

Tokopiki Boundary Change Group

1. I am in favour of the proposed amalgamation with Palmerston North.
2. I am not in favour of the proposed new boundary being so far south.
3. A rural oriented councillor is needed for Tokopiki.
4. I wish to be heard at the hearing.

TOKOPIKI

1. This is not as simple as it would appear for Opiki and Tokomaru rural areas. To succeed it has many problems outside the simplicity of drawing a line, even that line has problems. Where should it be?

2. We have heard a lot about rates and how it would be better to go Palmerston North way, but there is a lot more than that. It has obvious advantages – Palmerston North is where we all go for all we want or do, and also for employment. The only thing for which most of us go to Levin is to pay rates and/or request assistance from the Council for planning etc.

3. The Horowhenua large debt is another problem, you can't just walk away from debt. So where does the debt go? Does Palmerston North take it over proportionately or what (maybe they don't want). With many in Opiki and Tokomaru areas wanting to secede will that leave a large enough rate base to keep Horowhenua County going or will they have to amalgamate with another council.

4. Then there is the boundary, at the moment its proposed position is close to Shannon, being that far from Palmerston North will lead to the Shannon folk being farther from PN than from Levin. Is it a frying pan and fire position. Will it give the same problems as Tokomaru and Opiki have now, too far from the governing body. Maybe an arbitrary line across farm land closer to Opiki and Tokomaru. Are there any paper roads which could be followed for the proposed new boundary?

5. Could Palmerston North council free up land for much needed building sections on the outskirts of Tokomaru village, should the Tokopiki proposal be approved. Are the services (water and sewage) up to an increased population or will they have to be enlarged at the cost to the ratepayers. To get sewage treatment right and big enough for future development is a costly business. Can Tokomaru ratepayers afford a targeted rate, because that is how it works for outlying villages. User pays.

7. It would be good if Tokomaru and Opiki had its own councillor to put the rural point of view at Palmerston North council table and not linked with the Fitzherbert ward. That ward takes in mainly

urban and lifestyle dwellings, also Massey university, who are totally different thinking people with different ideas than rural dwellers.

8. Now we read that Palmerston North does not want Tokomaru and Opiki. Does that mean that we stay with the devil we know or if you the Commissioners go the Palmerston North way regardless of Council wishes, that will mean that we will want our own councillor even more than ever to put our case whatever it is. If not we will be out in the cold for a long time. Simply a bank for the Council as it appears we are now.

9. You the Commissioners will need some special guidance – would God do? Because I have not got the answers, in fact I think that I may have given you more headaches with my observations.




PS
Tokopiki 11

I was in two minds about putting in a submission when I heard that Palmerston North did not want Tokopiki. Their executive had put in a report to Palmerston North councillors saying that further amalgamation would create further problems for PN to deal with. The report was endorsed by the councillors.

There must have been others like myself feeling let down, and who did not put in submissions. Very naughty of PN to do this at the time of written submissions. After all up until that point they had been wooing us. (Changing horses midstream comes to mind). More problems for the commissioners to consider.

I have worn many hats during my life, one of them as developer of sections, both lifestyle and domestic. The difficulty with Tokomaru village sections is that if you have to buy the land + all the costs of subdivision (the same costs in both areas) that dirty word called "profit" cannot be achieved. Enquiries have revealed that current prices in Tokomaru could realize approx.. \$180,000 and in PN & its environs \$400,000, so there is a major difference in value. So can Tokomaru grow or does it want? Or can anyway

The costs are the same in both areas



To Whom It May Concern

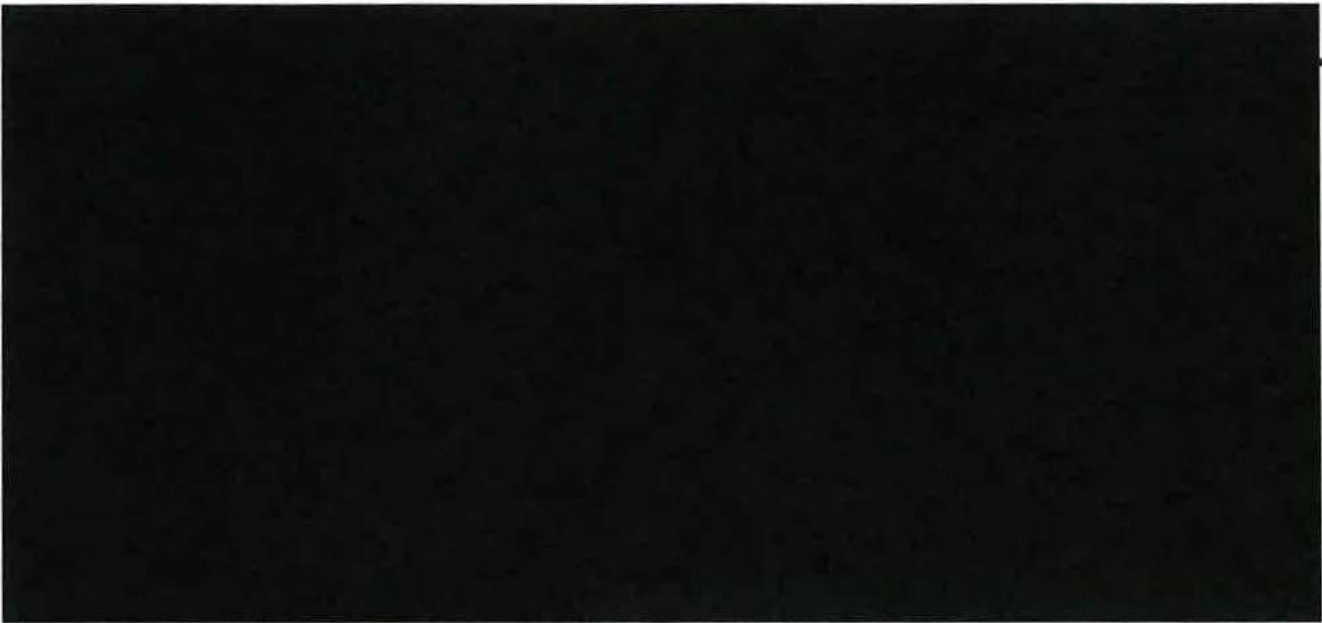
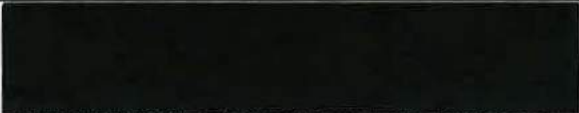
I am against Tokomaru and Opiki transferring from Horowhenua Council to Palmerston Council unless they take all previous owing debt with them.

As each ratepayer in the Horowhenua which includes Tokomaru and Opiki - owes approx \$4,000 each because the Horowhenua Council at present is in debt for approximately \$4 million and the council represents the ratepayers so its all of our debt in the Horowhenua including Tokomaru and Opiki's debt.
They should pay for their share of debt before they go.

I am concerned it doesnt get left for the rest of Horowhenua rate payers to pay for.

I am also concerned about a further rate increase in the Horowhenua otherwise on top of future rate hikes for the next 2-3 years as are being forecast by the HDC.

Jill Billsborrow


Subject: Opiki & Tokomaru request to transfer councils

Submission

'As each ratepayer in the Horowhenua owes approx \$4,000 because the Horowhenua Council is in debt, I think Tokomaru and Opiki should take any or old debt with them as part of the transfer.

We are concerned our rates will go up even more if Horowhenua ratepayers have to pick up their tab'.

Pauline and Bill Keast



To: Submissions
Subject: Tokomaru/Opiki (PN/Horowhenua)

Yes, I certainly support the requested boundary alteration.

From 2004 until 2013, I served on the Horowhenua District Council, elected by the constituents of the Kere Kere ward.

During this period of time, we had submitters pointing out the inequities experienced by those owning property in this Tokomaru/Opiki area.

Their land values were generally higher than other rural sectors of the Horowhenua District.

Their rates, based on land values were accordingly high.

Due to their distance from our main centres, their access to amenities was low.

Expenditure on essential infrastructure failed to meet the demand for quality standards, and was initially deferred beyond the cycle of the ten-year plan.

Although I always felt sorry for these submitters, I felt powerless to offer any option that would satisfy these ratepayers – apart from an application for a reorganisation proposal.

Many of the remaining questions, I consider inappropriate for me to answer.

This question however is valid: Which territorial authority is best able to represent Opiki and Tokomaru residents and property owners?

The honest answer would have to be Horowhenua, due to the statutory formula for determining ward boundaries.

The statistical data tells its own story when it comes to population.

Horowhenua would lose 4% of its population, whereas PN would gain 1.6%, so obviously the adjustment in boundaries would have a negligible impact on existing representation in PN.

By contrast, Miranui would lose 46% of its population, falling well below the threshold to justify one ward councillor.

The statistics on land suggest there is scope for considerable expansion for Palmerston North, particularly towards the direction of Massey University.

I doubt whether the Horowhenua would invest the same amount for development of the 14% northern segment of the district when Tokomaru, as the main settlement, is some 22 minutes travelling time away.

Besides, the Horowhenua is already planning to invest heavily in the Levin area with obligatory infrastructure upgrades.

Comparing the distances, Tokomaru is only 16.3km from Palmerston North whilst it is 28.9km to Levin.

For a person travelling to and from work each day, these comparative distances acquire greater significance.

Finally, I would like to address the alternative reorganisation applications filed by Ngati Turanga.

As a reputable researcher and author, I appeared as a technical witness for the Mua-Upoko Priority hearings before the Waitangi Tribunal.

I also receive all the briefs of evidence for the forthcoming Ngati Raukawa hearings.

The claim that the Ngati Turanga rohe extends across the Manawatu, Horowhenua and Kapiti districts is ambitious, to say the least.

Proposals for this alternative reorganisation should therefore be treated with considerable caution.

Name: Anne Hunt



At this stage, I do not wish to speak about my feedback at a Commission hearing.

Proposed Boundary Alteration between Horowhenua District and Palmerston North City at Tokomaru and Ōpiki

Submission of Horowhenua District Council

31 March 2021

Introduction

- 1 This submission responds to the Commission's investigation into the local government reorganisation application it received on 4 October 2018 (amended application received on 5 November 2018) for a boundary alteration between Horowhenua District and Palmerston North City in the areas of Tokomaru and Ōpiki.
- 2 The Horowhenua District Council appreciates the Commission's notification and subsequent consultation and thanks you for the opportunity to provide comment. We wish to be heard in support of this written submission.

