

Unitary Benchmarking Assessment

Wairarapa Councils

JUNE 2026



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Executive Summary

This benchmarking assessment indicates that a Wairarapa unitary authority could be operationally feasible and could potentially deliver combined territorial and regional council functions at a lower underlying operating cost than the current arrangement. The main issue, however, is not operating cost alone. Greater Wellington Regional Council (GWRC) currently allocates materially more cost to Wairarapa than it collects from its ratepayers. This suggests the current model includes a significant benefit from the wider Wellington rating base. If Wairarapa were to operate as a standalone unitary authority, that benefit would fall away and mean that a unitary model could still require further revenue to be raised locally, even if the total cost of service delivery is lower.

Marlborough, Nelson, and Tasman are the most relevant comparators for this assessment because they are existing South Island unitary councils of a broadly similar population scale and with a mix of rural and urban service responsibilities. Their actual operating costs provide a useful sense check on the benchmark cost range for a potential Wairarapa unitary authority. However, they are not direct proxies. Wairarapa differs in geography, settlement pattern, current governance arrangements, and, importantly, its financial relationship with GWRC. Gisborne is less useful as a current cost comparator because recent costs are materially affected by cyclone recovery and response activity. Comparator evidence should therefore be treated as indicative, not determinative.

The assessment also highlights that governance design would be critical. A unitary model may be structurally feasible, but its acceptability and long term effectiveness would depend on how it maintains local voice across the districts, including decisions on representation, Māori wards, and the future role of community boards or local boards. Broader hybrid or federated models may be conceptually relevant, but they do not appear to be the primary structures being tested through the current Head Start pathway.

When thinking about Council Controlled Organisations (CCOs and CCTOs) equivalent in costs in Nelson

) and shared services, the model of governance must consider the requirements of other legislation such as the Land Transport Management Act 2023. Similarly, governance models should be assessed on how well they support an integrated planning and environmental management system under the new planning framework, rather than on structural simplicity alone. The strongest model will be the one that keeps planning, water management, environmental protection, infrastructure and spatial planning working together at the right scale, while maintaining clear accountability, manageable transition risk, sufficient capability, and meaningful local representation. In practice, this means favouring arrangements that align with catchments and communities of interest, avoid fragmented responsibilities, and are workable to implement under the new statutory regime.

This report is a preliminary benchmarking assessment, not a full business case. It does not include transition costs, implementation costs, detailed service redesign, or a developed governance model.

Further assessment will consider the Wairarapa unitary option in combination with a fourth council, Tararua District. This will be provided by way of an update to this report in a separate Appendix.

We set out to answer four questions. These are summarised, with their responses below.

Is there a relationship between cost and scale?

We analysed a national data set collected by Statistics New Zealand and compared costs to a range of key cost drivers that were able to be collected from publicly available information. Of the 13



activities that we considered, we found that 9 had a statistically significant relationship with at least a moderate correlation between scale and cost.

This means we can use scale measures as a reasonable indicator of the potential future costs for a combined unitary authority.

How do GWRC costs for Wairarapa compare to benchmarking across other councils?

The costs that have been allocated to the Wairarapa area by GWRC were compared to:

- Data provided by Nelson City Council. This indicated that GWRC's costs were significantly higher than the equivalent costs in Nelson. However, we note that the urban form, population density and land use in Nelson is significantly different to the Wairarapa area.
- The costs of smaller regional councils, including Environment Southland, Taranaki Regional Council and Hawke's Bay Regional Council. This indicated that costs allocated to the Wairarapa region were materially higher than those smaller regional councils.
- Our national data benchmarking, which indicated that costs incurred by GWRC to service the Wairarapa area were higher than we would expect based on national benchmarking.

Overall, in our view the costs that are currently incurred by GWRC for the Wairarapa are materially higher than the costs that we would expect to be incurred by a unitary authority servicing the same area.

Are unitary authorities cheaper?

We compared the costs derived from our benchmarking with the actual costs incurred by Gisborne District Council, Marlborough District Council, Nelson City Council and Tasman District Council.

The work identified that our benchmarked costs were 20 – 25% higher than the actual costs of Nelson and Tasman, and 7% lower than the actual costs for Marlborough.

While actual costs for Gisborne were significantly higher than our benchmarks, these costs are heavily influenced by cyclone recovery costs.

Overall, while there may be some indication unitary authorities cost less than a simple aggregation of territorial authority and regional council functions, there is insufficient evidence to draw any firm conclusions on this matter.

What could a Wairarapa unitary authority cost?

We compared our benchmarking to a simple aggregation of the existing costs for the Wairarapa councils and share of GWRC functions. This work indicated that the total combined costs of providing district and regional services in the Wairarapa could be between 5% - 30% lower (or \$10 million – \$40 million) than the current cost.

However, GWRC currently collects only \$13 million of rates (once the contributions to public transport and the stadium rate have been removed) from Wairarapa ratepayers, compared to an estimated \$46 million of allocated costs. GWRC also collects approximately \$10 million of grants, subsidies, fees and charges in relation to services delivered in the Wairarapa.

The existing flow of rates from the urban Wellington councils to the Wairarapa, almost entirely offsets any potential savings or efficiencies that would arise due to amalgamation of territorial authority functions and regional council functions in the Wairarapa. We estimate that, based on 2024/25 costs, a Wairarapa unitary authority would have to collect between 2% and 25% more revenue than is currently collected (assuming full funding of depreciation). In dollar terms, that equates to between \$80 – \$1,200 per rateable property in the Wairarapa.



Introduction

This work provides a preliminary assessment of whether the three Wairarapa district councils could operate together as a unitary authority. In particular, it considers whether the benchmark cost of delivering regional council functions would be materially lower than, similar to, or higher than the current arrangements through Greater Wellington Regional Council (GWRC).

The assessment has been prepared in the context of broader consideration of future local government arrangements. The alternative to a unitary model is continued participation in a Wellington regional arrangement, whether through the current GWRC structure or any successor regional form that may emerge through reform.

This assessment is intended to support consideration of participation in the Head Start programme by providing an early view of the potential cost implications of a Wairarapa unitary model relative to remaining within the Wellington region. As part of this assessment, the relative similarities of the combined councils with reference to existing unitary councils are presented as well as high level governance considerations.

This assessment is a preliminary piece of analysis only. It does not assess the full range of matters that would need to be considered as part of any formal reorganisation or implementation process, including actual governance design, statutory requirements, transition costs, service integration, and delivery risks.

The work has been prepared to meet programme timing requirements and to inform the next stage of discussion and analysis by the respective councils. More detailed work would be required if councils wished to test the feasibility of a unitary option beyond this initial assessment.

Approach and methodology

The detailed methodology for our estimate of a unitary authority cost base for the Wairarapa Councils can be provided. However, at a high level, it involved:

- Identifying a range of potential cost drivers that are readily available from public information.
- Comparing against cost categories from Statistics New Zealand Local Authority Financial Statistics for the 2024/25 year to identify trends and potential relationships between cost and scale.
- Separating Territorial Authority (TA) functions and regional council functions and analysing these independently.
- Excluding interest and depreciation costs – these are inherited upon amalgamation and therefore would be the simple sum of the parts. There may be minor adjustments to these over time as estimated lives for assets are aligned across the new council area, or if the combined entity is able to attract a lower borrowing cost.
- We then compared the results of our benchmarking model against actual costs to determine fit. This gave us some confidence that our approach was appropriate within the Wairarapa context and that where our approach differed from actual costs, actual costs were typically lower than those produced by our model.



