



How we represent you

Auckland Council representation review

Written Feedback

Regional Organisations Volume #1

August 2024



Sub #	Organisation Name	Page Number
20	Royal Forest and Bird Protection Society of New Zealand	1
171	New Zealand Sikh Womens Association (Inc.)	5
760	Northern Action Group Inc	9
766	Chinese Association of West Auckland	21
1104	Business North Harbour	24
1206	Federated Farmers of New Zealand	32
1207	Te Ara Rangatuu o te Iwi o Ngaati te Ata Waiohua	37
2279	Breast Cancer Foundation NZ	40
2366	Disability Connect Incorporated	43



How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Royal Forest and Bird Protection Society of New Zealand Inc

Local Board: Regional Organisation

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Other

Tell us why

This review does not address the issues discussed in the community workshop. For example, the idea that our political boundaries need to align with the natural landscape (and features) such as catchments. Another example is the bigger picture access to decision making and wider allocation of decision makers/local representatives.

Changes to wards from the 2022 elections

2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Tell us why

2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

- 5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?**

Tell us why

- 6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?**

This review should have had wider scope. The resources allocated would have got the review far enough along to expand scope without much difficulty or additional resource.

'Nature is its own constituency': consider ecological connections, water catchment orientated or informed boundaries, natural assets informing subdivision (e.g., the presence of a significant natural feature such as the Waitakere Ranges requires much more resourcing than what would be measured by human population in that area).

Increased local access to decision making: full time paid local board roles to be considered, investigate delegation of more transport decisions to local boards, make the roles of local board members more accessible/affordable.



How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): New Zealand Sikh Womens Association (Inc.)

Local Board: Māngere-Ōtāhuhu

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Support

Tell us why

Changes to wards from the 2022 elections

2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Support

Tell us why

2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Support

Tell us why

Because of housing growth

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

- Long-term partnership for priority programmes for the betterment of the ethnic communities.
- An age-friendly plan the Council have, but the implementation is not linked locally.
- Ethnic communities should have access to ethnic food banks if the council can influence them in some way.

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Support

Tell us why

Happy to support the minor changes

- 5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?**

Tell us why

- 6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?**

The local Board should have regularly engaged with the community to ensure their interests and priorities were taken into account when making decisions.



How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Northern Action Group Inc

Local Board: Rodney

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Tell us why

See attached

Changes to wards from the 2022 elections

- 2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Tell us why

- 2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

See attached

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

- 5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?**

Tell us why

- 6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?**

See attached



Table of Contents

<i>This Submission</i>	2
<i>Introduction</i>	2
<i>The process</i>	3
<i>The Proposal</i>	3
<i>Communities of Interest: Rodney is different</i>	4
<i>Compromise</i>	5
<i>Variation?</i>	6
<i>Conduct of opponents</i>	7
<i>Recommendation</i>	8
APPENDIX: RLB member Facebook postings	9

This Submission

We make this submission in support of the changes proposed and resolved for consultation by Auckland Council's (AC) Governing Body (GB).

We offer some comments in support of the conceptual change behind the proposal. We suggest some minor adjustments to boundaries that would address concerns we have heard expressed during the consultation period.

We comment on the various misrepresentations and scaremongering tactics that have been used by some people to encourage opposition to the proposed changes.

We wish to appear before the Joint Governance Working Party (JGWP) to speak to our submission.

Introduction

In December 2020 we provided a paper in support of a motion tabled by Rodney Councillor Greg Sayers, supported by our local MPs, seeking a review of the Rodney Local Board (RLB) area subdivision boundaries¹. The governing body deferred our proposal for consideration in the general review required every six years (in this case for the 2025 local body elections).

In preparation for the GB resolution for the public consultation required for 2024, we have been actively working with community groups to promote an understanding of the representation review process, the current non-compliance of the subdivisions in Rodney, and the proposed change in concept for interpreting communities of interest.

This has been challenging as, with the general level of apathy regarding participation in local authority elections and the process for these, it is perfectly natural and understandable for members of the public to be for the most part uninterested in engagement on these issues unless they feel disenfranchised by current subdivision arrangement or threatened in some way by proposals for change. In our opinion, the public at large, struggle to understand the difference between Wards and Local Board Areas and subdivisions, and Councillors and Local Board members.

Nonetheless we have been able to engage with some local community groups (Kaipara flats, Sandspit, Puhoi, Whangateau, Warkworth Area Liaison Group, NAG and LCA AGMs) and generally received appreciative support.

¹ https://infocouncil.aucklandcouncil.govt.nz/Open/2020/12/GB_20201217_AGN_9669_AT_WEB.htm (includes the paper <https://nag.org.nz/NAG%20Subdivision%20Paper.pdf>)

An on-line poll we have had running since August 2023 has only attracted 109 responses, but 98% support the changes.

