

Auckland Governance Arrangements: Proposals for wards, local boards and boundaries for Auckland

- Submission of the Auckland Regional Council

1. INTRODUCTION

Thank you for providing the opportunity to comment on your draft proposals for the boundaries, wards and local boards of the Auckland Council.

This submission was approved by the Auckland Regional Council (ARC) at a Council meeting on 7 December 2009.

We appreciate that the Local Government Commission (LGC) was faced with a very difficult task to design boundaries, wards and local boards, within a tight timeframe. We are also aware that you faced a number of constraints, set in the Local Government (Auckland Council) Act, which made the task even more difficult. We appreciate the work you have done, and commend you for the significant number of positive and workable features of your draft proposal. We also make a number of comments in this submission about significant improvements that should be made.

The importance of your task cannot be overstated. A consistent, equitable and coherent approach to wards and local boards is needed if the Super City reforms are to gain essential public confidence and support.

2. SUMMARY OF RECOMMENDATIONS AND KEY POINTS

The ARC makes the following recommendations and key points:

- The Local Government Commission (LGC) should review the proposed ward boundaries to endeavour to achieve greater equality in representation between wards, by creating electoral bases that comply with the +/-10% ratio, except where this is prevented by legislation. We believe that achieving greater equity in representation at the ward level (or at least a genuine attempt at achieving equity) is crucial to the credibility and success of Auckland's governance reform process.
- The ARC strongly supports meaningful powers for local boards and therefore the LGC should ensure that there is appropriate local representation, and that local board members will not have unmanageable workloads. Where there is a very large population per board member, the LGC should consider creating additional local boards, adding additional local board members, or reviewing the boundaries of local boards. We note that the Government suggested 20 to 30 local boards would be appropriate given the number of identifiable communities of interest in the Auckland region.

- The LGC needs to re-examine the approach it has taken to setting local board electoral subdivisions and determining the number of members of local boards, including the local characteristics that influence the need for additional members or subdivisions in order to achieve greater fairness and equity. This approach should then be applied as consistently as possible across the region.
- The ARC remains strongly opposed to the requirement in the Local Government (Auckland Council) Act that the southern boundary be set at the Waikato river catchment boundary, rather than the north bank of the Waikato river. We are equally opposed to the requirement for the Mangatangi and Mangatawhiri catchments (and the area between these catchments and the Firth of Thames) to be excluded from the Auckland region. We request that you advise the Government that, for the Auckland Council as a territorial authority, the closest practicable boundary to the existing regional boundary is the Waikato river, and that there is no practicable boundary that divides the Hunua Ranges in two. The purpose of these reforms was to strengthen Auckland's regional governance, but the proposed southern boundary will weaken regional governance.
- Notwithstanding our position on the southern boundary,
 - The proposal to include the areas at Waiuku, Buckland and Pukekohe East in the Auckland region is supported. This is absolutely necessary to prevent these suburbs from being disconnected from their town centres for local government purposes. We suggest that this boundary be extended to include Pokeno and Tuakau in the Auckland region, for the same reason.
 - The proposal to include the area south of Matingarahi in the Auckland region is supported. The area shares a strong community of interest with nearby parts of the Auckland region, and it will remain important to manage growth in this area in integration with Auckland's growth.
- The ARC strongly opposes Environment Waikato's (EW) suggestion to include a greater proportion of the Firth of Thames in the Waikato region, so that aquaculture can be managed by a single authority. The original purpose of these reforms was to strengthen Auckland's regional governance, not weaken it. The proposals to reduce Auckland's territory, including this one, have been expensive distractions from achieving this purpose. The arrangement proposed by EW would remove Tapapakanga regional park from the Auckland region, and would not provide for effective representation of communities of interest. The applications for aquaculture are applications only, and regional boundaries should not be altered due to the presence of a number of applications for an activity. We do not believe that the scale of aquaculture applied for should go ahead in the Firth, because it would cause irreparable ecological damage and have significant impacts on the local community. Moreover, EW's track record suggests that environmental quality in the Firth would not improve under EW's management. Hauraki rivers under the jurisdiction of EW collectively discharge approximately 3,800 tonnes of nitrogen into the Firth each year, the equivalent of 32 trucks of urea being disposed of in the Firth each week. According to EW scientists, the problem is set to get worse and is likely to result in a 100m² anoxic zone within the Firth of Thames within 20 years.

