



Local Government Commission

Mana Kāwanatanga ā Rohe

Determination
of representation arrangements to apply for the election of the
South Wairarapa 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 South Wairarapa 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 South Wairarapa District Council to be held on 11 October 2025, the following representation arrangements will apply:
 - a. South Wairarapa District, as delineated on Plan SO 35998 will be divided into wards and will be represented by a Council comprising the mayor and 10 councillors elected as follows:

Ward	Councillors	Plan delineating area
Greytown General Ward	3	SO 36001
Featherston General Ward	3	SO 36000
Martinborough General Ward	3	SO 35999
Te Karu o Te Ika a Māui Māori Ward	1	LG-050-2025-W-1

- b. There will be 3 communities with community boards as follows:

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.

Community/ Community Board	Area	Subdivision	Members*	Appointed members
Greytown Community Board	As delineated on Plan SO 36001	N/a	4	2
Featherston Community Board	As delineated on Plan SO 36000	N/a	4	2
Martinborough Community Board	As delineated on Plan SO 35999	N/a	4	2

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
Greytown General Ward	3,880	3	1,293	73	+6.01
Featherston General Ward	3,320	3	1,107	-113	-9.29
Martinborough General Ward	3,780	3	1,107	40	3.28
Total general wards	10,980	9	1,220		
Te Karu o Te Ika a Māui Māori Ward	900	1	900		
Total	11,880	10			

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

5. The community boards will not be subdivided for electoral purposes. The population they each represent will be as follows:

Community board	Population*	Number of members^	Population per member
Greytown Community Board	4,060	4	1,015
Featherston Community Board	3,670	4	918
Martinborough Community Board	4,140	4	1,035
Total community board	11,870	12	

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

6. As required by section 19T(1)(b) wards of the Local Electoral Act 2001, the boundaries of the above wards 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 undertook a representation review in 2018. The initial proposal at the time was compliant with legislation and received no submissions so the initial proposal became the final proposal. In November 2022 it resolved to establish Māori wards. Accordingly, it was required to undertake a review prior to the next elections in October 2025.

Current representation arrangements

9. The Council's current representation arrangements are as follows:
 - A council comprising 9 members elected from 3 wards.
 - 3 community boards, each covering the area of a ward.

Current review

Preliminary consultation

10. The Council undertook preliminary engagement between February and May 2024. Reports were taken to the Featherston, Greytown and Martinborough Community Boards and the Māori Standing Committee. In April 2024, flyers and handouts were distributed through 11 community workshops that took place for the Council's enhanced annual plan drop-in sessions. In May 2024 an informal engagement survey was pushed out through social media, asking the community for their initial thoughts on representation. Around 60 people responded to this survey.
11. The representation review was overseen by the Council's Strategy Working Committee. Full feedback from the 2024 pre-engagement was taken to this committee on 3 July 2024 where the Committee made a recommendation to Council on the initial proposal. The officer report outlines 3 options for the general electoral population: to stay the same, to include a rural ward or to include at large representation.

The Council's initial proposal

12. On 31 July 2024, the Council resolved its initial representation proposal for a council comprising the mayor and 9 members elected from 1 at large, 3 general and 1 Māori wards. The proposal retained the Greytown, Featherston and Martinborough communities and community boards.

13. 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
Greytown General Ward	3,880	2	1,940	1,940	6.01
Featherston General Ward	3,320	2	1,660	1,660	-9.29
Martinborough General Ward	3,780	2	1,890	1,890	3.28
Total general wards	10,980	6	1,220		
South Wairarapa Māori Ward	900	1	900		
At large	11,880	2			
Total	11,880	9			

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

14. The proposed community board arrangements were as follows:

Community board subdivisions	Population*	Number of members^	Population per member
Greytown Community Board	4,060	4	1,015
Featherston Community Board	3,670	4	918
Martinborough Community Board	4,140	4	1,035
Total community board	11,870	12	

Submissions

15. The Council notified its initial representation proposal on 5 August 2024 and received 129 submissions by the deadline of 8 September 2024. Twenty-eight submissions supported the Council's initial proposal. Fifty-two submissions did not support the proposal based on the following reasons:

- (a) Submitters did not see any benefit for "at large" representation.
- (b) At large representation would lack a connection to any part of the community.

16. Key themes in the submissions were:

- Status quo/current arrangements are suitable, simple and acceptable with no reason for change.
- Decreasing ward representation, especially given the large geographical area for South Wairarapa.