Separately, we were provided with information from GWRC which allocated costs for the 2025/26 year to the Wairarapa based on their professional judgement. We used this data to:

- Compare costs with the costs for the same activities in Nelson City Council which is a unitary authority.
- Compare costs with small regional councils operating elsewhere in the country.

For comparisons with the benchmarking, we adjusted GWRC's cost information to 2024/25 values by referencing its actual 2024/25 results.

Public transport costs have been excluded from all of the analysis in this report.

Profile

This preliminary assessment indicates that a Wairarapa unitary authority would be broadly comparable in scale to several existing unitary councils, particularly Marlborough, Nelson, Tasman, and Gisborne, although each differs in important ways such as geography, settlement pattern, and service context. The existing unitary councils demonstrate that regional functions can be sustained in a unitary model at a broadly similar scale.

On key scale measures, Wairarapa is similar in population to Marlborough, Nelson, and Gisborne, and slightly smaller than Tasman. It is much less densely populated than Nelson, with 8.6 residents per km², placing it closer to the other councils including in terms of rural area. The Wairarapa also has a relatively large road network for its size, suggesting a comparatively high infrastructure servicing burden.

The comparison also suggests that Wairarapa has a relatively active regulatory and development profile due to higher growth than the comparative low growth unitary councils. Over the last five years combined, Wairarapa recorded 1,976 building consents, or 38.4 per 1,000 residents. This is higher than Marlborough (24.8), Nelson (22.5), and Gisborne (14.4), and close to Tasman (39.6). That pattern is consistent with the report's wider finding that consents are a strong predictor of planning and regulation costs.

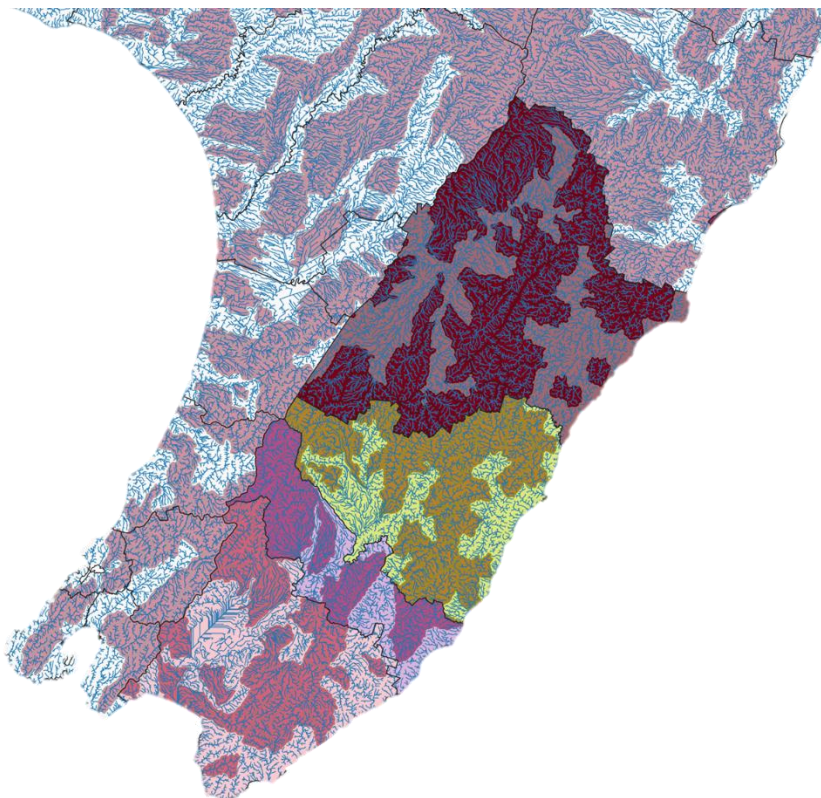


Figure 1 The Wairarapa councils (including Tararua district at the top) across existing catchments

The Wairarapa is more spatially integrated than some of the comparator councils. It is largely organised around the Ruamāhanga catchment and wider Wairarapa Moana floodplain, creating a connected land, water, flood, and groundwater system across the sub-region. This contrasts particularly with Marlborough and Tasman, which operate across multiple catchments with more geographically dispersed communities. In that sense, Wairarapa may be somewhat simpler to think about as a single regional environmental system, even though it remains institutionally more complex because regional functions are currently delivered through GWRC.

There are also important differences between the Wairarapa and the existing small unitary councils that affect any comparison. In particular, the Wairarapa is more closely connected to a larger metropolitan region through commuting patterns and transport links.

A full comparison breakdown is provided in Appendix One

Financial analysis

Is there a relationship between cost and scale?

To answer this question, we completed an analysis of the Local Authority Financial Statistics data collected by Statistics New Zealand. This was used because:

- It has a consistent grouping of activities¹
- It is a publicly available, national, data set
- It has been compiled by a reputable organisation.

¹ A detailed definition of activities used by Statistics New Zealand can be provided.



We compared this to a range of potential cost drivers that were selected because:

- They were publicly available
- We considered that they may be relevant to the underlying cost structure of one or more of the activities carried out by territorial authorities and regional councils.

We analysed this data to identify any relationship between our set of potential cost drivers and the actual costs incurred for each activity in the national dataset. Regression analysis was completed to determine whether any findings were statistically significant.

Overall, however, we found that 9 of the 13 activities that we examined had a statistically significant relationship between cost and scale with at least a moderate correlation between the two.

Table 1 Activities that have a relationship between scale and total cost

Activity	Cost driver
Environmental protection	Urban Land Area
Planning and regulation (regional councils)	Number of consents
Roading	Population
Solid waste/refuse	Population
Culture	Urban Population
Recreation and sport	Urban Population
Property	Infrastructure asset value
Planning and regulation (territorial authorities)	Consents
Community development	Urban Population
Economic development	Urban Population

Table 2 Activities that have no significant relationship between scale and total cost

Activity	Alternative approach
Governance	Compared to existing costs with allowance to reduce duplication
Emergency management	Sum of existing costs from each council
All other activities	Sum of existing councils, adjusted for observed efficiencies across benchmarked costs when compared to actual results

The analysis found that across all the activities considered, costs increase linearly with scale, each with a fixed and variable component.

- The variable component reflects how much a cost increases for each additional person (or other cost driver).
- The fixed component represents the minimum or “base” cost, regardless of the number of people.

When scale increases, the fixed cost is spread over more people, while the variable costs increase by a consistent amount.

This means that as population grows there are diminishing benefits of scale. While each new head of population adds some cost, it also funds a share of the base cost.



It is hard to separate base costs with confidence from the national data so instead we have used Masterton to represent the fixed / base costs with variable costs scaled with the inclusion of other councils.