- The ARC strongly supports the LGC's proposal not to alter the northern boundary of the region.
- The ARC strongly supports the LGC's proposal that the regional parkland in the Mangatangi and Mangatawhiri catchments (and the area between those catchments and the Firth of Thames) be vested in the Auckland Council.

3. WARDS

The ARC has significant concerns regarding the equality of representation between the proposed wards of the Auckland Council. Under the Local Electoral Act 2001, when determining ward boundaries and representation arrangements, the LGC and the council involved must usually ensure that the ratio of councillors to population of each ward deviates from the average ratio by no more than +/- 10%. Under the LGC's *Guidelines to Assist Local Authorities in Undertaking Representation Reviews*, local authorities are required to identify specific reasons for proposing wards that fall outside of this ratio. Usually in the cases of territorial authorities, the only possible exceptions to the +/-10% rule that can be considered are in the case of island communities or isolated communities.

While we understand that there are requirements in the Local Government (Auckland Council) Act which mean the +/- 10% deviation cannot be consistently achieved, it appears that, among the wards proposed, a deviation of less than 10% is the exception, rather than the rule. Of the 12 wards proposed, only four conform to this standard.

The current proposal, where the deviations from average population per councillor range from -24.3% to +24.3%, creates significant inequalities in voters' representation. For example, each elector in Maungawhau-Hauraki Gulf ward receives a vote that is worth only 68.4% of the vote of an elector in the Hibiscus-Albany-East Coast Bays ward.

Equality of representation is an important principle in any local government reorganisation, and is a fundamental tenet of democratic systems. We understand that it is very difficult to set ward boundaries that correspond with communities of interest and meet the +/-10% rule, and that sometimes it is justifiable for isolated communities to have some degree of over-representation. However, the ARC believes the LGC should review the proposed ward boundaries to ensure that electoral bases comply with the +/-10% ratio, except where prevented by legislation (Franklin and Rodney).

We believe that achieving greater equity in representation at the ward level is crucial to the credibility and success of Auckland's governance reform process. The new Auckland Council must have representation arrangements that are at least as equitable as the arrangements they are replacing.

We note that one of the main issues facing the LGC in its task to design ward boundaries was the requirement to stick rigidly to the requirement to have 20 councillors. If it is necessary, the LGC should ask the Government to revisit this requirement, and give the LGC some flexibility in the number of members so that fair representation arrangements can be put in place (we note that you chose not to stick to the requirement for "no fewer than 20 but no more than thirty" local boards). A degree of flexibility will also mean the Auckland Council is better able to set fair and effective representation arrangements when it reviews its representation every six years. This will give the Auckland Council the same ability to review its

representation as every other council in New Zealand. We see no reason why the elected members of the Auckland region should not have the same ability as every other council in New Zealand to determine the number of elected members, within a set range.

We note that your determination will lock in an arrangement for a number of years, and set expectations so that when the Auckland Council comes to review its wards, it may be unpopular to change the ward boundaries, even if they do not meet the criteria for fair representation. It is unclear what the LGC's approach will be when the Auckland Council is required to review its representation. If the Auckland Council submits a representation proposal similar to the LGC's current proposal, the LGC of that time could rightly reject the proposal because it does not meet the criteria for fair representation.

