

11 August 2024
Via email

SUBMISSION TO OTAGO REGIONAL COUNCIL ON REPRESENTATION ARRANGEMENTS FOR THE 2025 LOCAL ELECTIONS

Thank you for the opportunity to present this submission on the representation arrangements for the 2025 local elections (**representation arrangements**).

The Queenstown Lakes District Council (**QLDC**) is supportive of Otago Regional Council's (**ORC**) review of the representation arrangements.

QLDC appreciates the informal early engagement undertaken by ORC on their representation arrangements, and this submission reiterates Council's position on the number of elected members per constituency and the need to re-draw constituency boundaries.

Thank you again for the opportunity to submit. The Council seeks the opportunity to be heard on this submission.

Yours sincerely,

Glyn Lewers
Mayor

Mike Theelen
Chief Executive

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1.0 Context of ORC's representation arrangements in relation to QLDC

- 1.1 The Queenstown Lakes District is a high-growth district. Since 1996, the district has been the fastest growing area in Aotearoa New Zealand, with 4.82% per annum growth. Over the past 10 years, it has grown at 5.92% per annum. The district has a usually resident population of 52,800. The challenges the district faces are compounded by an average day population of 70,205 (visitors and residents) and a peak daily population of 99,220. By 2053 this is forecast to increase to 150,082 and 217,462 respectively¹.
- 1.2 ORC has a key role in the Queenstown Lakes District due to the importance of protecting and enhancing the natural environment and enabling the district's transport and travel mode shift journey for current and future populations. These issues have a significant impact on residents' quality of life and wellbeing and contribute to the district's reputation as Aotearoa New Zealand's premier visitor destination. Tourism is a foundation of the local economy, accounting for 39% of GDP and 55% of all employment in 2019² and contributing significantly to the national GDP.
- 1.3 As a metro sector territorial authority, Queenstown Lakes District is a nationally important area of growth, urban investment and development, a centre of increasingly diverse economic activity, and the base for an international airport which is the fourth largest in the country. As a tier 2 council, QLDC must plan and provide for growth. Under the National Policy Statement for Urban Growth, QLDC is required to work with other councils to provide sufficient development capacity and achieve well-functioning urban areas which includes features such as appropriate public transport provision. The challenges and needs of this area should be viewed as similar to those of urban centres such as Dunedin city and do not align with those of large, low population rural locations.
- 1.4 QLDC strategies and plans reflect the importance of protecting and enhancing the natural environment, effectively providing for and supporting sustained growth and increased urban density and achieving successful transport mode shift. In particular:
 - QLDC's spatial plan³ which was developed through the Grow Well Whaiora partnership between Central Government, Kāi Tahu, QLDC and ORC, and provides a proven framework to deliver infrastructure to enable the district to grow well, including ways of moving around the district. Transport mode shift is also supported in Better Ways to Go, QLDC's Travel Demand Management Single Stage Business Case, and the district's Regenerative Tourism Plan.
 - QLDC's Climate and Biodiversity Plan⁴ that strives to reduce emissions, prepare for climate adaptation and pursue biodiversity restoration.
 - Vision Beyond 2050⁵ which is a community led vision for the district that includes ecosystems flourishing and being predator-free, and setting the standard for regenerative, low-impact living, working and travel.

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² Source: Infometrics

³ [Spatial Plan - QLDC](#)

⁴ https://www.qldc.govt.nz/media/iw3pqsy1/qldc_climate-and-biodiversity-plan_jun22-web.pdf

⁵ [7a2-qldc-vision-2050-boards-feb19-v2.pdf](#)