To test the validity of our approach, we compared the results of our benchmarking approach with actual costs for each of the Wairarapa councils.² The results of this are shown in the chart below, it shows:

- Average benchmarked costs were 20% higher than Carterton's actual costs.
- Average benchmarked costs were 9% higher than Masterton's actual costs.
- Average benchmarked costs were 3% lower than South Wairarapa's actual costs.
- At the combined level (simple sum of the above), average costs under our projections were 8% higher than the sum of the individual councils' costs.

This indicates that our benchmarking, while not a perfect fit for the individual councils in Wairarapa, is a reasonable fit at the combined level, producing, if anything, costs that may be conservatively overstated.

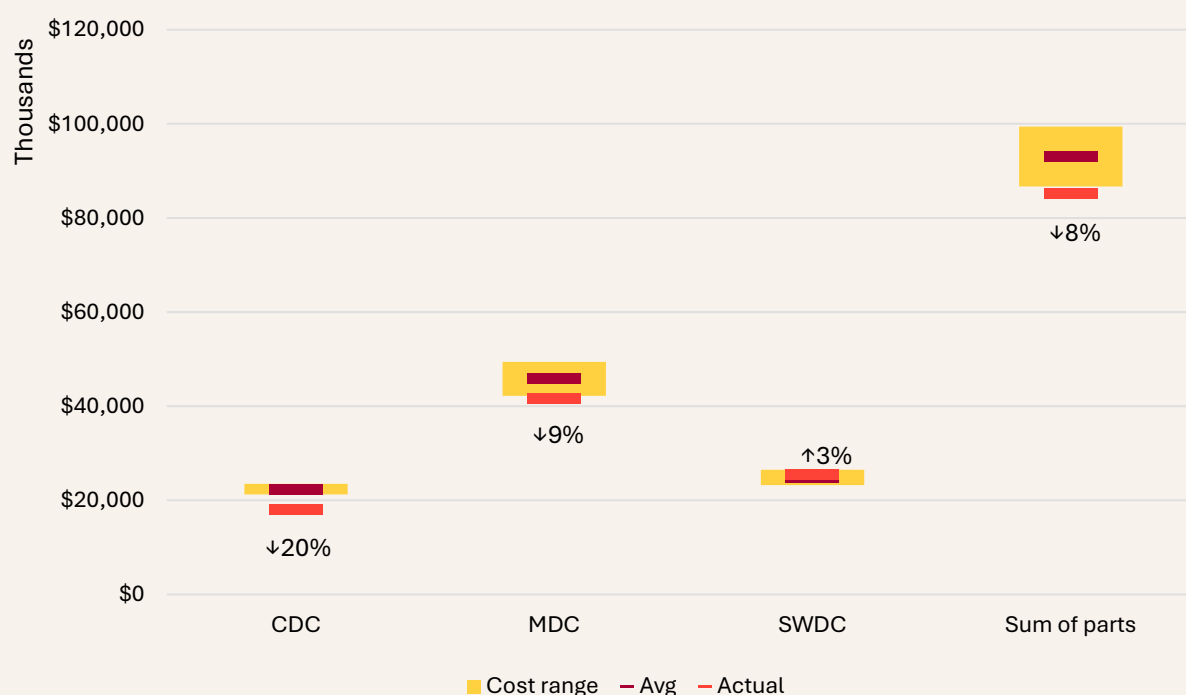


Figure 2 Comparison of benchmarked costs (using identified cost drivers, and actual costs from Stats New Zealand data set - Territorial Authority Functions only (excl 3 Waters))

² For this exercise we used the base costs that were derived from the benchmarking work rather than Masterton's costs. When Masterton's costs are used as the base costs instead, the variance for the sum of the parts reduced to 1%.



How do GWRC's costs for Wairarapa compare to benchmarking across other councils?

We compared our expected costs for a regional council that services the Wairarapa area with the GWRC's estimated cost allocation for the Wairarapa and compared this to the GWRC rates take for Wairarapa. The data shown in the chart below shows:

- When adjusted to reflect GWRC's overall increase in costs in the 2025/26 year, costs allocated to Wairarapa councils are only 3% higher than the top of our benchmarked costs. However, they are approximately 30% higher than the average benchmarked cost, and over 80% higher than the lower end of the benchmark.
- When adjusted to reflect GWRC's overall increase in rates in the 2025/26 year, rates taken from Wairarapa councils are approximately 40% lower (or \$4 million lower) than the lowest of our benchmarked costs.
- Total income (including grants etc) collected from, or relating to services provided in, the Wairarapa is approximately 15% higher than the lowest of our benchmarked costs, and 15% below the average.

The cost range shown in the chart mainly relates to activities grouped as "other activities" in the Statistics New Zealand Local Authority Financial Statistics. The lower end of the range represents GWRC's cost of "other activities" allocated to the Wairarapa councils based on population, while the upper end of the range represents those same costs allocated based on land area. We were unable to identify an obvious cost driver for "other activities" due to the varied nature of the activities contained within that category.

The difference between the high and low end of these costs accounts for \$11 million of the \$17 million cost difference in the band shown.



Figure 3 Estimated costs for regional functions based on national benchmarking compared to GWRC cost allocation



We also compared GWRC costs to small regional councils elsewhere in New Zealand. The costs in the table below exclude any public transport costs (for all councils), which we understand may be delivered through a Council Controlled Organisation.

Councils used in our comparison were chosen as they had the lowest population bases (other than West Coast Regional Council which was excluded due to its geography and relative isolation).

The costs show that the cost allocation from GWRC for services delivered in the Wairarapa exceed the total operating costs for Taranaki Regional Council and are only 7% higher than the total operating costs for Environment Southland.

Table 3 Cost allocation from Greater Wellington Regional Council

	Costs (000s)	Land area	Population
GWRC - Wairarapa share only	\$46,609	5,867	51,400
Taranaki Regional	\$43,182	7,254	130,300
Hawke's Bay Regional	\$68,671	14,138	179,700
Environment Southland	\$49,975	13,1023	104,800

On both a per square kilometre of land basis, and a per head of population basis, the GWRC costs that have been allocated to the Wairarapa Councils are materially higher than the next highest cost regional council that has been compared.

