



Local Government Commission

Mana Kāwanatanga ā Rohe

Determination of representation arrangements to apply for the election of the Kapiti Coast 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 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.
2. Having completed its considerations, the Commission's determination upholds the Kapiti Coast District Council's 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 Kapiti Coast District Council to be held on 11 October 2025, the following representation arrangements will apply:
 - a. Kapiti Coast District, as delineated on Plan LG-043-2025-W-1 will be divided into wards and will be represented by a Council comprising the mayor and 10 councillors, being two councillors elected from the district as a whole ('at large'), and eight councillors elected from five wards as follows:

Ward	Councillors	Plan delineating area
Kapiti Coast Māori Ward	1	LG-043-2025-W-2
Ōtaki General Ward	1	LG-043-2022-W-2
Waikanae General Ward	2	LG-043-2022-W-3
Paraparaumu General Ward	3	LG-043-2025-W-3

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

Paekākāriki-Raumati General Ward	1	LG-043-2025-W-4
----------------------------------	---	-----------------

b. There will be five communities with community boards as follows:

Community/ Community Board	Area	Members*	Appointed members
Ōtaki Community Board	Ōtaki General Ward	4	1, representing either the Ōtaki General Ward or the Kapiti Coast Māori Ward
Waikanae Community Board	Waikanae General Ward	4	1, representing either the Waikanae General Ward or the Kapiti Coast Māori Ward
Paraparaumu Community Board	LG-043-2025-Com-1	4	1, representing either the Paraparaumu General Ward or the Kapiti Coast Māori Ward
Raumati Community Board	LG-043-2022-Com-2	4	1, representing either the Paekākāriki General Ward or the Kapiti Coast Māori Ward
Paekākāriki Community Board	LG-043-2025-Com-2	4	1, representing either the Paekākāriki General Ward or the Kapiti Coast Māori Ward

*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
Ōtaki General	7,410	1	7,410	-241	-3.16
Waikanae General	14,950	2	7,475	-176	-2.31
Paraparaumu General	22,900	3	7,633	-18	-0.24
Paekākāriki-Raumati General	8,300	1	8,300	649	+8.48
Total general wards	53,560	7	7,651		
Kapiti Coast Māori	4,930	1	4,930		
At large members		2			
Total	58,490	10			

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

5. The community boards will not be subdivided for electoral purposes.

6. As required by section 19T(1)(b) and 19W(c) of the Local Electoral Act 2001, the boundaries of the above wards and communities coincide with the boundaries of current statistical meshblock areas determined by Statistics New Zealand and used for Parliamentary electoral purposes.

Background

7. 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.
8. The Council last reviewed its representation arrangements prior to the 2022 local authority elections. In November 2024 it resolved to establish a Māori ward. On 6 August 2024 the Council voted to affirm its decision to establish its Māori ward. Accordingly, it was required to undertake a review prior to the next elections in October 2025.
9. The Council has used the Single Transferable Vote (STV) system since 2004. In August 2023, it resolved to retain STV for the 2025 local elections.

Current representation arrangements

10. The Commission last determined Kapiti Coast District Council's representation in 2022. The determination altered the Council's proposed arrangements for a 5:5 mixed wards/district wide model, resulting in the current arrangements comprising the mayor and seven councillors elected from four wards, plus three councillors elected district wide. All wards complied with the fair representation requirement of section 19V(2) of the Act (the +/-10% rule).
11. The determination also upheld the Council's proposal for five community boards but altered some community boundaries to align more closely with ward boundaries.

