

**Mayor and Councillors  
COUNCIL**

6 DECEMBER 2018

Meeting Status: **Public**

Purpose of Report: For Decision

**FINAL PROPOSAL FOR WELLINGTON REGIONAL COUNCIL'S  
REPRESENTATION ARRANGEMENTS FOR 2019 LOCAL  
ELECTIONS - APPEAL AGAINST DECISION**

**PURPOSE OF REPORT**

- 1 This report requests approval of the proposed appeal against the decision of Greater Wellington Regional Council (GWRC) on its final proposal for the Wellington Regional Council's representation arrangements for the 2019 local elections.

**DELEGATION**

- 2 Council has the authority to consider this matter.

**BACKGROUND**

- 3 Under the Local Electoral Act 2001 (LEA), local authorities are required to review their representation arrangements at least once every six years. GWRC is legally required to carry out its next review in 2018, for the 2019 elections.
- 4 On 16 August 2018 the Wellington Regional Council reviewed its representation arrangements and resolved its initial representation proposal, to apply for the Council's elections to be held on 12 October 2019, that the Council comprise 13 members elected from six constituencies.
- 5 Other than a minor boundary alteration between the Porirua-Tawa and Wellington constituencies, and changes to names of some constituencies, as detailed in the following paragraphs, GWRC proposed to retain its current constituency boundaries and number of councillors elected from each constituency.
- 6 The minor modification to the boundary between the Wellington Constituency and the Porirua -Tawa Constituency aligns with a change to the boundary of the Tawa Community determined by the Local Government Commission on 25 September 2015.
- 7 GWRC, in its initial representation proposal, proposed the names of four constituencies be altered, as follows:
  - Kapiti Coast Constituency has been renamed as "Kāpiti Constituency"
  - Lower Hutt Constituency has been renamed as "Te Awa Kairangi ki Tai/Lower Hutt Constituency"
  - Upper Hutt Constituency has been renamed as "Te Awa Kairangi ki Uta/Upper Hutt Constituency"
  - Wellington Constituency has been renamed as "Pōneke/Wellington Constituency".

- 8 At a meeting of Kāpiti Coast District Council on 27 September 2018 Members approved that a submission be made to GWRC on the initial representation proposal for the 2019 triennial elections. (Appendix 2)
- 9 The submission:
  - rejected the proposed name change from 'Kapiti Coast Constituency' to 'Kāpiti Constituency' with the loss of the word 'Coast'
  - argued in favour of the Council's preferred option of Kāpiti Coast District Council for two Regional Councillors for the Kāpiti Coast District.
- 10 On 31 October 2018 GWRC resolved its final representation proposal for the 2019 local elections.
- 11 Having considered the matters raised in submissions GWRC resolved to adopt its initial proposal as its final proposal subject to the following amendment:
  - The name of the proposed Kāpiti Constituency being changed to the Kāpiti Coast Constituency.
- 12 GWRC rejected the matter raised in the submission by Kāpiti Coast District Council that the Kāpiti Coast Constituency should elect two Councillors. The reason given by GWRC was that 'This proposal would not provide for fair representation of the electors of the Kāpiti Coast District'.

## **ISSUES AND OPTIONS**

### **Issues**

- 13 Any person or organisation that has made submissions on GWRCs initial proposal may lodge an appeal against the Council's decision under section 19O of the Local Electoral Act 2001. An appeal must relate to the matters raised in the submission.
- 14 Appeals must be made in writing and be received by GWRC no later than 7 December 2018.
- 15 Appeals must then be referred to the Local Government Commission who will consider any appeals and complete its duties before April in election year.
- 16 If a final proposal does not comply with the '+/-10% rule' it must also be referred to the Local Government Commission under section 19V of the Local Electoral Act 2001.
- 17 The Local Government Commission's role is not merely supervisory of a local authority's decision. This means that the Commission is not restricted to checking that a local authority has followed a correct process and referred to all relevant factors, but that it is also required to form its own view on the matters which are within the scope of the review.
- 18 In order to reach the final proposed representation arrangement the approach taken by GWRC has ignored effective and fair representation.