This submission is made by the following:

Horowhenua District Council

126/148 Oxford Street, Levin 5510

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1 Executive Summary

- 1.1 The Horowhenua District Council strongly opposes the application from the 'Tokopiki' Boundary Change Group for the secession of the Tokomaru/Ōpiki area from the Horowhenua District, for inclusion into Palmerston North City.
- 1.2 The history of the Tokomaru/Ōpiki area is intrinsically linked to Horowhenua and the Council submits that the community of interest and rural nature of the area is better linked with Horowhenua than with Palmerston North City.
- 1.3 Current and future services provided, and the rating for those services by Horowhenua, is quantifiable and understood. It is unclear what might eventuate if the area is included in Palmerston North City therefore direct comparisons and assumptions of advantages are premature.
- 1.4 The Council refutes the contention that the Tokomaru/Ōpiki area has been treated poorly and that services and representation will be better in this area if it is joined with Palmerston North City. All local authorities need to make balanced decisions when considering the competing demands and priorities of the various communities that make up their territory.
- 1.5 The Council contends that its experience in supporting rural communities with similar service requirements will provide for better local government for the Tokomaru/Ōpiki area than the adjacent City will by attaching this small rural node to the bustling regional urban, commercial and industrial hub.
- 1.6 The Council's view is that the proposal will not provide for more effective governance, including decision making, nor would it facilitate more effective planning for the immediate and long term needs for the Tokomaru/Ōpiki area. Compared with the Horowhenua focus on rural needs, this area might become 'lost' in the more complex urban needs and demands that the Palmerston North City contends with.
- 1.6 The Council has not identified any significant productivity improvements, efficiency gains or cost savings should the application be approved.
- 1.7 The Council has identified that it will have some difficulty recognising a separate community of interest for the balance of Miranui Ward should the application be approved. This means that the opportunities, needs and circumstances, and representation of the whole of Miranui Ward, which the Council contends should be regarded as the 'affected area', will be adversely impacted.
- 1.8 A change to the local authority administration for this area will impact on the relationships iwi have with the respective local authorities. In particular, Ngāti Whakare and Ngāti Raukawa ki te Tonga will need to develop a relationship with Palmerston North City Council and will have expectations to be involved in decision making. For the both Ngāti Whakare and Ngāti Raukawa ki te Tonga iwi, that will mean duplication of effort. For the Palmerston North City it will mean involving both iwi, Ngāti Raukawa ki te Tonga and Rangitāne o Manawātū, in decision making and consultation and that may lead to duplication and confusion. This should be explored with both iwi to ensure their interests are not affected or in fact eroded.

- 1.9 The influence of Palmerston North as a large regional centre is as profound as many other regional areas in New Zealand and that influence impacts on the concept of communities of interest. Horowhenua provides a rural and coastal playground, economic opportunities, provision of supplies, transport inter-connectivity, etc, for the people of Palmerston North too. The concept of community of interest is not limited to urban functions and an inverse recognition needs to be acknowledged.
- 1.10 The planning and implementation of water and wastewater infrastructure in the Tokomaru/Ōpiki area is not indicative of the Council neglecting this area which has benefitted significantly from rating harmonisation of the Three Waters that was introduced in 2009.
- 1.11 Historical and planned incremental increases in roading expenditure are also not indicative of the area being neglected by the Council.
- 1.12 The Council requests that these significant matters should convince the Local Government Commission that the application for the secession of the Tokomaru/Ōpiki area from Horowhenua for inclusion into Palmerston North City, not be approved.

2 Background

2.1 The application specifically requests that the boundary of Palmerston North City be moved south to include the township of Tokomaru, the rural locality of Ōpiki and the surrounding areas. The amended application subsequently received did not affect the substance of the application with respect to the relevant statutory requirements.

2.2 At its meeting on 29 November 2018, the Commission considered the application and made the following decisions pursuant to Schedule 3 of the Act:

- (a) It **agreed** that the “affected area” in respect of the reorganisation application is the area bounded by the Manawatū River, Okuku Road, Kingston Road and the Tararua ranges which forms part of the Miranui ward of Horowhenua District;
- (b) It **agreed** that the affected local authorities are Horowhenua District and Horizons Regional Council;
- (c) It **agreed** that there are no grounds to decline the application under clause 7, and that it contains the necessary information specified in clause 5;
- (d) It **agreed** to assess the application and to notify the applicant, the affected local authorities, and Palmerston North City Council of the decision under clause 6;
- (e) It **agreed** under clause 8(1) that it has sufficient information to be satisfied there is demonstrable community support in the district of each affected territorial authority for local government reorganisation in the affected area;
- (f) It **agreed** to meetings with the applicants, affected local authorities, and Palmerston North City Council before deciding to publicly notify the application and call for alternative applications under clause 9.

2.3 The Commission has given the following reasons for its decision:

- (a) The Commission was required under clause 6 of Schedule 3 to consider the application as soon as practicable after receiving it, which was on 4 October 2018, and to decide whether or not to assess the application.
- (b) Clause 7 sets out the grounds on which the Commission may decline to assess an application. The Commission found that none of these grounds applied in respect of the “Tokopiki Boundary Change Group” application.
- (c) Among other things, the Commission was required to consider information provided demonstrating community support in the district of each affected territorial authority for the application. In order to satisfy itself on this requirement, the Commission needed to determine which are the affected territorial authorities.
- (d) An affected territorial authority under the Act is a territorial authority that contains an affected area. An affected area is defined under clause 2 of Schedule 3 and includes an area that would be included in a new or

different local authority if the reorganisation were to proceed. The Commission may, under specified circumstance, declare that the whole of the district containing such an area is affected area. The Commission did not consider there were grounds to do so.

- (e) Accordingly the affected local authorities are Horowhenua District Council (the "affected territorial authority") and Horizons Regional Council. While Palmerston North City Council is not an affected local authority in terms of the statutory definition, the Commission intends to ensure that it is appropriately included in the process.
- (f) The Commission was then in a position to assess whether there was the required information demonstrating community support in the district of the affected territorial authority (Horowhenua District) for the application. For this purpose it considered the following information it had received:
 - a collection of 307 signatures supporting the application, mainly from residents of the affected area;
 - accounts of attendance, and views expressed, at public meetings called to discuss a proposed boundary change in Tokomaru and Opiki.

On the basis of the above information, the Commission came to the conclusion that there was sufficient information demonstrating community support for the application in the district of the affected territorial authority.

- (g) As there were no further grounds to decline to assess the application, the Commission agreed it would assess the application.
- (h) Prior to proceeding to assess the application, however, the Commission must first be satisfied, under clause 8(1) of Schedule 3, that there is demonstrable community support in the district of each affected territorial authority for local government reorganisation in the affected area. The Commission considered that it did have sufficient information to satisfy itself of this.
- (i) The basis for this decision was the information referred to in paragraph 10. The Commission was conscious that the evidence demonstrating community support does not need to indicate a particular level or type of support, such as whether there was majority support, as this is not a requirement in the Act.
- (j) As part of its future consideration of whether to proceed to issue a draft reorganisation proposal and then a final proposal, the Commission will need to continue to assess levels of community support for local government reorganisation in the affected area, and for particular options that may be identified during the process. At each step in this process the Commission will need to continue to satisfy itself on the existence of demonstrable community support.

2.4 The Commission adopted a reorganisation investigation process in July 2020 and proceeded to meet with the community in Tokomaru and Opiki, on 13 October 2020. The final process was advised to Council in November 2020.

2.5 The Commission, in doing its assessment to determine if the information provided with the application demonstrated community support for the application advised that there was a collection of 307 signatures supporting the application "mainly from residents of the affected area".

The Council has determined that there are 816 enrolled electors in that affected area, therefore the number of signatures, presuming they came from the affected area, represents 38%. The Council concedes that is a significant number of people concerned about local government for their area.

Coincidentally, about the same number of people voted in the 2018 local elections – 323 voting papers were returned, that is 39.58%. This is less than the 43.34 % in the whole of the Miranui Ward who voted.

The Council's view is that in both the affected area and the whole of the Miranui Ward, this is a poor return and it will continue to work hard to encourage its electors to participate in local democracy.

3 The Council's View

3.1 Historical Context

- 3.1.1 The history of the area goes way back before the local government reforms of 1989. The alignment of this area with the Horowhenua catchment was established in 1885, over 135 years ago.
- 3.1.2 The Council will refer to the area identified by the Commission as Tokomaru/Ōpiki.
- 3.1.3 The Horowhenua County Council was formed in 1885 from the southern part of the Manawatū County. The first meeting of the Horowhenua County Council was held 24 January 1885. The Palmerston North Borough Council was formed just before Horowhenua County in 1877, also splitting off from Manawatū County.
- 3.1.4 As first established, the Horowhenua County had three ridings: Ōtaki (area surrounding Ōtaki township), Te Horo (southern portion of county around Waikanae) and Whirokino (northern portion of county including Levin, Shannon and Tokomaru). In 1893 part of Whirokino Riding was split off to form Tokomaru Riding which started just south of Shannon and covered the northern most part of the county. So Tokomaru was an established part of Horowhenua as early as 1885 and has been a separate identity since 1893.
- 3.1.5 The Shannon Borough Council was constituted on 1 August 1917 from Horowhenua County. In 1966 the Borough amalgamated back into the county and a county town committee was formed for the town.
- 3.1.6 In 1989 as part of the Local Government reorganisation the Horowhenua County amalgamated with Levin Borough, Foxton Borough and part of the first Manawatū District Council to form the Horowhenua District Council. At that time, the southern part of the County around the Waikanae and Ōtaki areas became part of the new Kāpiti Coast District Council.
- 3.1.7 The applicants' emphasis on one of the options considered in the 1989 reforms as being evidence of an historical connection with Palmerston North in a local government administrative sense and a significant reason for the proposed shift is inaccurate. The historical connection as part of Horowhenua was still relevant at that time.
- 3.1.8 The inclusion of the Tokomaru/Ōpiki area in Horowhenua District in 1989 recognised the community of interest that existed at that time and still exists today. According to the main requirements that guided the Commission in implementing the 1989 reforms the defined area for Horowhenua, including Tokomaru/Ōpiki, "corresponded with and served existing rather than historical communities of interest".

3.2 Rating

3.2.1 The rating examples used in the application are as at this particular point in time, and do not take into account what might happen in the future:

- (a) The Tokomaru/Ōpiki area has a standalone water supply with rating charges harmonised across the Horowhenua District. Palmerston North City has a single water supply system throughout the city. It is unclear if the Palmerston North supply would be extended and what the cost of that might be.
- (b) Palmerston North City Council has a waste disposal strategy with \$350M assigned to implement a disposal system. It is unclear whether Tokomaru and Ōpiki would be included within the scope of that strategy and the extent of cost that might be borne by those communities.

Horowhenua has “harmonised” the Three Waters rates meaning there is District wide subsidisation of the Tokomaru Township (especially for water and wastewater). The applicants do not accept this. The main reason for the move to harmonisation of these rates in 2009 was to make these services more affordable for small towns like Tokomaru. That resulted in a sizeable reduction to the rates applicable at that time that continues with the harmonisation policy still being applied today.

- (c) Horowhenua currently provides a waste collection service with a recycling component (currently \$126). To date Palmerston North City has not made a decision to provide a recycling service and the costs are not included in the rating examples provided. It is unclear what the cost of such a service would be if provided to the townships.
- (d) The application states that “according to the 2018 League Tables produced by the Taxpayers Union the average residential rates in Horowhenua District are \$2,311” and that “we are advised that Ōpiki pays the highest rural rates per hectare in the country”. The latest New Zealand Taxpayers’ Union league tables released in 2019 report that the average residential rates in Horowhenua are \$2,369 compared with the national average of \$2,460. For Palmerston North City, the average residential rates are reported as \$2,634, higher than the national average.

