

# LOCAL GOVERNMENT COMMISSION MANA KĀWANATANGA Ā ROHE

#### Determination

of representation arrangements to apply for the election of the Rotorua District Council to be held on 8 October 2016

## **Background**

- 1. All territorial authorities are required under sections 19H and 19J of the Local Electoral Act 2001 (the Act) to review their representation arrangements at least every six years.
- 2. Representation reviews are to determine the number of councillors to be elected, the basis of election for councillors and, if this includes wards, the boundaries and names of those wards. Reviews also include whether there are to be community boards and, if so, arrangements for those boards. Representation arrangements are to be determined so as to provide fair and effective representation for individuals and communities.
- 3. The Rotorua District Council (the Council) last reviewed its representation arrangements prior to the 2010 local authority elections. Therefore it was required to undertake a review prior to the next elections in October 2016.
- 4. The Council currently comprises a mayor and 12 councillors elected at large i.e. over the district as a whole.
- 5. There is also one community board, Rotorua Lakes, in the district. The board comprises four elected members and two appointed members.

#### The Council's proposal and review process

- 6. The Council commenced its representation review process by appointing a working party, comprising three independent persons and three councillors, to carry out "a thorough review of representation arrangements". The working party began by undertaking community engagement to seek feedback on existing representation arrangements and suggestions on what a fair and effective model might look like.
- 7. The Commission notes the community engagement process was a very effective exercise with over 350 individual response forms received in addition to responses from key sector and interest groups. The Commission commends the Council for the initiative it took in establishing the working party and for the broad terms of reference given to the working party to develop a new representation model.

- 8. Following the feedback received, the working party recommended a set of representation arrangements to the Council. The Council adopted these arrangements as its initial representation proposal. The proposal was for:
  - a council comprising 10 elected members (excluding the mayor), down from the current 12
  - the council continuing to be elected at large across the district as a whole
  - retention of Rotorua Lakes Community Board, subject to minor boundary changes, comprising four elected members and one appointed member
  - establishment of a new rural community board for all the rural area of the district, comprising four elected members and one appointed member.
- 9. The Council received 52 submissions on its initial proposal which it analysed in terms of support for particular representation options as follows:
  - the basis of election:

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o at large: 44
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o wards: 6

o mixed: 2

number of councillors:

o reduction to ten: 34

o retention of twelve: 18

• retention of Rotorua Lakes Community Board:

o yes: 38

o no: 14

establishment of rural community board:

o yes: 37

o no: 15

10. Following consideration of submissions, the Council resolved to adopt its initial proposal as its final proposal.

#### **Appeals**

- 11. Four appeals against the Council's final proposal were received from: Rotorua Lakes Community Board, Rotorua Federated Farmers, Stewart Graham and Allan Estcourt.
- 12. In addition an 'objection' was received from Rotorua District Residents and Ratepayers Inc. Society. This was despite the fact there was no right of objection, as provided in section 19P of the Act, given the council did not change its initial proposal in adopting it as the Council's final proposal. The Commission considered, however, there may have been some confusion for the public as a result of the wording of the Council's public notice of its final proposal. Given this, and notwithstanding that the Society did not make a submission on the Council's initial proposal, the Commission decided to hear the Society.

#### Hearing

- 13. A hearing of appeals was held in the Rotorua District Council chambers on 16 March 2016.
- 14. The Council's Governance and Partnerships Manager Oonagh Hopkins gave a presentation outlining the Council's review process and reasons for its decisions. The chair of the working party, Councillor Merepeka Raukawa-Tait, and the Council's Group Manager Strategy and Partnerships Jean-Paul Gaston, also appeared before the Commission in the Council's right of reply at the end of the hearing.
- 15. For the appellants, Geoff Palmer appeared on behalf of the Rotorua Lakes Community Board; Alan Wills, Neil Heather and Nigel Billings appeared on behalf of Rotorua Federated Farmers; Reynold Macpherson and Rosemary McKenzie appeared on behalf of Rotorua District Residents and Ratepayers Society.
- 16. The following is a summary of the main points made at the hearing by the Council in relation to its proposal:
  - the working party undertook a community engagement approach to begin the representation review process entitled 'Your choice'
  - the engagement process took place alongside the developing partnership model with Te Arawa
  - approximately 350 individual feedback forms were received in the initial engagement along with submissions from a number of groups
  - a range of themes appeared from this feedback relating to options for the basis of election (at large, wards, or mixed system), community boards and communities of interest
  - following the feedback, the working party developed the following objectives: a need for change, the need for a rural and a lakes voice, the opportunity to be involved in local decision-making, fairness, and the ability to elect as many councillors as possible
  - the proposed reduced number of councillors will allow for equal sharing of effort across a portfolio-based approach to council work
  - the Council will continue to use and develop the portfolios as a mechanism to obtain 'grass roots' issues
  - the at large system allows citizens to maximise their votes, provides an overview of the district's developmental issues and is considered to be the fairest way to represent a district with approximately 80% of its community located in the same geographical space
  - the Council does not want to repeat the old ward system as those wards were artificial and cut across communities of interest
  - wards also cut across the working party objective of a lakes and a rural voice as these would be diluted by having a large proportion of the urban area in each ward