The process

Our efforts have involved engaging with members of the Rodney local board and AC officials working on the review. We have been impressed with the level of understanding and support received from officials during the process. However, despite trying to raise the general level of public awareness since the middle of last year, we have been unable to engage formally with decision makers (the JGWP and RLB), to improve understanding of the change proposed, prior to opportunities afforded in the process for members of the public generally.

We understand that the intention of AC behind this process is to avoid lobbying or the promotion of special interests seeking to influence decision making by the JGWP and GB. However we note, as even the Chairperson of the JGWP commented during the public webinars, that elected members are significantly conflicted in having a strong vested interest in the process by which they are elected. Consequently they may find it difficult to be independent in their judgements about changes which could impact their chances of re-election.

We are pleased that the RLB has chosen to put aside potential conflicts and support and recognise the rural /urban basis of our proposal and recommended its adoption to the JGWP. The recommendation was supported by a narrow majority (5: 4) and modified the original proposal to maintain a perceived balance between North and South voting areas.

The Proposal

The subdivision boundary changes proposed for consultation by the governing body for the Rodney local board area are based on the concept proposed in 2020 of urban/rural communities of interest - as set out in our paper to the December 2020 GB meeting.

With the updated 2023 population numbers officials made minor changes from the original proposal which brought the Kumeu subdivision into compliance with the legislative population quota.

The split of the rural subdivision into two (North rural and South rural) subdivisions was recommended by the RLB to address concerns about a perceived potential imbalance between representation from the North and from South West Rodney and to encourage the election of representatives with more localised knowledge within such a large geographic area.

[This reflects the practical political reality of differences (policy and decision-making) between members representing the interests of either North Rodney or SW Rodney residents (or party voting “blocks” and independents) which were polarising in previous Rodney local boards and have tended to persist to some degree in the current local board. Differences between members, particularly over roads and transport spending, were instrumental in the review of concepts for deciding areas of representation.]

This split of the rural area necessarily introduces some arbitrariness as to the location of the boundary between North rural and South rural. However variations are possible to address local concerns which have been expressed about not splitting local communities for voting.

[It is important to recognise that with a diverse and dispersed population in Rodney - only half of which is lumped together in a few dominant communities - any subdivision of the Rodney district for voting purposes will produce boundaries with potential concerns from people affected by those boundary decisions, whether their perceptions are valid or not. (As we will see under the communities of interest discussion anything less than electing all members at large involves compromise.)]

Communities of Interest: Rodney is different

Our support for changes to improve performance and outcomes for Rodney is not new. We have consistently argued that the region-wide centralised silo management control structures adopted by AC and its CCOs have not been fit for purpose for Rodney².

Rodney's land area comprises 46% of the whole of Auckland council, with 20% of its roads (in km). Rodney is 95% rural, it has 76% of the region's unsealed roads and these make up 41% of all the roads in Rodney.

Rodney's rural ratepayers make up about half the population and pay about half of Rodney's rates.

In our 2020 paper we highlighted that Rodney was unique amongst the other Local Board areas and why spreading half of Rodney's voters as minorities across its urban centres was unfair and did not provide effective representation of communities of interest. (q.v. footnote 1).

² 2013-2020: e.g. NAG's Proposal to separate North Rodney from AC contained arguments about why it did not work for Rodney (e.g see <https://nag.org.nz/AlternativeProposal24.06.16.pdf>) ; and 2023: issues for Mayoral discussions, (<https://nag.org.nz/Active%20NAG%20issues%20for%20Mayor%20Jan2023.pdf>)

Compromise

With such a spread of rural and rural settlement communities and two main population centres, determining the perceptual, functional and political dimensions of effective communities of interest is challenging.

At one extreme electing all 9 members of the local board at large is an obvious starting point.

But that provides no guidance to prospective candidates as to what they stand for other than a “better Rodney”, and we surmise it would likely encourage the provision of political “tickets” of candidate party groups, who would predetermine what they thought was best for the District (and have been controversial in Rodney in recent local boards).

Given the distributed, and therefore less coordinated, groupings of rural voters, such “ticket” parties would have inevitably come from urban areas and lack the understanding of rural interests important to Auckland from its rural economic contribution. Voting “at large” would be expected to produce a form of representation little different from the place based concept of population centre groupings around which subdivision boundaries have been drawn traditionally.

Shifting to a fair representation based on rural/urban differences therefore seems obvious for Rodney – something not relevant in a more consistently dense urban population local board area.

However, a more pure approach based on StatsNZ’s SSGA2023 raises complications of non-contiguous groupings (which would be novel for people to understand) and a compromise which would lump Wellsford in with all the Rural Settlements (1 member) a large Other Rural area (5 members) and a grouping of Small Urban areas (3 members).