Current review

Preliminary consultation

12. For the current review, the Council's preliminary engagement included a questionnaire generating 285 responses, drop-in sessions in community board areas, and early engagement with mana whenua representatives.
13. The preliminary engagement indicated that in general, the community believed the current mixed model arrangements provided fair and effective representation (74%) and worked well (61%), and preferred minimal adjustments to provide for the establishment of a Māori ward (61%). Key findings of the preliminary engagement were shared at two public briefings with elected members and mana whenua representatives.
14. The Council then provided the following direction for its initial proposal:

- a. Move Te Horo into the Ōtaki General Ward and Community Board area to avoid splitting the Te Horo community of interest between wards.
 - b. Move Emerald Glen/Valley Road into the Paekākāriki-Raumati General Ward and Paekākāriki Community Board area to avoid splitting the Paekākāriki community of interest.
 - c. Include an alternative model for two district-wide wards, one general and one Māori that reflected the opportunity for proportional representation provided by STV.
15. As a result, the Council considered three options for its initial proposal, two of which were variations of the current mixed model with boundary adjustments as outlined above:
- Option 1: Mayor + 8 councillors elected from 5 wards + 2 councillors elected at large
 - Option 2: Mayor + 8 councillors elected from 5 wards + 3 councillors elected at large
 - Option 3: Mayor + 10 councillors: 1 elected from a district-wide Māori ward + 9 elected from a district-wide general ward

The Council's initial proposal

16. On 30 July 2024 the Council resolved its initial representation proposal for a council comprising the mayor and 10 councillors, being two elected at large and eight elected from five wards. The proposal retained the Ōtaki, Waikanae, Paraparaumu, Raumati, and Paekākāriki communities and community boards.
17. The initial proposed ward arrangements were as follows:

Wards	Population*	Number of members	Population per member	Deviation from district average population per member	% deviation from district average population per member
Ōtaki General	8,510	1	8,510	866	+11.32
Waikanae General	13,800	2	6,900	-744	-9.74
Paraparaumu General	22,900	3	7,633	-11	-0.14
Paekākāriki-Raumati General	8,300	1	8,300	656	+8.58
Total general wards	53,510	7	7,644		
Kāpiti Coast Māori	4,930	1			
At large members		2			
Total	58,440	10			

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

18. The proposal also retained the five existing communities and community boards with boundary alterations reflecting proposed changes to ward boundaries. All community boards comprised four elected members, with two councillors appointed to the Paraparaumu Community Board and one appointed to each of the remaining four community boards.

Submissions

19. The Council notified its initial representation proposal on 8 August 2024 and received 422 submissions by the deadline date of 12 September 2024. A majority (76%) supported the proposed council size of a mayor and 10 councillors, and a majority (80%) supported the proposed community board arrangements.
20. Key themes in the submissions were:
- Mana whenua support for the proposed boundary changes, and the proposed Māori ward arrangements subject to removing the macron from 'Kāpiti' in the ward name.
 - Opposition to the proposed structure of eight ward councillors and two at large councillors, including:
 - Mixed views on the relative numbers of at large and ward councillors.
 - Suggestions to reduce overall councillor numbers.
 - 15 of the 21 respondents directly affected by the proposed boundary changes at Te Horo did not support the boundary adjustment.
 - Disagreement with the community board structure and elected membership.
 - Inconsistency in the number of councillors appointed to community boards.
21. On 24 September 2024 the Council met to hear submissions. The Council subsequently discussed the following changes to its proposal at two public briefings on 8 and 22 October 2024:
- Amending the proposed Māori ward name to Kapiti Coast Māori Ward (macron removed from Kapiti) to reflect mana whenua preferences.
 - Retaining the existing boundary between Waikanae and Ōtaki General Wards and Community Boards.
 - Reducing the number of members appointed to the Paraparaumu Community Board to one, in line with the other community boards.
22. At a meeting on 31 October 2025, the Council rejected the remaining matters raised in submissions for the following reasons:
- Opposition to the proposed structure, as submissions were mainly opposed to the establishment of a Māori ward, which is out of the scope of the representation review.
 - Opposition to the community board structure and membership as it provides fair representation and is valuable to local democracy.

- c. Opposition to ward and community board boundary changes at Emerald Glen/Valley Road as the affected communities feel more strongly aligned with Paekākāriki.