- Three councillors per ward allows for greater representation to reflect the differing views in each ward.
 - At large representation may result in disproportioned representation if the at large councillors are elected from one ward, creating an imbalance towards the three towns.
 - Representation for the rural communities is needed.
 - Disestablishment of community boards.
 - Reduction in the total number of councillors.
 - Greater at large representation instead of general ward representation.
17. On 2 October 2024, the Council met to hear/deliberate on submissions. As a result of the submissions received, the Council amended the proposal to not have any at large wards.
18. The Council rejected the remaining matters raised in submissions for the following reasons:
- Support for a rural ward/rural representation: Council considers the existing arrangements provide for effective representation of rural communities through connection with their wider communities of interest. Council acknowledges the rural community as a community of interest and will look at establishing a Rural/Coastal Advisory Group to represent the interests of this community. It is noted that the rural community currently have representation through those councillors who live and/or work in the rural community.
 - Community Boards: Council acknowledges the need to provide clear direction and purpose to the Community Boards.
 - Reduction in the number of councillors: Council acknowledges and is sympathetic to reducing the number of councillors especially given the small remuneration pool. However, it is noted that SWDC may have no fewer than seven members nor more than 30 members.
 - The final proposal for 10 members plus the mayor is comparable to other similar-sized councils, and Council considers this number best provides for good governance and effective representation, taking account of elected members' workload ahead, the size of the district and maintaining a quorum.
 - At large representation: Council rejected at large representation due to potential for unbalanced representation across the district, and on the basis that the current representation is working well.
 - Alternative proposals: Replacement of council with either an expert panel, amalgamation or the commissioner are outside the scope of the representation review.

The Council's final proposal

19. At a meeting on 2 October 2024, the Council amended its initial proposal to the following final representation proposal.
20. The final proposal was for a council comprising the mayor and 9 councillors elected from 3 general wards, 1 councillor elected from 1 Māori ward, and 3 community boards.
21. The final proposal set ward arrangements as follows:

Wards	Population *	Number of members	Population per member	Deviation from district average population per member	% deviation from district average population per member
Greytown General	3,880	3	1,293	73	+6.01
Featherston General Ward	3,320	3	1,107	-113	-9.29
Martinborough General Ward	3,780	3	1,107	40	3.28
Total general wards	10,980	9	1,220		
South Wairarapa Māori Ward	900	1	900		
Total	11,880	10			

*Based on Stats NZ Tatauranga Aotearoa 2023 population estimates

22. The final proposal set out community board arrangements as follows:

Community board	Population*	Number of members^	Population per member
Greytown Community Board	4,060	4	1,015
Featherston Community Board	3,670	4	918
Martinborough Community Board	4,140	4	1,035
Total community board	11,870	12	

*Based on Stats NZ Tatauranga Aotearoa 2023 population estimates

^Not including appointed members

23. The Council publicly notified its final proposal on 30 October 2024. One valid appeal against the Council's proposal was received. This appeal had three signatories and was also accompanied by a supporting petition.

Appeals/objections against the Council's final proposal

24. The Council referred the appeal to the Commission, in accordance with section 19Q of the Act.

Hearing

25. 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. The Commission is not limited to holding a hearing purely in response to appeals or objections. 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.

26. In the case of the South Wairarapa District Council's final proposal, the Commission considered it appropriate to further explore the matters to be determined. Accordingly, the Commission decided that a hearing was required.
27. The Commission met with the Council and the three signatories to the appeal who wished to be heard, on behalf of the group appeal and petition that was submitted, at a hearing held online on 11 February 2025. The Council was represented at the hearing by Mayor Martin Connelly, supported by Chief Executive Janice Smith.
28. The following appellants appeared at the hearing:
 - a. Dan Riddiford
 - b. Jim Hedley
 - c. Jenny Boyne

