



# Local Government Commission

## Mana Kāwanatanga ā Rohe

Determination  
of representation arrangements to apply for the election of the  
Canterbury Regional Council  
to be held on 11 October 2025

### Introduction

1. All regional councils are required under sections 19I of the Local Electoral Act 2001 (the Act) to review their representation arrangements at least every six years. Under Section 19R of the Act, the Commission, in addition to consideration of the appeals and objections against a council's final representation proposal, is required to determine all the matters set out in sections 19I which relate to the representation arrangements for regional councils.
2. Having completed its considerations, the Commission's determination upholds the Canterbury Regional Council's (ECAN's) final representation proposal as set out below.

### Commission's determination<sup>1</sup>

3. In accordance with section 19R of the Local Electoral Act 2001, the Local Government Commission determines that for at least the triennial general election of the Canterbury Regional Council to be held on 11 October 2025, the following representation arrangements will apply:
  - a. Canterbury Region, as delineated on Plan LG-13-2025-Con-1 will be divided into 7 constituencies and will be represented by a Council comprising 14 councillors elected as follows:

Constituency	Councillors	Plan delineating area
North Canterbury/Ōpukepuke	2	LG-13-2019-Con-2
Christchurch West/Ōpuna	2	LG-13-2025-Con-2
Christchurch North East/Ōrei	2	LG-13-2025-Con-3
Christchurch Central/Ōhoko	2	LG-13-2025-Con-4
Christchurch South/Ōwhanga	2	LG-13-2025-Con-5

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<sup>1</sup> All plans referred to in this determination are deposited with the Local Government Commission

Mid-Canterbury/Ōpākihi	2	LG-13-2019-Con-7
South Canterbury/Ōtuhihi	2	LG-13-2019-Con-8

4. The ratio of population to elected members for each constituency will be as follows:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
North Canterbury/Ōpukepuke	87,000	2	43,500	-4,093	-8.60
Christchurch West/Ōpuna	104,800	2	52,400	4,807	10.10
Christchurch North East/Ōrei	100,600	2	50,300	2,707	5.69
Christchurch Central/Ōhoko	102,500	2	51,250	3,657	7.68
Christchurch South/Ōwhanga	88,300	2	44,150	-3,443	-7.23
Mid-Canterbury/Ōpākihi	118,100	2	59,050	11,457	24.07
South Canterbury/Ōtuhihi	65,000	2	32,500	-15,093	-31.71
<b>Total</b>	<b>666,300</b>	<b>14</b>	<b>47,593</b>		

\*Based on Stats NZ Tatauranga Aotearoa 2023 population estimates (2018 census base)

5. Under section 19V(6) of the Local Electoral Act 2001, the Commission upholds the decision of the Council not to comply with section 19V(2) in respect of the Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhihi constituencies, as:

- compliance would limit effective representation of communities of interest by dividing the Selwyn and Ashburton communities of interest, territorial authority districts similar in terms of land size and attributes and from a functional perspective, to align either Ashburton District with the South Canterbury constituency or Selwyn District with the North Canterbury constituency; or
- it may result in constituencies not conforming with territorial authority district boundaries and grouping together two or more communities of interest that share few commonalities of interest, namely Ashburton District and the South Canterbury districts; and
- In the case of the Christchurch West/Ōpuna constituency, making this constituency compliant would result in a constituency that does not comply with ward boundaries or contains a grouping of wards that do not contain a logical grouping of communities of interest.

6. As required by section 19T(b) of the Local Electoral Act 2001, the boundaries of the above constituencies coincide with the boundaries of current statistical meshblock areas determined by Statistics New Zealand and used for Parliamentary electoral purposes.

## Background

- The Council last reviewed its representation arrangements prior to the 2019 local authority elections. Accordingly, it was required to undertake a review prior to the next elections in October 2025.