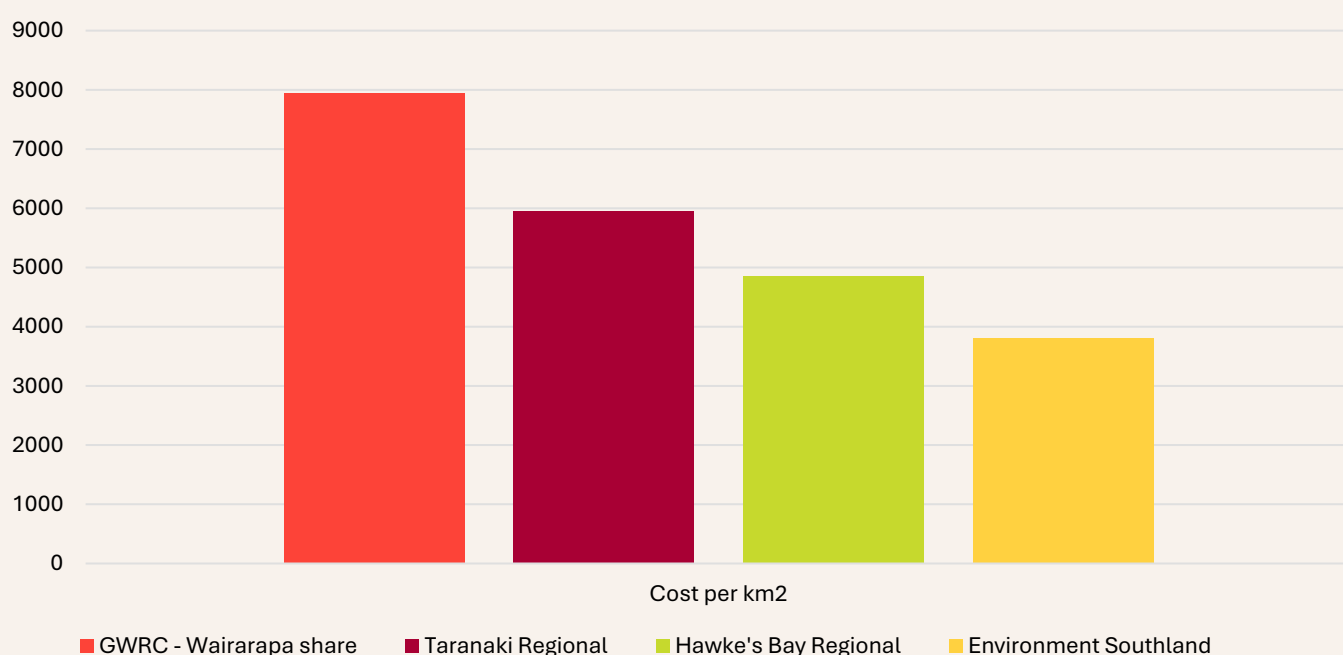


Figure 4 Costs per km² of land excluding public transport

³ Excludes National Park land

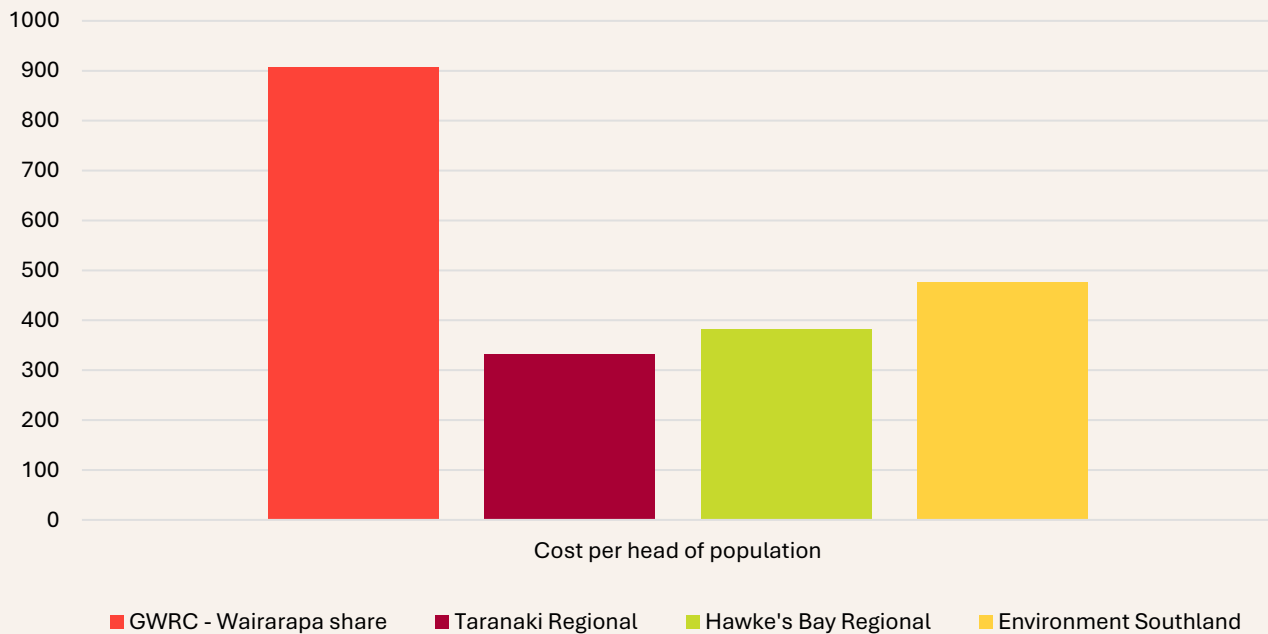


Figure 5 Costs per head of population excluding public transport

Summary of Greater Wellington cost comparison

The combination of our benchmarking approach, and direct comparison with other regional councils shows:

- Based on benchmarking, the costs allocated to Wairarapa by GWRC are between 3% - 80% higher than expected, with an average of 30%.
- On a per square kilometre of land area basis, the costs of GWRC services in Wairarapa are more than 30% higher than the next most expensive council in our sample.
- On a per head of population basis, the costs of GWRC services in Wairarapa are approximately 90% higher than the next most expensive council in our sample.

There may be other reasons why the costs of delivering services in the Wairarapa are higher than elsewhere. However, the combined evidence base would indicate that there is scope for some efficiencies to be achieved through amalgamation and establishment of fit for purpose regional council functions within a Wairarapa unitary authority.



Are unitary authorities cheaper?

The benchmarking approach that we have adopted allows us to consider the combined cost of:

- A territorial authority of equivalent scale to the combined Wairarapa councils.
- A regional council that services a community of the equivalent scale of the combined Wairarapa councils.

While our approach ensures that we do not include costs where clear duplication would exist (primarily governance costs), it does not include any efficiencies that may arise from combining functions or applying an alternative organisational structure.

However, it would be reasonable to expect that a unitary authority would adopt a distinctly different operating model and organisational structure than a simple combination of a regional council and a territorial authority. This is particularly likely in the planning, policy, regulation and consenting functions.

We have considered the extent to which efficiencies may be derived from this reorganisation in two ways:

- By comparing the actual costs of unitary authorities with our benchmarked costs.
- By examining the headcount and organisational structure of unitary authorities compared to GWRC.

Financial analysis

The financial analysis should be reviewed with caution. The four unitary councils that were reviewed are all of a similar scale and share many similar attributes in terms of our identified cost drivers. This means that we cannot identify any relationship between costs and scale among this group independently.

The graph below compares our benchmarked costs for Gisborne District Council, Marlborough District Council, Nelson City Council, and Tasman District Council. It shows that:

- The combined actual costs for a unitary authority in Wairarapa, are higher than the actual costs of Nelson, Tasman and Marlborough District Council (Marlborough District Council is the most similar to Wairarapa in terms of land area and population).
- The combined actual costs for a unitary authority in Wairarapa are lower than the actual costs of Gisborne, which has significant expenditure relating to emergency management and response.
- The benchmarked costs under our modelling are not a good match for the costs in Gisborne.
- Our benchmarked costs typically produce a cost range that is higher than the actual costs in the unitary councils.
- Our benchmarked costs for a unitary authority in the Wairarapa are broadly consistent with the actual costs of Marlborough District Council, Nelson City Council and Tasman District Council.