Matters raised at the hearing

29. Mayor Martin Connelly, supported by Chief Executive Janice Smith explained the process the Council had followed in carrying out its representation review and reaching its final proposal. They emphasised the following points:
30. A robust process has been followed to reach the decision the Council has come to for its final proposal.
31. There was a connection in the community to the wards representing the old boroughs of the district.
32. The consideration of other options including rural wards and the lack of clarity around what constitutes rural representation, i.e. is it just farming, what communities need rural representation.
33. That a Coastal and Rural Advisory group is fair representation for the rural community as it allows inclusion of rural communities, which may not have had as strong a voice as others, and guarantees representation from farming to consider particular issues, e.g. rates or climate change with the group and collect input and advice before decisions are made (which we believe will be more effective than a rural ward).
34. The appellants and objectors appearing at the hearing raised the following points in opposition to the Council's proposal:
 - a. Dan Riddiford argued that rural areas are different from urban areas and that currently rural is not being effectively or responsibly represented. The rural population has decreased and so has the rural voice on council. Mr Riddiford noted that the lack of rural representation had negative impacts on these communities in regard to rates and infrastructure. Mr Riddiford supports a rural ward for the residents in the district to "do for ourselves" or where the council does not deliver water services or other benefits, except for the roading network. Mr Riddiford spoke in support of one rural ward but also alternatively would support three rural wards.
 - b. Jim Hedley spoke to there being no farming representation on the Council and that a representation review should address this. Mr Hedley noted that currently, each ward is about 66% urban and 33% rural, so rural is out voted by 2 to 1. This lack of representation is creating impacts for the rural communities particularly in regards to rates.

- c. Jenny Boyne said that the rural sector carries a disproportionate share of rates however the representation does not reflect that. Mrs Boyne also noted that there is a disengagement from the community but that it still cares. She explained that an increase in subdivisions are leaving the lines blurred between rural and urban, and less representation is occurring for rural. Mrs Boyne suggested three rural wards, one per existing ward, based on rural rates.

Matters for determination by the Commission

35. 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.
36. 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.
37. The appeal to the Council's final proposal raises the one overarching issue for the Commission to resolve; that is whether there is value in one or more separate rural wards across the district. This is an option that the Council explored before adopting its initial proposal. This was not the option chosen.
38. Outside of the scope of the Commission's decision, but on the subject of rural representation is that the Council resolved to establish a Coastal and Rural Advisory Group on 13 November 2024.

Key considerations

39. 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

40. The Guidelines identify three dimensions for recognising communities of interest:
- 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
 - 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
 - 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.
41. 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.
42. The Council has adequately identified communities of interest based on the townships of Greytown, Featherston, Martinborough and surrounding rural areas. These wards are aligned with the traditional boundaries and residents within these identify with them.
43. The appeal to the Council's final proposal suggests that for fair representation of the "rural" community of interest, the Council should include rural wards.
44. In terms of the way that the communities organise themselves, rural communities still rely on the townships as service centres, despite a perhaps different sense of identity due to lifestyle and occupation.
45. Jenny Boyne noted in her submission that property subdivisions were blurring the lines between urban and rural areas. This is another factor the Commission considered as the placement of boundaries needs to be tested with the communities and may not always be geographically distinct.
46. When discussing communities of interest, the Commission considered the guidelines for identifying communities of interest and acknowledge that the rural community have a perceptual dimension of community of interest with commonalities within the rural sector, however this does not extend to the functional dimension of communities of interest.

Effective representation of communities of interest

47. 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).
48. '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).
49. 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.
50. 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.
51. Appellants argued that the "rural community" was a community of interest that needed representation that needed separate representation. We heard two separate suggestions from appellants:
- (a) That each existing ward be split into rural and urban.
 - (b) That the district be split into one urban ward and one rural ward.
52. The Commission considered both options and sought population data to understand what this might look like. There is adequate population within these areas for this option to be considered.
53. The Commission considered that it would be inappropriate to split the entire district into one urban ward and one rural ward as this ignores the identifiable communities of interest that currently exist. The urban ward would need to consist of three geographically separate and distinct areas within one ward.
54. Therefore, splitting the current ward structure into rural and urban seemed to be the most appropriate option for ensuring the current communities of interest would be acknowledged.
55. The Commission explored introducing rural and urban wards for each existing ward, using statistical areas. This involves dividing each existing ward into a rural and an urban ward. This results in the following arrangements:

Wards	Population*	Number of members	Population per member	Deviation from district average population per member	% deviation from district average population per member
Featherston town	2,470	2	1235	136	12.37
Featherston rural	850	1	850	-249	-22.65
Greytown town	2,680	2	1340	241	21.92
Greytown rural	1,210	1	1210	111	10.10
Martinborough town	1,860	2	930	-169	-15.37
Martinborough rural	1,920	2	960	-139	-12.64
Sub total	10,990	10	1099		
Māori ward	900	1			
Total	11,890	11			