The Council's final proposal

- 23. At the meeting on 31 October 2025, the Council amended its initial proposal to the following final representation proposal.
- 24. The final proposal was for a council comprising the mayor and ten councillors; two elected at large, seven elected from four general wards, and one elected from one Māori ward. The proposal retained five community boards electing four members each.
- 25. The final proposed ward and community board arrangements were as set out at paragraphs 4 to 7 above.
- 26. The Council publicly notified its final proposal on 1 November 2024. Three appeals against the Council's proposal were received.

Appeals against the Council's final proposal

- 27. The Council referred the appeals to the Commission, in accordance with section 19Q of the Act.
- 28. One appeal, from Chris Mitchell, was within the Commission's scope of powers to consider. This appeal was therefore considered valid and raised the following matters:
 - a. Number of councillors: The total should be increased from 10 to 11 or 12
 - b. The basis of election: All councillors should be elected from wards

Need for a hearing

- 29. 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.
- 30. The Council undertook in depth engagement during its representation review in 2021/22. The Commission considers such recent engagement can inform a current review where it is sufficiently comprehensive.
- 31. In our view, the Council has provided the community with sufficient opportunity to engage with the current representation review. Additionally, in 2021/22 the Council made a concerted effort to seek the views of people typically less engaged in council processes. We therefore considered there was sufficient information in the Council's documentation and in the appeal to proceed to a determination. Accordingly, it was decided no hearing was required.

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 councillors
 - 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 may be defined and membership distributed between them in a way that does not comply with the +/-10% rule.

Key considerations

34. 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

35. 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.

36. All three dimensions are important and often interlinked. 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.
37. In its 2022 determination for Kapiti Coast District Council, the Commission noted that the Council's engagement processes focussed on qualitative data which could have been strengthened by adding a substantive quantitative element. The Council has considered both in this review.
38. Since its constitution in 1989, the Council has recognised clearly identifiable communities of interest at the sub-district level, based around Ōtaki, Waikanae, Paraparaumu, Paekākāriki, and Raumati. The Council's 2021/22 review reconfirmed strong communities of interest centred on individual towns and suburbs, and along coastal, rural and urban dimensions.
39. Since 2004 the Council and the Commission have also recognised district-wide communities of interest along demographic, social, and economic lines, such as youth and business. The Council's 2021 engagement provided clear evidence that these communities continue to exist
40. We are satisfied that the current review is based on appropriately identified communities of interest in the District.

Effective representation of communities of interest

41. 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).
42. As the Council has resolved to establish Māori wards, it must also establish at least one general ward.
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. Mr Mitchell argues that the continuation of a mixed model since 2004, and the reduction in members, have progressively reduced effective representation of the District's communities. Consequently, the proposed representation arrangements do not fulfil part of the statutory purpose *to enable democratic local decision-making and action by, and on behalf of, communities* as set out in section 10 of the Local Government Act 2002.
45. 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.

Basis of election

46. The first aspect to address is the basis of election that provides for the most effective representation of communities of interest in the District.
47. Mr Mitchell proposes all councillors be elected on a ward basis because:
- Ward councillors are elected by their communities for their links, skills and knowledge of local issues
 - the Council has never assessed the value of the mixed representation model in relation to the statutory purpose of local government.
48. In rejecting submissions opposing a mixed wards/at large model, the Council noted overall community support for the existing mixed model and total number of councillors in preliminary engagement.
49. The Commission's endorsement of wards since 2004 reflects the need for dedicated representation at the sub-district level, which is further supported by five community boards covering the entire district and electing 20 members.
50. Residents identify with multiple communities of interest. The Council and the Commission have consistently recognised communities of interest at the district level along demographic, social, and economic lines, such as youth and business. The Council's 2021/22 review confirmed these communities continue to exist.
51. In our view, district-wide communities are an equally important consideration for effective representation. Councillors elected district wide allow the opportunity to elect members with the links, skills and knowledge of the issues that affect these communities.