The advantage of this arrangement is that it would help remove the political Kumeu v Warkworth, South West v North aspect of Rodney representation and decision making, but our view has consistently been that a shift to changed boundaries AND non-contiguous groupings was too radical a change for voters to readily adjust to.

The current proposal then has elements of the status quo (Dairy Flat boundaries unchanged as they remain within quota; and it recognises the two centres of Kumeu/Huapai and Warkworth) but fairly recognises the mainly rural character of Rodney and the different interests of rural and urban voters.

Variation?

During the consultation period we have heard the opposition to change from current vested interests, and concerns from the Kaukakapa (KKK) community that their representation will be split by the North/South rural boundary (the proposed boundary follows the river through middle of KKK).

While it is a matter for the JGWP whether or not to respond to these concerns, we can see 3 possible ways to meet them which would still be compliant with quota:

1. Shifting the boundary South of KKK to place KKK in North Rural
2. Shifting the boundary north of KKK (to place them in South Rural) and shifting the boundary south of Waitoki catchment (to place them in North Rural).
3. Removing the boundary completely to create a single Rural subdivision of 4 members.

We would not object to any of these changes which maintains quota and satisfies the concerns expressed by those communities.

We do note however, comments made by officials (which we support) that if the concept is based on rural versus urban communities of interest then the question voters should be asking is “am I rural?” not “am I voting in the same subdivision as other people in my neighbourhood?”

We do not share the concerns of some RLB members that this will mean that rural representatives will necessarily come from the South and will not recognise or represent the interests of the people in Wellsford or rural areas. There is a distributed spread of population across the rural area with no particular area dominant.

Our perception is that rural people have needs in common - whether they are from the South Head or Port Albert or Te Arai areas. Subdivision boundaries determine who ratepayers can vote for but they do not restrict where candidates must come from. Our view is that rural voters will universally pick candidates they believe will best represent rural interests across the whole of the district, as well as contributing responsibly to RLB decision-making for the needed development of urban areas.

Conduct of opponents

We have observed scaremongering and misleading comments by a local board member which may misrepresent proposals and potential outcomes. We have also seen postings and views from other local board members which have been supportive or just encouraging engagement, but we have not seen these make misrepresentations.

These Facebook posts from Ivan Wagstaff (below) mislead the public by implying that the proposal will mean people in Whangateau, Wellsford and Sandspit will lose assets or services when there is no reason to presume that will be the case.

The posts suggest that because the representation changes from 3 members for Warkworth and 1 for Wellsford, to 2 for Warkworth and 2 for North Rural, Warkworth and Wellsford voters will lose representatives who make decisions in their interests.

That is wrong because North Rodney still retains 4 members, the same as before, and the combined area of Warkworth and North Rural subdivisions is greater than the current area of Warkworth and Wellsford subdivisions.

Threatening people with the loss of assets or services is scaremongering. Suggesting that it will result from changes to where people vote from is misleading.

AC assets and services in Rodney are not restricted by boundaries and their value and usage can be enjoyed by all. There is clearly no connection between changing the allocation of voters to areas and the decisions elected representatives make on behalf of Rodney ratepayers. Such decisions can not be foretold.

Under the proposal Wellsford gets more rural oriented support and Warkworth continues to get support from North Rural. So there is no reason to imagine scenarios in which decisions will be made that some voters may not like (any more than it is natural for local boards to make decisions some voters do not like).

Also the posts imply a division between north and south Rodney and between rural and urban voting. Whether or not that is seen in decision-making depends entirely on who is elected, not who elected them.

In general we believe people are free to post their views and we are both pleased to see and welcome our local board members actively engaging in supporting their electors.

However, we are concerned that elected representatives may be using the review as an opportunity to promote themselves (sometimes using posts as paid advertising) within and outside their base of voter support - in a way that is not much different in concept from electioneering.

[REDACTED] not as an individual but does not declare any (obvious) conflict of interest. Nor does he disclose

that the RLB, of which he is a member, and whose decisions he has agreed to support as a member of that collective, voted to recommend the proposal to the JGWP and GB.

Recommendation

AC has recognised the conflict of interest present when elected members are required (by law) to propose or resolve the system by which they are elected (and any changes to it).

Local Boards are asked to participate in AC's decisions under the review, and make recommendations which the JGWP gives significant weighting to in making its recommendations to the GB for resolution.