- the two proposed community boards will provide representation for two sectors that feel under-represented and have no voice in decisions affecting them
- the Council proposes to develop the concept of locational councillors to strengthen communities so they can have input into projects and issues in their local area
- the Council proposes to reassess delegations and the powers of community boards in order for them to be truly effective.
- 17. The following is a summary of the main points made at the hearing by appellants in relation to the Council's proposal:
  - there should be an increase in the number of elected members on the Lakes Community Board given the extra work arising from the proposed additional areas adding more than 1,000 residents, and also their proposed additional responsibilities including more delegations and participation at council committee meetings
  - the rural voice is currently not heard at the Council table and this was demonstrated during the debate on changes to the rating policy
  - the Council table is the key decision-making table and a ward system with one councillor from the rural area would be more effective than a rural community board
  - given the spread out nature of the rural area, a rural community board would not be effective and farmers are too busy to stand for such a board
  - with the at large system residents don't know who to contact
  - since the change in Council name to Rotorua Lakes, the partnership with the area outside the lakes catchment and in Waikato Region has been broken and the area marginalised
  - the reduction in the number of councillors would reduce their effectiveness as representatives, result in less representation for the lakes and rural areas and result in further delays on projects such as sewage reticulation in particular areas
  - the old ward system failed as the wards were dominated by the urban areas but there could be a new arrangement
  - the Council's perceptions about the district identity are over emphasised and it has been slow to recognise the lakes and rural identities
  - the Council's portfolio approach is ineffective
  - only the Council should be responsible for policy-making with the community boards as policy advisory bodies only.

#### **Requirements for determination**

- 18. Statutory provisions relating to the determination of appeals and objections on territorial authority representation proposals are contained in sections 19R, 19H and 19J of the Act.
  - 19R. Commission to determine appeals and objections
  - (1) The Commission must—
    - (a) Consider the resolutions, submissions, appeals, objections, and information forwarded to it under section 19Q; and
    - (b) Subject to sections 19T and 19V in the case of a territorial authority, and to sections 19U and 19V in the case of a regional council, determine,—
      - (i) In the case of a territorial authority that has made a resolution under section 19H, the matters specified in that section:
      - (ii) In the case of a regional council that has made a resolution under section 19I, the matters specified in that section:
      - (iii) In the case of a territorial authority that has made a resolution under section 19J, the matters specified in that section.
  - (2) For the purposes of making a determination under subsection (1)(b), the Commission—
    - (a) May make any enquiries that it considers appropriate; and
    - (b) May hold, but is not obliged to hold, meetings with the territorial authority or regional council or any persons who have lodged an appeal or objection and have indicated a desire to be heard by the Commission in relation to that appeal or objection.
  - (3) The Commission must, before 11 April in the year of a triennial general election, complete the duties it is required to carry out under subsection (1).

#### 19H. Review of representation arrangements for elections of territorial authorities

- (1) A territorial authority must determine by resolution, and in accordance with this Part,—
  - (a) Whether the members of the territorial authority (other than the mayor) are proposed to be elected—
    - (i) By the electors of the district as a whole; or
    - (ii) By the electors of 2 or more wards; or
    - (iii) In some cases by the electors of the district as a whole and in the other cases by the electors of each ward of the district; and
  - (b) In any case to which paragraph (a)(i) applies, the proposed number of members to be elected by the electors of the district as a whole; and
  - (c) In any case to which paragraph (a)(iii) applies,—
    - (i) The proposed number of members to be elected by the electors of the district as a whole; and
    - (ii) The proposed number of members to be elected by the wards of the district; and
  - (d) In any case to which paragraph (a)(ii) or paragraph (a)(iii) applies,—
    - (i) The proposed name and the proposed boundaries of each ward; and
    - (ii) The number of members proposed to be elected by the electors of each ward.
- (2) The determination required by subsection (1) must be made by a territorial authority-
  - (a) On the first occasion, either in 2003 or in 2006; and
  - (b) Subsequently, at least once in every period of 6 years after the first determination.
- (3) This section must be read in conjunction with section 19ZH and Schedule 1A.