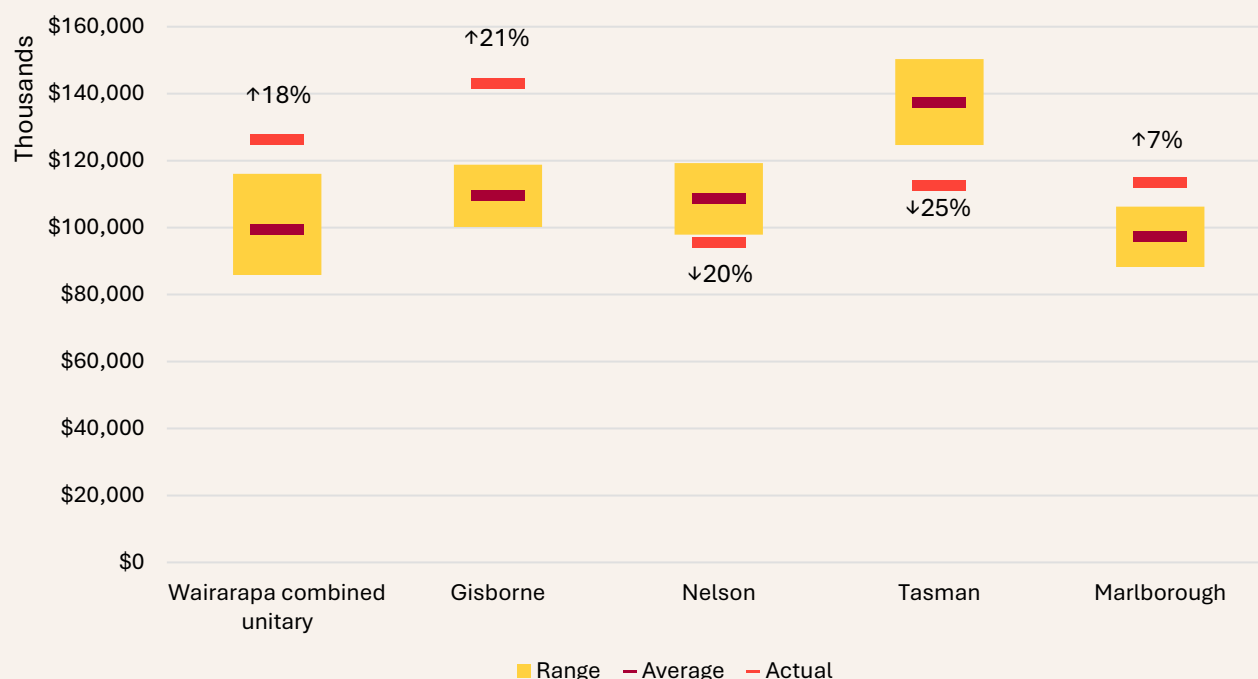


Figure 6 Comparison of unitary authority costs based on benchmarking versus actual costs

In our view, when considered together there may be some evidence that costs to deliver regional council and territorial authority functions through a unitary authority model are lower than they would be expected to be through simple aggregation. However, given the small sample size we would be cautious in drawing strong conclusions from this information.

Consistency between our benchmarked costs for a Wairarapa unitary and the actual costs for Marlborough, Nelson and Tasman gives confidence that our benchmarking is reasonable.

Organisational design and headcount differences

A combined Wairarapa unitary council could be approximately 358-391 FTE staff. This estimate is based on combining the three TA current staffing with an assumed regional component (187 FTE, representing 29% of GWRC's 646 FTE based solely on cost allocation), then applying efficiency reductions of 8-15% for organisational integration, and removing the transport allocation (33 FTE, being 29% of Metlink's 115 staff).

This possible staffing level is comparable to similar unitary authorities: Marlborough (319 FTE), Gisborne (389 FTE)⁴, and Nelson (287 FTE). If a future Wairarapa unitary were to require between 358 and 391 FTE, the staffing ratio would increase to between 6.96 and 7.61 FTE per 1,000 population. That range would place Wairarapa above Marlborough, broadly in line with or above Tasman, Gisborne, and well above Nelson (see Appendix One).

For a Wairarapa unitary, the regional environmental functions would merge with the existing TA associated teams from the Wairarapa. The comparative analysis of organisational structure across available unitary and regional councils suggests that a Wairarapa unitary would be a mid-sized unitary

⁴ Noting Gisborne's FTE is larger due to substantial recovery work. By way of illustration, Nelson's staff numbers have recently increased to 380 to address recovery work (the precise FTE increase is not known).



authority, with meaningful efficiency gains achievable through integrating consenting, compliance, policy, and planning functions across regional and territorial responsibilities as demonstrated, for example, by Marlborough's combined consents and compliance group and policy and planning model.

Further efficiency gains have not been factored into the benchmarking costs analysis done here alongside levels of service because of uncertainties around other costs and decision making.

Is there a reason Gisborne's costs are higher than our model predicts?

Comparison of modelled costs for Gisborne per cost activity, and the actual costs for those same activities reveals that the three most significant cost differences⁵, when compared to the benchmarked costs, for Gisborne are:

Table 4 Comparison of modelled costs for Gisborne

	Actual cost	Benchmarked cost (max)	Difference
Roading	\$32.6 million	\$15.2 million	\$17.4 million
Solid waste	\$29 million	\$9.2 million	\$19.8 million
Property	\$2.1 million	\$11.8 million	(\$9.7 million)

When considering Gisborne District Council's roading and solid waste costs, it is worth noting that Gisborne suffered extensive damage in Cyclone Hale and Cyclone Gabrielle and has a different level of service for solid waste. In particular, with respect to the cyclone, Gisborne District Council's Annual Report notes:

- There were eight bridges destroyed, and 54 bridges that suffered major damage.
- Over 3,000 faults on the roading network were registered, including over 200 major dropouts.
- There was an estimated total damage of \$465 million.
- There was 169,762m³ of large woody debris cleared in 2024/25, with an estimated total cost of \$154 million.
- The annual report notes that expenditure for the Solid Waste activity was \$7.5 million over budget due to the costs of large woody debris removal.
- There has been significant government funding provided to Gisborne District Council to assist with cyclone response work.

There may also be other reasons, such as the relative geographical isolation of Gisborne, that influence costs within Gisborne District. This suggests that:

- Gisborne District Council's costs are likely to be higher than they otherwise would under a "business as usual" scenario.
- Gisborne District Council is not a useful comparator for potential costs for a Wairarapa unitary authority.

⁵ In absolute dollar terms

What could a Wairarapa unitary authority cost?

Based on our benchmarking analysis, we consider that the total costs for a Wairarapa unitary are unlikely to be as high as the combination of the existing costs of each council and the Wairarapa share of regional council costs.

In our view, the data presented demonstrates that our benchmarking will result in a conservative estimate of future potential costs for a Wairarapa joint unitary authority, because:

- Benchmarked costs for the existing territorial authorities in Wairarapa are broadly consistent with the actual observed costs for those same councils.
- When compared to existing unitary authorities, benchmarked costs are typically close to, or higher than, actual observed costs for the same councils.
- The costs incurred by GWRC to deliver services in the Wairarapa are higher than observed in other, small, regional councils. Despite this, the upper end of our benchmarked costs for regional council functions is only 3% lower than the actual costs incurred by GWRC.

