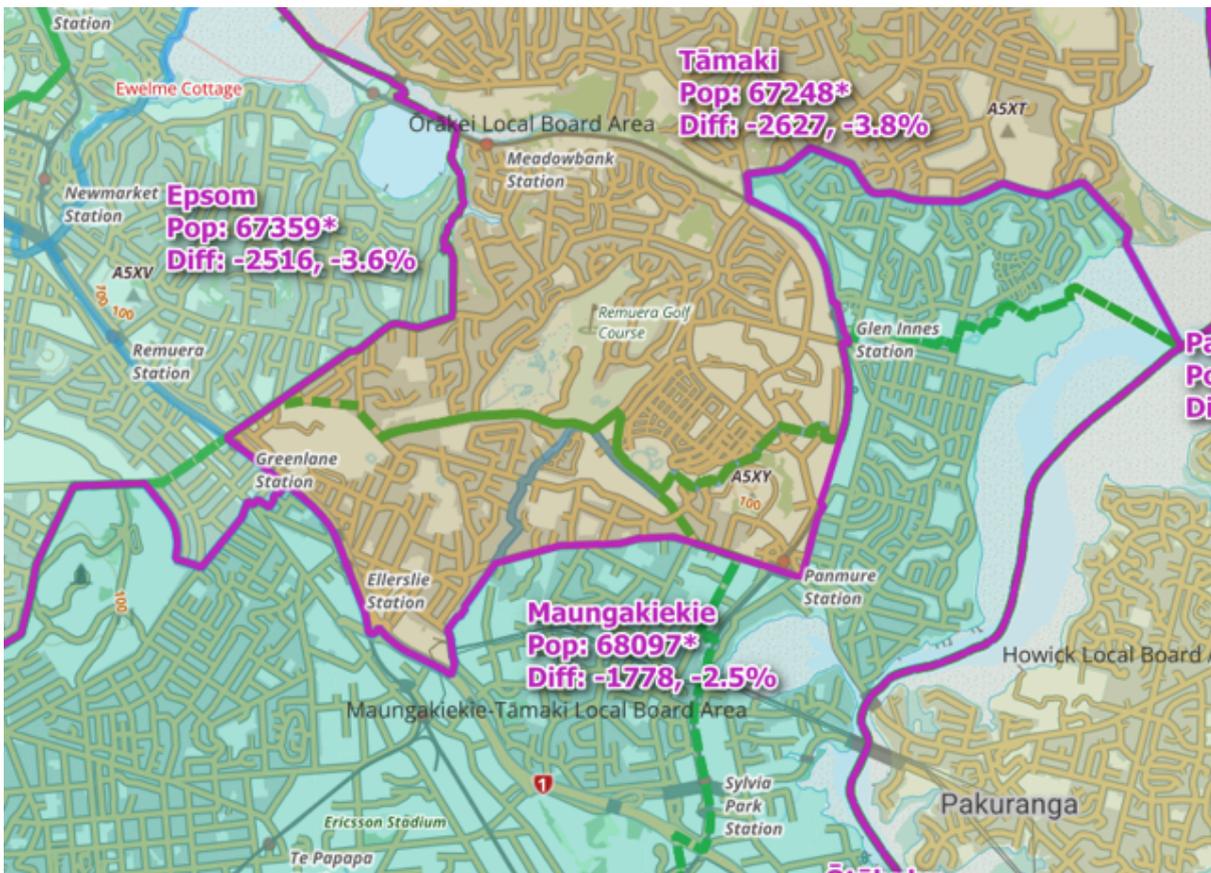
Auckland - Point England and Glen Innes

19 The draft boundaries propose to split Point England and Glen Innes from the neighbouring communities of Tāmaki and Panmure, putting Point England and Glen Innes in the Tāmaki electorate and Tāmaki / Panmure into Maungakiekie. We submit that these suburbs share several strong communities of interest, and should not be split from each other where that is avoidable. These communities of interest include:

- a. Panmure, Tāmaki, Point England, and Glen Innes are all within both the Maungakiekie-Tāmaki Local Board area, and Tāmaki, Point England, and Glen Innes are also within boundaries of the Tāmaki Regeneration Project. These two organisations create significant governance and urban development communities of interest for the residents in these areas
- b. Point England and Glen Innes, like Tāmaki and Panmure, sits inside the boundaries of the Tāmaki Regeneration Programme, one of largest urban renewal projects in New Zealand's recent history. The development of new housing opportunities and shared facilities across this rohe generates and deepens communities of interest between the included suburbs.
- c. The LDS congregation in Glen Innes draws in significant attendance from the Pacific populations of Glen Innes, Point England, and Tāmaki. The Pacific Islanders Presbyterian Church in Glen Innes serves a similar community role, again with a focus on Glen Innes, Point England, and Tamaki.
- d. Ruapōtaka marae provides social services to populations across all four of these suburbs
- e. The enrolment zone for Tamaki College takes in the populations of Tāmaki, Point England, and Glen Innes, creating ongoing communities of interest between residents of the three suburbs. In contrast, residents in Glen Innes (the northernmost of the suburbs) are not in the zone for either Glendowie School or Glendowie College, the southernmost coastal suburbs in what we propose as the Tāmaki electorate. This means that, in this dimension, there is less community of interest between Glen Innes and the suburbs to its north than between Glen Innes and suburbs to its south.

20 **Proposal:** We propose that Maungakiekie should be extended to the northeast to include Point England, so that the new boundary follows the previous boundary between Panmure-Otahuhu and Tāmaki.

21 This change would take both Maungakiekie and Tāmaki outside the tolerance around the population quota. As a result, we propose one further knock-on change along the same boundary, which is to extend Tāmaki’s southern boundary to include more of Ellerslie than it already does. Specifically, we propose that the area of Ellerslie east of SH1 and North of the Ellerslie-Panmure highway should be included in Tāmaki’s boundaries. This is principally because major roads such as SH1 and the Ellerslie-Panmure highway serve to divide the communities that sit on either side. This makes them helpful electorate boundaries.



22 If the Commission adopts these two changes (which we illustrate on the map above), it will improve representation for the residents of Ellerslie, Point England, and Glen Innes alike by pairing them with other nearby communities where they have better shared communities of interest, compared to the draft boundaries.

Napier - Tukituki

23 Several of our Napier stakeholders objected to the decision to extend Napier’s boundary north into East Coast rather than South into Tukitiki. This is due to their view that people living north of the Wharerata Hills have no geographical connection to, or community of interest with Napier and identify as

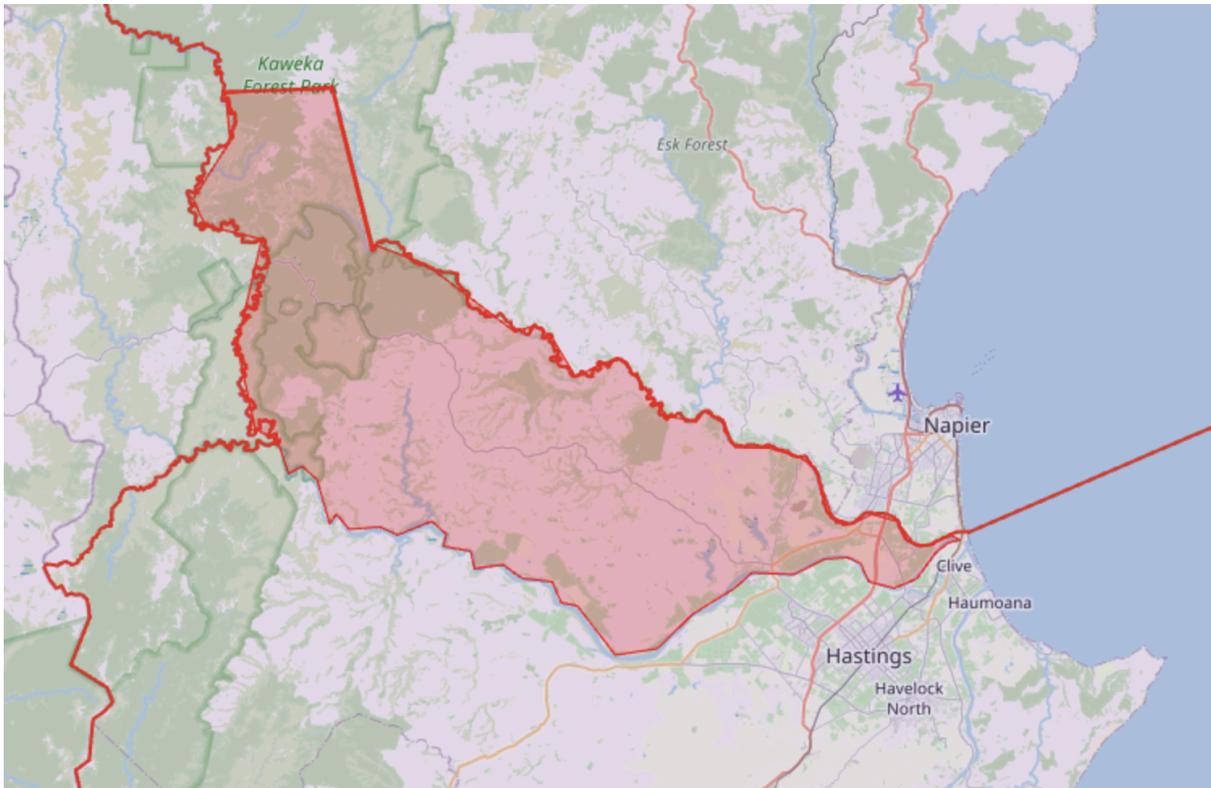
being part of the East Coast. At the same time the Napier Golf Club and the Marae for the Hāpū who hold Mana Whenua status over Napier is currently in the Tukituki Electorate

