



Address all correspondence to:
The Chief Executive

Our Reference
ID 248025

19 December 2019

Representation Commission
PO Box 3220
Wellington 6140

To whom it may concern

Proposed electoral boundary review

1. Summary

The New Zealand Representation Commission (the Commission) has proposed changes to the electoral districts (or electorates) for public discussion and consultation. The proposal would have a significant impact on the Clutha District, and this letter outlines the main concerns of Clutha District Council (CDC) in regards to the Clutha-Southland electorate.

The current boundaries are shown in Figure 1 (a), while the Commission's proposed changes are shown in Figure 1 (b). Rather than splitting the Clutha District into three different electorates (as proposed), CDC has provided an alternative proposal which meets the requirements of the Act, and also avoids unnecessary disturbance to the five electorates in the lower South Island. This suggested solution is shown in Figure 1 (c).

2. Assessment of the Electoral Commission's proposal – Clutha District concerns

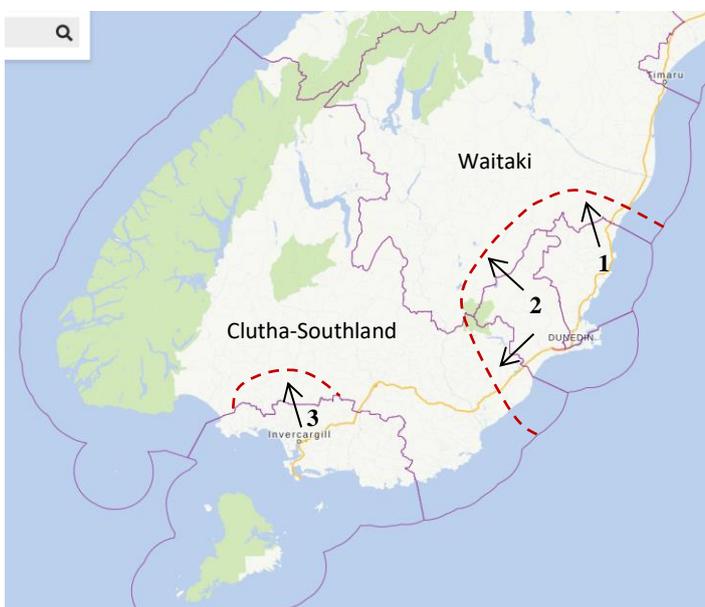
The 'NZ Electorate Boundary Review' (the review) states that the Commission is required to give due consideration to certain criteria when dividing New Zealand into General electorates. These criteria are listed in Table 1, along with CDC's assessment of whether the proposed changes adequately meet these requirements.



(a) Current boundaries



(b) Representation Commission Proposal (see also Figure 2)



(c) CDC Proposal (indicative boundaries only)

1. Dunedin North - gains 3,000 from Waitaki
2. Dunedin South - gains 1,500 from Waitaki and 2,500 from Clutha-Southland
3. Invercargill - gains 4,500 from Clutha-Southland

Figure 1. Current electorate boundaries (a); and boundaries proposed by the Commission (b) and CDC (c)

Table 1 Criteria for determining electorate boundaries, and summary of CDC concerns.

Criteria	Criteria met?	Comment
1. Electorate population must be within plus or minus 5% of the quota allowance of 65,458 people	Yes	The boundary changes proposed by the Commission result in a Clutha-Southland electorate population of 64,228 (-1.9% of quota). However, the proposed boundary realignment has been done in a manner that does not meet other criteria, and involves some indiscriminate and unnecessary changes. In particular, the proposal to 'swap' 12,200 people currently living in the Clutha-Southland electorate for 10,300 people currently living in the Waitaki electorate makes little sense in terms of continuity or defining communities of interest (Figure 2). An alternative method, involving more subtle boundary changes, and allowing for more natural growth / contraction of existing electorates is outlined in Section 3 and summarised in Figure 1 (c).
2. Existing General electorate boundaries	No	The changes proposed by the Commission (as shown in Figure 1 (b)) would result in a Clutha-Southland electorate which in no way resembles the current electorate boundaries.
3. Community of interest	No	As shown in Table 2, the changes by the Commission would result in the Clutha District's 'community of interest' being split amongst three different electorates. In many cases, there is little similarity between communities included in the rearranged electorates. ¹
4. Facilities of communications	No	Assuming that this item refers to the ability for constituents to communicate easily amongst themselves and with their MP, then the proposal does not meet this criterion. ² As noted, there is little similarity between many of the communities included in the proposed Dunedin South electorate, and therefore little opportunity for constituents to communicate easily. At present, residents of the Clutha District are represented by one Member of Parliament (MP). Under the changes proposed by the Commission, there would be three different MP's, representing different parts of the district.
5. Topographical features	No	At present, the Clutha-Southland electorate includes all of the Clutha District, which in turn is generally defined by the catchment boundary of the lower Clutha River. The proposed Dunedin South electorate ³ does not follow any natural topographical features, and straddles parts (but not all) of the Taieri and Clutha catchments, as well as the very small (but densely populated) South Dunedin catchment.
6. Any projected variation in the General electoral population of those electorates	Yes	The proposal does allow for anticipated population growth in the Clutha-Southland electorate. However, the alternative method outlined in section 3 also provides some room for anticipated growth.