- 19 The Kāpiti Coast District Councils preferred option of two councillors would achieve improved levels of compliance with the +/-10% rule in comparison with the proposed option. In terms of the requirements for fair representation this option would better meet those requirements.

Constituency	Pop'n	No of Crs in GWRC final proposal	Pop'n per Cr	% Variance	No of Crs in KCDC submission	Pop'n per Cr	% Variance
Kāpiti Coast	52700	1	52,700	33%	2	26,350	-28%
Porirua Tawa	71300	2	35,650	-10%	2	35,650	-3%
Wellington	197500	5	39,500	0%	5	39,500	8%
Lower Hutt	104700	3	34,900	-12%	3	34,900	-5%
Upper Hutt	43200	1	43,200	9%	1	43,200	18%
Wairarapa	44500	1	44,500	13%	1	44,500	21%
	513900	13	39,530	0%	14	36,707	0%
Max variance				33%	Max variance		21%
Average variance				6%	Average variance		2%

- 20 This model would provide more effective representation for communities of interest and fairer representation for electors over the current and final proposed representation arrangements.
- 21 This option would provide more effective representation for diverse communities through enabling councillors to hear and meet with a wider variety of groups and individuals, and on a more regular basis.
- 22 This option would enable the workloads of individual councillors to be more effectively managed through councillors being able to share the work involved.
- 23 Two councillors for the Kāpiti Coast Constituency would also facilitate more effective representation and support looking ahead in terms of the growth in opportunities resulting from the new expressway and the Kāpiti Airport benefitting both the people of the Kāpiti Coast and our neighbours.

### Option 1 (*Recommended Option*)

- 24 Approve the appeal against the decision of Greater Wellington Regional Council (GWRC) on its final proposal for the Wellington Regional Council's representation arrangements for the 2019 local elections and against the rejection of the submission of the Kāpiti Coast District Council that the Kāpiti Coast Constituency should elect two councillors. (Appendix 3)

### Option 2

- 25 Resolve not to approve the appeal against the decision of Greater Wellington Regional Council (GWRC) on its final proposal for the Wellington Regional Council's representation arrangements for the 2019 local elections and against the rejection of the submission of the Kāpiti Coast District Council that the Kāpiti Coast Constituency should elect two councillors. (Appendix 3)

## Policy considerations

26 There are no policy considerations.

## Legal considerations

27 There are no legal considerations.

## Financial considerations

28 There are no financial considerations.

## Tāngata whenua considerations

29 Following the publication of the initial proposal for the Wellington Regional Council's representation arrangements for the 2019 local elections it had been clarified that there had been no support from local iwi for the removal of word 'Coast' in the proposed change from 'Kapiti Coast Constituency' to 'Kāpiti Constituency'.

30 There are no further tāngata whenua considerations.

## Strategic considerations

31 The effective representation of Kāpiti Coast interests at a regional level contributes to supporting Council's plan for growth and investment.

## **SIGNIFICANCE AND ENGAGEMENT**

### Significance policy

32 This matter has a moderate level of significance under Council's Significance and Engagement Policy.

### Consultation already undertaken

33 No consultation has been undertaken in the preparation of this appeal.

### Engagement planning

34 An engagement plan is not needed to implement this decision.

## **RECOMMENDATIONS**

35 That the Council approves the appeal against the decision of Greater Wellington Regional Council on its final proposal for the Wellington Regional Council's representation arrangements for the 2019 local elections and against the rejection of the submission of the Kāpiti Coast District Council that the Kāpiti Coast Constituency should elect two councillors. (Appendix 3)

**Report prepared by**

**Approved for submission**

**Approved for submission**

**Leyanne Belcher  
Democracy Services  
Manager**

**Natasha Tod  
Group Manager  
Regulatory Services**

**Janice McDougall  
Acting Group Manager  
Corporate Services**

## **ATTACHMENTS**

- Appendix 1    Greater Wellington Regional Council report on final representation proposal for 2019 triennial elections
- Appendix 2    Submission on Greater Wellington Regional Councils initial representation proposal for 2019 triennial elections
- Appendix 3    Draft appeal against Greater Wellington Regional Council decision.