### Current representation arrangements

- The Commission last made a determination in relation to ECAN's representation in 2019.
- In that review there were four constituencies that were non-compliant with the +/-10% rule: North Canterbury/Ōpukepuke, Christchurch North East/Ōrei, Christchurch Central/Ōhoko, South Canterbury/Ōtuhituhi.
- Five appeals and 196 objections against the proposal were received, with a majority of these expressing opposition to the non-compliance of some constituencies with the +/-10% rule and seeking arrangements that did comply.
- In relation to this, the Commission upheld ECAN's final proposal as it achieved the best balance between effective representation and fair representation. The determination noted:
  - It results in constituencies that will better enable effective representation than other suggestions
  - The non-Christchurch constituencies are based on a traditional division of Canterbury, and therefore better reflect communities of interest
  - It provides fairer representation to South Canterbury than the initial proposal, without excessively detracting from fair representation for other constituencies.
- The Council's current representation arrangements have been in place since and are as follows:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
North Canterbury/Ōpukepuke	87,000	2	43,500	-4,093	-8.60
Christchurch West/Ōpuna Constituency	106,900	2	53,450	5,857	<b>12.31</b>
Mid-Canterbury/Ōpakihi	118,100	2	59,050	11,457	<b>24.07</b>
South Canterbury/Ōtuhituhi	65,000	2	32,500	-15,093	<b>-31.71</b>
Christchurch North East/Ōrei	100,700	2	50,350	2,757	5.79
Christchurch Central/Ōhoko	104,800	2	52,400	4,807	<b>10.10</b>
Christchurch South/Ōwhangai	83,800	2	41,900	-5,693	<b>-11.96</b>
<b>Total constituencies</b>	<b>666,300</b>	14	47,593		

13. Additionally, Canterbury Regional Council (Ngāi Tahu Representation) Act 2022 empowers Te Rūnanga o Ngāi Tahu to appoint up to two members to the Environment Canterbury Council with full decision-making powers. This is outside the Commission’s scope of determination.

## Current review

### Preliminary consultation

14. An informal, preliminary engagement was undertaken by the Council with its communities, constituent territorial authorities and the 10 Ngāi Tahu Papatipu Rūnanga within Waitaha from 6 to 26 May 2024. The purpose of this engagement was to seek informal feedback on options identified by the Council to see if there was a clear preference for one or more to form the Council’s Initial Proposal.
15. There were 291 responses; 16 gave feedback on behalf of an organisation, association or community group. Just over half live and/or work in Christchurch City. A Southern Canterbury Councils Joint Submission was received, endorsed by the Mackenzie, Timaru, Waimate and Waitaki District Councils. Individual written feedback was also received by Timaru, Waimate, Selwyn and Ashburton District Councils.
16. Overall, the preliminary engagement did not indicate a clear majority view on a preferred representation option. However, in response to a question about the number of councillors, a clear majority of respondents favoured retaining the current number.

### The Council’s initial proposal

17. On 24 July 2024, the Council resolved its initial representation proposal for a council comprising 14 members elected from 7 wards/constituencies.
18. The initial proposed constituency arrangements were as follows:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
North Canterbury/Ōpukepukē	87,000	2	43,500	- 4,084	-8.58
Christchurch West/Ōpuna	104,800	2	52,400	4,816	10.12
Christchurch North East/Ōrei	102,000	2	51,000	3,416	7.18
Christchurch Central/Ōhoko	101,100	2	50,550	2,966	6.23
Christchurch South/Ōwhanga	88,300	2	44,150	-3,434	- 7.22
Selwyn/Waikirikiri	81,250	2	40,625	-6,959	-14.62

Mid-South Canterbury/Ōtuhituhi	101,720	2	50,860	3,276	6.89
Total	666,170	14	47,584		

\*Based on Stats NZ Tatauranga Aotearoa 2023 population estimates (2018 census base)

## Submissions

19. The Council notified its initial representation proposal on 2 August 2024, and received 217 submissions by the deadline date of 2 September, and two late submissions.
20. Overall, across the Canterbury Region, 56.7% of submitters indicated they supported the proposal, and 43.3% of submitters (91) did not support the proposal. However, there were distinct differences in responses when submissions were analysed according to the areas affected. Comments made in submissions identify a range of themes raised by submitters who opposed the proposal.
21. Key themes in the submissions were:
  - The Mid-South Canterbury/Ōtuhituhi constituency is too large
  - Too few members to provide effective representation
  - Population-based representation is inappropriate
  - Representation should take account of environmental needs
  - Proposal will negatively impact on rural representation
  - Provides poor representation for southern areas
  - Does not provide for alignment of communities of interests
  - Rural communities of interest are not recognised
  - There is a shift in the balance between urban and rural members
22. On 19 September 2024, the Council met to hear and deliberate on submissions. As a result of the submissions received the Council amended the initial proposal as follows:
  - Reverting to the current constituency boundaries, names and membership for the proposed Mid Canterbury/Ōpākihi and South Canterbury/Ōtuhituhi constituencies.
  - Altering the boundary of the Christchurch Central/Ōhoko constituency to exclude the Linwood Ward of Christchurch City, and to include the Papanui Ward of Christchurch City.
  - Altering the boundary of the Christchurch North-East/Ōrei constituency to exclude the Papanui Ward of Christchurch City, and to include the Linwood Ward of Christchurch City.
23. The constituency boundaries, names and membership for the proposed North Canterbury/Ōpukepuke, Christchurch North East/Ōrei and Christchurch South/Ōwhanga constituencies were retained as in the initial proposal
24. The Council rejected the remaining matters raised in submissions for the following reasons:
  - The creation of a Selwyn/Waikirikiriri constituency, comprising the Selwyn District, would result in non-compliance with the requirements of Section 19V(2) of the Local Electoral Act 2001.