There are no rural or farm rates included in the 2019 report but the average non-residential rates for Horowhenua are \$1,575 compared with the national average of \$5,995. The average non-residential rates for Palmerston North City are reported to be \$6,504, again higher than the national average.

A direct calculated comparison for a rural farm property in Horowhenua with one in Rangitikei District for instance, with the same

land and capital values, shows that the ratepayer would pay less in Horowhenua.

These examples indicate that Horowhenua rates are not as exorbitant as implied by the rating information and comments contained in the application.

The total rate income for Horowhenua for the current year is \$41,454,000. If the Tokomaru/Ōpiki area is excluded then the rate income would be \$39,683,000 – a loss to Horowhenua District of \$1,771,000.

The effect of this on an 'average' Levin residential property with land value of \$180,000 and a capital value of \$360,000 would be a decrease in the current annual levy of \$16.62 (\$2,533.26 compared with \$2,516.64).

The effect on an 'average' rural farm property with land value of \$3,220,000 and a capital value of \$3,340,000 would be an increase in the current annual levy of \$1,803.24 (\$7,383.39 compared with \$9,186.63).

3.3 Backwater contention

- 3.3.1 The Horowhenua District Council refutes the contention that the Tokomaru/Ōpiki area has been treated as a backwater "providing minimal services in Tokomaru and mostly none in Ōpiki".
- 3.3.2 The Tokomaru water supply upgrade is a prime example. An innovative and clever engineering solution brought the project forward 8 years. Originally included in the Long Term Plan for 2024 at a cost in excess of \$2M, it was constructed in 2016 at a cost of \$350,000. In addition, the 'China' solution advocated by the applicant of a water supply treatment solution at even less cost was assessed and rejected by the Council and its specialist consultants as not being suitable for Tokomaru source water.
- 3.3.3 The Council engages with the community to develop its long term plans every three years and assesses priority needs basing decisions on the requirements described in sections 76 to 81 of the Local Government Act 2002 and the principles set out in section 14 of that Act. For completeness, Appendix 1 is a copy of the relevant sections. The decision making process is complex and the Council is required to take into account a multitude of factors and considerations. Despite efforts to secure broad community support around Council plans and proposals, it is not always possible to satisfy all community expectations in respect to levels of service.

3.4 Better All Round

- 3.4.1 The submitters contend that Palmerston North City will provide better services.

- 3.4.2 They also contend that with elections at large across the City, Palmerston North will better represent the interests of the small number of people in the Tokomaru/Ōpiki area. Being able to vote for more elected members in an at large system does not by itself support the contention that those in this small rural area will be better represented.
- 3.4.3 The applicants also suggest that the Palmerston North City Council is better run, will make better decisions and provide services more to their liking.
- 3.4.4 There are many examples in New Zealand of people living in proximity to a large urban centre but belonging in an adjacent rural community. That often leads to comparisons being made about the services provided, the quality of those services and the cost of delivery.
- 3.4.5 Regardless of whether the Tokomaru/Ōpiki area is included in the Horowhenua District or Palmerston North City, any decisions relating to that area have to be balanced with the needs and priorities of the rest of the District or City.
- 3.4.6 It is generally understood that in larger organisations, it becomes much more difficult for individual members of the public to be familiar with and understand the many and varied activities which the council undertakes, or to exercise effective influence. This is contrary to the views expressed in the application.
- 3.4.7 The question for all local authorities is: how do we balance the demands of those in the community for a say in how their community is run with the required objective of enhancing efficiency?
- 3.4.8 The application states that “a lot of people have bought houses in Tokomaru and work in Palmerston North, regarding the Tokomaru location being a good compromise between affordability and access to the City”. This is a choice we make when deciding where to live and there are many factors that influence and/or contribute to that decision.

3.5 Better Local Government

- 3.5.1 The Council contends that its experience in supporting rural communities with similar service requirements will provide better local government for the Tokomaru/Ōpiki area than the adjacent City will by attaching this small rural node to the bustling regional urban, commercial and industrial hub.
- 3.5.2 The Council has not assessed any significant productivity improvements for Horowhenua District should the application be approved.
- 3.5.3 The Council has not identified any significant efficiency gains or costs savings for Horowhenua District should the application be approved.
- 3.5.4 The Council will continue to have the resources necessary to enable it to effectively perform and exercise its responsibilities, duties and powers regardless of whether the application is approved or declined.

- 3.5.5 The Council has identified that it will have some difficulty recognising a separate community of interest for the balance of Miranui Ward should the application be approved. This means that the opportunities, needs and circumstances of the affected area (the whole of Miranui Ward, as the Council contends it should be) will be adversely affected.
- 3.5.6 The Council's view is that the effectiveness, efficiency and sustainability of Horowhenua District will be unaffected, and therefore not enhanced.
- 3.5.7 Support for the ability of the local and regional economies to develop and prosper will, in the Council's opinion, not be better.
- 3.5.8 The Council considers that Horowhenua is better placed to meet the changing needs of this rural community for governance and services into the future. Horowhenua is more experienced in providing services and support to rural communities than the larger urban regional city of Palmerston North.
- 3.5.9 The area seeking to be transferred to Palmerston North City will be too small to be recognised in that local authority as a separate rural community of interest whereas it is so recognised as part of the rural Miranui Ward in Horowhenua. Therefore, in the Council's view, the proposal will not provide for a more effective representation of its community of interest.
- 3.5.10 The Council's view is that the proposal will not provide for more effective governance including decision making, nor would it facilitate more effective planning for the immediate or long term needs for the area concerned. Compared with Horowhenua's focus on rural needs this area might become 'lost' in the more complex urban needs and demands that the City contends with.

4 Iwi Relationships

4.1 Potential Impacts

4.1.1 Ngāti Raukawa ki te Tonga is a local iwi with strong ties and a developing relationship with Horowhenua District Council. While Council does not have an official Memorandum of Partnership with Ngāti Raukawa ki te Tonga, as a recognised iwi partner, regular hui take place with hapū representatives from across the district. Environmental, planning, infrastructure projects and significant issues are a priority for Ngāti Raukawa ki te Tonga and Council. This relationship is key to input into Council's decision making process.

4.1.2 Whakawehi Marae (also known as Poutu Pā) is located just outside of Shannon, within the Miranui Ward. This is the marae of Ngāti Whakare, a hapū of Ngāti Raukawa ki te Tonga. The relationship with Ngāti Whakare as well as other hapū of Ngāti Raukawa ki te Tonga, is valued by Council and again, key to Council's decision making process.

Discussions between Council and Ngāti Whakare representatives have taken place where they have indicated their opposition to the proposal, which would see a split in their rohe between two territorial local authorities.

Ngāti Whakare informed that they are to meet with The Commission and in addition, make a submission to the proposal.

4.1.3 Rangitāne o Manawatū - there is a Memorandum of Partnership between Horowhenua District Council and Tanenuiarangi Manawatū Incorporated, approved by Horowhenua District Council on 3 September 2008, the first of its kind in Horowhenua to be signed with iwi. Consultation with representatives of Rangitāne o Manawatū takes place regarding environmental and planning issues.

The partnership document enables both parties to work on environmental and planning projects where there is mutual benefit for their respective communities of interest, consult with each other on issues of significance and develop opportunities that allow Rangitāne o Manawatū to share in the relevant decision making processes with the Council.

4.1.4 Muaūpoko are also an iwi of the Horowhenua District. Council has a Memorandum of Partnership with Muaūpoko which sets the platform for the relationship which focuses on, environmental issues, infrastructure planning and issues of significance to both parties. Council values this partnership which assists in the decision making process.

4.1.5 The application states that the rohe, other inter-iwi concerns and their interests cross local authority boundaries, and will be unaffected by the proposal.

4.1.6 Council recognises the importance and special position of tangata whenua within the district. Rangitāne o Manawatū, Ngāti Raukawa ki te Tonga and

Ngāti Whakare have strong interests in the Tokomaru/Ōpiki area and a change to the local authority administration for this area will impact on the relationships of both iwi with the respective local authorities.

In particular, Ngāti Raukawa ki te Tonga and Ngāti Whakare will need to develop a relationship with Palmerston North City Council and will have expectations to be involved in decision making. For the both Ngāti Raukawa ki te Tonga iwi and Ngāti Whakare, that will mean duplication of effort. For the Palmerston North City it will mean involving both iwi and hapū in decision making and consultation and that may lead to duplication and confusion. This should be explored with both iwi to ensure their interests are not affected or in fact eroded.

- 4.1.7 The Council's view is that, from its perspective, it can effectively provide for any co-governance or co-management arrangements that might be established by legislation. It is also the Council's view that iwi views should be sought on how they consider any co-governance or co-management responsibilities might be impacted, from their perspective, should the application succeed.

5 Representation Issues

5.1 Affected Area and Representation

5.1.1 The Council contends that the affected area determined by the Commission is too narrow. As with iwi relationships, there are many more in the community affected by this application than those within the area sought to be transferred to Palmerston North City.

5.1.2 At the last representation review in 2018, the Council determined that combining the Miranui Ward with the Kere Kere Ward would divide communities of interest and therefore adopted representation arrangements that recognised this.

Wards	General Electoral Population	Number of councillors per constituency	Population per councillor	Deviation from district average population per councillor	% deviation from district average population per councillor
Kere Kere	5,780	2	2,890	-356	-10.96
Miranui	3,080	1	3,080	-166	-5.11
Levin	16,950	5	3,390	144	4.44
Waiopahu	6,650	2	3,325	79	2.43
Total	32,460	10	3,246		

5.1.3 The Local Government Commission agreed with the Council's view and supported the Kere Kere Ward remaining separate with 2 elected members even though the % deviation from the district average per councillor exceeded 10%.

5.1.4 The Growth Strategy for Horowhenua predicts Miranui to be the slowest growing ward in Horowhenua. The number of electors in the area determined by the Commission to be affected as at 30 June 2020 is 816 (779 on the General Roll and 37 on the Māori Roll). Those remaining in the portion of the Miranui Ward that is not the subject of this application (if approved), will have their representation affected and their community of interest no longer recognised and therefore local government, for them, will be significantly changed and the Council's responsibility impacted upon. For that reason the Council believes the broader Miranui Ward residents are affected in accordance with clause 2 (b) of Schedule 3 of the Local Government Act 2002.