24 In the north the communities of Waipaoa, Pātūtahi Whatatuhu, Te Karaka and Manutūkē have strong links to those throughout the East Coast region, while being distinct from the communities where the bulk of the population of the Napier electorate lives. Moving these communities from East Coast into Napier would mean they are likely to be represented by an MP whose prime concerns are distinct from their own.

25 Instead, we propose that Napier’s northern boundary remains unchanged and its southern with Tukituki be shifted south so it follows the Ngaruroro river instead of the Tutaekuri river.

26 As well as helping people in the north of the electorate maintain their links to the East Coast, this boundary would also have several benefits for residents living between the Ngaruroro and Tutaekuri rivers. The Napier based Te Taiwhenua o Te Whanganui ā Orotū having all their Marae in the Napier Electorate would be unifying, for example. The new boundary would also follow the southern boundary of the enrollment zone for Taradale High School, which is located in Napier. And the Napier golf club would be in the Napier electorate.

27 Our understanding is that making this change to Napier’s northern and southern boundaries would leave East Coast, Napier, and Tukituki all within population tolerance. Our proposal in relation to the southern boundary is illustrated in the map below.



Wellington - Broadmeadows

28 We received feedback from local residents who supported the Commission’s decision to draw the Wellington Central / Kenepuru boundary so the suburb of Broadmeadows in Wellington Central and the nearby Malvina Major retirement village and surrounds are in Kenepuru. With both electorates above the population quota, we’re aware there’s limited flexibility to draw the boundary in this area, and we submit that the Commission has found a helpful line. Because the draft boundary divides two communities that, while geographically nearby, are demographically quite different from each other, their communities of interest are more limited than many other neighbouring communities. These include:

- a. The boundary as drawn helpfully follows a local body ward boundary
- b. The most convenient community facilities for the residents of the retirement community at Melvina Major are to the north in Johnsonville, also inside the Kenepuru boundaries. The nearest facilities to the south, in Khandallah, are about the same road distance but over much hillier terrain for residents.
- c. By contrast Broadmeadows is part of the ‘ORCA’ Onslow Residents Community Association network and so is most appropriately associated with Khandallah.