¹ There are many examples, with just one being the obvious differences between the tiny farming settlement of Clydevale in the heart of rural Clutha and the densely urban South Dunedin community – both of which are proposed to be in the 'Dunedin South' electorate.

² There is little explanation of what this criterion actually means in either the Electoral Act or the review.

³ Which would take in many South Otago communities (Table 2)

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Table 2 The current electorate of the main towns in the Clutha District, and the electorate those towns would sit within, under the proposals put forward by the Representation Commission, and the Clutha District Council

Town	Current electorate (a)	Electorate under the Representation Commission Proposal (b)	Electorate under the Clutha District Council proposal (c)
Balclutha	Clutha-Southland	Dunedin South	Clutha-Southland
Milton	Clutha-Southland	Dunedin South	Clutha-Southland
Kaitangata	Clutha-Southland	Dunedin South	Clutha-Southland
Lawrence	Clutha-Southland	Dunedin South	Clutha-Southland
Waihola	Clutha-Southland	Dunedin South	Dunedin South
Kaka Point	Clutha-Southland	Dunedin South	Clutha-Southland
Clydevale	Clutha-Southland	Dunedin South	Clutha-Southland
Tapanui	Clutha-Southland	Clutha-Southland	Clutha-Southland
Clinton	Clutha-Southland	Clutha-Southland	Clutha-Southland
Owaka	Clutha-Southland	Invercargill	Clutha-Southland
Papatowai	Clutha-Southland	Invercargill	Clutha-Southland

