



# Local Government Commission

## Mana Kāwanatanga ā Rohe

### Determination

of representation arrangements to apply for the election  
of the Whanganui District Council  
to be held on 11 October 2025

## Introduction

1. All territorial authorities are required under sections 19H and 19J 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 considering the appeals and objections against a council's final representation proposal, is required to determine all the matters set out in sections 19H and 19J which relate to the representation arrangements for territorial authorities.
2. Having completed its considerations, the Commission's determination differs from the Whanganui District Council's final representation proposal as set out below.

## Commission's determination<sup>1</sup>

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 Whanganui District Council to be held on 11 October 2025, the following representation arrangements will apply:
  - a. Whanganui District Council, as delineated on Plan LG-037-2025-W-1 will be divided into wards and will be represented by a Council comprising the mayor and 12 councillors elected as follows:

Ward	Councillors	Plan delineating area
Whanganui Māori Ward	2	LG-037-2025-W-2
Whanganui General Ward	10	LG-037-2025-W-3

- b. There will be one community with a community board as follows:

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<sup>1</sup> All plans referred to in this determination are deposited with the Local Government Commission.

Community/ Community Board	Area	Subdivision	Members*	Appointed members
Whanganui Rural Community Board	As delineated on Plan LG-037-2025-Com-1	Whanganui As delineated on Plan LG-037-2019-S-1	2	2 representing the Whanganui General Ward and/or the Whanganui Māori Ward
		Kaitoke As delineated on Plan LG-037-2019-S-2	2	
		Kai Iwi As delineated on Plan LG-037-2025-S-1	3	

\*number of members elected by the electors of each subdivision

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

Wards	Population*	Number of members	Population per member	Deviation from district average population per member	% deviation from district average population per member
Whanganui General	40,200	10	4,020	N/A	N/A
Whanganui Māori	8,720	2	4,360	N/A	N/A
<b>Total</b>	<b>48,920</b>	<b>12</b>			

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

5. The community board will be subdivided for electoral purposes. The ratio of population to elected members for each subdivision will be as follows:

Whanganui Rural Community Board subdivisions	Population*	Number of members <sup>^</sup>	Population per member	Deviation from community board average population per member	% deviation from community board average population per member
Whanganui Subdivision	1,350	2	675	-215	-24.16
Kai Iwi Subdivision	2,950	3	983	93	+10.49
Kaitoke Subdivision	1,930	2	965	75	+8.43
<b>Total</b>	<b>6,230</b>	<b>7</b>	<b>890</b>		

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

<sup>^</sup>Not including appointed members

6. Under section 19V(6) of the Local Electoral Act 2001, the Commission determines that the Whanganui and Kai Iwi subdivisions of the Whanganui Rural Community Board will not comply with section 19V(2), as compliance would limit effective representation of communities of interest by uniting within the Whanganui subdivision two or more communities of interest with few commonalities of interest, being:
  - the rural communities located along the Whanganui River and north-eastern parts of the district, which are remote both from each other and the urban city area; and
  - part of the Brunswick-Papaiti rural community on the north-western urban fringe of the city, which has commonalities of interest with other rural communities located on the outskirts of the Whanganui urban area.
7. As required by sections 19T(1)(b) and 19W(c) of the Local Electoral Act 2001, the boundaries of the above wards, community and subdivisions coincide with the boundaries of current statistical meshblock areas determined by Statistics New Zealand and used for Parliamentary electoral purposes.

## Background

8. Under sections 19H and 19J of the Local Electoral Act 2001 (the Act) territorial authority representation reviews are to determine the number of councillors to be elected, the basis of election for councillors and, if this includes wards, the boundaries and names of those wards. Reviews also include whether there are to be community boards and, if so, arrangements for those boards. Representation arrangements are to be determined so as to provide fair and effective representation for individuals and communities.
9. The Council last reviewed its representation arrangements prior to the 2019 local authority elections. In October 2023 it resolved to establish Māori wards. Accordingly, it was required to undertake a review prior to the next elections in October 2025.
10. On 3 September 2024 the Council affirmed its decision to establish Māori wards in accordance with the Local Government (Electoral Legislation and Māori Wards and Māori Constituencies) Amendment Act 2024.