4. LOCAL BOARDS

For some of the mainland local boards (including Rodney and Franklin), the ARC believes that the LGC has proposed very workable arrangements that reflect coherent communities of interest, and for these areas the LGC is to be commended. However, we have some concerns about the consistency of the approach the LGC has used across the region, and about the adequacy of local democratic representation for some local board areas under the proposal, as explained below.

4.1. Local board democratic representation.

Clearly there is a strong expectation within Government and in the community that local boards should have meaningful powers and the Auckland Regional Council has supported this approach from the outset. Given the ratio of board members to population in some local board areas, we have a concern about the potential workload of some local board members, and the ability of the public to access local board members who have a very large workload. For instance, for the Henderson local board subdivision, there is one local board member for every 20,275 people, for Massey there is one member for every 19,900 people, and for Maungawhau there is one member for every 15,772 people. These are very large populations to be served by each board member, and significantly higher than the average population to local board member ratio (1:11,240).

Putting the rural and island communities aside, even some other suburban local board members will have much smaller populations to represent, and therefore more manageable workloads. For instance, Papakura has one local board member for every 8,800 people and, in Three Kings the ratio is one member for every 9,633 people. We understand that one constraining factor was the requirement to have between four and nine members on each board, but believe that it will be important to ensure the local board members' workloads are achievable, and that there is not too much discrepancy in the workloads between the members of different local boards.

There are a number of options the LGC should consider to remedy this issue: first, additional local boards could be created (we note the Government provided for 20-30 local boards); second, the number of members could be increased; and third, local board boundaries could be adjusted. For instance, in the case of Waitakere, it may be feasible to create an additional local board, centred on the Waitakere Ranges Heritage Area and incorporating some of the southwest suburbs of Waitakere.

Leaving aside Great Barrier, Waiheke, Rodney and Franklin, there will be one local board member for every 12,740 people in Auckland. This is considerably higher than

other countries. For instance, in the UK there is one elected official for every 2,600 people, in France there is an elected member for every 120 people, and in Germany the ratio is one elected member for every 250 people.¹ Metropolitan Sydney is governed by 44 councils, in Melbourne there are 31 councils, and Adelaide has 20. Therefore we do not believe that the LGC should be hesitant about adding additional board members or local boards.

The median population of a territorial authority in New Zealand is 33,400, less than half the median population of a local board area in Auckland (78,860). While territorial authorities in New Zealand may have between six and 30 councillors, many of the local boards have only five members, and a maximum of nine. While we understand that the Local Government (Auckland Council) Act set a maximum of nine members for each local board, the LGC does have discretion to create a larger number of local boards. The Government has allowed for 20-30 local boards. A larger number of boards is likely to provide greater local representation.

4.2. Consistency of approach

We question whether a more consistent approach could have been taken to setting local board boundaries, subdivisions within local board areas, and the number of local board members. While we acknowledge that it is more important for local boards to reflect genuine communities of interest than to have a consistent ratio of members to population, we believe that a greater degree of consistency could be applied relatively easily, while still reflecting communities of interest.

We have concerns that similar sized local board populations have different numbers of members, for no apparent reason. Likewise, some local boards with very different population sizes have the same number of members. For instance, the Maungawhau local board has a population of 78,860 but only five local board members. Papakura has just over half the population of Maungawhau (44,000) but also has five board members. It appears that, where there are no other constraints, effort should be made to consistently determine the number of local board members for each area. If the average population per local board member across the region (11,240) was applied, Maungawhau would qualify for seven members rather than five.

Another issue relates to local board subdivisions. There are some local boards with relatively large populations which have no electoral subdivisions (e.g. Manurewa – population 85,400; Maungawhau – population 78,860), while smaller local boards do have electoral subdivisions (e.g. Mt Roskill – population 59,400).

It is not clear why the LGC made the decisions it has about the local board boundaries, number of board members, and board subdivisions, because the reasons for each decision are not explained in the draft proposal.

