

**Submission Number:** 38  
**Response ID:** C18C/104687  
**First Name:** Lionel  
**Last Name:** Hume  
**Organisation:** South Canterbury Federated Farmers

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Dear Sir/Madam,

Attached is South Canterbury Federated Farmers' submission on the Environment Canterbury Representation Review Proposal 2018.

Yours sincerely,

**DR LIONEL HUME**  
SENIOR POLICY ADVISOR

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## South Canterbury Province Federated Farmers of New Zealand

### Submission on: Environment Canterbury Representation Review

30 July 2018

**SUBMISSION TO ENVIRONMENT CANTERBURY  
ON ITS REPRESENTATION REVIEW PROPOSAL 2018**

**Submitter details**

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# **SUBMISSION ON THE ENVIRONMENT CANTERBURY REPRESENTATION REVIEW PROPOSAL 2018**

## **Introduction**

South Canterbury Federated Farmers welcomes the opportunity to submit on the Environment Canterbury Representation Review Proposal 2018.

Federated Farmers of New Zealand is a voluntary, primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers and their communities.

Federated Farmers aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which:

- Our members may operate their businesses in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

The economic importance of the agricultural sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%. Land-based primary sector exports comprise about 70% of New Zealand's total exports. Any council activity which affects farm businesses has the potential to also impact, positively or negatively, on district, regional and national economies.

This submission was developed in consultation with the members and policy staff of Federated Farmers.

South Canterbury Federated Farmers acknowledges any submissions individual members of Federated Farmers.

South Canterbury Federated Farmers wishes to be heard in support of its submission and requests that the hearing be located in South Canterbury.

## **Key Submissions**

1. South Canterbury Federated Farmers supports the proposed number of constituencies.
2. South Canterbury Federated Farmers supports the proposed names of the constituencies and the proposed boundaries of those constituencies.
3. South Canterbury Federated Farmers requests that the number of representatives for the South Canterbury Constituency be increased to 2, and that the total number of councillors

be increased to 14. This is necessary in order to provide strong representation for the diverse communities of interest in the South Canterbury Constituency, recognising the intense public scrutiny of environmental issues currently playing out in South Canterbury, particularly in the Mackenzie Basin. It should be noted that increasing the number of South Canterbury councillors to 2, in a 14 member council, would result representation for South Canterbury which deviates from the regional average (on a population basis) by essentially the same magnitude as the current proposal (as detailed below).

4. South Canterbury Federated Farmers requests that the current representation review proposal be amended by increasing the number of representatives for the South Canterbury Constituency to 2, and the total number of councillors to 14.

## **Detailed Submissions**

### **The proposal**

The proposal is to move to a fully elected council in 2019, with 13 members elected from 7 constituencies. It is proposed that there would be 2 members each from four city constituencies, Christchurch North, Christchurch Central, Christchurch West and Christchurch South. The proposal defines 3 rural constituencies, North Canterbury, Mid Canterbury and South Canterbury, with 2 members representing each of North Canterbury and Mid Canterbury but only one member representing South Canterbury.

### **Representation on a population basis**

We note that 4 constituencies do not comply with the +/- 10% population rule, which seeks to deliver uniform population-based representation in compliance with s19V(2) of the Local Electoral Act 2001. The greatest deviation is in the South Canterbury Constituency (+30.2% deviation from the region average), meaning that South Canterbury would be under-represented relative to the other constituencies. It should be noted that if the South Canterbury Constituency was represented by 2 councillors, in a 14 member council (as requested below), this would result in a -29.9% deviation from the region average, essentially the same magnitude of deviation as under the current proposal.

### **Communities of interest**

Section 19U(a) of the Local Electoral Act 2001 requires *that the number and boundaries of constituencies will provide effective representation of communities of interest within the region*. Further, non-compliance with s19V(2) (population rule) is permitted to enable effective representation of communities of interest that have been united within a ward or sub-division (s19V(3)(a)(iii)).

The South Canterbury Constituency is the largest constituency by size. This, combined with its diverse landscape, its diversity of land uses and external pressure (including from urban communities within Canterbury) for far-reaching environmental protections over parts of the constituency (particularly the Mackenzie Basin), means that strong representation is crucial in the regional council forum.

Environment Canterbury is currently engaging in water quality and quantity limit-setting processes throughout the region. These processes are controversial and potentially have a great impact on the economic wellbeing and viability of rural communities. Effective representation of rural constituencies is necessary to ensure the appropriate oversight and equity of these processes.

The Mackenzie Basin is a particular focus of public interest. Land use constraints flowing from implementation of the National Policy Statement for Freshwater Management, the Regional Policy Statement, the Upper Waitaki provisions of Plan Change 5 to the Canterbury Land and Water Regional Plan and Plan Change 13 to the Mackenzie District Plan, all have the potential to substantially affect the economic and social viability of the area. In addition to the effects of planning instruments, there is increasing public focus on the implementation of consents that have been already granted, such as those for the planned land use changes on Simon's Pass Station.

In contrast, issues in the more coastal areas of South Canterbury, with intensive pastoral and arable land uses and more highly modified environments, are distinctly different, with a relatively greater focus on nutrient discharge and impacts on surface and groundwater quality. Issues include the implementation of Plan Change 3 and Plan Change 5 (Lower Waitaki provisions) to the Land and Water Regional Plan, irrigation scheme development and the augmentation of Wainono Lagoon.

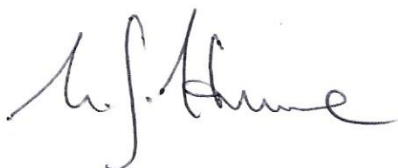
The Mackenzie Basin/Upper Waitaki and coastal South Canterbury areas have communities of interest which are varied and distinct, and parts of the constituency are the focus of intense public scrutiny. In addition, the South Canterbury Constituency hosts a disproportionate amount of nationally significant infrastructure, such as the Waitaki hydro-electricity generation dams. Therefore, it is vital that the varied communities of interest are strongly represented, in order to safeguard the interests of those who live, work and recreate in the constituency. It would be very difficult for a single councillor to stay abreast of the large number of issues currently playing out in the constituency and provide strong representation for the diverse communities of interest.

Therefore, South Canterbury Federated Farmers asks that the number of representatives for the South Canterbury Constituency be increased to 2, and that the total number of councillors be increased to 14.

Further, if effective representation cannot be provided for essentially rural constituencies such as South Canterbury, the over-arching structure of local government in the region needs to be re-thought, with a view to possibly establishing a South Canterbury Unitary Authority.

## **Conclusion**

South Canterbury Federated Farmers thanks the Environment Canterbury for the opportunity to submit on its 2018 representation review proposal. It is vital that representation on Council reflects the diverse landscapes, land uses and unique communities of interest that exist throughout the Canterbury/North Otago region.



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Jason Grant  
President, South Canterbury Province  
Federated Farmers of New Zealand