5.1.5 If the Commission approves the secession of the area it determines to be the affected area to Palmerston North City then based on the current population statistics as at 30 June 2020 the representation for Horowhenua, retaining 10 councillors and four wards (with one being a reduced Miranui Ward), before and after the secession would look like this:

Before secession:

Wards	General Electoral Population	Number of councillors per constituency	Population per councillor	Deviation from district average population per councillor	% deviation from district average population per councillor
Kere Kere	6,400	2	3,200	-408	-11.31
Miranui	3,480	1	3,080	-528	-14.63
Levin	18,200	5	3,640	32	0.89
Waiopahu	8,000	2	4,000	392	10.86
Total	36,080	10	3,608		

After secession:

Wards	General Electoral Population	Number of councillors per constituency	Population per councillor	Deviation from district average population per councillor	% deviation from district average population per councillor
Kere Kere	6,400	2	3,200	-326	-9.25
Miranui	2,664	1	2,664	-862	-24.45
Levin	18,200	5	3,640	114	3.23
Waiopahu	8,000	2	4,000	474	13.44
Total	35,264	10	3,526		

- 5.1.5 The population changes since the last representation review, before secession would still leave a strong argument to retain separate representation for Miranui (and in fact all exiting four wards) whereas, after secession, would almost certainly mean the raw population only factor for fair representation would dilute the communities of interest argument for Miranui to be recognised separately and create doubt that Waiopahu would retain its identity.
- 5.1.6 The Council's perception from attending public meetings in the area in recent times is that the level of support, in the area determined by the Commission to be affected, is divided.
- 5.1.7 If it is accepted that all of the people in the Miranui Ward are affected (as described above), then in the Council's view, there is insufficient evidence that there is a clear, quantifiable majority support for the proposal.

5.2 Introduction of Māori Wards

- 5.2.1 The enactment of the Local Electoral (Māori Wards and Māori Constituencies) Amendment Act 2021 gives Horowhenua District Council the opportunity to review whether or not to introduce Māori wards. There is a transition period until 21 May 2021 for the Council to make a determination in time for the introduction at the 2022 local elections.
- 5.2.2 If the Council decides to introduce Māori wards the entitlement, based on Māori electoral population and General Electoral population, is one Māori Member.
- 5.2.3 If that decision is made then the Council must carry out a representation review.
- 5.2.3 Should the Council decide to retain 10 elected members in total, there will be one Māori member elected at large (across the whole District) by those on the Māori Electoral Roll and nine elected members elected either at large, partially at large and by wards, or by wards.
- 5.2.4 Assuming that the Council decides to retain a total of 10 councillors with one Māori Councillor and the other nine general councillors elected from the existing wards, this is what the situation will look like, based on the latest population estimates provided by the Department of Statistics (note, these figures differ from the 2018 figures shown in 5.1.2 above):

Wards	General Electoral Population	Number of councillors per constituency	Population per councillor	Deviation from district average population per councillor	% deviation from district average population per councillor
Kere Kere	5,480	2	2,740	-707	-20.51
Miranui	2,840	1	2,840	-607	-17.61
Levin	15,500	4	3,875	428	12.42
Waiopahu	7,200	2	3,600	153	4.44
Total general	31,020	9	3,447		
Māori	5,060	1			
Total	36,080	10	3,608		

- 5.2.5 In this example, three wards are non-compliant as they breach the + or – 10% threshold. The Council would have to alter the number of elected members or include the election of some members at large. Should the Commission approve the secession of the Tokomaru/Ōpiki area to Palmerston North the situation then looks like this:

Wards	General Electoral Population	Number of councillors per constituency	Population per councillor	Deviation from district average population per councillor	% deviation from district average population per councillor
Kere Kere	5,480	2	2,740	-620	-18.45
Miranui	2,061	1	2,061	-1,299	-38.66
Levin	15,500	4	3,875	515	15.33
Waiopēhu	7,200	2	3,600	240	7.14
Total general	30,241	9	3,360		
Māori	5,023	1			
Total	35,264	10	3,526		

5.2.6 This example shows that changes to the numbers of elected members will not enable Miranui to reach a fair representation based on the legislative compliance issues.

5.3 Community of Interest

5.3.1 The influence of Palmerston North as a large regional centre is as profound as many other regional areas in New Zealand and that influence impacts on the concept of communities of interest.

5.3.2 Communities of interest are often based on assumptions of people's behaviour and characterised by their frequent interactions such as employment, shopping, banking, recreation, education and social activities within that urban centre.

5.3.3 Palmerston North's sphere of influence extends way beyond the Tokomaru/Ōpiki area.

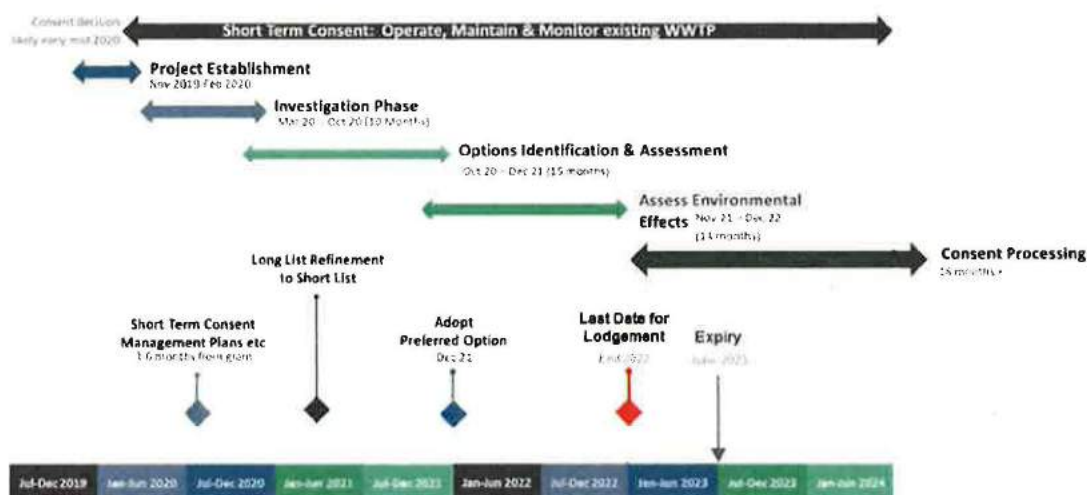
5.3.4 Horowhenua provides a rural and coastal playground, economic opportunities, provision of supplies, transport inter-connectivity, etc, for the people of Palmerston North too. The concept of community of interest is not limited to urban functions and an inverse recognition needs to be acknowledged.

5.3.5 The telephone free calling area is now much less of a factor with the continuing developments of the mobile telephone and data transmission networks.

6 Infrastructure Issues

6.1 Wastewater:

- 6.1.1 The Council harmonised the rating of the Three Waters in 2009. Wastewater rating in the Tokomaru/Ōpiki area has benefited by this harmonisation policy.
- 6.1.2 The Tokomaru wastewater system is subject to an enhancement project that is currently underway.
- 6.1.3 The Wastewater project's aim is to:
 - a) Agree on a renewed five (5) year discharge consent to water with Horizons Regional Council and key stakeholders;
 - b) With the community and key stakeholders, agree on a long term treatment and discharge option before 2022.
- 6.1.4 A short term consent was sought for the ongoing operation of the wastewater treatment plant while the long term option was determined. A hearing was held on 28 July 2020 and consent was granted on 31 July 2020. The consent has been granted with conditions which had previously been agreed by the Horowhenua District Council.
- 6.1.5 The Council has made a commitment to work with iwi and the community to investigate and implement a long term land-based treatment option. Stakeholder (Working Party) feedback has been that they wish to ensure all options to remove wastewater discharge to water are explored.
- 6.1.6 Central Government (Ministry for the Environment) funding was secured and this has assisted Council to purchase land which is considered suitable for the purpose.
- 6.1.7 The investigation phase commenced in March 2020 and is ongoing. A key part of this work includes inflow and infiltration assessments (as requested by stakeholders), as well as planning as to how growth areas may be serviced and impacts on wastewater flows over the life of the long term solution. Current work is focused on including measures to accelerate the project to reach a preferred solution and lodge applications as soon as practicable.
- 6.1.8 Tokomaru Wastewater Working Party (TWWWP) meetings are being held twice yearly during the course of the work programme.
- 6.1.9 The project in schematic form is:



6.1.10 The planning and implementation of this project is not indicative of the Council neglecting this area.

6.2 Water Supply

- 6.2.1 Without the harmonised water rating introduced by the Council in 2009, the area that is provided with a water supply in the Miranui Ward would have had considerable difficulty meeting the costs without further subsidisation if actual location-based costs were used. Small rural water supplies that comply with all requirements for potable water are very expensive and the small number of users of the service struggle to meet both the capital and the ongoing maintenance and treatment costs.
- 6.2.2 Palmerston North City has a single water supply provided for the whole city whereas Tokomaru/Ōpiki water supply is a standalone system. It is unclear what the costs of supply of water would be
- 6.2.3 Three Waters Reforms - Central Government is reviewing how to improve the regulation and supply of drinking water, wastewater and stormwater (the three waters) in New Zealand. This is to give New Zealanders confidence that drinking water is safe to use, sources of drinking water are adequately protected, and wastewater and stormwater are managed in environmentally sustainable ways. Once the reforms are implemented, this will impact on the delivery of Three Waters in the Tokomaru area.

6.3 Rooding

- 6.3.1 Plans for the next 3 years include expenditure of \$11.72M on roading (21/22 \$3.665M, 22/23 3.925M and 23/24 \$4.13M). The incremental increase is 7 and 5% respectively.
- 6.3.2 This expenditure includes metalling unsealed roads, resurfacing sealed roads, drainage renewals, sealed roads pavement rehabilitation, structure

component replacement, bridge and structure renewals, traffic services renewals and footpath renewals.

- 6.3.3 This is an increase of \$2.86M on the expenditure of \$8.86M (32%) spent over the last three years on the same infrastructure.
- 6.3.4 Both the historical and the planned spend are not indication of an area being neglected by the Council.

6.4 Parks and Property

Several projects have been identified including replacing toilet facilities at Horseshoe Bend in the next 3-5 years. Council also has some seminal plans to resurface Tokomaru Hall carpark (next 2-3 years), install some drainage and potentially a play area on the adjacent reserve.

Note that Council has not yet consulted with the community on the plans, and there are no budgets either now or in the current LTP (21-24) for the works.

Appendix 1 – Relevant sections of the Local Government Act 2002 (refer clause 3.3.3)

Section 14 Principles relating to local authorities

- (1) In performing its role, a local authority must act in accordance with the following principles:
- (a) a local authority should—
 - (i) conduct its business in an open, transparent, and democratically accountable manner; and
 - (ii) give effect to its identified priorities and desired outcomes in an efficient and effective manner;
 - (b) a local authority should make itself aware of, and should have regard to, the views of all of its communities; and
 - (c) when making a decision, a local authority should take account of—
 - (i) the diversity of the community, and the community's interests, within its district or region; and
 - (ii) the interests of future as well as current communities; and
 - (iii) the likely impact of any decision on each aspect of well-being referred to in [section 10](#);
 - (d) a local authority should provide opportunities for Māori to contribute to its decision-making processes;
 - (e) a local authority should actively seek to collaborate and co-operate with other local authorities and bodies to improve the effectiveness and efficiency with which it achieves its identified priorities and desired outcomes; and
 - (f) a local authority should undertake any commercial transactions in accordance with sound business practices; and
 - (fa) a local authority should periodically—
 - (i) assess the expected returns to the authority from investing in, or undertaking, a commercial activity; and
 - (ii) satisfy itself that the expected returns are likely to outweigh the risks inherent in the investment or activity; and
 - (g) a local authority should ensure prudent stewardship and the efficient and effective use of its resources in the interests of its district or region, including by planning effectively for the future management of its assets; and
 - (h) in taking a sustainable development approach, a local authority should take into account—
 - (i) the social, economic, and cultural well-being of people and communities; and

- (ii) the need to maintain and enhance the quality of the environment; and
 - (iii) the reasonably foreseeable needs of future generations.
- (2) If any of these principles, or any aspects of well-being referred to in [section 10](#), are in conflict in any particular case, the local authority should resolve the conflict in accordance with the principle in subsection (1)(a)(i).