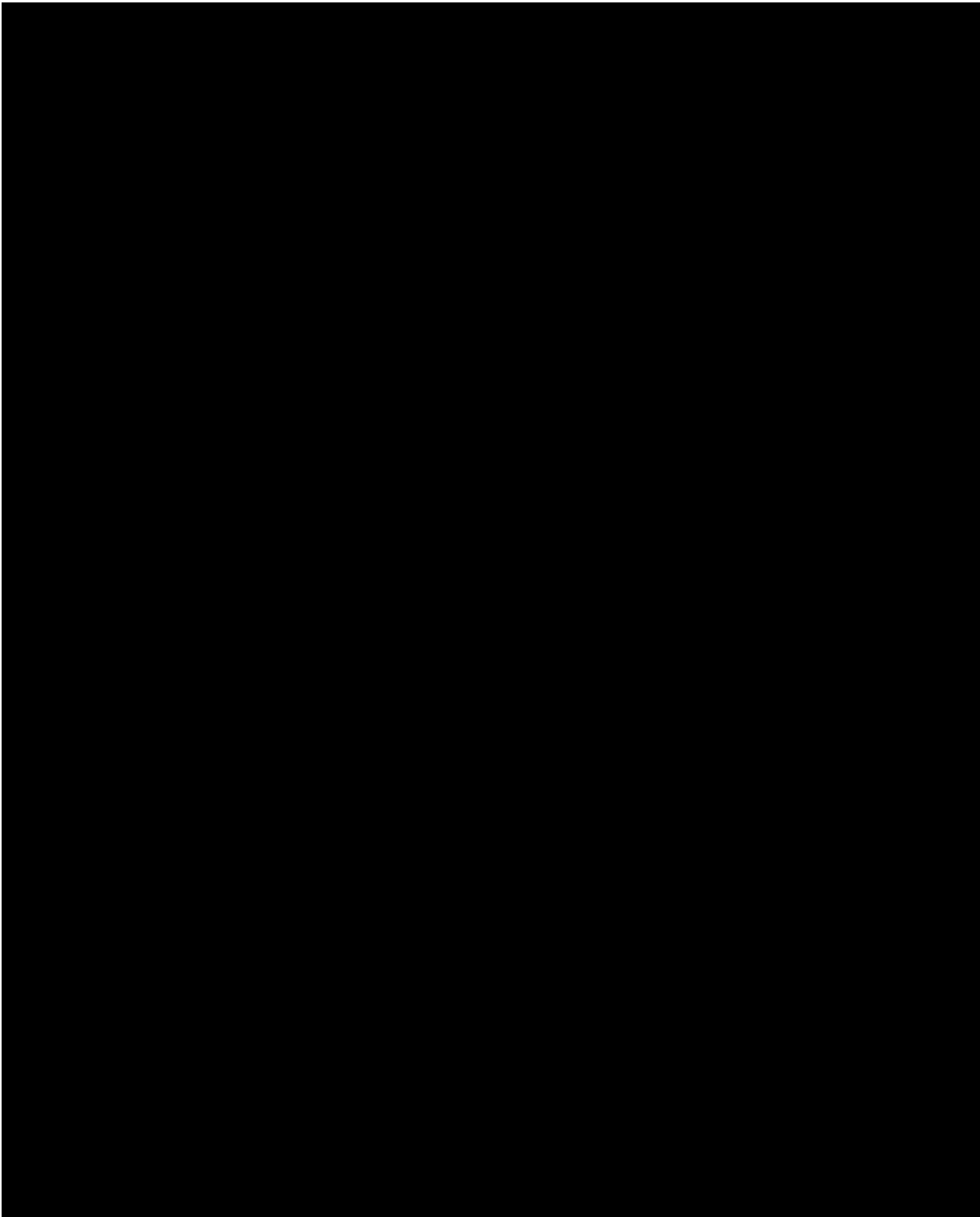
Good governance practice would be for members to recuse themselves from participating in the discussion on the merits or otherwise of such decisions (amongst voters who, presumably, are the ones who are then asked to decide on the systems by which they wish their representatives to be elected). (Standard exceptions are where members can help explain to voters, or provide useful information on, what is proposed, without offering any view as to the merits or otherwise of what is proposed.)

AC chose not to resolve any proposal for consultation under reorganisation review provisions this time. However, we believe the same arguments regarding the position of conflict of interest of elected members and restrictions on participation in public discussion on any proposal should equally apply to any reorganisation or representation proposals resolved for consultation.

We therefore **recommend:**

that the JGWP propose that the GB adopt as policy for future reviews that elected members be required to refrain from publicly expressing any views or opinions on any representation or reorganisation review proposal once it has been resolved for public consultation by the GB.

Northern Action Group Inc.
Landowners and Contractors Association
Rodney Community Voices





How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Chinese Association of West Auckland

Local Board: Whau

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Support

Tell us why

fair

Changes to wards from the 2022 elections

2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Tell us why

2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

I think it is possible, because appropriate flexibility is a principle.