**Report** 18.464  
**Date** 23 October 2018  
**File** CCAB-8-1904

**Committee** Council  
**Author** Cr Barbara Donaldson, Chair, Representation Review 2018 Hearing Committee

## Final representation proposal for 2019 triennial elections

### 1. Purpose

For Council to adopt its final representation proposal for the 2019 triennial elections.

### 2. Background

#### 2.1 Initial proposal

On 16 August 2018 the Council resolved its initial proposal for the 2019 triennial elections.

The initial representation proposal provided for the Council comprising 13 members elected from six constituencies, as follows:

<i>Constituency</i>	<i>Number of members</i>	<i>Community of interest represented by the constituency</i>	<i>Population per Councillor</i>  (Average: 39,531)  (+/-10% range from the average: 35,578 to 43,484)
<i>Pōneke/Wellington</i>	<i>5</i>	<i>The area of Wellington City, excluding the area of the Tawa Community</i>	<i>39,500</i>
<i>Porirua-Tawa</i>	<i>2</i>	<i>The area of Porirua City, and the area of the Tawa Community of Wellington City</i>	<i>35,650</i>

<i>Kāpiti</i>	<i>1</i>	<i>The area of the Kapiti Coast District</i>	<i>52,700</i>
<i>Te Awa Kairangi ki Tai/Lower Hutt</i>	<i>3</i>	<i>The area of Lower Hutt City</i>	<i>34,900</i>
<i>Te Awa Kairangi ki Uta/Upper Hutt</i>	<i>1</i>	<i>The area of Upper Hutt City</i>	<i>43,200</i>
<i>Wairarapa</i>	<i>1</i>	<i>The area of South Wairarapa District, Carterton District and Masterton District, and that part of Tararua District that falls within the Wellington Region</i>	<i>44,500</i>

## 2.2 Consideration of submissions

The Council's initial proposal was publicly notified on Friday, 24 August 2018. The opportunity for submissions was also featured on the home page of GWRC's website during the submission period. Submissions closed on 26 September 2018. Five submissions were received.

The Representation Review Hearing Committee (the Committee) met on 18 October 2018 to consider the submissions. The Committee heard from three submitters.

After considering all the submissions received, the Committee resolved the following recommendations for consideration by Council:

*That the Committee:*

- 1. Receives the report.*
- 2. Notes the content of the report.*
- 3. Considers the information in this report and attachments in determining its findings and recommendations to Council.*
- 4. Recommends that the Council adopts the reasons for the acceptance or rejection of submissions, as set out in the table below:*

<i><b>Issue</b></i>	<i><b>Reason for acceptance or rejection of submission</b></i>
<i>That the Tawa area should be included in the Wellington Constituency, providing the Wellington Constituency with a sixth Councillor.</i>	<i>Rejected. The Tawa area shares a common regional community of interest with Porirua; splitting the Porirua-Tawa Constituency would not provide effective representation for the Porirua-Tawa area. Also, a six member Wellington Constituency for a Council with a total of 13 Councillors would not provide fair representation for the electors of the Wellington Constituency.</i>
<i>That Councillors should be elected at large.</i>	<i>Rejected. Under the Local Electoral Act 2001 a region must be divided into constituencies for electoral purposes.</i>
<i>That the Council should comprise 11 Councillors: Wellington/Porirua – 6, Kapiti – 1, Hutt Valley – 3, Wairarapa – 1.</i>	<i>Rejected. This proposal would not provide effective representation for Wellington Region's distinct communities of interest. Also, it would not provide fair representation for the electors of the Kapiti Constituency.</i>
<i>That the Council should comprise 14 members, with Tawa included in the Wellington Constituency (total six Councillors), and the Porirua and Kapiti areas combined into a single constituency electing three Councillors.</i>	<i>Rejected. The Tawa area shares a common regional community of interest with Porirua; splitting the Porirua-Tawa Constituency would not provide effective representation for the Porirua-Tawa area. This proposal would not provide effective representation for the distinct Porirua and Kāpiti Coast regional communities of interest. Also, it would not provide fair representation for the electors of the Upper Hutt and Wairarapa constituencies.</i>
<i>That the Kāpiti Coast Constituency should elect two Councillors.</i>	<i>Rejected. This proposal would not provide for fair representation of the electors of the Kāpiti Coast Constituency.</i>