Sections 76 to 81: Decision Making

76 Decision-making

- (1) Every decision made by a local authority must be made in accordance with such of the provisions of [sections 77, 78, 80, 81](#), and [82](#) as are applicable.
- (2) Subsection (1) is subject, in relation to compliance with [sections 77](#) and [78](#), to the judgments made by the local authority under [section 79](#).
- (3) A local authority—
 - (a) must ensure that, subject to subsection (2), its decision-making processes promote compliance with subsection (1); and
 - (b) in the case of a significant decision, must ensure, before the decision is made, that subsection (1) has been appropriately observed.
- (4) For the avoidance of doubt, it is declared that, subject to subsection (2), subsection (1) applies to every decision made by or on behalf of a local authority, including a decision not to take any action.
- (5) Where a local authority is authorised or required to make a decision in the exercise of any power, authority, or jurisdiction given to it by this Act or any other enactment or by any bylaws, the provisions of subsections (1) to (4) and the provisions applied by those subsections, unless inconsistent with specific requirements of the Act, enactment, or bylaws under which the decision is to be made, apply in relation to the making of the decision.
- (6) This section and the sections applied by this section do not limit any duty or obligation imposed on a local authority by any other enactment.

77 Requirements in relation to decisions

- (1) A local authority must, in the course of the decision-making process,—
 - (a) seek to identify all reasonably practicable options for the achievement of the objective of a decision; and
 - (b) assess the options in terms of their advantages and disadvantages; and
 - (c) if any of the options identified under paragraph (a) involves a significant decision in relation to land or a body of water, take into account the relationship of Māori and their culture and traditions with their ancestral land, water, sites, waahi tapu, valued flora and fauna, and other taonga.

- (2) This section is subject to [section 79](#).

78 Community views in relation to decisions

- (1) A local authority must, in the course of its decision-making process in relation to a matter, give consideration to the views and preferences of persons likely to be affected by, or to have an interest in, the matter.
- (2) *[Repealed]*
- (3) A local authority is not required by this section alone to undertake any consultation process or procedure.
- (4) This section is subject to [section 79](#).

79 Compliance with procedures in relation to decisions

- (1) It is the responsibility of a local authority to make, in its discretion, judgments—
- (a) about how to achieve compliance with [sections 77](#) and [78](#) that is largely in proportion to the significance of the matters affected by the decision as determined in accordance with the policy under [section 76AA](#); and
- (b) about, in particular,—
- (i) the extent to which different options are to be identified and assessed; and
- (ii) the degree to which benefits and costs are to be quantified; and
- (iii) the extent and detail of the information to be considered; and
- (iv) the extent and nature of any written record to be kept of the manner in which it has complied with those sections.
- (2) In making judgments under subsection (1), a local authority must have regard to the significance of all relevant matters and, in addition, to—
- (a) the principles set out in [section 14](#); and
- (b) the extent of the local authority's resources; and
- (c) the extent to which the nature of a decision, or the circumstances in which a decision is taken, allow the local authority scope and opportunity to consider a range of options or the views and preferences of other persons.
- (3) The nature and circumstances of a decision referred to in subsection (2)(c) include the extent to which the requirements for such decision-making are prescribed in or under any other enactment (for example, the [Resource Management Act 1991](#)).
- (4) Subsection (3) is for the avoidance of doubt.

80 Identification of inconsistent decisions

- (1) If a decision of a local authority is significantly inconsistent with, or is anticipated to have consequences that will be significantly inconsistent with, any policy adopted by the local authority or any plan required by this Act or any other enactment, the local authority must, when making the decision, clearly identify—
 - (a) the inconsistency; and
 - (b) the reasons for the inconsistency; and
 - (c) any intention of the local authority to amend the policy or plan to accommodate the decision.
- (2) Subsection (1) does not derogate from any other provision of this Act or of any other enactment.

81 Contributions to decision-making processes by Māori

- (1) A local authority must—
 - (a) establish and maintain processes to provide opportunities for Māori to contribute to the decision-making processes of the local authority; and
 - (b) consider ways in which it may foster the development of Māori capacity to contribute to the decision-making processes of the local authority; and
 - (c) provide relevant information to Māori for the purposes of paragraphs (a) and (b).
- (2) A local authority, in exercising its responsibility to make judgments about the manner in which subsection (1) is to be complied with, must have regard to—
 - (a) the role of the local authority, as set out in [section 11](#); and
 - (b) such other matters as the local authority considers on reasonable grounds to be relevant to those judgments.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

Submissions,
Local Body Commission,
Wellington.

Good afternoon,

I don't believe the breaking away of Tokomaru/Opiki from the Horowhenua District will deal with the problems of Horowhenua. The complete breakup of Horowhenua as a District is the best solution for local governance for the following reasons:

(a) Horowhenua is too small and diverse for effective governance.

(b) there are 16,606 households in the Horowhenua District. At present the level of debt the District Council carries (\$100,000,000) has most ratepayers feeling concerned. The present debt of \$100,000,000 is forecast in the long-term plan to double to \$200,000,000 within 5 years. Within 14 years the borrowings are forecast to be \$270,000,000.[Long-Term Plan 2021 – 2041 forecast statement of financial position page 28 – 29].

[c] the growth the Council and its staff are planning for requires a level of skill which is not presently available to this small Council.

[d] the Council and staff are increasingly focused on their ambition of being a dormitory suburb of Wellington.

I will expand on each of these points:

- a. and (d). These 2 points are complementary to each other. The council anticipates urban growth to almost double Horowhenua's population over the next 20 years. As the council increasingly becomes focused on urban development the rural, small towns and townships are neglected. As a farmer I am keenly aware of the lack of consideration to the rural. The council protests in its submission to the Commission that it is more suited to look after the rural sector than Palmerston North. This is not correct. Palmerston North has within its boundaries Massey University and other rural-based research establishments. There is a complete failure of the Horowhenua District to protect rural businesses from urban threat. Us farmers look on in dismay as urban enclaves encroach on rural land with the constant threat of these enclaves enforcing their urban values onto the countryside.
- b. The forecast level of debt requires a far greater population. It is too big a burden on 16,606 households. The Levin based Council sees it's natural home as part of the greater Wellington region. I agree with that view. Levin anticipates becoming a city. The upgrading of roads linking Levin to Wellington means commuting from Levin to Wellington becomes feasible and attractive.
- c. The planned growth of the district and the problems of getting qualified staff.
Attracting staff and retaining them is a problem for small districts. The growth strategy will compound the problem. There seems to be a shortage of qualified staff New Zealand wide. Because of this suitable staff are hard to obtain and their salaries reflects this scarcity. Expansion creates opportunities but when things go wrong the problems are bigger. I don't believe the level of skill necessary for growth is available in the district councillors themselves and the staff they employ.

The solution.

The present proposal from the Tokomaru/Opiki residents should be accepted. The residual Horowhenua District should be broken into 2 parts using the Manawatu River as the dividing line. The northern portion should go into the Manawatu District. The southern portion; containing Levin, the lifestyle blocks that surround Levin and the horticultural blocks that service Levin and the greater Wellington region, should amalgamate with the Kapiti District.

Regards, Bill Huzziff. [REDACTED]

Sent from [Mail](#) for Windows 10



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7 April 2021

Palmerston North City Council Submission to Local Government Commission in response to Ōpiki/ Tokomaru boundary change application

EXECUTIVE SUMMARY

Palmerston North City Council does not support the requested boundary change to include the areas of Tokomaru and Ōpiki in the Palmerston North City boundary at this time.

While the residents of Tokomaru and Ōpiki frequent Palmerston North for education, employment and leisure activities, their continued access to services and facilities does not necessitate a boundary change.

There are no reasons set out in the proposal which give the confidence that Palmerston North City Council could respond more effectively to the opportunities, needs and circumstances of the communities of Tokomaru and Ōpiki than Horowhenua District Council. Neither does the proposal give any sufficient reasoning for how the requested change would enhance effectiveness, efficiency and sustainability of service provision.

The benefits of the proposal are not clear. Palmerston North City Council cannot clearly ascertain the costs associated with a change, ahead of any detailed reorganisation plan being developed by the Commission. It is our expectation that there exists an infrastructure deficit which will need initial investment and ongoing operational expense. Such a liability cost would need to be funded and, consequently, a rating structure would have to be considered to fund a programme of investment. In the meantime, there will be an impact on productivity in the transition period.

1. Palmerston North City characteristics

Palmerston North City Council is a geographically compact urban authority. Palmerston North's population is growing strongly. Statistics New Zealand estimated the city's population to be 90,400 people in June 2020. This was a 1.2 per cent increase over the previous 12 months (the national increase was 2.0 per cent). The estimate suggests Palmerston North has a 1.8 per cent share of the national population. Population projections prepared by Infometrics for the Council in March 2020, suggest the City's population will be 110,676 people by 2043.

In 2020, the median age of the City's population was 34.2 years. The national median age is 37.4 years, making Palmerston North, New Zealand's fourth youngest city after Hamilton, Queenstown-Lakes and Wellington (32.6 years). This is influenced by the large number of tertiary students attracted primarily for education and New Zealand's largest army base located within the city boundary at Linton Military Camp.

About 19 per cent of Palmerston North residents are Māori, compared with 16.7 per cent nationally (2018 estimates), while a further 12.6% of the city's population are Asian. Palmerston North is one of New Zealand's recognised refugee centres, and prides itself on being a welcoming, diverse, inclusive and safe place for all its residents, with over 152 different ethnic communities calling the city home in March 2018.

Palmerston North has experienced strong economic growth since 2000. Median annual salaries and wages in the city have been increasing faster than the rate of growth for New Zealand, with an increase of 89.2 per cent between September 2000 and September 2019. The national increase over this period was 83.2 per cent. Total income (salaries and wages and income from self-employment) was \$3,027 million in the year to March 2019, 138 per cent higher than in 2000, while national income growth was 164 per cent over this period.

Representation arrangements are an at-large electoral system, with 15 councillors and a mayor. Rangitāne representatives are appointed with full voting rights on four formal committees.