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

56. This resulted in 5 wards not complying with the +/-10% rule, two of them by a significant degree.
57. The Commission notes that the areas used to define these findings were based on Stats NZ statistical areas and we have not been able to test these against the actual shape of communities of interest on the ground. This makes it difficult to ascertain if they are the best boundaries for representation purposes. This is an issue that would need further consideration and could be explored by the Council in its next review. The Commission understands from the Council's presentation to the hearing that there are geographically different places (e.g. Kahutara, Ngawi, Tukurumuri, Hinakura) throughout South Wairarapa and it is important that these are considered if a new ward structure were to be introduced. This could be dividing the communities of interest between wards, as these boundaries have not been explored with the community.
58. Furthermore, we haven't heard from enough of the community to understand if this option would be well supported district wide. While we heard from some of the community, others may feel that introducing an urban/rural split would be dividing communities of interest.
59. Another issue with the arrangements set out in the table is that it requires 11 members - 1 more than the proposal, and 2 more than the status quo. 11 members is a large number of members for a district of this population.
60. To ensure fair and effective representation, the Commission considers it important to ensure representation for the most identifiable communities of interest. While there is a perceptual dimension to the rural communities, and there is enough population to warrant separate wards, the functional dimension, combined with the clearly delineated communities makes Featherston, Greytown and Martinborough – including their rural communities – the most identifiable communities of interest.

61. Throughout the representation review process, the Council identified that representation for rural and coastal communities was an area that required further addressing. Consequently, in addition to the representation arrangements in the representation review, the Council has decided to introduce a Coastal and Rural Advisory Group, as opposed to a separate ward.
62. The Council's reasoning behind establishing the Coastal and Rural Advisory Group was to provide a rural/coastal perspective on issues associated with council services affecting rural communities which they have noted tend to be operational, with the potential to align and coordinate Wairarapa wide. The Council hopes that it will ensure that the rural perspective is considered for Council policy decisions and planning.
63. While the Coastal and Rural Advisory Group is not within the Commission's scope to determine, it is a factor to consider when considering whether there is adequate representation for rural communities in South Wairarapa and if rural wards should be introduced.
64. Based on this, the Commission agrees that the Communities of Interest were adequately identified, however there is scope for the council to consider in a future review whether these communities should be separated into rural and urban wards. This is a concept that could be tested with the Coastal and Rural Advisory Group once it is introduced.
65. In relation to this, the Commission considers that the Council's final proposal is the most appropriate structure for the South Wairarapa District.
66. The Commission is satisfied that the South Wairarapa District Council arrangements appropriately balance the requirements for fair and effective representation of the Featherston, Greytown and Martinborough areas. We have not heard that any specific communities could be considered isolated communities under section 19V(3) of the Act, or any other reasons that the Commission might split out rural communities. The proposed boundaries have appropriate accessibility, size and configuration of an area including access to elected members and vice versa. Additionally, by introducing a rural and urban split to existing wards, there is a risk of creating barriers to participation, such as at elections by not recognising residents' familiarity and identity with an area.
67. The Commission upholds the wards proposed by the Council.

Fair representation for electors

68. 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'.
69. 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.
- 70. 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.
- 71. The Council's final proposal provides effective representation of communities of interest and is compliant with the +/-10% rule.

Community Boards

- 72. 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.
- 73. The particular matters the territorial authority, and where appropriate the Commission, must determine 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. The Commission sees two of these 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 or communities of interest?
- 74. The Council is proposing three community boards: Greytown, Featherston and Martinborough. These community board boundaries are aligned with distinct communities of interest that are distinct and well defined. Furthermore, the community board boundaries are well recognised by the community. The appeals to the Council's proposal did not pertain to the community boards.

Commission recommendations

- 75. The Commission recommends that in its next representation review, the Council further explore communities of interest to determine if there is any delineation between urban and rural communities within the three towns of Featherston, Greytown and Martinborough.
- 76. The Commission strongly recommends that prior to the council's next representation review the Council (in conjunction with the rural community) review the effectiveness of the Board.
- 77. The Commission requests that South Wairarapa District Council advise the Commission when the Board is established, and of the Board's terms of reference and composition.

Conclusion

78. 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 of the Act.

Local Government Commission²

Commissioner Brendan Duffy (Chair)

Commissioner Bonita Bigham

Temporary Commissioner Gwen Bull

31 March 2025