## Current representation arrangements

11. The Commission last determined the Council's representation arrangements in 2019, in which it upheld non-compliance of the Whanganui Subdivision of the Whanganui Rural Community Board with s19V(2) of the Act (the +/-10% rule).
12. Aside from a minor subdivision boundary alteration in 2019, the Council's representation arrangements have been unchanged since 2007, being:
  - A council comprising the mayor and 12 members elected at large.

- The Whanganui Rural Community Board, comprising seven members elected from three subdivisions, with two appointed members.

## Current review

### Preliminary work

13. The Council formed a working party in February 2024 to evaluate the current representation arrangements and undertake preliminary engagement, via community kōrero sessions and a survey focusing on the number of elected members and whether rural community board representation should continue. A separate survey of rural residents gauged preferences for establishing a rural ward or continuing with community board representation.
14. The Council held workshops in April 2024 to consider options for the initial representation proposal. The working party then further refined three options for an initial representation proposal.
15. The working party's preferred option was for a 10-member Council comprised of eight members representing a district-wide general ward and two members representing a district-wide Māori ward. The Whanganui Rural Community Board was recommended to continue, with adjustments to the Kai Iwi and Whanganui Subdivision boundaries to comply with the +/-10% rule.

### The Council's initial proposal

16. On 25 June 2024 the Council resolved an initial representation proposal for a council comprising the mayor and 12 members elected from two wards. The proposal retained the Whanganui Rural Community Board, with the adjusted subdivision boundaries proposed by the working party.
17. The proposed ward arrangements were as set out in paragraph 4 above. The proposed community board arrangements were:

Whanganui Rural Community Board subdivisions	Population*	Number of members^	Population per member	Deviation from community board average population per member	% deviation from community board average population per member
Whanganui Subdivision	1,710	2	855	-32	-3.62
Kai Iwi Subdivision	2,560	3	853	-34	-3.81
Kaitoke Subdivision	1,940	2	970	83	+9.34
<b>Total</b>	<b>6,210</b>	<b>7</b>	<b>887</b>		

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

^Not including appointed members

## Submissions

18. The Council notified its initial representation proposal on 4 July 2024 and received 190 submissions by the deadline date of 4 August 2024. Of the 190 submissions:
  - 75 supported the initial proposal;
  - 44 did not support the proposal;
  - 21 did not comment on whether they supported the proposal;
  - A further 50 indicated that they did not support the proposal, but for reasons outside the scope of the representation review.
19. Key themes in the submissions were:
  - a. The number of elected members, with 111 submitters favouring a council of 12 elected members and 70 favouring a reduction to 10 elected members.
  - b. Whether the Whanganui Rural Community Board should be retained, with 127 submitters supporting its retention, 25 submitters supporting its disestablishment.
  - c. 12 submissions also commented on the nature of rural representation, questioning whether all rural electors had effective representation.
20. The Council rejected the matters raised in submissions disagreeing with the initial representation proposal as follows:
  - a. Submissions supporting a reduction in the number of elected members were rejected due to concerns that a reduction in elected members may result in less diversity, increase the potential for 'faction' voting, increase elected member workload, and lacked evidence of greater effectiveness.
  - b. Submissions supporting the disestablishment of the Whanganui Rural Community Board were rejected, as the rural community was considered to be a significant and distinct community of interest that needed its own voice.
  - c. Submissions received on the principle of Māori wards were considered out of scope of the representation review process.
21. At a meeting on 3 September 2024 the Council adopted its initial proposal as its final representation proposal.
22. The Council publicly notified its final proposal on 4 September 2024. Eight appeals against the Council's proposal were received.

## Appeals against the Council's final proposal

23. The Council referred the appeals to the Commission, in accordance with section 19Q of the Act.
24. Five appeals against the Council's final proposal were wholly or partially within the Commission's scope of powers to consider. These appeals raised the questions relating to:
  - a. rural representation, including whether the rural community had been adequately identified and whether rural residents had effective representation;
  - b. the number of elected members, including whether the number of Māori ward members had been accurately calculated;
  - c. election arrangements and the effect of a 2019 poll regarding ward or at-large arrangements; and
  - d. the degree to which evidence supported the Council's decisions.