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

- 5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?**

Tell us why

- 6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?**



How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Business North Harbour

Local Board: Upper Harbour

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Tell us why

Changes to wards from the 2022 elections

- 2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Tell us why

- 2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Support

Tell us why

See attached

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Support

Tell us why

See attached

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Support

Tell us why

See attached

5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?

Support

Tell us why

See attached

5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?

Support

Tell us why

See attached

5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?

Tell us why

6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?

See attached



Submission: Auckland Council Representation Review 2024

7th August 2024

Business North Harbour Incorporated

██████████ – General Manager

PO Box 303 126

North Harbour 0751

Phone 09 968 2222 or ██████████

Email: ██████████

Local Board Representation: Upper Harbour Local Board

7th August 2024

Auckland Council Representation Review
Freepost Number 190198
Private Bag 92300
Victoria Street West
Auckland 1142

representationreview@aucklandcouncil.govt.nz

Submission to Auckland Council Representation Review 2024

Auckland Council is seeking feedback on the Auckland Council Representation Review 2024.

Introduction

Business North Harbour (BNH) representing the North Harbour Business Improvement District welcomes the opportunity to make this submission on the Auckland Council Representation Review 2024.

BNH is a significant commercial and industrial Business Improvement District (BID), representing over 4,500 commercial property owners and businesses within the North Harbour area. Collectively they employ over 35,000 Auckland residents and ratepayers. The organisation is located within the Upper Harbour Local Board area, which remains one of the fastest growing areas in the country, in both absolute and percentage population terms, which brings both challenges and opportunities to the North Harbour business district.

BNH represents and works with a wide range of businesses comprising of a mix of sole traders, Small Medium Enterprises (SME), through to multi-national organisations, representing sectors such as ICT, business services, specialist manufacturing, light – medium warehousing, logistics, retail and hospitality. In addition, we have key educational institutions within or on our boundary, including Massey University Albany and AUT Millennium, along with a variety of primary and secondary schools including Rangitoto College, the largest secondary school in New Zealand.

Our primary interests are decisions within the Auckland Council Representation Review 2024 which:

- Impact on the cost of business – across a short to medium timeframe
- Impact on economic development and the ability to leverage value from location
- Support or restrict business growth opportunities
- Impact on access to both regional and localised transport hubs
- Impact on R&D and investment – sector development and capability
- Provide the scope to leverage natural assets for economic development across the leisure and tourism sectors – enhancing Auckland's reputation

Background:

Every six years Auckland Council must review representation arrangements including Governing Body and Local Boards, to ensure that they are fair and effective and are keeping pace with Auckland's growth. Auckland is currently divided into 13 Wards with 20 Councillors representing these Wards, who along with the Mayor, make up the Governing Body. Additionally, there are 21 Local Boards made up of a total of 149 Members, who are responsible for making decisions specific to the communities in their geographic areas.

Currently, some Councillor Wards do not meet the requirement that elected representatives must represent a similar number of people (within 10 per cent of the average). This is called the 'fair representation' rule which also applies to subdivisions within Local Boards.

The Council is also required to make sure that the election of Members provides effective representation of communities of interest. In simple terms, communities of interest are groups of people who feel connected to a place, use the same services, and who have similar issues that require representation at the decision-making table.

Auckland Council is proposing to maintain the current number of Wards and Councillors, while making adjustments to Ward boundaries, especially in the North Shore, Albany, and central Auckland areas. Changes to some Local Board subdivisions are also being proposed.

Auckland Council is seeking feedback on a number of different proposals. Our response, which is limited to those proposals affecting our area, is set out below and covers:

- (1) Changes To The North Shore And Albany Ward Maps (Question 2B)
- (2) Saunders Reserve Will Be Fully In The Upper Harbour Local Board (Question 5A)
- (3) Moving Kereru Reserve Fully To The Upper Harbour Local Board (Question 5B)
- (4) Shifting The Section Of The Upper Harbour/Kaipātiki Boundary (Question 5C)
- (5) Aligning Bayview To The Kaipātiki Local Board (Question 5D)
- (6) Any Other Feedback

(1) Changes To The North Shore And Albany Ward Maps (Question 2B):

The council proposes to move an area around Bayview currently in the Albany Ward to the North Shore Ward to reduce non-compliance with the fairness of representation rule and move an area to its east from North Shore to Albany Ward to align with minor changes to local board boundaries. With these changes the boundary between the Albany and North Shore wards will fully align with local board boundaries.

BNH supports these proposed changes as they help to address the current discrepancy in the fairness of representation rule and the alignment of the Ward and Local Board boundaries is logical. Whilst these changes will not see the ten per cent rule satisfied, the rationale of excluding other areas from moving due to their community of interest status in the Albany Ward is also a logical approach.

