



Local Government Commission

Mana Kāwanatanga ā Rohe

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

Introduction

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

Commission's determination¹

3. In accordance with section 19R of the Local Electoral Act 2001, the Local Government Commission determines that for at least the triennial general election of the Greater Wellington Regional Council² to be held on 11 October 2025, the following representation arrangements will apply:

Wellington Region, as delineated on Plan LG-09-2019-Con-1 will be divided into constituencies and will be represented by a Council comprising 14 councillors elected as follows:

Constituency	Councillors	Plan delineating area
Te Upoko o te ika a Māui Māori Constituency	1	LG-09-2025-Con-1

¹ All plans referred to in this determination are deposited with the Local Government Commission. Plans referred to in this determination that are preceded by LGC are deposited with the Local Government Commission. Plans preceded by SO are deposited with Land Information New Zealand.

² Greater Wellington Regional Council" is the promotional name of the Wellington Regional Council constituted by the Local Government (Wellington Region) Reorganisation Order 1989.

Kāpiti Coast General Constituency	1	SO 35952
Porirua-Tawa General Constituency	2	LG-09-2019-Con-2
Te Awa Kairangi ki Uta/Upper Hutt General Constituency	1	SO 35957
Te Awa Kairangi ki Tai/Lower Hutt General Constituency	3	SO 35956
Pōneke/Wellington General Constituency	5	LG-09-2019-Con-3
Wairarapa General Constituency	1	SO 35958

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

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
Kāpiti Coast General	53,400	1	53,400	14,531	37.38
Porirua-Tawa General	68,100	2	34,050	-4,819	-12.40
Te Awa Kairangi ki Uta/Upper Hutt General	44,400	1	44,400	5,531	14.23
Te Awa Kairangi ki Tai/Lower Hutt General	101,300	3	33,767	-5,103	-13.13
Pōneke/Wellington General	192,100	5	38,420	-449	-1.16
Wairarapa General	46,000	1	46,000	7,131	18.35
Total general constituencies	505,300	13	38,869		
Te Upoko o te ika a Māui Māori	45,000	1	45,000		
Total	550,300	14			

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

5. Under section 19V(6) of the Local Electoral Act 2001, the Commission upholds the decision of the Council not to comply with section 19V(2) in respect of:

- the Kāpiti Coast General constituency
- the Porirua-Tawa General Constituency
- the Te Awa Kairangi ki Uta/Upper Hutt General Constituency
- the Te Awa Kairangi ki Tai/Lower Hutt General Constituency

- the Wairarapa General Constituency

as compliance would result in:

- a total number of members on the Council that would not provide effective representation of communities of interest
 - splitting of communities of interest
 - uniting communities of interest with few commonalities.
6. As required by section 19U of the Local Electoral Act 2001, the boundaries of the above constituencies coincide with the boundaries of current statistical meshblock areas determined by Statistics New Zealand and used for Parliamentary electoral purposes.

Background

7. Under section 19I of the Local Electoral Act 2001 (the Act) regional council representation reviews are to determine the number of councillors to be elected, and the boundaries and names of constituencies. Representation arrangements are to be determined so as to provide fair and effective representation for individuals and communities.
8. The Council last reviewed its representation arrangements prior to the 2019 local authority elections. Accordingly, it was required to undertake a review prior to the next elections in October 2025.
9. On 26 October 2023 the Council resolved to establish a Māori constituency. The council reaffirmed that decision on 27 August 2024 as required by the Local Government (Electoral Legislation and Māori Wards and Māori Constituencies) Amendment Act 2024.