## Hearing

25. To make its determination the Commission may make such enquiries as it considers appropriate and may hold meetings with interested parties. In this case, the Commission considered it appropriate to hold a hearing to further explore the matters to be determined.
26. The Commission met with the Council and the three appellants who wished to be heard at a hearing held online on 5 December 2024. The Council was represented by Deputy Mayor Helen Craig, Councillors Josh Chandulal-Mackay and Jenny Duncan, Chief Executive David Langford, Democracy Services Manager Anna Palamountain and Legal Counsel Rob Goldsbury.
27. The following appellants appeared at the hearing: John Anderson, Bill Simmonds and Colin Anderson.
28. In addition, the Commission invited David Wells, Chair of the Whanganui Rural Community Board, to appear at the hearing, to assist the Commission regarding rural representation issues.

## *Matters raised at the hearing*

29. Deputy Mayor Helen Craig and the other Council representatives explained the processes the Council had followed in carrying out its representation review and reaching its final proposal. They emphasised the following points in their initial presentation and right of reply:
  - a. The Council's working party gained valuable knowledge from community surveys and kōrero sessions, which formed the basis of the preferred option for a 10-member council.

- b. The Council ultimately endorsed a Council of 12 elected members at the initial and final proposal stages. Concerns were expressed that a reduction to 10 members may result in decreased diversity, an increased likelihood of 'faction' voting, increased councillor workloads, and there was no evidence of greater effectiveness with fewer members.
- c. The working party had considered whether a rural ward should be established but felt there was a stronger community preference for retaining the Community Board instead.
- d. Community Board members had speaking rights on every committee, could raise issues and make recommendations via committees, and had a small budget for projects. The two appointed members to the Community Board ensured alignment and communication between the Council and Community Board.
- e. The working party felt that adjusting subdivision boundaries would not result in material changes for affected residents, as all members of the Community Board were focused on the entire rural community.
- f. The Community Board subdivision boundary adjustments were technical and aimed at complying with the +/-10% rule. It was possible that residents in the areas proposed to move to a different subdivision may not have realised that the proposed changes affected them.
- g. The Council had not considered during the review process whether the boundaries of the Community Board should include all areas zoned as 'rural' under the District Plan. Following the receipt of appeals on this point, the Council's GIS team had analysed the potential outcomes of doing so, which would result in:
  - 2,820 additional electors being added into the Kaitoke Subdivision;
  - 4,120 additional electors being added into the Kai Iwi Subdivision; and
  - 80 additional electors being added into the Whanganui Subdivision.
- h. The definition of the 'rural community' depended on context and carried different meanings for electoral representation arrangements, service provision and/or district planning. District planning zones were spatial planning tools that were subject to change and there were no obvious reasons to connect spatial planning tools with electoral arrangements and cycles.
- i. Three polls had been held alongside the 2019 local election:
  - one binding poll on the voting system (under which the First-Past-the-Post voting system was retained), and

- two non-binding polls regarding the number of elected members (favouring a council of 10 members), and whether representation should be via a ward system or an at-large system (favouring an at-large system).
30. The appellants appearing at the hearing raised the following points in opposition to the Council's proposal:
- a. Regarding evidence supporting the Council's decisions:
    - Low participation levels meant results of community surveys could not be relied on to guide decision-making. The pros and cons of district-wide wards had not been explored. Wider membership of the working party could have supported more extensive community discussion.
    - No evidence was presented regarding why the Community Board needed to continue. Rural interests were well represented by Horizons Regional Council, and changes to the district since 1989 meant the Community Board had outlived its usefulness.
  - b. Regarding the effectiveness of rural representation and whether rural representation should be extended to all residents living in rural-zoned areas:
    - Residents of rural lifestyle zones strongly identified with the rural community and did not feel connected to the urban community.
    - Increased urbanisation created challenges for retaining the rural character of rural-zoned areas, such as increased pressure on land for development purposes, urban-scale developments, and the imposition of urban-focused regulatory measures and services on areas that residents considered to be rural.
    - Rural representation was important to regulate such pressures and to protect the rural lifestyle. The boundaries of the Community Board should therefore align with areas zoned as 'rural'.
  - c. Regarding the Council's decision to establish district-wide wards and its calculation of the number of Māori ward members:
    - The referendum held alongside the 2019 election, which had favoured at-large representation with 81% support, was binding. Therefore, the Council could not move to a ward system during the current review.
    - The Council had not calculated the number of Māori ward members correctly. There should be one Māori ward member rather than two.
31. The Chair of the Whanganui Rural Community Board, David Wells, made the following points:



- There was a satisfactory relationship between the Community Board and the Council, and Board members could speak up on rural issues.
- Residents of rural areas strongly identified with the rural community.
- Compliance with the +/-10% rule seemed to have become elevated during the review process, with less importance placed on the appropriate grouping of communities within each subdivision.
- The Whanganui Subdivision was large, covering communities both remote from the urban area and from each other. It had a lower population for good reason, taking into account its geography, distance from the city and the dispersed nature of the population.

## Matters for determination by the Commission

32. Section 19R of the Act makes it clear that 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 19H and 19J, which relate to the representation arrangements for territorial 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.
33. The matters in the scope of the review are:
  - a. whether the council is to be elected from wards, the district as a whole, or a mixture of the two
  - b. the number of elected members
  - c. if there are to be wards, the area and boundaries of wards and the number of members to be elected from each ward
  - d. whether there are to be community boards
  - e. if there are to be community boards, the area and boundaries of their communities, and the membership arrangements for each board
  - f. whether wards and community board subdivisions should be defined and membership distributed between them in a way that does not comply with the +/-10% rule
34. As a result of appeals to the Council's final proposal, the Commission must resolve the following issues:
  - a. The number of elected members, including calculation of the number of Māori ward members;
  - b. Whether a rural ward should be established;

- c. Whether the Whanganui Rural Community Board should be continued;
- d. Whether the boundaries of the Whanganui Rural Community Board should be altered;
- e. Whether the proposed Community Board subdivision boundaries provide effective representation for the communities in each subdivision.

## Key considerations

35. 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

36. 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.
37. 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
38. During its review the Council identified that there was a district-wide community of interest, which had been recognised in the 2007 move from a ward-based representation system to an at-large representation system. The results of the 2019 referendum favouring at-large representation suggest a clear sense in the community of a district-wide community of interest.
  39. The Council also identified at a high level a separate rural community of interest and that the current community board boundary adequately reflected the boundary between the urban and rural communities of interest.
  40. While we are satisfied that the Council has identified communities of interest at a high level, we suggest that future reviews may benefit from a more rigorous and detailed examination of communities of interest, particularly with regards to identification of the rural community. Having detailed information regarding communities of interest, coupled with in-depth engagement with residents, will provide the Council with strong evidence to assist with decisions in future representation reviews.
  41. We return to these points further below, in our consideration of community board matters.

## Effective representation of communities of interest

42. Section 19T of the Act requires the Commission to ensure that:
  - a. the election of members of the council, in one of the ways specified in section 19H (i.e. at large, wards, or a combination of both) will provide effective representation of communities of interest within the district
  - b. ward 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 is practicable, ward boundaries coincide with community boundaries (where they exist).
43. '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).
44. The Commission's 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.
45. 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 district 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 ward, if there are to be wards.
46. Section 19A of the Act provides that a territorial authority shall consist of between 5 and 29 members, excluding the mayor. The Council's membership has been retained at 12 members across at least the last three reviews. In this review, the question of reducing it to 10 members was closely examined before the current membership of 12 was confirmed.
47. There are no appeals specifically seeking a reduction in membership, nor any obvious reasons to alter the number of members at this point. We therefore endorse that the Council comprise a mayor and 12 elected members.
48. We next consider the proposed ward arrangements for the Council. The Council has proposed to establish district-wide general and Māori wards. One of the appellants suggested that a referendum held alongside the 2019 local election, which favoured an 'at-large' representation system, prevented the Council from establishing a ward system. We are satisfied that the 2019 referendum on this point was non-binding, and did not prevent the Council establishing a district-wide general and Māori wards as part of this review.
49. As the Council has resolved to establish Māori wards, Schedule 1A of the Act requires it must also establish at least one general ward. This means that the Council was unable to consider continuing with 'at-large' representation.
50. The Council considered at an early stage whether a mixed system of representation should be used (with 'at-large' members elected alongside members elected by ward), and whether a rural ward should be established. However, it was felt that there was insufficient community support for either.
51. There are no appeals requesting that a mixed system of representation be implemented. While issues have been raised relating to rural representation, we have not heard a clear desire for a rural ward to be established.
52. We endorse the Council's decision to create district-wide general and Māori wards for the 2025 election, noting that district-wide wards will provide a sense of familiarity for electors who have become accustomed to electing members at-large across the district since this was implemented in 2007.