Feedback question 5 states:

We propose minor changes to local board boundaries across the Devonport-Takapuna, Upper Harbour, Kaipātiki, Puketāpapa and Maungakiekie-Tāmaki local boards to better align community areas and reserves.

(2) Saunders Reserve Will Be Fully In The Upper Harbour Local Board (Question 5A):

BNH supports the proposal that the boundary between the Upper Harbour and Devonport-Takapuna local boards is changed so that all of Saunders Reserve is in the Upper Harbour Local Board area, as it aligns with the criteria in the legislation that enables Auckland Council to include minor changes to Local Board boundaries to address minor issues and it also aligns with the legislation criteria surrounding the number of people affected. Both pieces of legislation are outlined on page 8 of the Initial Proposal Document.

(3) Moving Kereru Reserve Fully To The Upper Harbour Local Board (Question 5B):

BNH supports the proposal to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board. This proposal again aligns with the criteria in the legislation that enables Auckland Council to include minor changes to Local Board boundaries to address minor issues and it also aligns with the legislation criteria surrounding the number of people affected. Both pieces of legislation are outlined on page 8 of the Initial Proposal Document.

(4) Shifting The Section Of The Upper Harbour/Kaipātiki Boundary (Question 5C):

BNH supports the proposal to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary, as the road forms a logical and easy to identify boundary. Additionally, the proposal again aligns with the criteria in the legislation that enables Auckland Council to include minor changes to Local Board boundaries to address minor issues and it also aligns with the legislation criteria

surrounding the number of people affected. Both pieces of legislation are outlined on page 8 of the Initial Proposal Document.

(5) Aligning Bayview To The Kaipātiki Local Board (Question 5D):

BNH supports the proposal to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board as it seems logical to have a suburb contained in one Local Board area so that everyone in that suburb is dealing with the same Local Board and its representatives. This removes the possibility that a suburb and the people in it may receive differing support if they are represented by different Local Boards who have different priorities. Furthermore, the proposal again aligns with the criteria in the legislation that enables Auckland Council to include minor changes to Local Board boundaries to address minor issues and it also aligns with the legislation criteria surrounding the number of people affected. Both pieces of legislation are outlined on page 8 of the Initial Proposal Document.

(6) Any Other Feedback:

BNH supports any changes that ensure that Councillor Wards and Local Boards comply as far as is practicable with the fairness of representation rule and its ten percent variation.

That said, we believe that it is of paramount importance that whatever changes to Ward and Local Board boundaries are implemented, Auckland Council must develop the most effective governance and operational structure that will enable local representatives at Ward and Local Board level, to achieve optimum outcomes for their local communities, which are in line with the identified needs of their communities. Local Boards need to be given decision-making abilities and financial resources that support their ability to develop thriving local communities that have adequate housing, infrastructure and community facilities, all located within an aesthetically pleasing environment.

Furthermore, these local communities need to support and be supported by local business communities that provide local employment opportunities. Auckland Council and any relevant CCOs must ensure that their locally-based representatives have access to key stakeholders and resources that can assist in the development and implementation of local economic development initiatives that support local business and economic growth. A successful local economy will not only contribute individually towards a thriving local community, but also collectively towards the economic growth of Auckland as a whole.

The city, via its local communities and business communities, must continue to work to attract new businesses and employment opportunities, customers and visitors so that our local communities and Auckland in general may enjoy sustainable economic growth whilst providing a city that is both a pleasure to live in and affordable.

BNH asks that when considering the representation changes that it is asking for feedback on, Auckland Council goes further than simply moving some boundary lines on a map and fully investigates its central and local structure to ensure that programmes, services, infrastructure and economic development are all both effective and efficient. It could well be that more significant changes need to be made to achieve these outcomes.

Conclusions:

BNH fully supports fairness and equity which produces equality across every Ward and Local Board area in the city. We believe that Auckland Council must develop a representation and operational structure at its own central and local government levels based upon fairness and equity that enables, as far as is practicable, city-wide equality to be achieved.

Should there be any questions or other matters arising from this Submission, we would be pleased to respond to these.

Yours sincerely,

A large black rectangular redaction box covering the signature of the General Manager.


General Manager



How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Federated Farmers of New Zealand

Local Board: Regional Organisation

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Support

Tell us why

See attached document

Changes to wards from the 2022 elections

2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Tell us why

2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Support

Tell us why

See attached document.

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

See attached document.

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

- 5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?**

Tell us why

- 6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?**

See attached document.