<i>That the proposed Kāpiti Constituency should be renamed as “Kāpiti Coast Constituency”.</i>	<i>Accepted. “Kāpiti Coast” is acknowledged as the commonly known identifier for this regional community of interest.</i>
<i>That the Council should comprise 14 members, with two members elected from the Wairarapa Constituency.</i>	<i>Rejected. This proposal would not provide for fair representation of the electors of the Wairarapa Constituency.</i>
<i>That the level of delegation to the Wairarapa Committee should be increased.</i>	<i>Rejected. This matter is out of scope of the representation review.</i>

5. *Recommends that the Council confirms its initial proposal as its final representation proposal for the 2019 elections, subject to the name of the proposed Kāpiti Constituency being changed to “Kāpiti Coast Constituency”.*

### 3. **Comment**

The Council is now required to consider the recommendations of the Committee and resolve its final representation proposal for the 2019 triennial elections.

The Council needs to be aware that any amendments made to the Council’s initial representation proposal must be based on the matters raised in submissions. Both the Local Electoral Act 2001 and the Local Government Commission’s guidelines for representation reviews provide that a council must be able to demonstrate that:

- It has considered all the submissions received on its initial proposal by providing reasons or the acceptance and rejection of proposals; and
- Its final proposal is made in light of the submissions received on the Council’s initial proposal.

### 4. **Next steps**

Once the Council resolves its final proposal the Local Electoral Act 2001 provides that the final proposal must be publicly notified by 7 November 2018 and that copies be provided to the Local Government Commission, Surveyor-General, Government Statistician, Remuneration Authority and all territorial authorities in the Wellington Region. The public notice must set out Council’s final proposal, any amendments made to the initial proposal, and the right to appeal and/or object to the final proposal. The public notice will provide one month for the receipt of appeals and/or objections.

Any appeals and/or objections received will be referred to the Local Government Commission, which will then determine the Council’s representation arrangements for the 2019 triennial elections. Regardless of

whether any appeals and/or objections are received, the Council's final proposal must be referred to the Local Government Commission for determination if the proposal does not comply with the +/- 10% rule for fair determination set out in section 19V of the Local Electoral Act 2001.

## **5. Communication**

In addition to the public notification requirements referred to above each submitter will be provided with a copy of the public notice of the Council's final proposal and informed of their right to appeal and/or object.

## **6. Consideration of climate change**

The matters addressed in this report are of a procedural nature, and there is no need to conduct a climate change assessment.

## **7. The decision-making process and significance**

Officers recognise that the matters referenced in this report may have a high degree of importance to affected or interested parties.

### **7.1 Significance of the decision**

The subject matter of this report is part of a decision-making process that will lead to the Council making a decision of low significance within the meaning of the Local Government Act 2002.

The decision-making process is explicitly prescribed for the LEA, which provides that the Council's initial representation proposal shall be subject to public consultation, and that the Council must consider the matters that were raised in the consultation, in resolving its final proposal.

### **7.2 Engagement**

Engagement with regard to the Council's final proposal will be undertaken in accordance with the process set out in the Local Electoral Act 2001.

## **8. Recommendations**

*That the Council:*

- 1. Receives the report.*
- 2. Notes the content of the report.*
- 3. Adopts the reasons for the acceptance or rejection of submissions, as set out in the table below:*

<i>Issue</i>	<i>Reason for acceptance or rejection of submission</i>
<i>That the Tawa area should be included in the Wellington Constituency, providing the Wellington Constituency with a sixth Councillor.</i>	<i>Rejected. The Tawa area shares a common regional community of interest with Porirua; splitting the Porirua-Tawa Constituency would not provide effective representation for the Porirua-Tawa area. Also, a six member Wellington Constituency for a Council with a total of 13 Councillors would not provide fair representation for the electors of the Wellington Constituency.</i>
<i>That Councillors should be elected at large.</i>	<i>Rejected. Under the Local Electoral Act 2001 a region must be divided into constituencies for electoral purposes.</i>
<i>That the Council should comprise 11 Councillors: Wellington/Porirua – 6, Kapiti – 1, Hutt Valley – 3, Wairarapa – 1.</i>	<i>Rejected. This proposal would not provide effective representation for the Wellington Region's distinct communities of interest. Also, it would not provide fair representation for the electors of the Kapiti Constituency.</i>
<i>That the Council should comprise 14 members, with Tawa included in the Wellington Constituency (total six Councillors), and the Porirua and Kapiti areas combined into a single constituency electing three Councillors.</i>	<i>Rejected. The Tawa area shares a common regional community of interest with Porirua; splitting the Porirua-Tawa Constituency would not provide effective representation for the Porirua-Tawa area. This proposal would not provide effective representation for the distinct Porirua and Kāpiti Coast regional communities of interest. Also, it would not provide fair representation for the electors of the Upper Hutt and Wairarapa constituencies.</i>
<i>That the Kāpiti Coast Constituency should elect two Councillors.</i>	<i>Rejected. This proposal would not provide for fair representation of the electors of the Kāpiti Coast Constituency.</i>