While there may be some (limited) scope for further efficiencies in delivery, we do not consider it to be prudent to include these in any cost estimation.

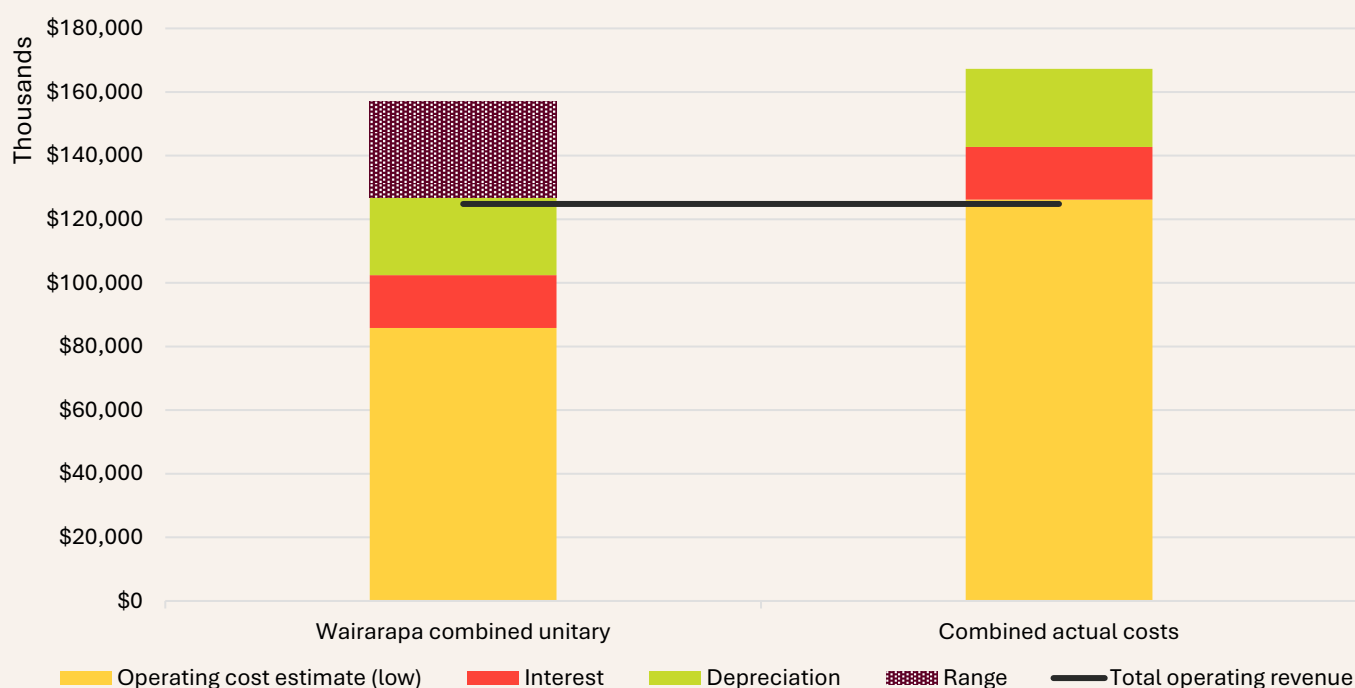


Figure 7 Benchmarked costs for a combined Wairarapa unitary authority compared to rates take

As shown in the chart above, our analysis indicates:

- Total costs for operating a joint unitary authority in the Wairarapa could be between 5% - 30% lower than the combined costs of the three councils plus GWRC's share of operating costs⁶
- The total revenue take from Wairarapa would only need to increase by 2% under the most optimistic scenario if depreciation was to be fully funded. If costs are instead at the upper end

⁶ Note no depreciation expense has been included in either set of costs for GWRC as this data has not been provided. This would impact both scenarios equally.



of our benchmarked cost range, total revenue would need to increase by 25%. In dollar terms, that equates to between \$80 – \$1,200 per rateable property in the Wairarapa.

- Remaining with delivery through the GWRC (or some equivalent future body) would provide opportunities for the Wairarapa councils to continue to receive rates subsidies from areas with larger population bases (as they do currently).

Governance considerations

This section moves to outline the main governance issues that would need to be resolved under a Wairarapa unitary model, including representation, local voice, sub local governance, and any continuing role for shared services or other regional delivery arrangements.

What are the current representation approaches?

The following Table 5 shows the current governance models for the Wairarapa councils:

Table 5 Wairarapa Council's current governance models

Council	General Wards	Māori Wards	Community Boards	Number of Councillors	Population per Member
Masterton District	Yes + at large	Yes	No	8	3618
Carterton District	No	No	No	8	1286
South Wairarapa District	Yes	Yes	Yes	9	1216

There are some similarities in the approaches to governance models adopted by the three District Councils and also some key differences: Two councils have a ward based electoral model, with Carterton representation being elected at large.

- Two councils have Māori wards.
- Only South Wairarapa has community boards and do not use a subdivision model to elect community board members.
- In addition to ward-based representation, Masterton District Council electors elect three additional members at large across the total council area. While this is less common amongst New Zealand territorial authorities there are a significant number who use this model.
- The electoral population per elected member ranges from 1216 in South Wairarapa District Council and 3618 at Masterton District Council.
- The three councils' electors benefit from an ability to access elected representatives than many other councils, due to the lower population to councillor ratio compared with larger cities.⁷
- In South Wairarapa District all residents reside within a community board area.

⁷ By comparison, *Auckland Council* has 20 ward councillors representing a population of about 1.15 million, which is roughly 57,500 residents per councillor.



Comparison with the four small existing unitary councils, Gisborne, Tasman, Nelson, and Marlborough, suggests that a Wairarapa unitary would be operating at a comparable population scale. These councils generally have between 12 and 14 elected members, which provides a useful reference point for thinking about the size of a possible Wairarapa unitary council.

Tasman is the main comparator that uses community boards. This likely reflects its large geographic area, dispersed communities, and strong sub regional differences.

Ward based representation in the comparator councils ranges from 3,606 to 4,531 general electors per representative. A Wairarapa unitary with 13 elected members would sit within a broadly comparable range at around 3,953 electors per representative.

Overall, the comparison suggests there is no single standard governance model for councils of this scale. However, the small unitary councils provide useful reference points for a future Wairarapa unitary authority, particularly in relation to council size, representation mix, and whether any form of sub local representation should be retained.

Why is local voice important?

The Government's Head Start programme includes maintaining local voice as a core assessment criterion. For consideration of a Wairarapa unitary proposal, this means considering how the governance would preserve community identity, provide fair and effective representation, and remain practical to operate. Defined communities of interest necessitate understanding how people identify with place, how they use services, and whether the proposed structure would allow different communities to be represented fairly and effectively.

- The functional dimension focuses on service catchments, travel patterns, employment, shopping, and other day to day interactions.
- The perceptual dimension, residents value local identity and belonging.
- The political dimension, whether a council can represent diverse interests, reconcile tensions, and retain public confidence.

What does this mean for possible models?