We submit that the LGC needs to re-examine the approach it has taken to setting electoral subdivisions, and the types of local characteristics that should prompt the creation of a local board subdivision. It might also explain the approach taken to determining the number of members of local boards. This approach should then be applied consistently across the region. Better still, the LGC should endeavour to come up with a more consistent and coherent model.

¹ McKinlay, P. (2008) *The Future Governance of the Auckland Region*. Paper prepared by the Local Government Centre, AUT University.

5. SOUTHERN BOUNDARY

5.1. ARC Position

The ARC's position is that the regional boundary must be moved to the Waikato river, and that, as a territorial authority, there is no practicable boundary for the Auckland Council that follows the catchment boundary, because this disconnects a strong community of interest. We are very strongly opposed to the requirements in the Local Government (Auckland Council) Act that require the LGC to set the regional boundary at the catchment boundary, and to exclude the Mangatangi and Mangatawhiri catchments from the Auckland region.

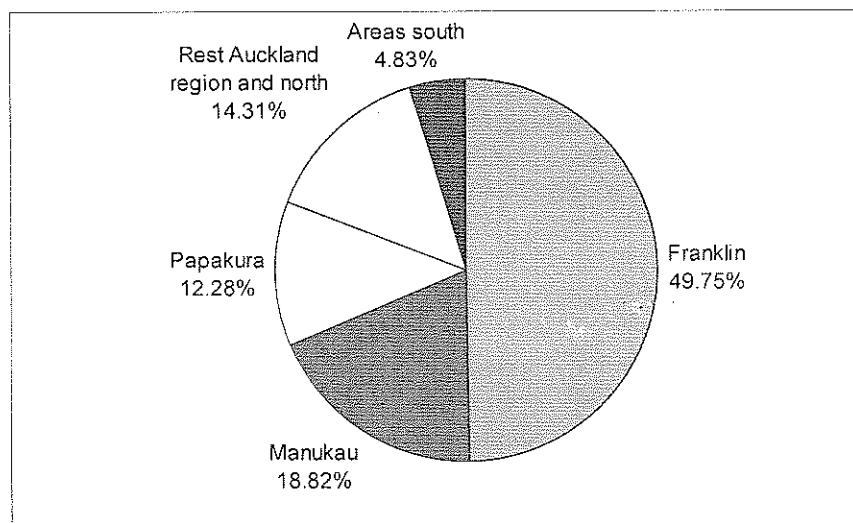
The ARC strongly suggests that you note in your proposal that there is no practicable boundary that meets the requirements in the Local Government (Auckland Council) Act 2009. We suggest that you advise the Government that the requirements in the Local Government (Auckland Council) Act 2009 will not provide for effective governance of the Auckland region or the current Franklin district. We believe that it is within your power to state that, for a territorial authority, the closest practicable boundary to the existing regional boundary is the Waikato river and that there is no practicable boundary that divides the Hunua Ranges in two.

We make the following points in relation to the southern boundary:

- The purpose of the governance reforms is to strengthen Auckland's regional governance, however, the proposed boundary weakens Auckland's regional governance.
- The boundary that has been proposed will exclude 11,573 hectares of regional parkland from the Auckland region, including most of the Hunua Ranges, as well as Whakatiwai and Waharau Regional Parks. The area to be excluded at the Mangatangi/Mangatawhiri catchments (and between the catchment and the Firth of Thames) is 14,480ha, of which 80% is owned and managed by the ARC. It contains the region's two largest dams, the Mangatangi and the Mangatawhiri, which collectively account for 54% of the region's bulk water storage capacity. These assets were paid for by Auckland ratepayers over a number of generations, and are some of the region's most prized assets. We are aware that these assets are to be vested in the Auckland Council, but believe that this will be an extremely substandard arrangement, because Aucklanders will lose responsibility for governance over this area.
- At present the Hunua Ecological District lies completely within the Auckland region. The proposed boundary change will artificially divide the Hunua Ecological District and we believe this will be a retrograde step in terms of integrated environmental management.
- The proposal for the boundary of the Auckland Council, as a territorial authority, to follow the catchment boundary will disconnect two parts of the Franklin community of interest. As noted in your draft proposal, it will lead to difficulties in terms of service provision and infrastructure. This is a strong and effective community of interest. While the catchment boundary made sense as a regional council boundary, it makes no sense as a territorial authority boundary.