53. Schedule 1A of the Act sets out the formula that must be used to calculate the number of Māori ward members. This formula is dependent on the overall number of members to be elected by wards. The formula requires the use of General Electoral Population (GEP) and Māori Electoral Population (MEP) figures, which are produced annually by Stats NZ. We note that GEP and MEP figures do not equate to the actual number of electors enrolled on either the general or Māori electoral rolls.
54. We are satisfied that the Council has correctly calculated the formula in Schedule 1A of the Act, which results in two Māori ward members for a Council of 12 members. We note that, if the number of members were reduced to 10, the formula would still have resulted in there being two Māori ward members.

### *Community Boards*

55. Section 19J of the Act requires every territorial authority, as part of its review of representation arrangements, to determine whether there should be community boards in the district and, if so, the nature of those communities and the structure of the community boards. The territorial authority must make this determination considering the principle in section 4 of the Act relating to fair and effective representation for individuals and communities.
56. The matters that must be determined include the number of boards to be constituted, their names and boundaries, the number of elected and appointed members, and whether the boards are to be subdivided for electoral purposes.
57. Section 19W also requires regard to be given to the criteria applying to reorganisation proposals under the Local Government Act 2002 as appropriate. The Commission sees two of the criteria as particularly relevant for the consideration of proposals relating to community boards as part of a representation review:
  - a. Will a community board have an area that is appropriate for the efficient and effective performance of its role?
  - b. Will the community contain a sufficiently distinct community of interest?
58. The Council has proposed to retain the Whanganui Rural Community Board with its current membership, but to adjust the boundaries of two of its three subdivisions to ensure all subdivisions comply with the +/-10% rule.
59. One appellant questioned the evidence underlying the decision to retain the Whanganui Rural Community Board and suggested that the board had outlived its usefulness. Other appellants supported the continuation of the community board and sought an expansion of its boundaries to include all land zoned as rural within the community boundaries.

60. In particular, one appellant spoke of the challenges that greater urbanisation has brought to rural areas on the immediate outskirts of the city. We note that urbanisation, and its consequential effects for communities that have traditionally identified as more rural in nature, is a challenging issue for many communities around New Zealand facing housing pressures.
61. The Community Board currently encompasses 6,210 electors. The Council advised at the hearing that to include all land zoned as rural within the Community Board boundaries would result in an additional 7,020 electors. This would result in the population within the Community Board more than doubling, and we do not think there is sufficient evidence available on which to base such a significant change.
62. Furthermore, we share the Council's view that spatial planning designations do not necessarily correspond with electoral representation matters. The aspects we must consider is whether there is fair and effective representation for communities of interest in the district. We acknowledge that creeping urbanisation can alter the character of communities of interest.
63. Ahead of the next representation review, we recommend that the Council:
- closely examines the rural community of interest, especially in areas on the urban fringes that have experienced increased levels of development in recent years;
  - carefully plans an in-depth consultation process with residents in such areas, including an explanation of the differences between spatial planning zones and considerations for representation arrangements.
64. We are satisfied that the Whanganui Rural Community Board contains a distinct community of interest and has an area appropriate for the efficient and effective performance of its role. We therefore endorse the Council's decision to retain the Whanganui Rural Community Board with its current boundaries. We consider below whether the Council's proposed subdivision boundaries are appropriate.