- Although the proposed Mid-South Canterbury/Ōtuhituhi constituency would meet the fair representation requirements of section 19V(2) of the Act 2001, the addition of Ashburton District would create a significantly larger constituency but without any additional representation, thereby effectively reducing effective representation for the southern areas.
  - The alternative proposal to combine Ashburton District with the Ellesmere and Malvern wards of Selwyn District and move the Rolleston and Ellesmere wards to Christchurch City constituencies would result in existing communities of interest being split, and lead to grouping of communities which do not share common interests.
  - The alternative proposal to reduce elected member numbers to 13 and move the Malvern Ward would split an existing community of interest, and compromise effective representation by reducing the ability for elected members to provide even representation across the region.
  - The creation of one or more unitary authorities to replace the functions of Environment Canterbury was outside the scope of this representation review.
25. At a meeting on 23 October 2024 the Council amended its initial proposal to the following final representation proposal.

### The Council's final proposal

26. The final proposal was for a council comprising 14 councillors elected from 7 constituencies.
27. The final proposal set out constituency arrangements as follows:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
North Canterbury/Ōpukepuke	87,000	2	43,500	-4,093	-8.60
Christchurch West/Ōpuna	104,800	2	52,400	4,807	10.10
Christchurch North East/Ōrei	100,600	2	50,300	2,707	5.69
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Mid-Canterbury/Ōpākihi	118,100	2	59,050	11,457	24.07
South Canterbury/Ōtuhituhi	65,000	2	32,500	-15,093	-31.71
<b>Total</b>	<b>666,300<sup>2</sup></b>	<b>14</b>	<b>47,593</b>		

\*Based on Stats NZ Tatauranga Aotearoa 2023 population estimates

<sup>2</sup> The population totals in these datasets may differ slightly due to rounding. Both sets use the same underlying estimates, but the rounding process can cause minor discrepancies in the final totals. This is a common occurrence in statistical data and does not affect the overall accuracy or reliability of the estimates.

28. The Council publicly notified its final proposal on 23 October 2024, including advice that the population-based fair representation requirements of the Act (the +/- 10% rule) present difficulties for regional councils with geographically large constituencies, making it difficult to achieve effective representation of communities of interest, particularly for rural communities.
29. Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi constituencies did not comply with the fair representation requirement of section 19V(2) of the Act (the +/-10% rule). Specifically for these constituencies:
  - The Christchurch West/Ōpuna constituency enabled effective representation of the Harewood, Waimairi, Hornby and Halswell wards of Christchurch City.
  - In regard to the Mid-Canterbury/Ōpākihi ward, the Rangitata River forms a natural geographical boundary between the Ashburton District and the South Canterbury/Ōtuhituhi constituency, and Ashburton's natural community of interest lies more generally to the north than to the south.
  - In regard to the South Canterbury/Ōtuhituhi ward, the amended proposal is more consistent with the 2019 determination of the Local Government Commission, which found that the size of the South Canterbury/Ōtuhituhi constituency warranted a higher level of representation.
30. Due to the non-compliance of the proposed Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi constituencies, the Council was required by section 19V(4) of the Act to refer its proposal to the Commission for determination. In addition, one valid appeal was received.
31. ECAN also resolved that the current Council recommends to the incoming Council, following the 2025 local body elections, that ECAN undertakes a comprehensive representation review to apply for the 2028 local body elections.

