

From: Matt Whitehead
To: [Mailroom Mailbox](#)
Subject: Representation Review Appeals and Objections
Date: Saturday, 29 September 2018 2:58:02 PM
Attachments: [Objection to the report on Environment Canterbury local elections.docx](#)

Please find my objection (and counter-proposal) attached.

Kind regards,
Matthew Whitehead.

Objection to the report on Environment Canterbury local elections

Personal notes

I am currently resident in Wellington, and am only submitting in the interests of democracy being well-served, with no particular interest in local Canterbury politics.

I am an enthusiast of electoral reform, polling, and responsive government, but not a formal expert.

I am currently a member of the Green Party.

I have family members resident in Canterbury but have not consulted them before writing this submission.

Initial thoughts

The proposed report presents some troubling facts. Firstly, that a council that was not legitimately elected in its entirety has ruled out electoral reform for the next elected council without an overwhelmingly supportive consultation period should worry residents of Canterbury- at worst this issue should be kicked to touch for a legitimately elected regional council to deal with, and ideally a referendum should be held before local body elections on whether to stick with FPP.

Secondly, that the council has the audacity to request it be allowed to hold elections in which a *majority* of districts have an unacceptable variance from the average population per representative should be regarded as negligent at best, or an insulting attempt at gerrymandering a rural majority at worst. Even though it is a slight improvement on the original proposal, I can't endorse it. This is sad because the reasons the report gives for its decision to increase representatives in South Canterbury-Ōtuhituhi are good ones that I support, and aligning city and regional districts does make sense, I just don't think they can merit a final proposal like this.

What the current proposal looks like

7 Constituencies	Population	No. of Councillors per constituency	Population per councillor	Deviation from region average (43,734)	Percentage deviation from region average
North Canterbury-Ōpukepuke	75800	2	37900	-5834	-13.34%
Mid-Canterbury-Ōpākihi	93440	2	46720	2986	6.83%
South Canterbury-Ōtuhituhi	61320	2	30660	-13074	-29.89%
Christchurch North East-Ōrei	100400	2	50200	6466	14.78%
Christchurch West-Ōpuna	95700	2	47850	4116	9.41%
Christchurch Central-Ōhoko	103300	2	51650	7916	18.10%
Christchurch South-Ōwhanga	82320	2	41160	-2574	-5.89%
(Totals)	612,280	14	(average absolute deviation:)		14.03%
(Average)			43734.29	0.285714286	

(Districts with deviations more than 10% above or below the average are highlighted in orange)

On districts deviating from the average

In the proposed model for regional elections, there would be a roughly fourteen percent average absolute deviation per district, which is *itself* above the ten percent threshold. I would submit that any proposal that can't stay under ten percent deviation on average needs to be dismissed out of hand.

The report states that although deviation from the average could be reduced, they feel it could not be done through redrawing the districts without disturbing natural communities of interest. That's fine, however they have dismissed the most obvious way to prevent such a deviation while maintaining all other goals: Start from the assumption the districts are fixed, and that the smallest district *must* have a given number of seats. From there, set the population per seat of that smallest district as a quota, and divide the population of the remaining districts through by the quota, rounding to the nearest number of seats.

For one seat in South Canterbury-Ōtuhituhi, this gives us:

7 Constituencies	Proposed seats	Population per	Deviation	% deviation
North Canterbury-Ōpukepuke	1	75800	16391.43	21.62%
Mid-Canterbury-Ōpākihi	2	46720	-12688.57	-27.16%
South Canterbury-Ōtuhituhi	1	61320	1911.429	3.12%
Christchurch North East-Ōrei	2	50200	-9208.571	-18.34%
Christchurch West-Ōpuna	2	47850	-11558.57	-24.16%
Christchurch Central-Ōhoko	2	51650	-7758.571	-15.02%
Christchurch South-Ōwhanga	1	82320	22911.43	27.83%
(Totals)	11	(average absolute deviation:)		19.61%
(Average)		59408.57		

Obviously, as with the initial proposal, this is unacceptable. It's actually made the average absolute deviation worse, and wasn't the first model I made, because I genuinely believe the reasons for South Canterbury wanting an extra councillor are legitimate, but I wanted to provide it first to knock down the objection that adding more councillors is a problem, as this system would actually *subtract* three from the current proposal, and it's measurably less representative, with every district except South Canterbury outside acceptable deviation due to rounding being very harsh at this level to North and South Canterbury and southern Christchurch.

While a well-crafted district in terms of proportionality shouldn't diverge from the average district population by more than 5% in either direction, I do accept that we will inevitably need some districts to diverge due to geographical boundaries and communities of interest. These are valid concerns when drawing a district, and is why my modelling has *strictly* stuck within the districts provided to come up with a better solution, despite changing the districts being a reasonable possibility.

A proposed model

Conveniently, the most representative solution was the first one I tried- anything else gets a higher average of absolute deviations per district. It follows:

7 Constituencies	Proposed seats	Population per	Deviation	%deviation
North Canterbury-Ōpukepuke	2	37900	5479.048	14.46%
Mid-Canterbury-Ōpākihi	3	31146.66667	1274.286	-4.09%
South Canterbury-Ōtuhituhi	2	30660	1760.952	-5.74%
Christchurch North East-Ōrei	3	33466.67	1045.714	3.12%
Christchurch West-Ōpuna	3	31900	520.9524	-1.63%
Christchurch Central-Ōhoko	3	34433.33	2012.381	5.84%
Christchurch South-Ōwhanga	3	27440	4980.952	-18.15%
(Totals)	19	(absolute average deviation:)		7.58%
(Average)		32420.95		

It's not an entirely perfect proposal. It actually over-represents Christchurch South-Ōwhanga a lot, while under-representing North Canterbury-Ōpukepuke. But otherwise it does a pretty good job of minimising deviation, while preserving existing districts. The only disadvantage is that it requires a larger, nineteen-member regional council, which some might object to as too large, however this is a *natural* consequence of the boundaries drawn and avoiding unfair advantage to as many districts as possible.

There aren't really any other acceptable breakpoints within a balanced formula, but the one modification I would recommend considering is removing a seat from Christchurch South-Ōwhanga to get better parity between city and country, as the net urban overrepresentation is 10.82%, whereas the net rural under-representation is 4.62%- removing that seat would make the asymmetry worse, but arguably ensuring the over-representation for the regional districts would compensate for them being in the minority, whereas having the majority urban population over-represented compounds the unfairness. Removing that seat would make the split 6.11% under-representation for city, and 13.24% over-representation for country. Note that this makes the deviation worse overall, with the absolute average rising to 8.42%, but over-representation should generally be in favour of minority groups where it's allowed to exist.

Giving a quota that breaks down the proposed seats any differently only *increases* the deviation when trying to make an even split between these districts, and none of the other options remain under 10%. While I feel the proposed boundaries are hard to manage well in terms of fair distribution of representation, I think the proposals above are both fair and should be acceptable to all Cantabrians.

Regarding council size: both my proposals and the current proposal are larger than Wellington's regional council but smaller than Auckland's, but the ratio of population to councillors would still be smaller than, say, Northland's regional council. 19 is not an unreasonable size, and allows for the chair's vote to break ties.

Failing one of them being adopted, I would propose that the council should redraw the proposed districts to comply with a less-than-10% deviation in *all* cases, and that it also consider whether it is

practical to have one-seat or three-seat districts inside the urban area where needed if there is difficulty redrawing the urban boundaries to be more balanced.

Under *no* circumstances should the council be allowed to proceed with either its initial proposal or its current proposal, as both are unbalanced to the point that they raise legitimate concerns of purposeful gerrymandering.