<i>That the proposed Kāpiti Constituency should be renamed as “Kāpiti Coast Constituency”.</i>	<i>Accepted. “Kāpiti Coast” is acknowledged as the commonly known identifier for this regional community of interest.</i>
<i>That the Council should comprise 14 members, with two members elected from the Wairarapa Constituency.</i>	<i>Rejected. This proposal would not provide for fair representation of the electors of the Wairarapa Constituency.</i>
<i>That the level of delegation to the Wairarapa Committee should be increased.</i>	<i>Rejected. This matter is out of scope of the representation review.</i>

4. **Confirms** its initial proposal as its final representation proposal for the 2019 elections, subject to the name of the proposed Kāpiti Constituency being changed to “Kāpiti Coast Constituency”.
5. **Adopts** the final representation proposal for the 2019 triennial elections, providing for a Council of 13 members elected from six constituencies as follows:

<b>Constituency</b>	<b>Number of members</b>	<b>Community of interest represented by the constituency</b>	<b>Population per Councillor</b>  (Average: 39,531)  (+/-10% range from the average: 35,578 to 43,484)
<i>Pōneke/Wellington</i>	<i>5</i>	<i>The area of Wellington City, excluding the area of the Tawa Community</i>	<i>39,500</i>
<i>Porirua-Tawa</i>	<i>2</i>	<i>The area of Porirua City, and the area of the Tawa Community of Wellington City</i>	<i>35,650</i>
<i>Kāpiti Coast</i>	<i>1</i>	<i>The area of the Kapiti Coast District</i>	<i>52,700</i>
<i>Te Awa Kairangi ki Tai/Lower Hutt</i>	<i>3</i>	<i>The area of Lower Hutt City</i>	<i>34,900</i>
<i>Te Awa Kairangi ki Uta/Upper Hutt</i>	<i>1</i>	<i>The area of Upper Hutt City</i>	<i>43,200</i>

<i>Wairarapa</i>	<i>1</i>	<i>The area of South Wairarapa District, Carterton District and Masterton District, and that part of Tararua District that falls within the Wellington Region</i>	<i>44,500</i>
------------------	----------	---	---------------

**Cr Barbara Donaldson**

Chair, Representation  
Review 2018 Hearing  
Committee

27 September 2018

Representation Review  
 Greater Wellington Regional Council  
 PO Box 11646  
 Manners Street  
**WELLINGTON 6142**

Email: [repreview@gw.govt.nz](mailto:repreview@gw.govt.nz)

Dear Francis,

**Proposed representation arrangements for the 2019 local elections**

1. Thank you for the opportunity to submit on the proposed representation arrangements for the 2019 local elections. This submission was finalised by our Council at their meeting on 27 September 2018 and replaces our previous draft submission.
2. Kāpiti Coast District Council (Council) would like to make an oral presentation in support of our submission.
3. Having assessed the proposed option in terms of the requirements for effective and fair representation Council is unable to support the proposed option below:

<i>Constituency</i>	<i>Number of members</i>	<i>Community of interest represented by the constituency</i>	<i>Population per Councillor (Average: 39,531) (+/-10% range from the average: 35,578 to 43,484)</i>
<i>Pōneke/Wellington</i>	<i>5</i>	<i>The area of Wellington City, excluding the area of the Tawa Community</i>	<i>39,500</i>
<i>Porirua-Tawa</i>	<i>2</i>	<i>The area of Porirua City, and the area of the Tawa Community of Wellington City</i>	<i>35,650</i>
<i>Kāpiti</i>	<i>1</i>	<i>The area of the Kapiti Coast District</i>	<i>52,700</i>
<i>Te Awa Kairangi ki Tai/Lower Hutt</i>	<i>3</i>	<i>The area of Lower Hutt City</i>	<i>34,900</i>
<i>Te Awa Kairangi ki Uta/Upper Hutt</i>	<i>1</i>	<i>The area of Upper Hutt City</i>	<i>43,200</i>

4. This proposed option is, we consider, blatantly unfair to the population of the Kāpiti district. The suggested solitary councillor representing a population of 52,700 results in a percentage deviation from the region average population per councillor of +33.2.

Constituencies	Population	Percentage of region's population	Number of councillors per constituency	Population per councillor	Deviation from the region average population per councillor (39,531)	Percentage deviation from the region average population per councillor
Kapiti Coast	52,700	10.2	1	52,700	+13,169	+33.2
Porirua-Tawa	71,300	13.9	2	35,650	-3,881	-9.8
Wellington	197,500	38.4	5	39,500	-31	-0.1
Lower Hutt	104,700	20.4	3	34,900	-4,631	-11.7
Upper Hutt	43,200	8.4	1	43,200	+3,669	+9.3
Wairarapa	44,500	8.7	1	44,500	+4,969	+12.6
TOTAL	513,900	100.00	13	39,531		

5. The preferred option of Kapiti Coast District Council is for two Regional Councillors for the Kapiti Coast District.
6. This option, as presented in the Greater Wellington Regional Council 16 August meeting report 'Initial representation proposal for the 2019 triennial elections', achieves improved levels of compliance with the +/-10% rule in comparison with the current and proposed options. In terms of the requirements for fair representation this better meets the requirements for fair representation.

Constituencies	10 members		11 members		12 members		14 members	
	Number of councillors per constituency	Percentage deviation from the region average population per councillor (51,390)	Number of councillors per constituency	Percentage deviation from the region average population per councillor (46,718)	Number of councillors per constituency	Percentage deviation from the region average population per councillor (42,825)	Number of councillors per constituency	Percentage deviation from the region average population per councillor (36,707)
Kapiti Coast	1	+2.6	1	+12.8	1	+23.1	2	-28.2
Porirua-Tawa	1	+38.7	2	-23.7	2	-16.8	2	-2.9
Wellington	4	-3.9	4	+6.7	5	-7.8	5	+7.6
Lower Hutt	2	+1.9	2	+12.1	2	+22.2	3	-4.9
Upper Hutt	1	-15.9	1	-7.5	1	+0.9	1	+17.7
Wairarapa	1	-13.4	1	-4.8	1	+3.9	1	+21.2

7. This model would provide more effective representation for communities of interest and fairer representation for electors over the current representation arrangements. This option would provide more effective representation for diverse communities through enabling councillors to hear and meet with a wider variety of groups and individuals, and on a more regular basis.
8. This, our preferred option, would enable the workloads of individual councillors to be more effectively managed through councillors being able to share the work involved.
9. In order to reach the proposed representation arrangement offered by option 1 the approach taken by Greater Wellington Regional Council has prioritised a particular consideration of communities of interest while choosing to ignore effective and fair representation.

10. Kāpiti Coast District Council rejects the proposed name change from 'Kapiti Coast Constituency' to 'Kāpiti Constituency' with the loss of the word 'Coast'.
11. Thank you once again for the opportunity to submit on the proposed representation arrangements for the 2019 local elections.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'K. Gurunathan JP, MA', with a horizontal line underneath.

K. Gurunathan JP, MA  
**MAYOR, KĀPITI COAST DISTRICT**

A large, stylized handwritten mark or flourish in blue ink, consisting of a large loop and a vertical line.