### **Appeals/objections against the Council's final proposal**

32. The Council referred the appeals to the Commission, in accordance with section 19Q of the Act.
33. One appeal against the Council's final proposal was wholly or partially within the Commission's scope of powers to consider. This appeal argued that the proposal resulted in a lack of democratic representation for Selwyn, within the Mid-Canterbury/Ōpākihi Constituency (comprising Selwyn and Ashburton districts) which has a +24.07% difference from quota. The appellant referenced the initial proposal recognising growth in Selwyn, which indicated that the appellant favoured this as an alternative representation arrangement.
34. An additional appeal was received from the Ashburton District Council supporting the final outcome of the representation review but was deemed invalid due to supporting the final proposal.

## Need for a hearing

35. For the purpose of making a determination, the Commission may make such enquiries as it considers appropriate and may hold meetings with the interested parties. There is no obligation on the Commission to hold a hearing. Rather, the need for a hearing is determined by the information provided by the relevant parties and as a result of any further inquiries the Commission may wish to make.
36. In the case of Canterbury Regional Council's final proposal, the Commission considered there was sufficient information in the documentation provided by the Council and the appeals and objections for the Commission to proceed to a determination. Furthermore, the appeal related to a matter that was contained in the non-compliance with the +/-10% issue. Accordingly, it was decided no hearing was required.

## Matters for determination by the Commission

37. Section 19R of the Act makes it clear that the Commission, in addition to consideration of the appeals and objections, is required to determine all the matters set out in section 19I of the Act, which relates to the representation arrangements for regional authorities. This interpretation was reinforced by a 2004 High Court decision which found that the Commission's role is not merely supervisory of a local authority's representation arrangements decision. The Commission is required to form its own view on all the matters which are in scope of the review.
38. The matters in the scope of the review are:
  - a. the number, boundaries and names of the proposed constituencies
  - b. the proposed number of councillors for each constituency
  - c. whether constituencies may be defined and membership distributed between them in a way that does not comply with the +/-10% rule
39. The appeal to the Council's final proposal raises the following overarching issues for the Commission to resolve:
  - a. Representation for the Selwyn community of interest, as defined by the Selwyn territorial authority boundaries, contained in the Council's final proposal within the Mid-Canterbury/Ōpākihi constituency.

## Key considerations

40. Based on the legislative requirements, the Commission's *Guidelines for local authorities undertaking representation reviews* (the Guidelines) identify the following three key factors when considering representation proposals:
  - communities of interest
  - effective representation of communities of interest
  - fair representation for electors.

## Communities of interest

41. The Guidelines identify three dimensions for recognising communities of interest:



- a. *perceptual*: a sense of identity and belonging to a defined area or locality as a result of factors such as distinctive geographical features, local history, demographics, economic and social activities
  - b. *functional*: ability of the area to meet the needs of communities for services such as local schools, shopping areas, community and recreational facilities, employment, transport and communication links
  - c. *political*: ability to represent the interests of local communities which includes non-council structures such as for local iwi and hapū, residents and ratepayer associations and the range of special interest groups.
42. All three dimensions are important and often interlinked. We note however, that there is often a focus on the perceptual dimension. That is, what councils, communities or individuals intuitively feel are communities of interest. It is not enough to simply state that a community of interest exists because it is felt that it exists; councils must provide evidence of how a sense of identity is reinforced, or how a community is distinct from neighbouring communities. Such evidence may be found by considering, for example:
  - how communities rely on different services and facilities to function as part of the wider district, city or region
  - demographic characteristics of an area (for example age, ethnicity or deprivation profiles) and how these differ from other areas
  - how particular communities organise themselves and interact with others as part of the wider district, city or region
43. In its 2019 determination for ECAN, the Commission noted that the appellants and objectors focused on fair representation, but decisions on constituencies need to take into account both fair representation and effective representation. The +/-10% rule is not absolute.
44. The then Commission went on to state that effective representation should be considered first as it relates to the number of constituencies and their boundaries; fair representation should be considered next as it relates to the allocation of members to those constituencies.
45. The Commission also concluded that the Rangitata River forms the logical northern boundary of South Canterbury, and Ashburton looks towards Christchurch rather than Timaru; and that the South Canterbury constituency (both existing and proposed) is a large area and its issues generates a great deal of work for regional councillors.
46. There was no explicit discussion of Selwyn in the 2019 determination, however in 2019 the Mid-Canterbury/Ōpākihi constituency (containing Selwyn District) was compliant with the +/- 10% rule. The constituency has since moved from +6.83% to a +24.07% deviation from region average population per councillor. South Canterbury has moved marginally from -29.9% to -31.71%
47. The identification of communities of interest have not changed. However, they have been affected by population growth and change in the region.