Current representation arrangements

10. The Commission last made a determination in relation to Wellington Regional Council's representation in 2019. In making that determination the Commission was required to consider the non-compliance of the Kāpiti Coast Constituency and two appeals. One appeal sought an additional member for the Kāpiti Coast Constituency while the other sought an 11-member council achieved through combining firstly the two constituencies in the Hutt Valley and secondly the Pōneke/Wellington and Porirua-Tawa constituencies. The Commission confirmed the Council's proposal. The representation arrangements confirmed in the determination have been in place since and are as follows:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
Kāpiti Coast	58,400	1	58,400	16,054	37.91
Porirua-Tawa	77,700	2	38,850	-3,496	-8.26

Te Awa Kairangi ki Uta/Upper Hutt	48,300	1	48,300	5,954	14.06
Te Awa Kairangi ki Tai/Lower Hutt	114,000	3	38,000	-4,346	-10.26
Pōneke/Wellington	200,900	5	40,180	-2,166	-5.12
Wairarapa	51,200	1	51,200	8,854	20.91
Total	550,500	13	42,346		

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

Current review

Preliminary consultation

- The council undertook preliminary engagement in March 2024 using its “Have Your Say” on-line platform. A discussion paper released as part of the engagement set out 7 options for consideration. The engagement process resulted in 272 responses (compared to 95 responses in the previous review in 2018).
- The 7 options and the results of the engagement were considered by the Council when developing its initial proposal in August 2024.

The Council’s initial proposal

- On 27 August 2024, the Council resolved its initial representation proposal for a council comprising 14 councillors elected from seven constituencies.
- The initial proposed constituency arrangements were as follows:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
Kāpiti Coast General	53,400	1	53,400	14,531	37.38
Porirua-Tawa General	68,100	2	34,050	-4,819	-12.40
Te Awa Kairangi ki Uta/Upper Hutt General	44,400	1	44,400	5,531	14.23
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Total general constituencies	505,300	13	38,869		
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Submissions

15. The Council notified its initial representation proposal on 3 September 2025 and received two submissions by the deadline date of 24 September 2025. Neither submission supported the proposal.
16. The submissions were as follows:
- a. one submission sought either:
 - an increase in the number of members representing the Kāpiti Coast General Constituency from 1 to 2 and a reduction by 1 member for either the Te Awa Kairangi ki Tai/Lower Hutt General Constituency or the Pōneke/Wellington General Constituency; or
 - an 11-member council.
 - b. the other submission sought the adoption of the 11-member option.
17. The Council rejected the matters raised in the submissions for the following reasons:
- a. An 11-member council would not provide effective representation for communities of interest in the regional context. Taking into account:
 - Geographic size and diversity of the Wellington Region
 - Diversity of council's statutory functions
 - Need for efficient and effective governance of the Wellington Region
 - Enabling of community access to members and vice versa.
 - b. A second member for the Kāpiti Coast Constituency would not provide effective representation for communities of interest in the regional context and fair representation for electors.
18. On 31 October 2024 the Council adopted its initial proposal as its final representation proposal.

The Council's final proposal

19. The Council publicly notified its final proposal on 5 November 2024, including advice that in order to provide effective representation of communities of interest in five general constituencies, those constituencies do not comply with the fair representation requirement of section 19V(2) of the Act (the +/-10% rule).
20. Due to the non-compliance of these constituencies, the Council was required by section 19V(4) of the Act to refer its proposal to the Commission for determination. In addition, two appeals against the Council's proposal were received, from Asher Wilson-Goldman and Gwynn Compton.

Appeals against the Council's final proposal

21. The Council referred the appeals to the Commission, in accordance with section 19Q of the Act. The relief sought by the appeals is set out in paragraph 16.
22. Collectively the appeals raise the following matters:
 - a. The proposal does not comply with the +/-10% rule in that most constituencies do not comply; and
 - b. Specifically that the Kāpiti Coast General Constituency will not receive fair or effective representation.

Need for a hearing

23. For the purpose of making a determination, the Commission may make such enquiries as it considers appropriate and may hold meetings with the interested parties. There is no obligation on the Commission to hold a hearing. Rather, the need for a hearing is determined by the information provided by the relevant parties and as a result of any further inquiries the Commission may wish to make.
24. In the case of Greater Wellington Regional Council's final proposal, the Commission considered there was sufficient information in the documentation provided by the Council, the appeals and the Commission's 2019 determination for the Commission to proceed to a new determination. Accordingly, it was decided no hearing was required.