- Areas of south Franklin are under significant pressure to accommodate growth, due to their proximity to Auckland. It will remain essential for growth and development to be managed in an integrated and coherent way, and infrastructure provision will need to keep pace with demand. This growth needs to be managed in integration with growth facing the rest of the Auckland region, because Auckland's outward expansion (through subdivision in areas such as south Franklin) influences transport, energy use, demand for goods and services and other matters in Auckland. It is highly unlikely that councils centred in the Waikato will place priority on this task.
- Residents of towns such as Pokeno and Tuakau are clearly part of the Auckland regional community of interest. According to the Automobile Association, the drive from Pokeno to the Auckland CBD takes 36 minutes, but the drive from Pokeno to central Hamilton (where EW's office is located) takes one hour and five minutes. A travel survey undertaken by the ARC to inform the development of the Auckland Transport Model showed that residents of Franklin, including those who live in Pokeno and Tuakau, are far more likely to travel north to Auckland for employment than they are to travel south to Waikato (see Figure 1 below). A similar pattern existed for other types of trips. There has been pressure for extension of rail services to enable residents of Tuakau and Pokeno to commute to Auckland.

Figure 1: Destination of work trips from Franklin district



- Other functional boundaries illustrate that south Franklin is part of the Auckland regional community of interest. Franklin District Council opted to join the Auckland Civil Defence Emergency Management Group rather than the Waikato group. All of Franklin district is included in the Counties Manukau Police District, the Counties Manukau District Health Board area, and Counties Manukau Sport area. The Local Government (Auckland) Amendment Act 2004 defined the Auckland region as including all of Franklin district for the purposes of that Act.
- The rural hinterland areas, including all of the area north of the Waikato river, are an integral part of the Auckland region. Prior to 1989, the Auckland Regional Authority's jurisdiction extended to the Waikato river, and the area north of the river was part of the Auckland province before that. When formulating its reorganisation proposal for the Auckland region in 1989, the

LGC acknowledged that the Waikato river catchment boundary split the recognised Franklin community of interest, and that the Auckland region community of interest extended at least as far as the Waikato river.² Due to Auckland's rapid rate of growth and transport improvements, it is likely that the community of interest has expanded since 1989.

- Likewise, the area between Matingarahi and Kaiaua has long been part of the Auckland region. The jurisdiction of the Auckland Regional Authority extended to Miranda from when it was established in 1963 until 1989. The area has been part of Manukau and Franklin Counties since 1876, and this area has never been considered to be part of Waikato district or Hauraki district.
- While the catchment of the Waikato river will be managed by a single authority under the boundary proposed in the Local Government (Auckland Council) Act 2009, we note that the management of important groundwater aquifers will not. The Kaawa Formation aquifer and the Pukekohe volcanic aquifer in western Franklin district straddle the regional boundary. The water availability in these aquifers in the Auckland region is relatively high (9 million m³/year and 2.3 million m³/year respectively). Both aquifers are used for municipal, industrial and irrigation water supply. There would be advantages if the regional boundary was set at the Waikato river, because the management of these aquifers would be undertaken by a single authority, the Auckland Council.
- The ARC has previously suggested legislative arrangements whereby EW could continue to be responsible for the Waikato river bed and surface water in the Waikato catchment, even if the area north of the Waikato river was in the Auckland Council area.
- The ARC believes that the Treaty of Waitangi settlement with Waikato-Tainui may have influenced the Government's decisions on the southern boundary. However, we note that Waikato-Tainui influence and claims extend well into the Auckland region, including the Manukau Harbour, the Waiuku block, and Tamaki and south Auckland areas. Therefore Waikato-Tainui will need to work with the Auckland Council, and could effectively work with the Auckland Council over issues related to south Franklin and the Mangatangi/Mangatawhiri catchments, just as it could with EW.