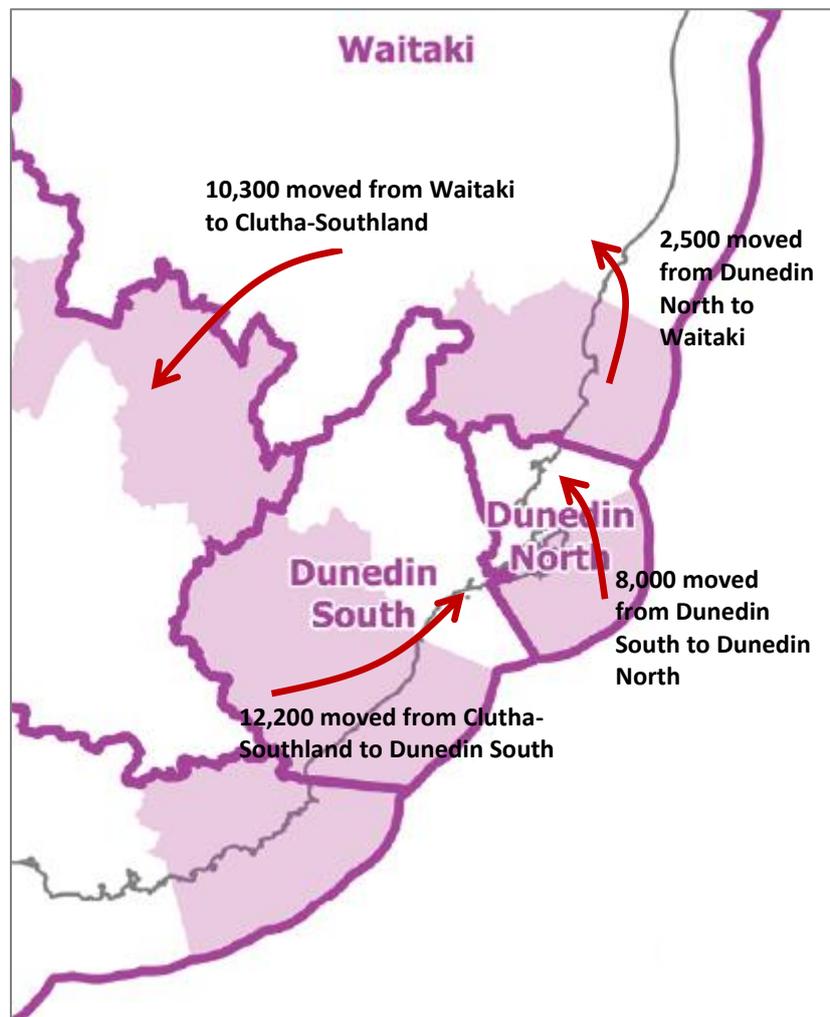


Figure 2 Diagram illustrating the 'population go-round' proposed by the Commission, for the Waitaki, Clutha-Southland, Dunedin South and Dunedin North electorates (source: NZ Electorate Boundary Review).

3. Alternative CDC proposal

There is an obvious need to balance electorate populations, so that they meet the target quota. However, CDC disagrees with the proposal to split communities within the Clutha District amongst three different electorates (as shown in Table 2), or to create a major 'population go-round' (as shown in Figure 2).

CDC proposes that the requirements of the Electoral Act can still be met, under an alternative proposal which allows for required growth in lower population electorates (Invercargill, Dunedin South and Dunedin North), at the expense of neighbouring overpopulated electorates. It is proposed that this growth occurs 'naturally', around the margins of the two larger cities, rather than major population swaps, and this concept is shown in Figure 1 (c)).

At the time this letter was prepared, there was limited 2018 census information available to determine the exact areas where these changes would occur, but reasonable assumptions have been made about the numbers of people within certain areas (e.g. Waihola, Ranfurly/Maniototo, Palmerston). The latest available local-scale data from the 2013 census has been also been considered.

3.1 Summary of boundary adjustments proposed by CDC

The main components of the proposal suggested by CDC are listed as items 1 to 5 below. It is noted that in total, this proposal would ensure that all lower South Island electorates were within the allowable population quota, and that the other criteria for determining electorate boundaries were also met. The CDC proposal is shown spatially in Figure 1 (c), and also summarised in Table 3.

- 1) *Balancing the Clutha-Southland / Invercargill electorates:* CDC agrees that it makes sense to expand the Invercargill electorate by about 4,500 people, at the expense of Clutha-Southland. It also makes sense for this change to include the Winton area, as proposed. However, rather than add 1,000 people to Invercargill from The Catlins, it would make more sense to expand Invercargill into similar communities of interest in rural Southland – for example around Otautau or Maitua.
- 2) *Balancing the Clutha-Southland / Dunedin South electorates:* Clutha-Southland could also lose about 2,500 people from the Waihola / Bruce area to Dunedin South. Of the communities in the Clutha District, this area has the closest alignment with Dunedin.
- 3) *Balancing the Dunedin / Waitaki electorates:* CDC proposes that the two Dunedin electorates expand outwards (i.e. north, south and west), to include the Waihola / Bruce area (as above), as well as neighbouring parts of the Waitaki electorate. The proposal is for approximately 4,500 people to move from Waitaki, to be spread amongst the two Dunedin electorates.
- 4) These changes mean that Clutha-Southland, as well as its neighbouring electorates would all meet the population quota (Table 3), without the need for the wholesale 'swapping' of population between various electorates currently proposed (Figure 2).
- 5) Also as a result of this proposal, Clutha-Southland would be beneath the target quota, allowing for the future growth expected to occur in this electorate.

Table 3. Alternative CDC proposal, describing changes and resulting electorate populations⁴

Electorate	Current Population	CDC Proposed Change	Resulting Population
Clutha-Southland	70,613	Lose 4,500 to Invercargill. ⁵ Lose 2,500 to Dunedin South	63,600 (-2.9%)
Invercargill	61,357	Gain 4,500 from Clutha-Southland	65,857 (+0.6%)
Waitaki	72,752	Lose 4,500 to the 2 Dunedin electorates, and 1,500 to the Rangitata electorate ⁶ (total loss 6,000).	66,750 (+1.9%)
Dunedin North	61,687	Gain 3,000 from Waitaki (e.g. from Waihemo / Maheno areas)	64,700 (-1.2%)
Dunedin South	61,125	Gain 2,500 from Clutha-Southland (Waihola / Bruce area) Gain 1,500 from Waitaki (e.g. from Ranfurly area)	65,125 (-0.5%)

Yours sincerely



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Clutha District

⁴ Note that the target quota for each electorate is 65,458 people

⁵ as proposed

⁶ Which, according to the consultation document, is currently below quota

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