Matters for determination by the Commission

25. Section 19R of the Act makes it clear that the Commission, in addition to consideration of the appeals and objections, is required to determine all the matters set out in section 19I of the Act, which relates to the representation arrangements for regional authorities. This interpretation was reinforced by a 2004 High Court decision which found that the Commission's role is not merely supervisory of a local authority's representation arrangements decision. The Commission is required to form its own view on all the matters which are in scope of the review.
26. The matters in the scope of the review are:

- a. the number, boundaries and names of the proposed constituencies
- b. the proposed number of councillors for each constituency
- c. whether constituencies may be defined and membership distributed between them in a way that does not comply with the +/-10% rule

Key considerations

27. Based on the legislative requirements, the Commission's *Guidelines for local authorities undertaking representation reviews* (the Guidelines) identify the following three key factors when considering representation proposals:

- communities of interest
- effective representation of communities of interest
- fair representation for electors.

Communities of interest

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

- a. *perceptual*: a sense of identity and belonging to a defined area or locality as a result of factors such as distinctive geographical features, local history, demographics, economic and social activities
- b. *functional*: ability of the area to meet the needs of communities for services such as local schools, shopping areas, community and recreational facilities, employment, transport and communication links
- c. *political*: ability to represent the interests of local communities which includes non-council structures such as for local iwi and hapū, residents and ratepayer associations and the range of special interest groups.

29. All three dimensions are important and often interlinked. We note however, that there is often a focus on the perceptual dimension. That is, what councils, communities or individuals intuitively feel are communities of interest. It is not enough to simply state that a community of interest exists because it is felt that it exists; councils must provide evidence of how a sense of identity is reinforced, or how a community is distinct from neighbouring communities. Such evidence may be found by considering, for example:

- how communities rely on different services and facilities to function as part of the wider district, city or region
- demographic characteristics of an area (for example age, ethnicity or deprivation profiles) and how these differ from other areas
- how particular communities organise themselves and interact with others as part of the wider district, city or region

30. With one exception the current constituencies align with the boundaries of the territorial authority districts in the region. This meets the requirement of section 19U of the Act that, so far as is practicable, constituency boundaries coincide with the boundaries of 1 or more territorial authority districts or the boundaries of wards.
31. The exception is the inclusion of the Tawa Community of Wellington City in the Porirua-Tawa Constituency along with Porirua City. This arrangement was first determined by the Commission in 2007 in preference to the then council's proposal to combine Kapiti Coast District and Porirua City into a single constituency. In combining Tawa and Porirua the Commission stated that "this [was] appropriate given the geography of the area, in particular the Porirua-Tawa basin and location of the catchment of the Porirua Stream the source of which is in Wellington City."
32. The Council officers' report on the initial proposal commented that "these constituency arrangements have recognised that territorial authority areas afford a sense of community in terms of the day-to-day local authority services provided by and used by individuals and communities." We agree with this comment.
33. We would also observe that the communities of interest contained in these constituencies are physically distinct and separated from those in other constituencies, albeit more in some cases than in others.
34. We conclude that the constituencies identified by the Council reflect communities of interest and will enable effective representation of the communities of interest contained in them.

Effective representation of communities of interest

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

- b. not splitting recognised communities of interest between electoral subdivisions
 - c. not grouping together two or more communities of interest that share few commonalities of interest
 - d. accessibility, size and configuration of an area including access to elected members and vice versa.
38. 'Effective representation' is not defined in the Act. The Guidelines note that what constitutes effective representation will be specific to each local authority but that the following factors should be considered:
- a. avoiding arrangements that may create barriers to participation, such as at elections by not recognising residents' familiarity and identity with an area
 - b. not splitting recognised communities of interest between electoral subdivisions
 - c. not grouping together two or more communities of interest that share few commonalities of interest
 - d. accessibility, size and configuration of an area including access to elected members and vice versa.
39. The Guidelines suggest that local authorities consider the total number of members, or a range in the number of members, necessary to provide effective representation for the region as a whole. In other words, the total number of members should not be arrived at solely as the product of the number of members per constituency.
40. Section 19D of the Act provides that regional councils shall consist of between six and 14 members. The Council has comprised 13 councillors since 2001.
41. Both appeals proposed a council comprising 11 members, as a means of achieving better compliance with the +/- 10% rule. This results in the following arrangements.