#### 19J. Review of community boards

- (1) A territorial authority must, on every occasion on which it passes a resolution under section 19H, determine by that resolution, and in accordance with this Part, not only the matters referred to in that section but also whether, in light of the principle set out in section 4(1)(a) (which relates to fair and effective representation for individuals and communities)
  - (a) There should be communities and community boards; and
  - (b) If so resolved, the nature of any community and the structure of any community board.
- (2) The resolution referred to in subsection (1) must, in particular, determine—
  - (a) Whether 1 or more communities should be constituted:
  - (b) Whether any community should be abolished or united with another community:
  - (c) Whether the boundaries of a community should be altered:
  - (d) Whether a community should be subdivided for electoral purposes or whether it should continue to be subdivided for electoral purposes, as the case may require:
  - (e) Whether the boundaries of any subdivision should be altered:
  - *(f)* The number of members of any community board:
  - (g) The number of members of a community board who should be elected and the number of members of a community board who should be appointed:
  - (h) Whether the members of a community board who are proposed to be elected are to be elected—
    - (i) By the electors of the community as a whole; or
    - (ii) By the electors of 2 or more subdivisions; or
    - (iii) If the community comprises 2 or more whole wards, by the electors of each ward:
  - (i) in any case to which paragraph (h)(ii) applies, -
    - (i) The proposed name and the proposed boundaries of each subdivision; and
    - (ii) The number of members proposed to be elected by the electors of each subdivision.
- (3) Nothing in this section limits the provisions of section 19F.
- 19. Other statutory provisions the Commission is required to consider include those set out in sections 19A, 19C, 19F, 19G, 19T and 19V and these are addressed below.

#### **Consideration by the Commission**

- 20. In addition to determining the substantive matters raised in the appeals, the Commission is required by the Act to determine the ward and membership arrangements for the Council and community board arrangements generally.
- 21. The steps in the process for achieving required fair and effective representation are not statutorily prescribed. As reflected in its 'Guidelines to assist local authorities in undertaking representation reviews', the Commission believes that the following steps in determining representation arrangements will achieve a robust outcome that is in accordance with the statutory criteria:
  - (a) identify the district's communities of interest
  - (b) determine the best means of providing effective representation of the identified communities of interest

(c) determine fair representation for electors of the district.

## Communities of interest

- 22. Both wards and community boards need to be based on distinct and recognisable communities of interest.
- 23. The Guidelines identify three dimensions for recognising communities of interest:
  - perceptual: a sense of belonging to an area or locality
  - functional: the ability to meet the community's requirements for services
  - political: the ability to represent the interests and reconcile conflicts of the community.
- 24. The Commission considers that the case for specific representation of distinct and recognisable communities of interest should reflect these dimensions.

Effective representation of communities of interest

- 25. Section 19T of the Act requires the Commission to ensure that:
  - the election of members of the Council, in one of the ways specified in section 19H (i.e. at large, wards, or a combination of both) will provide effective representation of communities of interest within the district
  - ward boundaries coincide with the boundaries of the current statistical meshblock areas determined by Statistics New Zealand and used for parliamentary electoral purposes
  - so far as is practicable, ward boundaries coincide with community boundaries.
- 26. 'Effective representation' is not defined in the Act, but the Commission sees this as requiring consideration of factors including the number of elected members and the appropriate basis of election of members for a particular district.
- 27. While not a prescribed statutory requirement, the Guidelines suggest that local authorities consider the total number of members, or a range in the number of members, necessary to provide effective representation for the district as a whole. In other words, the total number of members should not be arrived at solely as the product of the number of members per ward where these exist.
- 28. Section 19A of the Act provides that a territorial authority shall consist of between 5 and 29 elected members (excluding the mayor), i.e. councillors. The Council comprised 16 councillors when it was constituted in 1989 and this number was reduced to 12 for the 1992 elections and remains the current number.
- 29. The Council is now proposing to reduce the number of councillors to ten. This was described at the hearing as being on the basis of the Council acting more as an