A future representation model design would need to decide:

- Whether members are elected at large, by wards, or through a mixed model.
- The total number of councillors and how they are distributed across the area.
- Whether community boards, local boards, or another sub local structure are needed to preserve local voice.
- How Māori wards would be treated as part of the overall design, rather than added later.

The main structural choice is between wards, at large representation, and a mixed model. In general, at large representation suits places with a strong shared identity and compact geography, wards suit places with distinct communities of interest, and a mixed model can help balance region wide leadership with local representation.

The model should support access between residents and elected members, avoid splitting recognisable communities without good reason, and use boundaries that are logical and defensible. Population equity remains important, but it is not the only consideration.



Any representation model needs to explicitly resolve:

- Regional efficiency versus local identity
- Population equality versus community integrity
- Scale versus accessibility
- Technical compliance versus community acceptance.

What are the options for sub-local governance?

There are two types of sub-local governance; community boards and local boards. The key difference is that community boards are used across most of New Zealand and local boards are available to unitary authorities and used only in Auckland Council currently. A territorial authority that assumes the responsibilities and powers of a regional council becomes a unitary authority. There are 110 community boards around the country and 21 local boards in Auckland.

Community boards

Community boards are not a local authority in their own right; they are created at the discretion of the territorial authority and governed under the Local Government Act 2002 Part 4 Subpart 2. They are primarily advisory and advocacy focused to:

- Represent community interests
- Make submissions to council
- Provide local feedback
- Monitor services in their area.

Their decision-making authority is limited and variable as powers are delegated by the parent council and can vary significantly between councils.

Local boards

Local boards can be established as part of the unitary councils “shared governance” model under the Local Government Act 2002, Part 4, Subpart 1A and are a formal part of Auckland Council’s governance structure (Local Government (Auckland Council) Act 2009 Part 2, Section 6).

A local board is an unincorporated body. A local board is not a local authority, a community board, or a committee of a governing body and does not have separate legal standing from the unitary authority and therefore, without limitation, may not:

- acquire, hold, or dispose of property; or
- enter into contracts; or
- appoint, suspend, or remove employees; or
- commence, or be a party to, or be heard in legal proceedings.

They have clearly defined statutory responsibilities and act alongside the governing body (Mayor and councillors).

The intent with local boards is to have a greater and more consistent authority than community boards with:

- Shared governance responsibilities
- Responsibility for local services and decision-making



- Input into regional strategies
- Local boards can also:
 - influence or propose bylaws
 - in some cases, raise targeted rates for local priorities.

They are not just advisory, rather they are part of formal decision-making.

Key differences between the two

The key differences between community boards and local boards are summarised in the table below.

Table 6 Differences between community boards and local boards

Dimension	Community boards	Local boards
Geographic coverage	Most NZ councils	Auckland and Unitary Councils
Legal basis	LGA 2002, discretionary	LGA 2002 and Auckland governance legislation, embedded
Relationship to council	Subordinate, advisory	Shared governance partner
Powers	Delegated, inconsistent	Statutory, more consistent
Decision-making	Limited	Significant local decision-making
Funding influence	Limited	Can influence budgets, targeted rates
Strategic role	Local voice, advocacy	Local governance and delivery

Ultimately the key issue for councils creating unitary authorities to consider when weighing up community or local boards is:

- Do they want a formal structure for local input (community board model), or
- Do they want local decision-making authority (local board model), or
- Do they want a combination of both community boards and local boards to fulfil different communities' needs?

What other delivery options are available for regional services?

If Wairarapa were to become a unitary authority but wished to retain some delivery at a wider regional scale, options are available under the current Local Government Act 2002 including a joint committee, a jointly owned CCO, a lead authority model, or a contracted shared service arrangement.

Like water service delivery there are models which would allow planning and delivery, for example to remain coordinated across a wider geography, while separating other regional functions into a Wairarapa based unitary structure. The most suitable option would depend on whether the main objective is network integration, delivery efficiency, funding alignment, or governance simplicity.

For planning, the current Planning Bill draft requires a single plan for each region, including a regional spatial plan, although the practical implications of what constitutes a region for these purposes will depend on the final legislative settings. On that basis, a key issue for Wairarapa would be whether the current GWRC planning geography remains the most appropriate basis for future planning, or whether a distinct Wairarapa planning area should be proposed. That question is material because planning boundaries influence not only plan making, but also institutional design, accountability, and how land use, infrastructure, and environmental decisions are integrated over time. The legislation is still before

Parliament and may change through the select committee and House processes, so any conclusions at this stage should be treated as provisional.

Some councils are also exploring whether planning functions could sit within a council-controlled organisation. If that approach were considered, it would need to be tested carefully against the wider governance model. There is a risk that layering a regional planning CCO over local boards with sub-regional governance arrangements could blur accountability, weaken the link between local place-based priorities and statutory planning decisions, and create a more complex decision path. For Wairarapa, the stronger design principle may be keeping planning governance as direct and transparent as possible, unless there is a clear case that a different delivery model would materially improve capability, consistency, or regional coordination.

Catchment management and transport are the two key issues to be addressed if a region is changing. The difference with public transport is that it operates under a more specific statutory framework, so the critical issue is not only governance but also who would hold the formal transport role and how Wairarapa would influence decisions. If Wairarapa were to become a unitary authority but retain transport delivery at a wider regional scale, this would likely require a joint governance arrangement alongside a clearly defined lead authority, CCO, or shared service model.

What about hybrid models?

The Future for Local Government review 2023 previously proposed a structure called a combined network approach in which local councils retain place-based leadership and service delivery, while a combined regional council carries out functions that cross local boundaries or require specialist capability, supported by shared services where that adds value.

The combined network model, or broader hybrid or federated models such as the Greater Manchester style approach explained in Appendix Two are not the primary structure being tested through Head Start⁸, even though they still could be relevant as a broader system reform or backstop concept.

Other versions in this vein include Local Leadership Authorities aligned to a major community of interest or sub region and framed as a core part of governance, not a second local governance layer like a local board. These would be led by a Chair and several elected members where some of these members would then sit at the regional level, carrying local voice into regional decisions. A presumption could be made that powers under legislation be part of the conversation to address communities of interest at a sub-regional scale but this would need statutory defined decision-making authority. LLAs are closer to a sub-regional local council within a unitary framework, even though it would not necessarily be a separate legal authority. It is being designed to have:

- Stronger leadership
- Stronger fiscal tools
- More formal decision rights
- A direct role in regional governance
- A wider sub-regional identity base.

⁸ The Department of Internal Affairs Head Start guidance frames the pathway around outline proposals for new unitary authorities, rather than broader hybrid or federated models. See Department of Internal Affairs, *Guidance for Head Start outline proposals* (May 2026), via [Simplifying Local Government](#).



That is stronger than a local board model is usually understood, because local boards operate within a shared governance framework, but this concept is being pushed further towards a more explicit sub-regional decision-making tier.