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
Kāpiti Coast General	53,400	1	53,400	2,860	5.66
Porirua-Tawa General	68,100	1	34,050	3,260	6.45
Te Awa Kairangi ki Uta/Upper Hutt General	44,400	1	44,400	-6,140	-12.15
Te Awa Kairangi ki Tai/Lower Hutt General	101,300	2	33,767	110	0.22

Pōneke/Wellington General	192,100	4	38,420	1,085	2.15
Wairarapa General	46,000	1	46,000	-4,540	-8.98
Total general constituencies	505,300	10	38,869		
Te Upoko o te ika a Māui Māori	45,000	1	45,000		
Total	550,300	11			

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

42. As can be seen, all constituencies in this option are compliant, except for a slight non-compliance for the Te Awa Kairangi ki Uta/Upper Hutt General Constituency.

43. The 11-member option was considered by the Council but rejected for the following reasons:

The alternative proposal would not enable effective representation for communities of interest in the regional context, taking not account the:

- Geographic size and diversity of the Wellington Region with its urban and rural areas
- Diversity of Council's statutory functions
- Need for efficient and effective governance of the Wellington Region
- Enabling of community access to members and vice versa.

44. This issue was addressed by the Commission in considering appeals against the council's final representation review proposal in 2019. The then Commission concluded that "a council of 13 is appropriate for the Wellington Region given its geographical size encompassing both urban and rural areas, and the diversity of the council's functions. It is also in line with other regional councils of a similar size around the country".

45. Gwynn Compton, in his appeal, makes several arguments related to the total number of members of the council. These include:

- Some regional councils with larger land areas having fewer members than the Greater Wellington Regional Council
- A smaller number of members would result in more effective governance
- A smaller number of members would enable those members elected to be better remunerated.

46. Other regional councils do have a range of number of members, but the majority of councils sit in the range of 11 to 14 members (with 14 being the maximum number of elected members). Each regional council will have a diverse set of issues and a region's population and land area may not necessarily be the complete indicator of the number of elected members required to provide effective representation.

47. Notwithstanding this we consider that a comparison with regional councils with a similar population is useful. The population of the Wellington Region is 550,300. The most comparable regions, in population terms, are Canterbury Region with 666,300 and Waikato Region with 522,300. The regional councils for both those regions also have 14 elected members.³ Both regions are obviously much larger, geographically, than Wellington Region. However the Greater Wellington Regional Council has as diverse a range of responsibilities as other regional councils.
48. Additionally, there are some specific responsibilities which set the Greater Wellington Regional Council apart from other regions. Examples of these are:
- Passenger transport where, with the exception of the Auckland Council, the Greater Wellington Regional Council must have the largest set of passenger transport responsibilities of any local authority in New Zealand
 - Te Awa Kairangi/Hutt River floodplain management and associated works, one of the largest floodplain management schemes in New Zealand protecting a large urban area
 - The bulk water supply function, the Council being the only regional council with this function.
49. The passenger transport and flood plain management activities, in particular, directly impact populous areas which are likely to increase the level of engagement required with affected communities.
50. As far as remuneration is concerned, while we appreciate that remuneration levels are a concern, we are not convinced that capping councillor numbers to maintain remuneration levels will ensure more effective representation in the form of a broader range of candidates. In our view, a representation review is not the appropriate mechanism for addressing councillor remuneration
51. We conclude from the above that effective representation of communities of interest in the Wellington Region will be better achieved from a council of 14 members than a council of 11 members.

Fair representation for electors

52. Section 19V of the Act sets out the requirement for the Commission to ensure that electors receive fair representation. Section 19V(2) establishes fair representation as a population per member ratio per constituency type (i.e. general or Māori) that does not differ by more than 10% across the region. This is also referred to as 'the +/- 10% rule'.

³ Environment Canterbury has, in fact, a total of 16 members, 14 of which are directly elected and 2 being appointed by Te Rūnanga o Ngāi Tahu under the Canterbury Regional Council (Ngāi Tahu Representation) Act 2022.