48. In its 2019 determination, Commissioners agreed that the communities of interest were appropriately reflected, and that effective representation pertaining to the number of constituencies and their boundaries was the most important principle to apply. If this principle continues to be applied, the communities of interest are appropriately identified and are largely based on territorial authority districts and natural geographic landmarks. These are not factors that have changed.
49. The four constituencies covering Christchurch City group together wards, which in turn were identified in the Christchurch City Council's 2021 representation review as reflecting communities of interest. ECAN's current review appears to have resulted in logical groupings of wards in constituencies. Those constituencies reflect both long-standing arrangements and changes to reflect issues raised in the submission process.

### Effective representation of communities of interest

50. Section 19U of the Act requires the Commission to ensure that:
  - (a) that the number and boundaries of constituencies will provide effective representation of communities of interest within the region; and
  - (b) that constituency boundaries coincide with the boundaries of the current statistical meshblock areas determined by Statistics New Zealand and used for parliamentary electoral purposes; and
  - (c) that, so far as is practicable, constituency boundaries coincide with the boundaries of 1 or more territorial authority districts or the boundaries of wards.
51. 'Effective representation' is not defined in the Act, but the Commission sees this as requiring consideration of factors including an appropriate number of elected members and an appropriate basis of election of members for the district concerned (at large, wards, or a mix of both).
52. The Guidelines note that what constitutes effective representation will be specific to each local authority but that the following factors should be considered:
  - a. avoiding arrangements that may create barriers to participation, such as at elections by not recognising residents' familiarity and identity with an area
  - b. not splitting recognised communities of interest between electoral subdivisions
  - c. not grouping together two or more communities of interest that share few commonalities of interest
  - d. accessibility, size and configuration of an area including access to elected members and vice versa.
53. 'Effective representation' is not defined in the Act. The Guidelines note that what constitutes effective representation will be specific to each local authority but that the following factors should be considered:
  - a. avoiding arrangements that may create barriers to participation, such as at elections by not recognising residents' familiarity and identity with an area
  - b. not splitting recognised communities of interest between electoral subdivisions
  - c. not grouping together two or more communities of interest that share few commonalities of interest

- d. accessibility, size and configuration of an area including access to elected members and vice versa.
54. 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 region 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 constituency.
55. Section 19D of the Act provides that regional councils shall consist of between six and 14 members. ECAN initially comprised 17 members on its constitution in 1989. This reduced to 13 members in 1992 when the Local Government Act was amended to reduce the maximum number of members on a regional council to 14. It was increased to 14 in 1995 and has remained at that number, except when commissioners were appointed to manage ECAN from 2010-2016, and from 2016-2019 a mixed model was in place with half elected councillors and half commissioners. From 2019 ECAN, elected councillors only were in place. The total number of members per se does not seem to be in contention in the review, although it is one of the variables that could affect both effective representation and fair representation
56. The Commission is satisfied that the proposed Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi constituency arrangements appropriately balance the requirements for fair and effective representation. The Commission upholds the proposed Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi boundaries proposed by the Council.

### **Fair representation for electors**

57. Section 19V of the Act sets out the requirement for the Commission to ensure that electors receive fair representation. Section 19V(2) establishes fair representation as a population per member ratio per constituency type that does not differ by more than 10% across the region. This is also referred to as 'the +/- 10% rule'.
58. Section 19V(3) of the Act provides that, despite subsection (2), if a regional council or the Commission considers that effective representation of communities of interest so requires, constituencies may be defined and membership distributed between them in a way that does not comply with subsection (2).
59. Section 19V(6) provides that on receiving a reference under subsection (4), the Commission must determine whether to:
  - a. uphold the decision of the council, or
  - b. alter that decision
60. The Council's proposal results in 3 constituencies not complying with the +/-10% rule. Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi constituencies.