SUBMISSION

TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ



To: Auckland Council
Via email: representationreview@aucklandcouncil.govt.nz

Address for service: [REDACTED]
[REDACTED]
Federated Farmers of New Zealand

[REDACTED]
[REDACTED]

SUMMARY OF SUBMISSION

- FFNZ at a high level supports the proposed changes to Rodney subdivisions, provided there is widespread support amongst communities of interest.

1. INTRODUCTION

- 1.1 Auckland Federated Farmers (**Federated Farmers**, or **FFNZ**) appreciates this opportunity to submit on Auckland Council's (**AC** or **Council**) Representation review 2024 (**initial proposal**).
- 1.2 Federated Farmers acknowledge any submissions from individual members of our organisation.
- 1.3 Federated Farmers would like the opportunity to speak to Council about this submission.

2. GENERAL COMMENTS

- 2.1 FFNZ understands that a change to rural representation is proposed in the Rodney Local board subdivisions. Two new subdivisions are proposed to 'better reflect the shared interests of rural communities'. FFNZ at a high level supports the proposed addition of two subdivisions to Rodney Local Board, provided there is widespread support amongst communities of interest.
- 2.2 In terms of the Franklin subdivisions, FFNZ supports the initial proposal with no changes to these boundaries and subdivisions. Specifically, FFNZ supports Clarks Beach and Patumāhoe being included in the Pukekohe subdivision and would like Council to retain this arrangement.
- 2.3 The focus of this submission will be on the proposed Rodney Local Board subdivisions.

3. RODNEY LOCAL BOARD SUBDIVISIONS

- 3.1 As previously mentioned, FFNZ at a high level supports the proposed new subdivisions for Rodney.
- 3.2 The Kumeū subdivision representation is perceived to have an urban focus (Kumeū township is very close to metropolitan Auckland and contained by a Rural Urban Boundary) so can be perceived to underrepresent the rural interests that make up a large part of the subdivision, and Rodney as a whole. The proposal makes some progress towards addressing this issue.
- 3.3 However, FFNZ has some concerns that the proposed 'North Rural Subdivision' may be too large of an area for effective representation, particularly for rural people. Also, the communities of interest of much of the area lie to the south and east, rather than to the north. FFNZ wants to ensure that through the consultation process, the public agree that this is indeed the best way to represent communities of interest and in particular rural interests.
- 3.4 FFNZ also has some concerns that the proposed Kumeū and Dairy Flat subdivisions are 9.83% and 5.88% different from the average at present. Given the growth in these areas, Council should consider the impact on representation in the medium term given the next representation review will not occur for another six years.

Federated Farmers thanks Auckland Council for considering this submission

About Federated Farmers

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that local government policies and processes impact on our member's daily lives as farmers and members of local communities.





How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Te Ara Rangatuu o te Iwi o Ngaati te Ata Waiohua

Local Board: Franklin

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Support

Tell us why

Changes to wards from the 2022 elections

- 2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Tell us why

- 2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?

Tell us why

5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?

Tell us why

6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?



How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Breast Cancer Foundation NZ

Local Board: Waitematā

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Tell us why

Changes to wards from the 2022 elections

- 2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Do not support

Tell us why

I support Newmarket and Parnell remaining in the Orakei Ward on the basis that the resident demographic is a shared community of interest.

2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Tell us why

3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?

Tell us why

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Tell us why

Non-complying subdivisions

4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

Tell us why

- 5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?**

Tell us why

- 5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?**

Tell us why

- 6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?**

How we represent you:

Auckland Council representation review

Note: this version of the feedback form has been created for the purpose of publishing submissions. As such, contact and demographic information has been removed and handwritten submissions have been transcribed.

Submitter details:

Organisation (if applicable): Disability Connect Incorporated

Local Board: Maungakiekie-Tāmaki

Your feedback

Representation review initial proposal

1. Overall, what is your opinion of the changes outlined in the representation review initial proposal?

Do not support

Tell us why

Do Not Support – For local areas we feel there is under-representation for disabled people and the proposal does nothing to address this. There is a lack of consistency across Council and Local Boards about how the rights of disabled people and their whānau are interpreted and acted upon. We would like to see agreed disability training undertaken by all elected members as part of their induction. There also needs to be oversight by officials as to how disabled people's needs are being met by Boards.

Changes to wards from the 2022 elections

2A. What is your opinion of the proposed changes to the *Central Auckland wards* (maps 1.1 to 1.4)?

Support

Tell us why

2B. What is your opinion of the proposed changes to the North Shore and Albany wards (map 1.5)?

Support

Tell us why**3A. What is your opinion of the proposed changes to the Rodney Local Board subdivisions (map 2.1 and 2.2)?**

Do not support

Tell us why

Increasingly disabled people and their families are moving north to cheaper housing options in the countryside and semi-rural areas. Consideration of their needs requires representation of disabled people and their families in Warkworth and Kumeu, which are their nearest town centres. Reducing the geographic catchment misses their voice.