29 On that basis, we wish to record our support for the Commission’s decision.

Hutt Valley

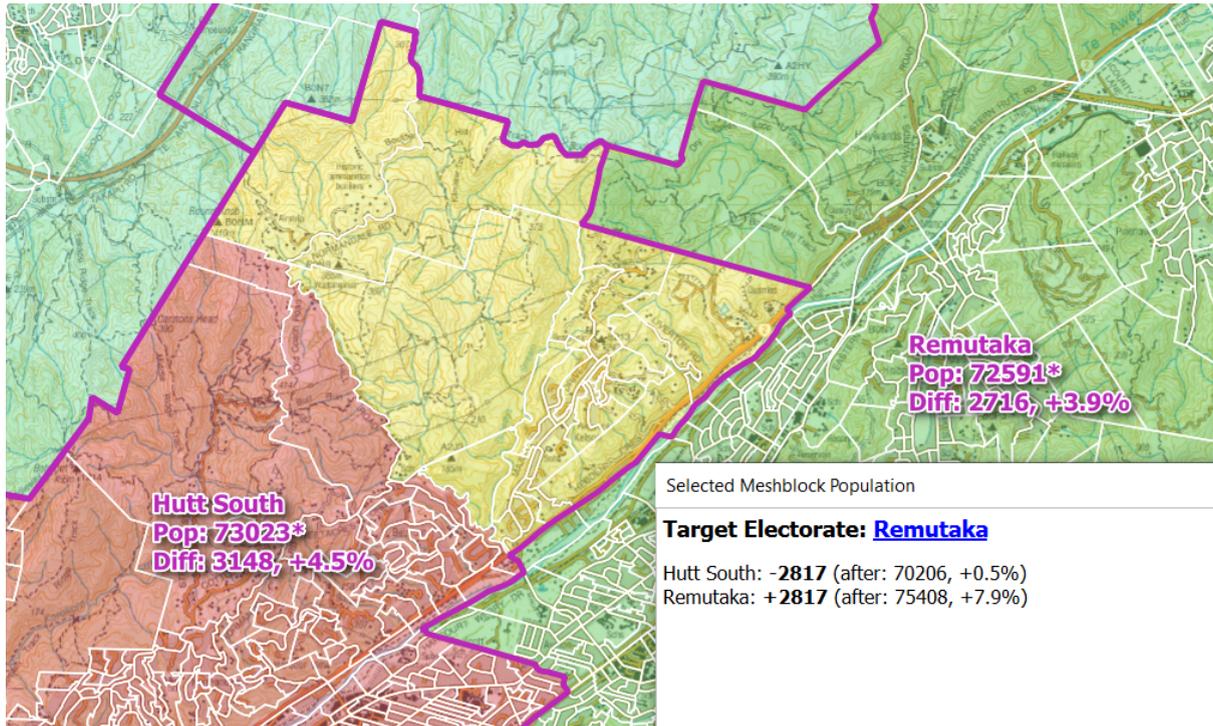
30 We received representations that the suburb of Kelson on the western side of the Hutt Valley has a stronger community of interest with Remutaka than with Hutt South. This community of interest is, in part, driven by the geography of the area. Kelson does not have a local transport link with other suburbs in the Western Hutt hills, as they are separated by the Pareraho Forest. Instead, the suburb’s transport connections with all other parts of the valley runs via SH2. This means Kelson’s community connections and major employment are mainly located on the eastern side of the Hutt river, the closest such suburbs being Taita and Avalon which are accessed via the Kennedy Good bridge. Both those suburbs are in the Remutaka electorate.

31 While Kelson has its own primary school (years 1-6), it is in-zone for only one intermediate school (years 7-8). That school is Naenae Intermediate, which is located in Remutaka and otherwise draws from suburbs also in Remutaka. This further strengthens the community of interest between Kelson families and the Avalon / Taita / Naenae community in Remutaka. It’s worth noting that the zone for Naenae Intermediate excludes students from Belmont, Kelson’s neighbouring suburb on the western Hutt hills. In addition, the nearest public secondary school for families in Kelson is Naenae College, which is in Remutaka.

32 Kelson has also been included in Remutaka in some previous iterations of the electoral boundaries.

33 Our analysis is that shifting Kelson to Remutaka would take Remutaka outside the tolerance around the population quota. However, this is easily remedied by returning to the existing (2020) Remutaka / Hutt South boundary line in the Hutt valley floor. This would return areas such as Fairfield to Hutt South where they are currently represented. Our local feedback indicates that the community of interest considerations that led the Commission to include these areas in Hutt South in 2020 remain just as strong today as they were then.

34 Recommendation: We recommend that Kelson should be moved from Hutt South to Remutaka, and the valley floor boundary for the 2020 and 2023 elections should be retained. Our proposed map of the redrawn Hutt South - Remutaka boundary appears below.



Christchurch

35 We received significant representations from residents and organisations in the Christchurch suburb of Spreydon. Members of the community felt that they should not be split between Christchurch Central and Wigram, and that the portion of the suburb currently proposed to be in Christchurch Central has significant communities of interest with Wigram (namely with the rest of Spreydon and Hoon Hay). The area concerned is West of Selwyn Street, between Brougham Street in the North and Milton/ Frankleigh Streets in the South.

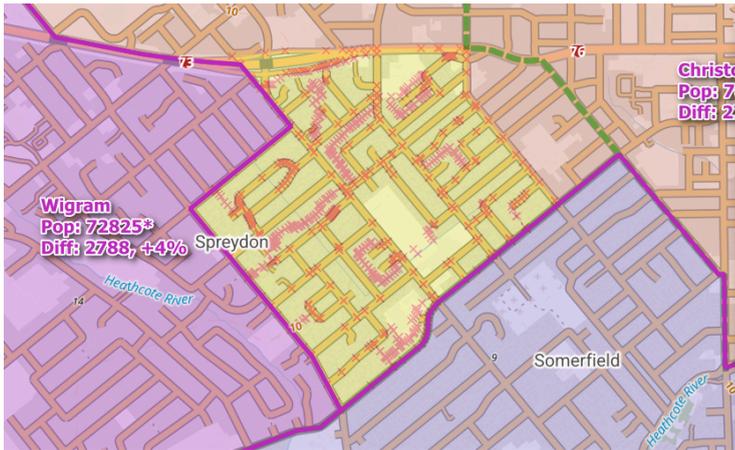
36 The proposed boundary along Neville St and Barrington Street is not a boundary that makes any sense from the communities' perspectives. There is no community or geographical rationale for dividing this community in half along this boundary. There is no other community, educational or electoral boundary that aligns with the commission's proposal. For example:

- a. Residents Association – The Spreydon Neighbourhood Network has a boundary that extends to Selwyn Street in the east. The current proposed boundary effectively divides the Association’s area in half.
- b. The local body boundary extends to Antigua/Strickland Streets in the east. Again the commission’s proposed boundary effectively divides this ward in half. Our recommendation (below) would bring the electorate boundary more in line with the local government boundary.
- c. Educational boundaries - The commission’s proposed area also forms around half of the enrolment zone for West Spreydon School. The remaining half of the enrolment zone, and the school itself, remain in Wigram according to the draft boundaries. This means a significant community of interest linking this part of Spreydon with other communities within the Wigram electorate can be expected to remain in future years. Likewise, the Hillmorton High School enrolment zone extends down Selwyn St in the North along to Coronation St and then down Barrington Street.
- d. That area of Spreydon is currently in the Wigram electorate and residents are used to being represented through a Wigram-based MP.

37 The most central street through Spreydon is Barrington Street. Rather than being a boundary between separate communities it forms a village centre. Barrington Mall is a centre for the community. It includes a major supermarket, pharmacy, The Warehouse, banks and post office facilities. There is also a major GP facility for the community located over the road from the mall. Next to the Mall is the Spreydon Library and Barrington Park. Barrington Mall is also the central public transport hub and interchange for this area of South West Christchurch. On the proposed boundaries these facilities would all be in Christchurch Central but serve the communities of Spreydon and surrounding suburbs to the west in the Wigram electorate.

38 Locally there are strong community connections between Spreydon as a whole and the suburbs to the west of Hoon Hay and Hillmorton. Central to the provision of social services in South West Christchurch is South West Baptist Church. This church and its associated social services are a critical epicentre in the Spreydon/ Hoon Hay/ Hillmorton Communities. There is alignment of need across these communities. On the current boundaries South West Baptist Church would sit outside the Wigram electorate.

39 Recommendation: For these reasons, we recommend the area of Spreydon west of Selwyn Street, between Brougham Street in the North and Milton/ Frankleigh Streets in the South, should be returned to Wigram, so that the Wigram - Christchurch Central boundary runs down Selwyn Street from the motorway all the way to Milton Street. We illustrate this recommendation on the map below.



40 Our analysis indicates that adopting this change would drop Christchurch Central a little below the tolerance of the population quota and would mean Wigram is above the maximum allowed population. There are three knock-on changes the Commission can make elsewhere that bring these electorates back within tolerance of the quota, keep other Christchurch electorates within quota, and improve the communities of interest for the affected areas. The areas are:

- a. The area south of Yaldhurst Road bound by Racecourse Road Main South Road and Epsom Road has stronger community of interest ties with Avonhead and Russley across the other side of Yaldhurst Road and can better be represented via Ilam.
- b. The rural area south of Prebbleton, taking in Ladbrooks and surrounds, can be returned to Selwyn where it has been represented up to now. While Prebbleton is a suburban dormitory suburb, the areas to the South are substantially rural in their nature and have virtually no community of interests with the suburbs in Wigram. Significant local issues in this area such as the management of water races would be better represented from the Selwyn electorate.
- c. The area of Bishopdale that was previously in Christchurch Central but on the draft boundaries shifts to Ilam, and a small extra area of Bishopdale bordered by Harewood Ave, Highsted Road, and Sawyers Arms Road. We propose these areas should be in Christchurch Central. This move unifies the Bishopdale community in one electorate. Under this proposal, the electorate boundary would follow much of the Bishopdale School enrolment zone boundary. The Christchurch Central boundary would also more closely align with the Papanui Ward boundary in local elections than it does under the draft boundaries.

41 Recommendation: We recommend that, as a consequence of improving the community of interest for residents of Spreydon, that the Commission also make the three small changes detailed above. Maps illustrating the changes appear below.