52. Mr Mitchell argues that there is no evidence that the current mixed model and council size results in a better governed and/or better performing organisation. Within the statutory requirements of a representation review and the Commission's Guidelines, the value of a representation model lies in how well it provides for effective representation of clearly identified communities of interest, rather than a particular standard of governance and performance.
53. Effective governance performance is assessed by electors, ultimately at the time of each election. We are not aware of any evidence that links elected member capability or conduct with a particular representation model.
54. We consider the proposed mixed wards/at large model appropriately balances fair and effective representation of communities of interest at both district and sub-district levels.

Number of members

55. On the basis that all councillors should be elected from wards, Mr Mitchell proposes that the number of councillors should be increased from 10 to 11 or 12 for the following reasons:
 - 10 councillors is too few relative to similar sized districts
 - The District's population has doubled since 1989 but the number of councillors elected from wards has decreased from 14 to seven.
56. While we have ruled out a wards-only model on this occasion, it is still open to the Commission to increase the number of councillors elected from wards. Therefore, the question of an appropriate number of ward councillors bears further examination.
57. 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.
58. Section 19A of the Act provides that a territorial authority shall consist of between 5 and 29 members, excluding the mayor. Kapiti Coast District Council has comprised a mayor and 10 councillors since 2004; five councillors elected at large and five by wards. The Commission's 2022 determination altered the mix to three at large and seven from wards. The Council's proposal is for two at large and eight from wards.
59. The Council's engagement and consultation indicate high community support for 10 councillors, based on perceptions of efficiency and effective representation for the district's size and population, and satisfaction with the current structure. Overall, submissions suggested an ideal council size ranging from five to eleven, with eight being most frequently mentioned.
60. At a total of 10 members, Kapiti Coast District Council is within the range of councils with a similar population. There are both significantly larger councils with 10 members, and smaller councils with 13 or 14 members. Within this range, we do not consider the number councillors necessarily impacts on effective representation for the District as a whole.

61. We have also explored the impact on fair representation if the number of ward councillors was increased to 11 or 12.

Fair representation for electors

62. 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 ward type (i.e. general or Māori) that does not differ by more than 10% across the district. This is also referred to as 'the +/- 10% rule'.
63. 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, wards 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 wards
 - c. compliance would limit effective representation of communities of interest by uniting within a ward two or more communities of interest with few commonalities of interest.
64. The Council's 2021/22 initial proposal for significant ward boundary changes met with strong community opposition. In the current review, the Council has adjusted general ward boundaries based on community feedback, thereby reflecting communities of interest relatively well.
65. Mr Mitchell has not proposed specific ward boundaries. However, based on the Council's proposal, adding three or four general ward councillors results in significant non-compliances with the +/-10% rule of up to -23.91% (over-representation).
66. The least disruptive compliant options involve transferring over 1300 people into or out of the Ōtaki General Ward (depending on the total number of councillors), and around 1400 people into the Paekākāriki-Raumati General Ward from the Paraparaumu General Ward. While this meets the fairness test, such large boundary alterations are not justified from an effective representation viewpoint given the clear identification of local communities of interest.
67. We expect that as the District's population continues to grow, the Council will continue to consider whether more ward and/or at large councillors are necessary for fair and effective representation, taking into account the potential for STV to provide for proportional representation.
68. We are satisfied the Council's proposal provides fair representation for electors and effective representation for communities of interest. We uphold the proposed ward arrangements, including ward boundaries and the number of councillors elected from wards and at-large.

Community Boards

69. 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 in light of the principle in section 4 of the Act relating to fair and effective representation for individuals and communities.
70. The Council is proposing to retain the five existing community boards, with boundary alterations to reflect adjustments made to general ward boundaries. There are no appeals in relation to community boards.
71. Accordingly, we endorse the Council's proposal in relation to community boards.

Conclusion

72. 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

7 April 2025