53. Section 19V(3) of the Act provides that, despite subsection (2), if a regional authority or the Commission considers that effective representation of communities of interest so requires, constituencies may be defined and membership distributed between them in a way that does not comply with subsection (2).
54. Section 19V(6) provides that on receiving a reference under subsection (4), the Commission must determine whether to:
- a. uphold the decision of the council, or
 - b. alter that decision
55. The Council's proposal results in 5 constituencies not complying with the +/-10% rule.
56. Asher Wilson-Goldman proposed two options, within a 14-member council, for a 2 member Kāpiti Coast General Constituency electing 2 members. These are described below.
57. The first option involves increasing the number of members representing the Kāpiti Coast General Constituency by reducing the number of members representing the Te Awa Kairangi ki Tai/Lower Hutt General Constituency. This results in the following:

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
Kāpiti Coast General	53,400	2	26,700	-12,169	-31.31
Porirua-Tawa General	68,100	2	34,050	-4,819	-12.40
Te Awa Kairangi ki Uta/Upper Hutt General	44,400	1	44,400	5,531	14.23
Te Awa Kairangi ki Tai/Lower Hutt General	101,300	2	50,650	11,781	30.31
Pōneke/Wellington General	192,100	5	38,420	-449	-1.16
Wairarapa General	46,000	1	46,000	7,131	18.35
Total general constituencies	505,300	13	38,869		
Te Upoko o te ika a Māui Māori	45,000	1	45,000		
Total	550,300	14			

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

58. The second option involves increasing the number of members representing the Kāpiti Coast General Constituency by reducing the number of members representing the Pōneke/Wellington General Constituency. This results in the following arrangements.

Constituencies	Population*	Number of members	Population per member	Deviation from region average population per member	% deviation from region average population per member
Kāpiti Coast General	53,400	2	26,700	-12,169	-31.31
Porirua-Tawa General	68,100	2	34,050	-4,819	-12.40
Te Awa Kairangi ki Uta/Upper Hutt General	44,400	1	44,400	5,531	14.23
Te Awa Kairangi ki Tai/Lower Hutt General	101,300	3	33,767	-5,103	-13.13
Pōneke/Wellington General	192,100	4	48,025	9,156	23.56
Wairarapa General	46,000	1	46,000	7,131	18.35
Total general constituencies	505,300	13	38,869		
Te Upoko o te ika a Māui Māori	45,000	1	45,000		
Total	550,300	14			

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

59. It can be seen that both these options involve significant non-compliance, albeit differently distributed to the Council's proposal. Because of this we do not consider that the alternatives proposed by Mr Wilson-Goldman provide fairer or more effective representation.
60. Any other solution to the issue of compliance would require either the alteration of boundaries between constituencies and/or the combining of constituencies. We have already found that the proposed constituencies will enable effective representation of communities of interest, but consider them again in the context of compliance with the +/-10% rule.
61. The alteration of constituency boundaries would inevitably divide communities of interest, a situation that would be exacerbated in some cases by the significant physical barriers between communities.

62. Combining constituencies was examined and discounted by the then Commission in 2019. We have examined the 2019 determination and consider that the analysis in that determination is still valid⁴. In addition, we do not detect any mandate from the current review for combining constituencies.
63. For the reasoning set out above we confirm the Council's proposal for some constituencies to not comply with the +/-10% rule.

Commission recommendations

64. We have affirmed the Council's proposal. We acknowledge, however, that representation arrangements in the Wellington Region are likely to continue to be a matter of public interest, in particular the non-compliance of some constituencies with the +/-10% rule.
65. The preliminary engagement undertaken by the Council prior to the formal review attracted 272 responses which, compared to similar engagements undertaken by other councils, is reasonably high. We do note, however, that this engagement was undertaken over a fairly limited period, from 11 - 31 March 2024 and, as we understand it, solely through the 'Have a Say' platform. We recommend that at its next review the Council should engage more widely to more extensively test community views on representation arrangements and non-compliance.

Conclusion

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

Local Government Commission

Commissioner Brendan Duffy (Chair)

Commissioner Bonita Bigham

Commissioner Sue Bidrose

Temporary Commissioner Gwen Bull

24 March 2025

⁴ See paragraphs 28-31 of that determination.