5.2. Comment on LGC's Proposal

Notwithstanding the ARC's position on the southern boundary, we have a number of comments on the details of your proposal.

5.2.1. Pukekohe and Waiuku

We support your proposal to include additional land at Waiuku, Buckland and Pukekohe East in the Auckland region. These inclusions are essential to ensure that the suburbs of Pukekohe and Waiuku are not disconnected from their town centres in terms of local government.

² Local Government Commission (1988) *Draft Reorganisation Schemes for the Auckland region*. (see Section D – Notes to the draft reorganisation schemes for the Auckland region).

However, even if you choose not to advise the Government that, for the Auckland Council, the closest practicable boundary to the existing regional boundary is the Waikato river, we strongly suggest that you amend your draft proposal to include both Pokeno and Tuakau in the Auckland region. As noted above, residents of these towns are closely connected to Auckland and are part of the Auckland regional community of interest.

Both Pokeno and Tuakau are under considerable pressure for growth due to their proximity to Auckland, and it is essential that this growth be managed in integration with growth across the Auckland region. Both towns are included in Franklin District Council's growth strategy as important growth nodes for population, employment and economic activities. The Pukekohe wastewater treatment plant is located close to Tuakau but services areas north and south of the proposed boundary, including Pukekohe, Tuakau, Buckland, Pokeno and Patumahoe.

5.2.2. *Area south of Matingarahi*

Notwithstanding our ongoing objection to the proposal to include the Mangatangi and Mangatawhiri catchments in the Waikato region, we support your proposal to retain the area directly south of Matingarahi in the Auckland region. This area shares a strong community of interest with places such as Orere Point and Clevedon, and is relatively close to regional centres in South Auckland.

We also note that there is pressure for rural subdivision and development along this coastline, due to its proximity to Auckland. While the scale of development proposed in this area is modest in comparison with other areas of the region, the proposals are significant given that the coastline currently is relatively undeveloped. The ARC believes that development such as this needs to be carefully managed in integration with growth pressures facing the rest of the Auckland region. We have sought to carefully manage development in order to protect the important natural features and rural character of this area. If the area was to be part of the Waikato region, there would be little incentive for EW to manage growth, and little sense in managing growth associated with proximity to Auckland, from Hamilton.

5.2.3. *Firth of Thames*

We note your comment that EW has stated that the seaward boundary at the Firth of Thames should be fixed so that a greater proportion of the Firth of Thames is included in the Waikato region, including the area where there are a number of applications for spat catching. We are also aware that EW has suggested the inclusion of the area between Matingarahi and Tapapakanga in the Waikato region, with the seaward boundary to be set at the Tapapakanga river. The only reason given for this proposal is so that aquaculture can be managed by a single authority. This is most unusual.

These reforms started with the purpose of strengthening Auckland's regional governance. The objective was to put in place governance arrangements that "ensure Auckland is a successful, sustainable city in the Asia Pacific and is recognised as such".³ There have been a number of proposals to reduce the territory of the Auckland region, and all of these have been expensive distractions to achieving this objective, as they would amount to a weakening of regional governance. This latest proposal by EW to reduce the territory of the Auckland region also falls into this category.

³ Terms of Reference for the Royal Commission of Inquiry into Auckland's Governance

The arrangement proposed by EW would exclude the bulk of Tapapakanga regional park (approximately 160ha of the total 198ha) from the Auckland region. This park is well loved by Aucklanders. We are aware that the LGC and the Auckland Governance Legislation Select Committee recommended that the Auckland Council would own the ARC's parks that would be outside the region. However, we remain concerned about the willingness of future generations of councillors and Aucklanders to fund parks that are outside the region.