The Council has five goals in its pursuit of "he iti rā, he iti pounamu, small city benefits, big city ambition": to be an innovative and growing city, a creative and exciting city, a connected and safe community, an eco-city and a driven and enabling council.

2. Lessons learned from the City's previous experience with boundary change

As the result of a Local Government Commission process in 2012, at the request of Manawātū District Council and Palmerston North City Council to accommodate growth pressures, the boundary lines of Palmerston North City were shifted to incorporate some land from the adjoining Manawātū District, including the villages of Longburn and Bunnythorpe. The Council has worked hard in these more rural villages, yet it has taken (is taking) time to reach the levels of service that meet the expectations of residents without unduly impacting ratepayers. The infrastructure investment needed was not fully calculated at the time of the change. The experience has left the Council less open to this proposal.

3. Response to the proposal paper

The 2018 change request from the 'Tokopiki Boundary Change Group' inaccurately suggest that the Palmerston North City Council is in favour of the proposal (see pages 6 and 12). The Council resolved on 24 September 2018, "we are happy for a boundary change discussion to continue- suitable to PNCC conditions." The Deputy Chief Executive sent a letter to this effect to the Commission on 25 September 2018. Neither the letter nor the resolution suggested there was support for the proposal, only for the discussion to continue.

4. Response to the discussion paper

The discussion paper from the Local Government Commission sets out the potential impacts and issues to be considered by the Commission but does not clearly show specific advantages or disadvantages of the requested boundary alteration for iwi, residents or local authorities.

The original 1 March 2021 published document set out inaccurate suggestions of rates, fees and user charges. A second 5 March paper was published with revised rates and charges. The inclusion of rates and charges seemingly suggests that this is a criterion by which the Commission might measure the proposal. Rates are not a criterion set out in the Local Government Act. Neither can a conclusion be drawn that rate levels are an indicator of the efficient provision of local government services. It should not be assumed, should the boundary change take place, that Palmerston North City would apply the current rating system to the new area without first reviewing it to apply an efficient formula. The impact on ratepayers in the change area is yet to be determined.

5. Scale of potential benefits and likelihood of these being realised is unclear

Benefits of the boundary alteration are not laid out in the discussion paper. Thus, any scale of benefits cannot be determined, making it difficult for Palmerston North City to assess the likelihood of any undefined benefits being realised.

It is certain that Palmerston North City does not require the area under consideration for growth or strategic planning purposes, including transport planning.

Palmerston North is open to considering opportunities for joint planning where there may be benefits to both parties. We have joint agreements with Manawātū District Council and Horizons Regional Council. Action on joint planning, however, does not require a boundary change.

6. The proposed change would not better fulfil the purpose of local government

GOVERNANCE

There is no evidence to suggest that Palmerston North City Council could better reflect the interests of the Tokomaru and Ōpiki communities, nor, as a result, promote the wellbeing of those communities (current and future) better than Horowhenua District Council. The proposal does not explain how greater democratic local decision making and action by and on behalf of the Tokomaru and Ōpiki communities might be enabled by the change.

Effective and fair representation

The rural nature of the area may not be adequately addressed by an urban, at-large system, such as is Palmerston North's. The discussion paper (page 4) sets out that Palmerston North would increase its area by 38% and cause a 1.6% increase in its population. What is not noted is the shift that would occur in the rural/urban breakdown of Palmerston North City. The 'rural' population (2020 population estimates) of Palmerston North City has had a growth rate of 9.9% since 2012. The proposal would increase the rural population by 20%, and rural settlement population by 54%, a combined increase of 26%. Land classified rural would increase by 49%. Any change would require a representation review to investigate how the specific rural needs of the communities of Ōpiki and Tokomaru could best be met. In 2013, the Commission, on an appeal for rural wards in Palmerston North (within its current boundary), determined that rural wards were not feasible. The same message was repeated in its 2019 determination. Should Tokomaru and Ōpiki be brought within the city boundary, it would need to be proven that these same small numbers of "elongated wrapped around the edge" rural populations saw a shared community of interest with the new area. Even in doing so, it would remain difficult to establish a rural ward and retain fair representation arrangements for a city which is comfortable with its at-large electorate. If a rural ward is not an option, a community board may need to be considered to fairly represent the rural nature of the area. The 2019 Commission determination on the issue of community boards was that STV (Single Transferable Voting) allows for rural voters to collectively support rural candidates should they wish to do so. In summary, should the area move into Palmerston North, it may be sufficiently rural to be different, but not sufficiently populous to have special representation. The consequence of which is that residents of Ōpiki and Tokomaru may be represented less effectively were the change to occur.

Elected members in Horowhenua have a lower number of electors to represent than would be the case should the area move to Palmerston North. The 2019 local body election statistics give a ratio of one councillor to 1965 electors in Miranui Ward, Horowhenua and one councillor to every 3722 electors in at-large Palmerston North. Should any future representation review in Palmerston North consider a reduction to the number of councillors this ratio would only increase. Certainly, the number of electors in the 2021 by-election has already increased and the ratio would rise again were the residents of Tokomaru and Ōpiki be included. Access challenges are further

exacerbated when we consider added travel times for councillors to physically reach those residents. Again, residents of Tokomaru and Ōpiki may be better represented by current arrangements.

Iwi relationships

The change request does not adequately acknowledge current relationships between territorial authorities and iwi, between iwi and iwi, nor the co-management arrangements currently in place with iwi. Page 4 of the discussion document notes that, "Palmerston North City Council would be required to extend its relationship with 'other iwi', and to work with additional hapū." The proposal, states on page 6 that, "Rohe boundaries and other inter-iwi concerns would be unaffected by the proposal." These statements are misleading. Palmerston North City Council has a partnership agreement with Rangitāne o Manawatū which acknowledges Rangitāne o Manawatū as the mana whenua within the current local authority boundary. This is outworked through regular operational meetings, funding agreement and formal representation arrangements on four Council committees. In contrast, Ngāti Raukawa have expressed competing intentions in its alternative reorganisation application submitted to the Local Government Commission as a part of this boundary reorganisation investigation. These competing interests are in the process of being worked out through the Treaty Settlement process. It is inappropriate timing for local government boundary decisions to be made even as the Raukawa settlement claim is currently being heard, as the impact of the settlement decisions may affect those same arrangements.

SERVICES

It is difficult to envisage how the requested change would affect Palmerston North City Council's capacity to meet the service needs of the communities of Tokomaru and Ōpiki effectively now and in the future. There are asset management challenges in providing services to the 1400 residents in these areas as set out below.

Resources

At this point in the reorganisation process, PNCC can only undertake a desktop analysis to estimate asset condition. We cannot assure that the Council has the resources necessary to effectively perform or exercise the responsibilities, duties and powers set out under the Local Government Act, without first assessing the condition of the assets and reconsidering our rating policy against that detail.

Productivity and growth

Palmerston North City Council has not identified any operational efficiencies associated with the boundary change. We have not been able to find any gains or attributable efficiencies and cost savings for Palmerston North City Council. The

discussion document notes (page 3) that the current zoning provides for expected residential growth in Tokomaru township and for nearby rural residential development. It does not hold that Palmerston North needs this land for its own development planning. Palmerston North City Council's growth planning does not identify any need for the surrounding land of Ōpiki and Tokomaru in order to develop the economic prosperity of the city. Rather, future housing growth has been identified at Aokautere, Ashhurst, and Kakatangiata, which, in conjunction with intensification, will satisfy projected demand for the next 30 years. Industrial growth focuses on the Kiwi Rail Freight Hub and ring road, where connectivity can best be facilitated and the benefits of co-location best realised.

7. There are identifiable financial, disruption and opportunity costs of implementing the proposed change at the proposed time

It is difficult to ascertain costs ahead of any detailed reorganisation plan being determined. It is Palmerston North City Council's assessment from the data provided that there is an infrastructure deficit which will need initial investment and ongoing operational investment to address. The liability cost will need to be funded and a change to rating structure may need to be considered to fund a programme of investment. There will be an impact on productivity in the transition period which may outweigh the "small scale" of the change.

Palmerston North City Council assumes, based on the data available to us, that should the boundary change go ahead, Palmerston North City residents and ratepayers would likely subsidise the maintenance and operation of aging water and wastewater infrastructure in Tokomaru and roading infrastructure across the boundary change area.

An evaluation of the network from the data available to PNCC (Palmerston North City Council) shows that:

- In upcoming years there will be significant network renewal needed to maintain the water supply network of Tokomaru
- Investment is needed to find and reduce leakage within the water reticulation network
- Between \$0.5-2.5M would be needed to find additional water storage/source to meet growth
- A considerable portion of wastewater assets will come to the end of their useful life in 2036-37

Palmerston North City's current focus in the wastewater area is the planning process associated with gaining resource consent for the discharge from Council's main wastewater treatment plant to the Manawatū River that is due to expire in 2028.

For the 10 Year Plan, it has been assumed that a consented solution will be provided with a capital outlay of \$350 million (\$391.7m including inflation) and that the expenditure will be incurred between 2023 and 2027. It has also been assumed there

will be additional operating costs of \$6.5 million per annum from 2026 on top of the debt servicing and repayment costs.

The Tokomaru waste water discharge consent, which has been identified as a land-based option, is estimated at a potential 5-10 million dollars to our ratepayers who are already looking at significant rises in rates and debt levels to cover wastewater infrastructure costs. The Tokomaru wastewater consent needs to be submitted by January 2023.

Palmerston North City Council has committed significant resource to progressing its wastewater solution. The boundary change would require the council to commit significant additional resources to progressing a solution to the Tokomaru wastewater discharge. The nature of this type of wastewater consenting is complex and costly. There would not be efficiency gains as the two projects could not be combined.

Impact on current ratepayers

Any planning for services in the boundary change areas would affect services to the current area. Page 4 of the discussion document says, "Palmerston North City Council would need to ensure its planning and operations provide for capital expenditure, maintenance and operating costs for local government services" as if to suggest it is a simple, stand-alone, transferable task. Yet, efficient local government service delivery is a question of efficiency for all affected parties. The costs of taking on the asset management of Tokomaru and Ōpiki as well as the costs of transfer, for example- consideration of bylaws application, reconsideration of the district plan, asset condition assessment, representation review etc. would be costs to Palmerston North. Current ratepayers who perceive a cost to themselves are unlikely to be strongly in support of the change when the City is already facing cost pressures. In turn this brings into question the likelihood of cohesion of the new population into the city community fabric.

Risk of no change

It is difficult to determine any risks of not making the change when the proposal has already been with the Commission for three years. It is concerning that at this time of significant change in the resource management and planning space, and with great unknowns in three waters provision changes from central government, that the Commission might require Palmerston North to take on more risk.

8. Communities of Interest exist, and linkages will be maintained without the need for boundary change.

There are several indications that the residents of Tokomaru and Ōpiki have existing communities of interest in Palmerston North. There are functional connections where residents of Tokomaru and Ōpiki frequent Palmerston North for education, employment and leisure activities. The data, for example, shows us that for those who travel out of the Tokomaru and Ōpiki area for work or school travel predominantly in

the direction of Palmerston North. Citizens come into daily contact with individual government departments that do not use the same boundary lines. A boundary change is not necessary as access to services and facilities, including Palmerston North City libraries and pools continues regardless.