6 December 2018

Representation Review  
Greater Wellington Regional Council  
PO Box 11646  
Manners Street  
**WELLINGTON 6142**

Email: [repreview@gw.govt.nz](mailto:repreview@gw.govt.nz)

Dear Francis,

### Final representation arrangements for the 2019 local elections

1. Kāpiti Coast District Council would like to appeal against the decision of Greater Wellington Regional Council (GWRC) on the final representation proposal for the 2019 local elections and against the rejection of the submission of the Kāpiti Coast District Council that the Kāpiti Coast Constituency should elect two Councillors.
2. In our submission on the initial proposal Kāpiti Coast District Council had assessed the proposed option in terms of the requirements for effective and fair representation and was unable to support the proposed option below:

<i>Constituency</i>	<i>Number of members</i>	<i>Community of interest represented by the constituency</i>	<i>Population per Councillor</i> (Average: 39,531) (+/-10% range from the average: 35,578 to 43,484)
<i>Pōneke/Wellington</i>	<i>5</i>	<i>The area of Wellington City, excluding the area of the Tawa Community</i>	<i>39,500</i>
<i>Porirua-Tawa</i>	<i>2</i>	<i>The area of Porirua City, and the area of the Tawa Community of Wellington City</i>	<i>35,650</i>
<i>Kāpiti</i>	<i>1</i>	<i>The area of the Kapiti Coast District</i>	<i>52,700</i>
<i>Te Awa Kairangi ki Tai/Lower Hutt</i>	<i>3</i>	<i>The area of Lower Hutt City</i>	<i>34,900</i>
<i>Te Awa Kairangi ki Uta/Upper Hutt</i>	<i>1</i>	<i>The area of Upper Hutt City</i>	<i>43,200</i>
<i>Wairarapa</i>	<i>1</i>	<i>The area of South Wairarapa District, Carterton District and Masterton District, and that part of Tararua District that falls within the Wellington Region</i>	<i>44,500</i>

3. This initial proposal was, we argued, blatantly unfair to the population of the Kāpiti district. The suggested solitary councillor representing a population of 52,700 resulting in a percentage deviation from the region average population per councillor of +33.2.
4. GWRC adopted its initial proposal as its final proposal subject to the amendment of the name of the proposed Kāpiti Constituency being changed to Kāpiti Coast Constituency.
5. In order to reach the final proposed representation arrangement the approach taken by GWRC has ignored effective and fair representation.
6. The preferred option of Kāpiti Coast District Council was for two Regional Councillors for the Kāpiti Coast Constituency.
7. This option would achieve improved levels of compliance with the +/-10% rule in comparison with the proposed option. In terms of the requirements for fair representation this option would better meet those requirements.

Constituency	Pop'n	No of Crs in GWRC final proposal	Pop'n per Cr	% Variance	No of Crs in KCDC submission	Pop'n per Cr	% Variance
Kāpiti Coast	52700	1	52,700	33%	2	26,350	-28%
Porirua Tawa	71300	2	35,650	-10%	2	35,650	-3%
Wellington	197500	5	39,500	0%	5	39,500	8%
Lower Hutt	104700	3	34,900	-12%	3	34,900	-5%
Upper Hutt	43200	1	43,200	9%	1	43,200	18%
Wairarapa	44500	1	44,500	13%	1	44,500	21%
	513900	13	39,530	0%	14	36,707	0%
Max variance				33%		Max variance	21%
Average variance				6%		Average variance	2%

8. This model would provide more effective representation for communities of interest and fairer representation for electors over the current and final proposed representation arrangements.

9. This option would provide more effective representation for diverse communities through enabling councillors to hear and meet with a wider variety of groups and individuals, and on a more regular basis.
10. This, our preferred option, would enable the workloads of individual councillors to be more effectively managed through councillors being able to share the work involved.
11. Two Councillors for the Kāpiti Coast Constituency would also facilitate more effective representation and support looking ahead in terms of the growth in opportunities resulting from the new expressway and the Kāpiti Airport benefitting both the people of the Kāpiti Coast and our neighbours.
12. Effective and fair representation has been ignored in the approach taken by GWRC to reach the final proposed representation arrangement.
13. That concludes our appeal against the final proposed representation arrangements for the 2019 local elections and against the rejection of the submission of the Kāpiti Coast District Council that the Kāpiti Coast Constituency should elect two Councillors.

Yours sincerely,

Wayne Maxwell  
**CHIEF EXECUTIVE**