### ***Proposed non-compliance of Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi***

61. The Commission's 2019 determination on ECAN's representation arrangements permitted non-compliance for the North Canterbury/Ōpukepuke, Christchurch North/East/Ōrei, Christchurch Central/Ōhoko and South Canterbury/Ōtuhituhi constituencies on the basis that:

- The South Canterbury/Ōtuhituhi constituency needed two members to represent its large area (39.84% of Canterbury) and important issues like water management and biodiversity. The area has diverse, spread-out communities, and the boundaries match territorial authority boundaries to reflect these communities.
  - The North Canterbury/Ōpukepuke constituency also needs two members for its large area (28.5% of Canterbury) and similar issues, including earthquake recovery. It has diverse, spread-out communities, and the boundaries align with territorial authority boundaries.
  - In the case of the Christchurch North East/Ōrei and Christchurch Central/Ōhoko constituencies previous boundary changes had caused problems, and the current arrangement matches city ward boundaries, making it easier for residents to know their representatives and improving cooperation between city and regional councillors.
62. Christchurch West/Ōpuna has a 10.10% deviation from the region average population per member. This constituency comprises the area of the Harewood, Waimairi, Hornby and Halswell wards of Christchurch City. Any adjustments would involve separating communities of interest already in alignment with territorial authority or ward boundaries. Furthermore, the non-compliance is minimal at only .10% over the threshold.
  63. The South Canterbury/ Ōtuhituhi constituency comprises the area of the Timaru, Mackenzie, Waimate and part Waitaki Districts. It has a -31.71 deviation from the region average population per member. This is the smallest population represented per member in the region. However, as the Commission's previous determination notes, the South Canterbury constituency is a large area and its issues generate a great deal of work for regional councillors. Furthermore, the Rangitata River forms a logical northern boundary of South Canterbury, and Ashburton looks towards Christchurch rather than Timaru.
  64. The Mid-Canterbury/Ōpākihi constituency comprises the Selwyn and Ashburton districts. It has a 24.07% deviation from the region average population per member. This is also the constituency that had an appeal relating to it. It is reasonable to take the communities of interest reflected in existing territorial authorities or territorial authority wards as a starting point for communities of interest to be reflected in regional council constituencies.
  65. An alternative approach would be the Council's initial proposal. This proposal still resulted in non-compliances in the Christchurch West/Ōpuna and the proposed Selwyn/Waikirikiriri constituencies.
  66. The Commission considers that the factors pertaining to the South Canterbury/ Ōtuhituhi constituency identified in the 2019 determination, are still relevant. It also notes that the non-compliance in the Christchurch West/Ōpuna constituency is minimal, and present in both the Council's initial and final proposal. This leaves the Mid-Canterbury/Ōpākihi constituency as the constituency that requires the most consideration.
  67. In relation to this we refer to our comment in paragraph 44 of this determination, that: *Effective representation should be considered first as it relates to the number of constituencies and their boundaries; fair representation should be considered next as it relates to the allocation of members to those constituencies.*

68. The initial proposal included Ashburton District in the Mid-South Canterbury/Ōtuhituhi constituency, grouping it with Timaru, Mackenzie, Waimate and part Waitaki districts. The Ashburton District Council submitted that it supported a structure that aligned Ashburton District with rural Selwyn who they consider to be a community of interest, sharing similar perceptual, functional and political interests and challenges. This view was reinforced in an appeal that was submitted but that the Commission deemed invalid.
69. s.19U(2) requires, that, so far as is practicable, constituency boundaries coincide with the boundaries of 1 or more territorial authority districts or the boundaries of wards. ECAN's review process has identified that these territorial authority districts and wards form a logical grouping from a community of interest point of view. In the case of all three non-compliant constituencies, making these compliant would result in a constituency that did not comply with ward boundaries or contained a grouping of wards that did not contain a logical grouping of communities of interest.
70. When taking the above into account, we are satisfied that the issues relating to the Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi constituencies identified by the Council appropriately balance the requirements for fair and effective representation of the areas. The Commission upholds the Christchurch West/Ōpuna, Mid-Canterbury/Ōpākihi and South Canterbury/ Ōtuhituhi boundaries proposed by the Council.

## Commission recommendations

71. The Commission notes that ECAN has indicated it will recommend undertaking a further representation review prior to the 2028 local elections. The Commission strongly recommends that this is carried out, and in its next representation review, the Council carefully considers/explores population growth and projection across the district and its implication on constituencies and fair and effective representation, particularly in high growth areas.

## Conclusion

72. We have made this determination pursuant to section 19R of the Local Electoral Act 2001 having considered the information before the Commission and the requirements of sections 19U and 19V of the Act.

### **Local Government Commission**

Commissioner Brendan Duffy (Chair)

Commissioner Bonita Bigham

Commissioner Sue Bidrose

Temporary Commissioner Gwen Bull

17 February 2025