We draw the Commission's attention to Statistics New Zealand's recently released (February 2021) functional urban area classification. The functional urban area (FUA) classification names small urban areas and rural areas that are integrated with larger urban areas by finding commuting zones around the larger urban areas. Shannon sits just within the Levin functional urban area. Neither Tokomaru or Ōpiki fall within either Palmerston North or Levin. The data reiterates the rural nature of the area, that many 'work from home' in farming. The classification also highlights that there may not be a natural fit for Tokomaru and Ōpiki in Palmerston North.

It is not clear that Palmerston North residents hold strong affinity with the areas of Tokomaru and Ōpiki. Affinity is difficult to measure. It is certain that the areas have never been administered from Palmerston North. It is possible that the state highway as it traverses the geography of the river basin sets Ōpiki apart in psychological perception. The location of Te Rangimarie marae may also be considered a boundary marker.

There will be significant impact on iwi. Page 3 of the discussion document notes, "This change will also have a significant impact on hapū and Marae," yet despite acknowledging these impacts to be significant does not share what the Commission considers these impacts to be. We ask the Commission to refer to the Rangitāne o Manawatū submission when assessing the potential impact of the proposed changes on sites of interest.

CONCLUSION

Palmerston North City Council does not support the requested boundary change at this time. We request to speak to our submission at the Commission hearing, including the key points listed:

- There would be a significant impact on iwi relationships.
- The data available suggests that, should current rates settings hold, Palmerston North City Council ratepayers would subsidise the work needed to invest in an aging water and wastewater network in Tokomaru and an aging road network across the boundary change area.
- It is an inappropriate time to promote a boundary change when there is significant change in the sector, particularly in the Three Waters space.
- There is no evidence to suggest that there would be any efficiency gains in service provision.
- There is no evidence to suggest that a change would positively affect local government representation and decision-making.
- The land is not required or identified to service the growth of Palmerston North.

Ken Riddle



6 April 2021

Local Government Commission
 PO Box 5362
 Wellington 6140

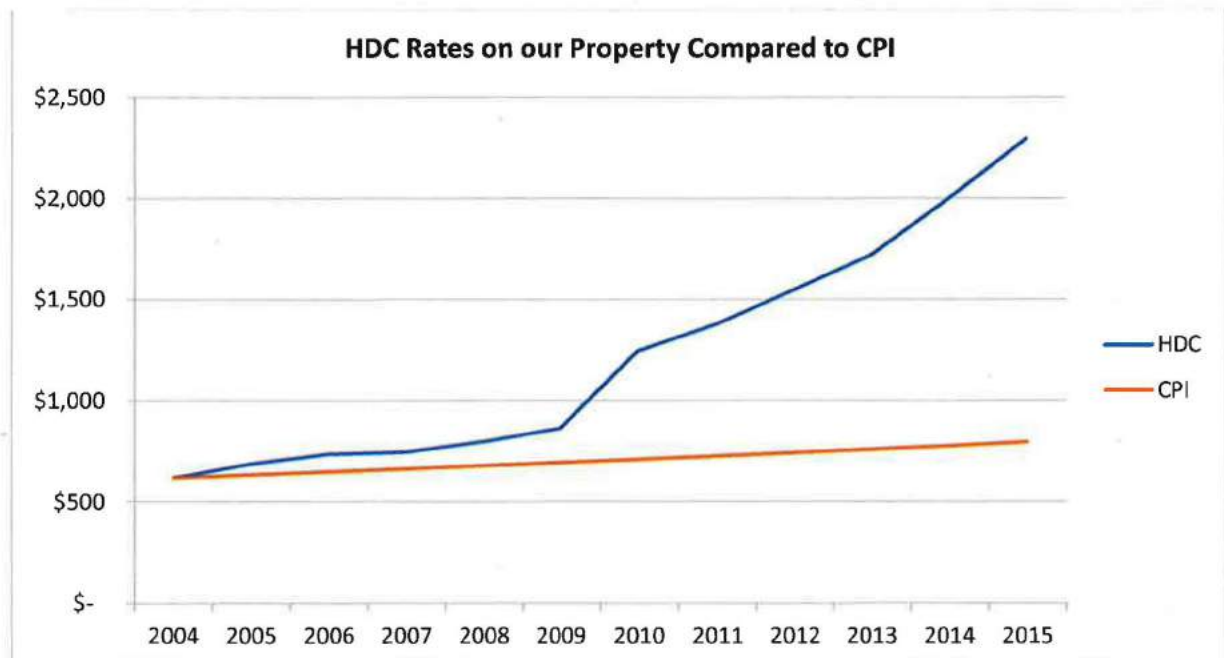
RE: FEEDBACK ON OPIKI AND TOKOMARU DIVORCING HOROWHENUA

Dear Sir/Ma'am,

I read the the paper entitled "Seeking your feedback on: A request for Opiki and Tokomaru to become part of Palmerston North City" and even though I am not in the area seeking release from Horowhenua, I am one seeking relief and realised that if the proposal goes ahead it will impact my rates as the same rates burden will be shared by fewer people. Hence I have decided to add my views on the subject, hoping that something I have to say might help.

One of the greatest joys in one's life is one's wedding day, and conversely one of the greatest shames to endure is your husband or wife presenting you with divorce papers.

It is a shameful indictment against the Horowhenua District Council (HDC) that a whole community want to be divorced from the district and be united to another, because the new spouse will treat them more fairly.



As can be seen by the above graph, HDC's policies have seriously discriminated against Rural land owners and Lifestyle blocks from 2009 onwards. Those contained within the proposed split are within a class of people who have endured excessive and arbitrary taxation over their property in the name of 'paying their fair share'.

If HDC rates had been pinned to the CPI, then today we would still be paying under \$1,000 of rates on our property rather than nearly three times that amount.

It is because of this disparity and the unfair treatment that has been served against Rural and Lifestyle property owners that a divorce from the HDC is being sought. If the HDC were to treat us more fairly, then we might grumble, but no one would not be looking for a divorce.

Levin is the largest settlement within the HDC's jurisdiction and the bulk of the expenditure has been centred around that settlement. Since the current Chief Financial Officer (CFO) of the HDC arrived (approximately 2008), we have had constant battles with the HDC to ensure that rate increases are not unreasonable.

Statistics New Zealand stated in their 2018 Census that the average income for individuals 15 years and over was \$27,200 for the Manawatu-Wanganui region.¹

Hourly wages have increased on average by 3.5% per annum compounded over the last 18 years.²

The population in the HDC has increased from approximately 29,820 in 2001 to around 35,000 in 2019 (HDAEP, page 27). This number equates to an annual increase of 0.9% per annum with the bulk of the actual population growth occurring after 2015. It should be noted that this growth is not primarily in wage earners, nor entrepreneurs, nor highly skilled labourers, nor well paid workers, but primarily in retirees; and they are drawing on their equity, savings, KiwiSaver and national superannuation. In other words, they have both a fixed income and diminishing income.

Over the same period, the CPI increased by 45.4% using the Reserve Bank of New Zealand's CPI calculator, or approximately 2.1% per annum compounded.³

HDC rates income in 2001 was \$11.7 million, and in 2019, rates income had jumped to \$38.5 million. The rating revenue according to the HDC Annual Report for the year ended 30 June 2001 was \$391 per person, whereas in 2019 it was approximately \$1,102 per person. This equates to an increase of around 5.9% per annum compounded.

National superannuation is annually inflation adjusted; as a result, while general rates have increased by 5.9% per annum compounded, or a total increase of 180% over the 18 years, CPI has increased by 45.4% over the same time period. Rates are becoming a larger portion of an ever decreasing pie for many people, especially those on fixed incomes.

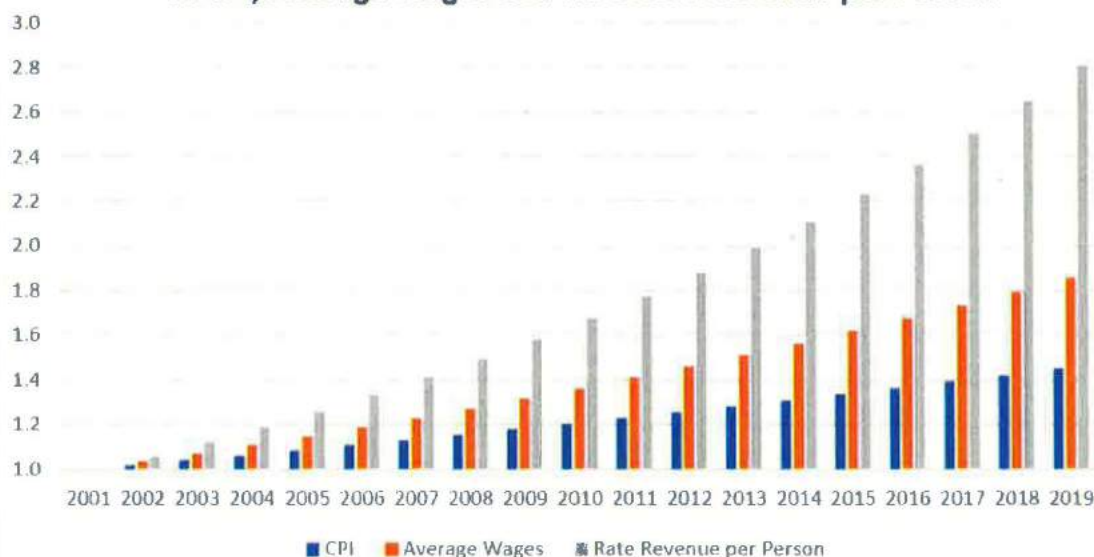
I cannot say that farming income has been able to match CPI, some years it is better, some years much worse.