- executive board with a strengthened portfolio system for councillors and increased community involvement through the portfolios and 'locational' councillors.
- 30. The reduced number of councillors is also to be balanced against the proposal to establish a rural community board alongside the existing Lakes Community Board. The two boards would cover the whole district outside the urban area. The Council also proposes to recommend to the incoming Council following the October elections, enhanced powers and delegations to the community boards.
- 31. The number of councillors is addressed further below in conjunction with the proposals relating to community boards.
- 32. The Guidelines state that decisions relating to the representation of communities of interest (the political dimension) will need to take account of the extent that distinct geographical communities of interest can be identified, i.e. a physical boundary is able to be defined below the district level for the community of interest.
- 33. From its constitution in 1989 until the 2010 elections, Rotorua District was divided into four wards (North, West, East and South). In 2010 the Council proposed to move to an at large system of representation and this proposal was appealed to the Commission. The Commission rejected the appeal noting the Council's view that "the community of Rotorua District as a whole is the predominant geographically-defined community of interest".
- 34. The at large system was to replace the existing four-ward structure based on geographically defined 'quarters' of the district. These quarters reflected the main access routes connecting the outlying and rural areas with the Rotorua urban area. The wards each combined parts of the urban area with large rural and outlying areas. As a result, the majority of electors within each ward resided within the urban area and the Commission noted "this would be the same if the wards were disbanded and an at large system adopted". It also noted that while the wards broadly reflected distinct rural and outlying parts of the district, some of the ward boundaries did not reflect recognisably distinct communities of interest within the Rotorua urban area.
- 35. One appellant seeks reinstatement of a ward system with three wards. These wards would be an urban ward electing six councillors and a rural north and a rural south ward both electing three councillors. Given approximately 80% of the district's population resides in the urban area, this suggestion would not comply with the section 19V(2) +/-10% fair representation requirement. While it would address the artificiality of the previous four wards ('quarters'), it is not clear the suggested rural north and rural south separation would reflect distinct communities of interest.
- 36. Another appellant seeks introduction of a mixed system of representation with two councillors elected at large, seven from the combined urban and lakes area and one from the rural area. This suggestion would comply with the fair representation requirement based on 2013 census population figures. It does, however, only provide the rural area with 'a voice', whereas the Council's working party identified both the rural and lakes areas as needing to have their own voice. There is also a question as

- to whether one person could provide effective representation for an area as large as that proposed by the Council for the new rural community board.
- 37. In response to the appeals seeking a different basis of election, the Commission notes the level of community support for the Council's proposed at large system (44 out of the 52 submissions on the Council's initial proposal). In addition, there was 50% support for the at large system during the preliminary engagement phase, with 23% support for wards and 29% for a mixed system.
- 38. On the basis of the above information, the Commission is satisfied there is sufficient community support for retention of the at large system of representation to provide effective representation for communities of interest in Rotorua District. It notes at the same time, neither of the two alternative bases of election suggested by appellants would meet requirements for effective representation of communities of interest in the district. Accordingly the Commission determines to endorse the Council's proposal for retention of an at large system of representation.
- 39. This decision is also taken in light of the Council's proposals for two community boards to cover the whole district outside of the urban area (see below).

#### Fair representation for electors

- 40. Section 19V of the Act requires that the electors of each ward receive fair representation having regard to the population of the district and of that ward. More specifically, section 19V(2) requires that the population of each ward divided by the number of members to be elected by that ward, produces a figure no more than 10% greater or smaller than the population of the district divided by the total number of elected members (the +/-10% fair representation requirement).
- 41. Given the decision to endorse the proposal for an at large system of representation, the requirements of section 19V in relation to wards do not apply.