2.0 Representation arrangements need to reflect population growth in the district

- 2.1 The ORC's 22 May 2024 report on Membership Representation ("**Report**") acknowledges that the region has experienced significant population growth in the Dunstan constituency and that the constituency's population per member ratio is now non-compliant with legislative requirements.
- 2.2 The number of elected members for each constituency is proposed to be amended to provide proportional representation for the size of the population. This has increased the number of elected members for the Dunstan constituency to four.
- 2.3 Under section 19U of the Local Electoral Act 2001 and the requirement for effective representation, regional councils must ensure "that the number and boundaries of constituencies will provide for effective representation of communities of interest within the region". The ORC Report acknowledges that the region presents challenges to achieve fair and effective representation. Whilst the existing proposal meets the requirement under section 19V for statistically fair representation it does not take into consideration *where* the population growth is occurring with the existing constituency boundary. Nor does it take into consideration the needs outlined by Council in this submission that suggest considering a specific community of interest approximating the existing Queenstown Lakes District boundary.
- 2.4 The ORC Report states that an advantage of the current proposal is that it "reflects communities of interest, as determined by previous councils". Any historic consideration of communities of interest does not reflect the current context for the Queenstown Lakes District which has changed significantly since the previous ORC representation review. When the 2018 representation review was completed, the QLDC usually resident population was only 80% (42,500) of the current population and given the rapid growth and diverging needs across Dunstan since that time it is difficult to consider the existing communities still constitute a single community of interest. Retaining the existing constituency boundary for Dunstan to maintain compliance regarding the +/-10% rule, is contrary to LEA s19V (2)(iii) where such compliance limits "effective representation of communities of interest by uniting within a ward or subdivision 2 or more communities of interest with few commonalities of interest".
- 2.5 Acknowledging that there is a level of growth in Cromwell (within the Central Otago District and as recognised by ORC's Report), it is the Queenstown Lakes District urban centres around Queenstown, Frankton and Wānaka that have experienced significant population growth that has led to the need to increase representation within the existing Dunstan constituency. These areas differ significantly in challenges, environment, diverse needs and populations from other centres in the existing Dunstan constituency such as Ranfurly or Omakau. These considerations, and the absence of commonality with the majority of the Central Otago District, make it clear that these growth areas and environs should be considered a community of interest and therefore worthy of increased or specific representation.
- 2.6 By 2030, the usually resident population in the Queenstown Lakes District is projected to be 60,212. This milestone will align with the requirement for a further review of representation by the ORC. It represents a 43% increase since the 2018 ORC representation review. This rapid and sustained growth should be taken into consideration now when adopting a final arrangement for representation including communities of interest, constituency boundaries and the number of members overall and per constituency. QLDC estimates that the population size of this community of interest within the Queenstown Lakes District boundary would easily demand three dedicated elected members (depending on balancing other changes within the overall number of elected members at the Otago regional level). This is largely consistent with the ORC's own modelling in option 2 of its Report which proposes the creation of an Upper Lakes constituency which includes Cromwell. Ultimately any arrangement should take into consideration the future growth over the next six years in alignment with the legislative requirement to complete a further review.

- 2.7 The ORC Report acknowledges that the current proposal is statistically compliant, however it does not create dedicated representation for the growth areas in Dunstan. In contrast, option 2 in the Report does respond to the significant growth in Queenstown, Wānaka and Cromwell.

3.0 Constituency boundaries need to be redrawn to reflect the diversity in challenges, environment and transport needs within the current constituency

- 3.1 The Dunstan constituency includes the Queenstown Lakes District and Central Otago District territorial authorities. The proposed representation arrangements retain the existing constituency boundary lines which have remained unchanged since at least 1995, based on publicly available maps from the Local Government Commission Te Mana Kāwanatanga ā Rohe.
- 3.2 The geographic scale⁶ of the existing Dunstan constituency creates too many divergent needs to consider the whole population as one community of interest. Queenstown Lakes District Council is recognised by LGNZ as a metro sector council which reflects the significant, rapid and sustained growth and development being experienced and the challenges that this Council faces. These include public transport needs for Queenstown, Frankton and Wānaka which differ greatly from those of more rural locations in the wider existing Dunstan constituency. There is increasing demand for public transport services in the Queenstown Lakes District both in frequency and in variety of routes.
- 3.3 The role the ORC needs to play in the Queenstown Lakes District Council area is a key one given the district has numerous significant lakes and waterways, in particular the deep-water lakes of Whakatipu, Wānaka and Hāwea. An extended new Upper Lakes constituency would also encapsulate Lake Dunstan as a further significant body of water.
- 3.4 Redrawing the constituency boundaries to create a new constituency approximating the existing Queenstown Lakes District boundary and including Cromwell, would enable fair *and effective* representation of a population with metro status and common needs such as public transport that are not reflected in the other areas of the existing Dunstan constituency and ensure representation from within the area that understands these needs and the local context. Cromwell is a consideration in the Queenstown Lakes Spatial Plan and viewed as an urban satellite with links between there and Wānaka, Frankton and Queenstown for employment and housing, and this Council supports the potential for Cromwell to be part of a new fifth constituency.

Recommendations:

R.1. In recognition of a community of interest centering around the urban hubs of Queenstown, Frankton, Wānaka, and Cromwell new boundaries should be instated to establish a fifth constituency encompassing the existing Queenstown Lakes district community. Including Cromwell would recognise the close relationship between these areas reflected in the Queenstown Lakes Spatial Plan and Cromwell's increasing growth with challenges emerging similar to those of the Queenstown Lakes District. In essence, QLDC recommends that ORC adopts an arrangement as outlined in option 2 of ORCs May 2024 report.

R.2. A new constituency (as recommended in R1 above) should elect a number of members to fairly, effectively, and proportionately represent the growing population now and into the mid-term future (assuming no further review of representation for another six years) and the overall population trends in the wider Otago region. This submission supports option 2 in ORCs Report which proposes three elected members for a new Upper Lakes constituency and recommends the ORC adopts this arrangement.

R.3. That QLDC be consulted on the name for the new constituency (with "Upper Lakes" being signalled as a working title) to ensure that the constituency name reflects the whakapapa of the geographic area.

⁶ The Dunstan Constituency covers an area of approximately 18,435km², with the Queenstown Lakes District making up 8,467km² of that area.