¹ <https://www.stats.govt.nz/tools/2018-census-place-summaries/manawatu-whanganui-region#income>

² <https://tradingeconomics.com/new-zealand/wages>

³ <https://www.rbnz.govt.nz/monetary-policy/inflation-calculator>

Cumulative Comparison Between the Growth in CPI, Average Wages and HDC Rate Revenue per Person

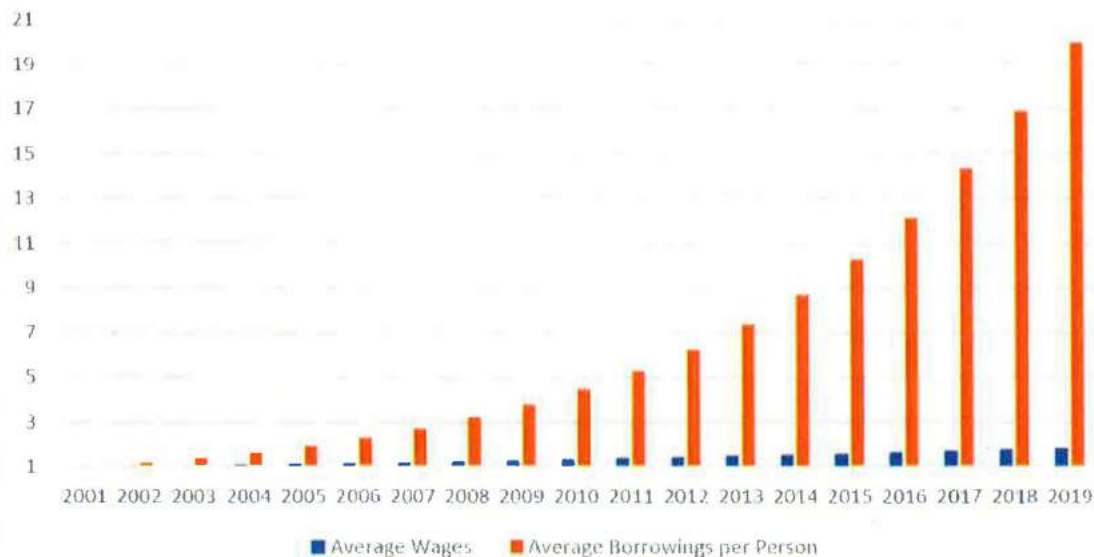


The above graph highlights the disparity between the income growth of those dependent upon benefits, wage earners and the rate revenue levied upon each person in the HDC over the last 18 years, using 2001 as a zero base for the calculation. It is because of this disparity that rates rebates were introduced by the Government to help those on fixed and low incomes, but Councils have abused this situation to their own advantage, expecting the Government to subsidise their lust for more and help them grow their empires. It is an abuse of power and a misuse of public funds that is the issue, both of which are hidden by masking terms such as sustainability, infrastructural needs, community wellbeing, social justice, common good, and climate change.

Our own HDC rates increased from around \$706 in 2001 to \$3,021 by 2019. This amount equates to an 8.5% per annum compounded increase in rates per year or a 330% increase over 18 years. We operate a small home business and our income has been flat over the last four years. Unlike provisional tax (which increases or decreases based upon one's income), rates levied is not related to any personal income generation and is becoming like a millstone around our necks, especially for those in the Rural and Lifestyle areas that see virtually nothing for the amount that they pay to the HDC.

In June 2001 the outstanding borrowings of the HDC were \$4 million, with debt per person of \$138. However, by 30 June 2019, total borrowings amounted to \$96 million, with debt at \$2,742 per person.

Cumulative Growth in Average Wages compared to the Cumulative HDC Average Borrowings per Person



The above graph highlights the huge disparity between the income growth of average wage earners and the amount borrowed by the HDC per person in the District over the last 18 years, using 2001 as a zero base for the calculation.

After reviewing that data, it is clear that the HDC has buried us in debt, and what is even more troubling is that the HDCDAP forecasts debt of \$115 million as at 30 June 2021. With a projected population growth of 1.2% (HDCDAP page 132), this would increase the debt per person to around \$3,247 by 30 June 2021. Debt is growing like a virus and needs to be immediately doctored.

We also live on a lifestyle holding or small farm, and we were repeatedly told by the CFO of HDC that we were not paying our 'fair share' when we protested about the disproportionately large increases we were receiving in rates year over year. We are now paying more than our fair share and have been doing so for some years. When we started having very large increases I noted that expensive properties in Levin were receiving decreases.

We cannot generate wealth by borrowing our way out of debt or by spending other people's income; it does not work that way in the real world. We do clearly see that the HDC are consuming an ever increasing percentage of everyone else's income. One can only tighten one's belt so far. However, we no longer believe that it is in any way equitable or fair to those who work hard when the HDC's share of the pie is becoming so large that it leaves others either going hungry or just with the crumbs. It is an abuse which has been unaddressed and has been listened to with deaf ears by the HDC.

The paper entitled "Seeking your feedback on: A request for Opiki and Tokomaru to become part of Palmerston North City" states that rates between Palmerston North City Council (PNCC) and HDC are calculated quite differently. From a study of various Councils, it is obvious that rates calculations are arbitrarily. Rates are apparently an arbitrary tax levied in an arbitrary way. One must question the moral justification for even charging rates. Furthermore, whatever happened to the philosophy of user pays for services? The Rural community has subsidised so many services that they never use and do not have access to.

Councils must not be allowed to continue abusing the rates disparity situation, seeking to fund projects which are not necessary for the true wellbeing of communities except to keep up with larger cities which have by nature larger budgets. Rates must not increase by more than the CPI.

What will be the result of the divorce? Those leaving will be happy because they are receiving a fairer rate assessment. The PNCC rates are still higher than what I would like; however, the people paying the lower rates will still receive similar services to those provided by HDC, and at the same time, they will not feel that they are being forcibly violated each year that they receive their rates assessment.

However, those who are left within the overbearing clasps of the HDC will be forced to take the full weight of a lustful oppressor pursuing their treasures. The total amount of rates take by HDC will remain much the same and must be borne by fewer ratepayers. In other words, those left behind must take up the additional rate and debt burden, which will cause those left behind to be further plundered, pillaged and molested by the hard-hearted HDC which will cause others to seek divorce as their only recourse to avoid further unjust molestation.

The line of Kingston Road appears to also be an arbitrary line for dissolution of the union with HDC. As I live just south of this demarcation, I would like it altered to include properties "North of Mangahao Road and North of the Green Belt Residential Zone of Shannon".

In order to circumvent this avoidable great schism from taking place, the HDC must do four things.

Firstly, sack the current CFO of HDC, whose singular policies have resulted in this indictment of injustice against selected Rural and Lifestyle groups in the Horowhenua over the last ten years or more, while HDC provided no increase in services to them over this time.

Secondly, implement a system which would result in Rural and Lifestyle properties paying the equivalent or less than what they would be liable to pay if they were under the PNCC.

Thirdly, ensure that new rate increases do not exceed CPI.

Fourthly and finally, apologise to the groups that have been abused and ignored for years. They must admit that they were in the wrong, otherwise dissent will only continue to grow against them.

Last year I provided a list of 14 items to the HDC that they should be doing to offset some of disparity, but did not get any feedback from the HDC.

Respectfully yours,

Ken Riddle, *BBS, BD, MA (Hons.)*
Shannon

A TRUE ACCOUNT OF A FOOLISH RULER NOT LISTENING TO THE REASONABLE REQUESTS OF THE PEOPLE

¹ And Rehoboam went to Shechem: for all Israel were come to Shechem to make him king. ² And it came to pass, when Jeroboam the son of Nebat, who was yet in Egypt, heard of it, (for he was fled from the presence of king Solomon, and Jeroboam dwelt in Egypt;) ³ That they sent and called him. And Jeroboam and all the congregation of Israel came, and spake unto Rehoboam, saying, ⁴ Thy father made our yoke grievous: now therefore make thou the grievous service of thy father, and his heavy yoke which he put upon us, lighter, and we will serve thee. ⁵ And he said unto them, Depart yet for three days, then come again to me. And the people departed. ⁶ And king Rehoboam consulted with the old men, that stood before Solomon his father while he yet lived, and said, How do ye advise that I may answer this people? ⁷ And they spake unto him, saying, If thou wilt be a servant unto this people this day, and wilt serve them, and answer them, and speak good words to them, then they will be thy servants for ever. ⁸ But he forsook the counsel of the old men, which they had given him, and consulted with the young men that were grown up with him, *and* which stood before him: ⁹ And he said unto them, What counsel give ye that we may answer this people, who have spoken to me, saying, Make the yoke which thy father did put upon us lighter? ¹⁰ And the young men that were grown up with him spake unto him, saying, Thus shalt thou speak unto this people that spake unto thee, saying, Thy father made our yoke heavy, but make thou *it* lighter unto us; thus shalt thou say unto them, My little *finger* shall be thicker than my father's loins. ¹¹ And now whereas my father did lade you with a heavy yoke, I will add to your yoke: my father hath chastised you with whips, but I will chastise you with scorpions. ¹² So Jeroboam and all the people came to Rehoboam the third day, as the king had appointed, saying, Come to me again the third day. ¹³ And the king answered the people roughly, and forsook the old men's counsel that they gave him; ¹⁴ And spake to them after the counsel of the young men, saying, My father made your yoke heavy, and I will add to your yoke: my father *also* chastised you with whips, but I will chastise you with scorpions. ¹⁵ Wherefore the king hearkened not unto the people; for the cause was from the LORD, that he might perform his saying, which the LORD spake by Ahijah the Shilonite unto Jeroboam the son of Nebat.

¹⁶ So when all Israel saw that the king hearkened not unto them, the people answered the king, saying,

What portion have we in David?

Neither *have* we inheritance in the son of Jesse:

To your tents, O Israel:

Now see to thine own house, David.

So Israel departed unto their tents. ¹⁷ But *as for* the children of Israel which dwelt in the cities of Judah, Rehoboam reigned over them. ¹⁸ Then king Rehoboam sent Adoram, who *was* over the tribute; and all Israel stoned him with stones, that he died. Therefore king Rehoboam made speed to get him up to his chariot, to flee to Jerusalem. ¹⁹ So Israel rebelled against the house of David unto this day. ²⁰ And it came to pass, when all Israel heard that Jeroboam was come again, that they sent and called him unto the congregation, and made him king over all Israel: there was none that followed the house of David, but the tribe of Judah only.

1 Kings 12:1-20

A submission to: Local Government Commission

In response to: Proposed transfer of Tokomaru
and Opiki communities to the Palmerston North
City Council

From: Troy O'Carroll on behalf of Ngati Whakaterere

[REDACTED]
[REDACTED]

We do request the opportunity to make an oral submission.

Presentation: We/ Ngati Whakaterere who for 180 years have maintained manawhenua over the disputed lands/boundaries contested within the application requesting transfer to the Palmerston North City Council, hereby forward our submission and our desire to speak to such at the hearing set for 21 April 2021 at Tokomaru.

As recognised kaitiaki of this rohe we acknowledge our duty to maintain the integrity of the land and waterways contained therein. Our tupuna have fought for generations – which can be witnessed through Maori Land Court and Territorial Body records, to keep the mauri and rangatiratanga of the land intact allowing no division, actual or perceived.

This is our primary stance in regards to the application.

Submission:

We acknowledge the role that Te Mana Kaawanatanga a Rohe have played in this matter and wish to thank them for their understanding of our mana a rohe in this district.

As stated earlier the concept of manawhenua is our primary stance here but we do recognise other ingredients which potentially could create an imbalance not only for us but for maori in our communities as well.

With the loss in numbers (if the application is successful) to the Horowhenua District, we believe this would impact on the availability of health dollars and services to an area already underfunded and underserved.

This loss of numbers would also directly impact on the Maori Roll which in effect could remove our own sitting councillor as well as undermine the place of a Maori Ward in the Horowhenua.

It is for these reasons we strongly oppose the application for transfer and seek to have our submission accepted,

Naaku iti noa

Troy O'Carroll

Applicant for Ngati Whakaterere