### Communities and community boards

- 42. Section 19J of the Act requires every territorial authority, as part of its review of representation arrangements, to determine whether there should be community boards in the district and, if so, the nature of those communities and the structure of the community boards. The territorial authority must make this determination in light of the principle in section 4 of the Act relating to fair and effective representation for individuals and communities.
- 43. The particular matters the territorial authority, and where appropriate the Commission, must determine include the number of boards to be constituted, their names and boundaries, the number of elected and appointed members, and whether the boards are to be subdivided for electoral purposes. Section 19W also requires regard to be given to such of the criteria as apply to reorganisation proposals under the Local Government Act 2002 as is considered appropriate. The Commission sees two of these criteria as particularly appropriate for consideration of proposals relating to community boards as part of a representation review:

- Will a community board have an area that is appropriate for the efficient and effective performance of its role?
- Will the community contain a sufficiently distinct community of interest or sufficiently distinct communities of interest?
- 44. The statutory role of a community board is to:
  - represent and advocate for the interests of its community
  - consider and report on matters referred to it by its parent council
  - maintain an overview of council services provided in the community
  - prepare an annual submission to the council for expenditure within its community
  - communicate with community organisations and special interest groups within its community
  - undertake any other responsibilities delegated to it by its parent council.
- 45. The Council's proposal is for the retention of the existing Rotorua Lakes Community Board (with some small extensions) and establishment of a new rural board covering the rural area of the district. These proposals received strong support from submitters on the Council's initial proposal as set out in paragraph 9 above. In the Council working party's preliminary engagement there was also a good level of support with 46% supporting the same community board arrangements (i.e. one board) and 37% supporting more community boards.
- 46. The Council sees these proposals as responding to the identified need for 'a voice' for these two sectors of the community i.e. the lakes and rural areas. It also sees the two boards as an important part of a new approach to the overall governance of the district. This will include portfolios covering the lakes and rural areas and the appointment of what the Council describes as 'locational councillors' for these areas. In addition the Council proposes a review of delegations to the community boards with a recommendation to the incoming Council accordingly.
- 47. Taken together, the Council sees the proposed arrangements as giving the community boards a significant role in the governance of the district both in their own right within their communities, and by working more collaboratively with the Council. In light of this, the Commission notes the further context of the proposed reduction in the number of councillors and endorses that element of the Council's proposal.
- 48. The Commission sees the proposed governance arrangements as an effective response to concerns expressed by some appellants about perceived powers and responsibilities of community boards in comparison to those of the Council.
- 49. Given its support in principle for community boards outside of the urban area of the district, the Commission now turns to the appropriate areas for those boards. As noted above, two important reorganisation criteria relating to community boards are: an area appropriate for the efficient and effective performance of their role, and the communities containing a sufficiently distinct community or communities of interest.

- 50. The Rotorua Lakes Community Board was established in 2007 as a result of appeals to the Local Government Commission. The Commission at that time concluded that the proposed board reflected a distinct community of interest and that its establishment would promote 'good local government' of the area concerned.
- 51. While the area of the Rotorua Lakes Community Board did not cover all the lakes in the district, the Commission agreed the lakes covered constituted a distinct community of interest. This was on the basis "the residents of the proposed area are mostly lakeside dwellers, as distinct from rural farming communities around Lakes Rotomahana and Rerewhakaaitu, and do not generally share the same commonalities of interest".
- 52. The Council is now proposing to add further areas on the eastern and northern sides of Lake Rotorua to the board area. As primarily lakeside areas, holiday homes or small holdings, the Commission agrees these areas fit appropriately within the distinct lakes community of interest separate from the main Rotorua urban area.
- 53. The Commission heard the Lakes Community Board has been effective in helping address the issue of lake water quality, working collaboratively with the Department of Conservation and Bay of Plenty Regional Council. It also works to address the common interests and concerns of residents by providing improved access to the Council, addressing costs and services associated with living in the area such as sewerage schemes, and addressing other environmental concerns such as gorse control. The information provided leads the Commission to the conclusion the area of the board is an appropriate one for the efficient and effective performance of the community board role.
- 54. Given the level of community support for the existing board in the consultation phases of the review process, the Commission also concludes the board can be seen to be accepted by the community as effectively representing a distinct lakes community of interest.
- 55. The Council is proposing establishment of a further community board for the rural area of the district. This proposal arose out of the Council's working party engagement and identification of a need for a 'rural voice'. The suggestion of a further community board(s) received 37% support in feedback in the preliminary engagement. Thirty-seven submissions out of 52 (71%) specifically supported the proposal for a new rural community board in response to the Council's initial proposal. Only one of the appellants explicitly opposed the establishment of a rural community board.
- 56. The rural area of the district, distinct from both the urban area and the lakes area, can be seen to reflect a distinct community of interest in Rotorua District. This is in line with the reorganisation criterion identified by the Commission as important for consideration in relation to community board proposals.
- 57. The Commission also needs to consider whether the proposed area of the board is appropriate for the efficient and effective performance of the community board role. The fact it encompasses all the rural area of the district will facilitate performance of the role. This includes in relation to representing and advocating for the interests of the community; maintaining an overview of council services provided to the

community; preparing an annual submission to the Council for expenditure in the community; and communicating with community organisations and special interest groups.