The arrangement for the Hunua Ranges, Waharau and Whakatiwai regional parks will be extremely substandard in the ARC's view. In the past, Aucklanders have had governance, ownership and management roles over these prized assets. While Auckland will maintain ownership and management responsibilities, it will lose control over the governance of the land, which will be in Waikato's jurisdiction.

We do not believe that moving the boundary to Tapapakanga would provide for the effective representation of communities of interest in the area. The area between Matingarahi and Tapapakanga has been part of Manukau County or Franklin County since 1876 and part of Manukau City since 1965. The area has never been considered to be part of Hauraki district, Waikato district or Waikato region. The area is relatively close to centres such as Clevedon and Auckland's southeastern suburbs, and has very close linkages to Orere Point and Kawakawa Bay. We doubt whether residents in this area would travel south to access goods and services, and suggest that they would see Auckland as their closest regional city, rather than Hamilton where EW is centred.

There is pressure for subdivision, growth and development in this area of relatively undeveloped coastline. The Auckland Council will have a far stronger ability to manage growth in this area in integration with growth throughout the rest of the Auckland region than EW would.

In addition, the ARC sees no reason why the boundary should be changed due to the presence of a number of applications for marine farms. They are applications only. Even the suggestion that regional boundaries should be amended because there are a number of applications for an activity in an area is perplexing. We are not aware of legislation that states that applications for an activity are part of the criteria the LGC is required to take into account when setting regional boundaries.

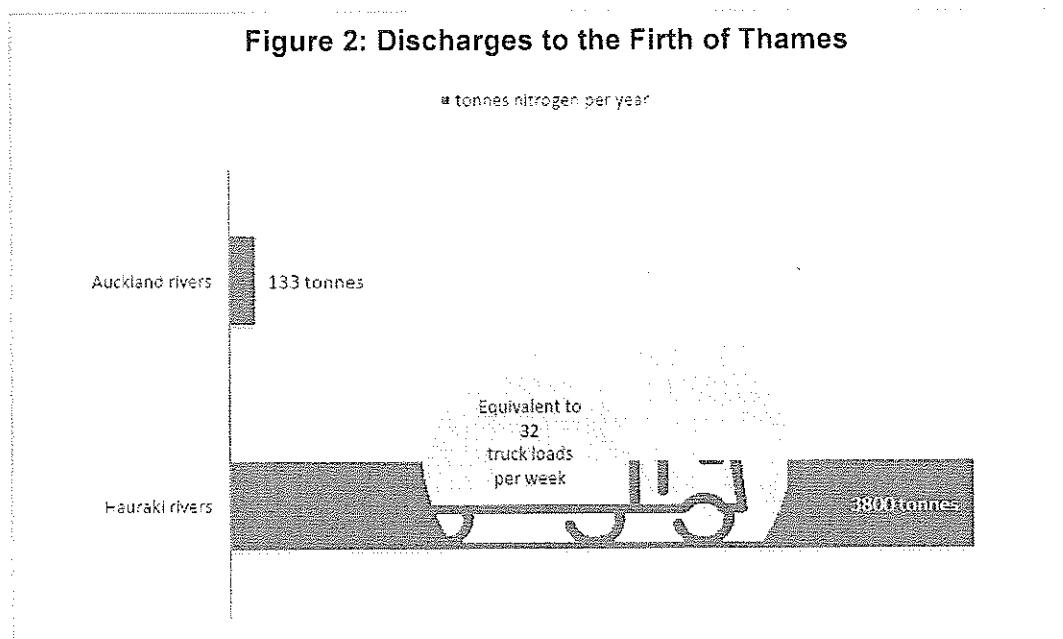
Moreover, the ARC does not envisage that most of these applications would go ahead. Our modelling has shown that the scale of aquaculture applied for in the Firth would exceed the ecological carrying capacity of the Firth. Joint investigations undertaken by the ARC and EW between 2000 and 2005 showed that 4,300ha of mussel farming (less than the total area applied for in the western Firth of Thames) could lead to irreparable degradation of this highly valued and internationally important area. Specifically, it could lead to significant localised phytoplankton depletion within the farmed area and a halo of change extending well beyond the area, potentially overlapping with Wilson's Bay. Our investigations identified even greater potential impacts upon the local community, with concerns about visual amenity and the impact on recreational boating activities. In April 2008, the ARC released its proposed aquaculture policy direction, which identified the entire western Firth of Thames as an excluded area for large scale aquaculture expansion.