### Fair representation for electors

65. The final matter for us to consider is whether the Council's proposed representation arrangements provide fair representation for electors.
66. Section 19V of the Act sets out this requirement. Section 19V(2) establishes fair representation as a population per member ratio per ward type (i.e. general or Māori) and per community board subdivision that does not differ by more than 10% across the district or community. This is also referred to as 'the +/- 10% rule'.
67. We have upheld the Council's proposal for district-wide general and Māori wards. There are no issues to consider in relation to fair representation with regards to these wards. However, we are required to consider the proposed community board subdivision boundaries.

68. Section 19V(3) of the Act provides that, despite subsection (2), if a territorial authority or the Commission considers one or more of certain prescribed conditions apply, community subdivisions may be defined and membership distributed between them in a way that does not comply with subsection (2). The prescribed conditions are:
- a. non-compliance is required for effective representation of communities of interest within island or isolated communities situated within the district of the territorial authority
  - b. compliance would limit effective representation of communities of interest by dividing a community of interest between subdivisions
  - c. compliance would limit effective representation of communities of interest by uniting within a subdivision two or more communities of interest with few commonalities of interest.
69. The Council proposed to adjust the boundaries of the Kai Iwi and Whanganui subdivisions so that all three community board subdivisions complied with the +/-10% rule. There was no discussion in the Council's papers regarding what effect, if any, the proposed adjustment in boundaries would have on the communities within the current Kai Iwi and Whanganui subdivisions.
70. At the hearing the Council explained that any effect on such communities was considered negligible, because the Community Board served all residents across subdivisions. However, in response to our questions, the Council reflected that affected residents may not have been aware of the proposed adjustment to subdivision boundaries.
71. We suggest that future reviews would benefit from a closer examination of the communities of interest represented within each subdivision and greater engagement with residents, to inform decisions about the appropriate location of subdivision boundaries.
72. We heard that the Whanganui Subdivision has a distinct nature, in that it represents dispersed communities that are remote both from the urban area and from each other. This includes communities located either side of the Whanganui river, as well as along State Highway 4 towards the Ruapehu District. There are few, if any, interconnecting roads between such communities and they have fewer interactions with each other and the urban city area.
73. The rural communities of the Kai Iwi and Kaitoke subdivisions are much closer to the urban area, with better transport links including easier access to State Highway 3 between the Rangitikei and South Taranaki Districts. There are a higher proportion of lifestyle blocks, and a higher proportion of residents would commute to the urban area on a daily basis.

74. We consider that the nature of communities within the Whanganui Subdivision is quite different to those in the Kai Iwi and Kaitoke Subdivisions. We are concerned that the proposed boundary adjustment will unite within the Whanganui Subdivision communities of interest with few commonalities. Specifically, it would group part of the 'urban-fringe' Brunswick-Papaiti rural community with the remote communities of the Whanganui Subdivision.
75. The Whanganui Subdivision has consistently been non-compliant with the +/- 10% rule since it was established in 2007. The Council has provided evidence at each subsequent review, that non-compliance was warranted to ensure effective representation of communities of interest in the Whanganui Subdivision. We have not seen evidence in the current review to suggest that the previous rationale for non-compliance has fundamentally changed.
76. We do not uphold the Council's proposal on this point, and instead confirm the current Community Board Subdivision boundaries.
77. The boundaries result in non-compliance with the +/-10% rule, with the Whanganui Subdivision over-represented at -24.16% and the Kai Iwi subdivision slightly under-represented at +10.49%. For the reasons set out in paragraphs 72-74 above, we consider that the s19V(3)(a)(iii) exemption is justified in this case for both subdivisions.

## Commission recommendations

78. The Commission strongly recommends for the Council's next representation review:
  - a close examination of the rural community of interest, especially in areas on the urban fringes that have experienced increased levels of development in recent years;
  - an in-depth consultation process with residents in such areas, including an explanation of the differences between spatial planning zones and considerations for representation arrangements; and
  - careful consideration of community board subdivisions, to ensure effective representation the various communities of interest within each subdivision.

## Conclusion

79. 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 19T, 19W and 19V of the Act.

## Local Government Commission

Commissioner Brendan Duffy (Chair)



Commissioner Bonita Bigham

Temporary Commissioner Gwen Bull

20 January 2025