- The area is large, circling both the urban and lakes areas. The Commission considers the proposed four elected members for this board, the minimum number permissible under the Act, would be better able to effectively represent the area than say one councillor under a ward system of representation.
- 59. The Commission notes the Council is proposing that one councillor be appointed to the board. Under its proposed enhanced portfolio and locational councillor approach this will provide assistance to the board in undertaking its role and developing a strong relationship with the Council.
- 60. On this basis the Commission endorses the Council's proposal to establish a Rotorua rural community board for the rural area of the district. It also supports the proposal for four elected members for the board, plus one appointed member, while noting that the Council is able to review this membership at its next representation review in either three or six years. Such a review may be necessary after the initial period of operation of the new board including the carrying out of any new delegated powers and responsibilities.
- 61. Given its decision to endorse the proposal of four elected members and one appointed member for the new rural community board, the Commission considers the same membership should apply in respect of the Lakes Community Board covering a smaller area of the district.
- 62. The Commission notes that the Lakes board did seek an increase in the number of elected members in light of extensions to its area involving the addition of over 1,000 people to the board's area, and the board's proposed enhanced role. The extended area comprises a number of meshblocks on the eastern and northern sides of Lake Rotorua. The board argued that its current members have been allocated responsibilities in respect of settlements around the other lakes in the board's area (Tarawera, Okareka, Rotoiti and Rotoma/ Rotoehu) and the arrangements focussing on these lakes worked well. The board also currently has two appointed members.
- 63. The Commission notes the board raised its concerns in its submission on the Council's initial proposal. The Council decided to make no change to its proposal.
- 64. While acknowledging the concerns raised, the Commission considers it appropriate to let the Council's proposed approach to working with the community boards to become established before deciding on any increase in board members. The approach involves a focus on councillor portfolios and locational councillors for identified areas of the district. The Council also proposes to reassess delegations to the community boards and make recommendations on these to the new Council. The actual future workload for the boards will be finally determined when the new Council is in place. At that time the Council will be in a position to consider further levels of support required for the boards and any need for additional resources. It could then consider undertaking a review of representation arrangements to apply following the next elections in 2019.

Accordingly the Commission endorses the Council's proposal in relation to membership of the Rotorua Lakes Community Board.

#### **Commission's Determination**

- 65. Under section 19R of the Local Electoral Act 2001, the Commission determines that for the general election of the Rotorua District Council to be held on 8 October 2016, the following representation arrangements will apply:
  - (1) Rotorua District, as delineated on SO Plan 58044 deposited with Land Information New Zealand, will not be divided into wards.
  - (2) The Council will comprise the mayor and 10 councillors who will be elected by the electors of the district as a whole.
  - (3) There will be two communities as follows:
    - (a) the Rotorua Lakes Community, comprising the area delineated on LG-024-2016-Com-1 deposited with the Local Government Commission
    - (b) the Rotorua Rural Community, comprising the area delineated on LG-024-2016-Com-2 deposited with the Local Government Commission.
  - (4) For the Rotorua Lakes Community, there will be a Rotorua Lakes Community Board comprising:
    - (a) four members elected by the electors of the community as a whole
    - (b) one member of the Council who will be appointed to the community board by the Council.
  - (5) For the Rotorua Rural Community, there will be a Rotorua Rural Community Board comprising:
    - (a) four members elected by the electors of the community as a whole
    - (b) one member of the Council who will be appointed to the community board by the Council.
- 66. As required by section 19W(c) of the Local Electoral Act 2001, the boundaries of the above communities coincide with the boundaries of current statistical meshblock areas determined by Statistics New Zealand and used for Parliamentary electoral purposes.

## REPRESENTATION REVIEWS COMMITTEE FOR LOCAL GOVERNMENT COMMISSION

Commissioner Janie Annear (Chair)

Temporary Commissioner Dr Pauline Kingi

31 March 2016