Furthermore, even if the aquaculture did go ahead, we note that a boundary shift is not necessary to achieve integrated investigation and management of marine farming effects within the Firth, as ARC and EW have already demonstrated. The ARC and

EW have successfully conducted joint investigations and worked co-operatively in relation to aquaculture management in this area for some time.

While we acknowledge that integrated management of catchments by a single authority is usually preferable, EW's track record shows that, in this case, it is unlikely to result in better environmental quality in the Firth. Currently, Hauraki rivers (in the Waikato region) collectively discharge approximately 3,800 tonnes of nitrogen into the Firth each year, the equivalent of 32 trucks of urea being disposed of into the Firth per week (see Figure 2 below).⁴ In contrast to the Waikato, Auckland rivers collectively dispose of around 133 tonnes of nitrogen into the Firth each year.⁵

Research undertaken by EW suggests that the nitrogen entering the Firth could lead to an anoxic zone in the Firth as large as 100km². There is now an extraordinary expansion of mudflats taking place in the area, pushing around 20,000 birds out of their habitat, despite the area being considered to be a wetland of international importance under the Ramsar Convention.



6. NORTHERN BOUNDARY

The ARC strongly supports your proposal to retain the Northern boundary in its current position. Rodney is an integral part of the Auckland region. Strong and effective connections have been built up for well over 150 years between the residents and businesses of the Rodney district and the wider Auckland region, and it is clearly part of the Auckland regional community of interest. The economies of Rodney and of Auckland are closely linked, and dependent on one another in many ways.

The ARC owns ten regional parks in Rodney – Muriwai, Shakespear, Wenderholm, Mahurangi, Scandrett, Tawharanui, Pakiri, Atiu Creek, Te Arai and Te Rau Puriri. All of these parks, which are very popular with Aucklanders, are held for the benefit of the regional community and funded by regional ratepayers.

⁴ Singleton, P (2009). *The condition of rural water and soil in the Waikato region*. Presentation to the Hauraki Gulf Forum, March 2009.

⁵ Hauraki Gulf Forum (2008) *Tikapa Moana – Hauraki Gulf State of the Environment Report*.

Rodney is one of the fastest growing areas of New Zealand, and this growth is forecast to continue. As a consequence, it is already facing an infrastructure deficit. The retention of Rodney within in the Auckland Council area will support the management of growth and development in an integrated and coherent way, and ensure that infrastructure provision keeps pace with demand.

The Royal Commission concluded that the Auckland Council should retain control of areas outside the metropolitan area in order to retain land for food production, support rural industries and economies, and to protect rural amenity, landscape, coastal and ecological values and water quality. The Royal Commission considered that the existing northern boundary of the Auckland region was sufficiently far from the metropolitan area to achieve these goals, and recommended that the existing boundary be retained. Your draft proposals support this conclusion and we strongly support them.

7. ASSETS AND LIABILITIES

We support the LGC's proposal that the regional parkland in the Mangatangi and Mangatawhiri catchments (and the area between those catchments and the Firth of Thames) will be vested in the Auckland Council. We note that your report does not specifically refer to the three parks in the area – the Hunua Ranges, Whakatiwai and Waharau Regional Parks. We trust that all of the ARC's land and assets will be vested in the Auckland Council, and that the asset information be clearly detailed in your final determination.