3B. What is your opinion of the proposed changes to the Howick Local Board subdivisions (map 3)?

Do not support

Tell us why

Do Not Support. While we agree with the need for an increase to 11 representatives the boundaries drawn don't follow local school boundaries for Botany Downs Secondary College. People in the BDSC school zone don't identify with Ormiston.

Non-complying subdivisions**4. Do you have any feedback on the proposal to maintain some subdivision arrangements that are currently not compliant with the rule for fairness of representation?**

Alignment with the school zone would redress the imbalance in population for the new subdivision and Botany.

Local board boundaries

5A. We are proposing that Saunders Reserve, currently split across Devonport-Takapuna and Upper Harbour Local Boards, will be fully in the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

I don't know

Tell us why

I don't know. We have received no feedback on Saunders Reserve being part of Upper Harbour Local Board.

5B. We are proposing to move part of Kereru Reserve, currently split across Kaipātiki and Upper Harbour Local Boards, to the Upper Harbour Local Board (map 4.1). What is your opinion of this proposal?

I don't know

Tell us why

I don't know. We have received no feedback on Kereru Reserve being part of Upper Harbour Local Board.

5C. We are proposing to shift the section of the Upper Harbour / Kaipātiki boundary that lies between Caribbean Drive and Albany Highway southwards, so it follows a road boundary (map 4.1). What is your opinion of this proposal?

I don't know

Tell us why

I don't know. We have received no feedback on shifting this boundary.

5D. We are proposing to align Bayview, currently split across Upper Harbour and Kaipātiki Local Boards, to the Kaipātiki Local Board (map 4.1). What is your opinion of this proposal?

I don't know

Tell us why

I don't know. We have received no feedback on aligning Bayview.

5E. We are proposing to align Taumanu Reserve (Onehunga), currently split across Puketāpapa and Maungakiekie-Tāmaki Local Boards, to the Maungakiekie-Tāmaki Local Board (map 4.2). What is your opinion of this proposal?

Support

Tell us why

Support. We agree that Taumanu Reserve should be part of Maungakiekie- Tamaki Reserve. We see it as it is closer to Onehunga in identity than Hillsborough.

6. Do you have any other feedback about how you and your community can be better represented through local boards and the governing body?

Disabled people don't see themselves as being represented - we can't get on to the Council or Boards to be able to make a real difference. It's really difficult for a disabled person to campaign in local councils. We would like to see disabled people in leadership making decisions for us, with us.

We are deeply concerned about this lack of representation of disabled people in local decision making. While the Disability Reference Group is helpful, it simply doesn't have the capacity or the power to influence decisions on Council owned local amenities and infrastructure. For example accessible footpaths in council parks - can a person who has mobility needs access and use a local park safely? Years ago there was supposed to be an audit done on all parks. Where is that? Also change places bathrooms- there is no clear strategy for meeting the needs of disabled people and their families across Auckland because of the lack of representation.

We recommend a disabled representative on each local board, this would help build a good relationship in the community. They need to have a broad vision of different disabilities, including autism/neurodivergence, and include parents of disabled people who are often in time poverty- with no choices or capacity to engage when Council representatives meet.

Knowledge of the United Nations Convention on the Rights for People with Disabilities and the New Zealand Disability Strategy is poor among elected members and candidates. We think it should be mandatory for elected members to undertake "Disability 101 training" to understand disability rights, legislation and strategy that they have a legal responsibility to uphold.

As local boards meet on different days and times, it's hard for disabled people to attend and engage, particularly during the day. We would like one board representative on each Council body to have the responsibility of connecting with disabled people and their families. This is particularly important in South Auckland.

Disability Connect has accessed data from IHC's recent report from Data to Dignity Dec 2023

<https://cdn.prod.website->

[files.com/628455c1cd53af649dec6493/6584cc68cbd28550e09d0397_Full_IDI%20report_final_web.pdf](https://cdn.prod.website-files.com/628455c1cd53af649dec6493/6584cc68cbd28550e09d0397_Full_IDI%20report_final_web.pdf)

Our analysis shows 49% of people with Intellectual Disability in Auckland live in South Auckland. The main areas, in order, are Manurewa, Otara/Papatoetoe, Howick, Mangere/Otahuhu and Papakura.

We also would like an Easy Read version of all consultation material provided by Council for Auckland residents. It's very difficult for people with intellectual disabilities to read documentation that comes out from council or any other institution. Picture exchange boards (PECS) for non-verbal members of our community are well received

<https://nationalautismresources.com/the-picture-exchange-communication-system-pecs/>