Appendix One Comparative unitary model council metrics

Metric	Combined TA Wairarapa	Marlborough	Nelson	Tasman	Gisborne
Population	51,400	50,800	54,300	59,900	55,700
FTE per 1,000 population	5.31	6.28	5.29	7.03	6.98
Total land area (km ²)	5,960.3	10,786.0	491.3	9,853.7	8,385.3
Urban land (km ²)	63.3	39.6	72.4	121.8	37.5
Rural land (km ²)	5,826.9	10,419.1	394.0	9,549.7	8,347.6
Population density (residents per km ²)	8.6	4.7	110.5	6.1	6.6
All building consents (five years)	1,976	1,258	1,222	2,372	804
All building consents per 1,000 residents	38.4	24.8	22.5	39.6	14.4
Average annual consents (5 year)	395.2	251.6	244.4	474.4	160.8
Average annual consents per 1,000 residents	7.7	5.0	4.5	7.9	2.9
Road network length (km)	1,927.7	1,517.9	279.6	1,683.5	1,889.4
Road network length per 1,000 residents (km)	37.5	29.9	5.1	28.1	33.9
Rural road length (km)	1,696.9	1,310.7	52.1	1,474.9	1,661.6
Urban road length (km)	230.8	207.2	227.5	208.6	227.8
Urban population	34,908	36,036	50,556	34,134	36,912
Rural population	14,694	13,380	2,028	23,691	14,223
Businesses	6,609	7,380	6,804	7,899	5,703
Businesses per 1,000 residents	128.6	145.3	125.3	131.9	102.4
Dwellings	23,337	24,324	22,626	25,755	19,314
Dwellings per 1,000 residents	454.0	478.8	416.7	429.9	346.8



Metric	Combined TA Wairarapa	Marlborough	Nelson	Tasman	Gisborne
Māori population share (%)	18.5	14.5	11.5	9.6	50.3
Median age	45.0	38.1	44.0	46.8	36.7
Home ownership %	74.6	74.0	71.2	77.4	62.9
Deprivation 1 to 3 %	29.8	13.8	9.4	9.1	5.0
Deprivation 8 to 10 %	25.4	9.5	10.1	12.0	63.5
Animal management requests for service (2024/25)	1,193	2,505	1,245	1,155	1,385
Animal management requests per 1,000 residents	23.2	49.3	22.9	19.3	24.9
Animal management requests per 1,000 registered dogs	97.5	233.5	209.4	92.2	154.4
Registered dogs	12,241	10,726	5,947	12,531	8,968
Registered dogs per 1,000 residents	238.2	211.1	109.5	209.2	161.0

*Some of these are figures taken from the last annual report, others are the average annual activity by 5 year total from Stats NZ



Appendix Two The Greater Manchester Model

The Greater Manchester Combined Authority (GMCA) is a “combined authority” rather than a merged single council or unitary model and therefore is not a model which will be considered as part of the Head Start process.⁵

It consists of 10 constituent councils (each retains full legal autonomy) with 1 directly elected Mayor. The governance body comprises 11 members in total, 10 council leaders (one per council) and the mayor.

This is fundamentally a two-tier model with the local tier where councils retain local services and a regional tier where the combined authority handles strategic functions. This is similar to the current regional/district council model that is being replaced.

The mayor chairs the combined authority and has a direct electoral mandate across the region. The council leaders form the Mayor’s Cabinet and typically lead a policy portfolio (e.g. transport, housing). Decision-making is collaborative and collective with the mayoral leadership layered on top, not replacing councils⁶.

Local councils retain “place-based” services (e.g. waste, local planning, libraries), local accountability and identity, while the combined authority controls strategic, cross-boundary functions such as:

- Transport
- Spatial planning
- Economic development
- Skills and employment
- Housing and regeneration

The GMCA employs over 2000 staff, with around 1500 (72%) working solely for Greater Manchester Fire and Rescue Service. The other 600 are working directly for the Combined Authority. The GMCA has eight directorates:

- Digital
- Education, work and skills
- Economy
- Environment
- Place making
- Public service reform
- Police, crime, criminal justice and fire
- Corporate functions; Finance / Audit / Core Investment; IT services; People Services Procurement & Contracts; Waste; Legal / Governance / Information Governance/Business Support; Strategy; Research; Communications & Engagement

The model creates a functional split between local service delivery and regional strategy and investment. The model is strengthened by central government devolving powers and funding; therefore, it is not just a governance reform but governance, fiscal and functional devolution.

The model emerged from a long history of voluntary collaboration between councils and the desire to act as a single economic region while retaining local democratic identity. The councils had been voluntarily entering into ‘deals’ on key regional decisions.

The model is seen as successful because it preserves local identity while enabling scale, thus avoiding the community and political resistance of full amalgamation. It allows greater co-ordination, alignment and funding for activities like:

- Region-wide transport planning
- Housing growth alignment
- Economic strategy

This is particularly relevant for growth corridors, housing supply and infrastructure integration and providing strong regional leadership where the region can “speak with one voice” to central government. In addition, it enables pooled funding and prioritised regional investment.

While the model is touted as successful, it is not without disadvantages and risks:

- The governance model is complex with multiple layers, local councils, the combined authority and the mayor. This can be difficult to understand and hard to attribute accountability.
- It is dependent on collaboration and trust and works because GM councils had decades of prior collaboration but in other areas there are risks of a stalemate or stalled decisions and conflict among parochial interests.
- There is a question about the democratic legitimacy of a non-elected (except the mayor) leadership group.
- There can be an uneven balance of power from larger or more influential councils.
- There is limited fiscal autonomy as the authority is reliant on central government funding.
- Scale versus local voice tension can still exist.

The Greater Manchester model is more akin to a federation of councils with a shared strategic authority. It is a two-tier model that sits between full amalgamation and loose collaboration that is based on a high level of trust and a strong history of collaboration between the constituent councils.

What the GMCA proves is that regional scale and coordination can be achieved without abolishing councils with strong mayoral leadership. But it is not a simple model and requires high trust and maturity, nor does it eliminate representation tensions.



Appendix Three Representation comparison

Comparative representation for Wairarapa councils (as at 2025).⁹

District	Māori Electoral Population	General Electoral Population	Total Population	Total Members (Current)	Number of General Wards ¹⁰	Number of Māori Wards ¹¹	Number of General Members	Number of Māori Members	Population per General Electoral Member	Māori Electoral Population per Māori Electoral Member	Number of Community Boards	Māori Ward Members ¹²	Māori Ward Members (Rounded)
Masterton District	3,440	25,500	28,940	8	1	1	4	1	3,643	3,440	0	0.95	1
Masterton District (at large)							3		9,647				
Carterton District	690	9,600	10,290	8	0	0	8	0	1,200	0	0	0.54	1
South Wairarapa District	910	11,250	12,160	10	3	1	9	1	1,250	910	3	0.75	1
Total	5,040	46,350	51,390	26	4	2	24	2	8,825	4,350	3	2.24	2
Average	1,680	15,450	17,130	9	1	1	8	1	2,942	1,450	1	0.75	1

⁹ <https://www.lgc.govt.nz/assets/Resources-Representation-Review/MEP-and-GEP-statistics-2025-estimates-2023-base-2025-membership.xlsx>

¹⁰ [Ward 2025 | Stats NZ Geographic Data Service](#)

¹¹ [Ward 2025 | Stats NZ Geographic Data Service](#)

¹² LGC indication of possible proportional calculation of Māori members based on the number of Māori electors to general electors.

Comparative representation for small unitary councils (as at 2025)¹³

District	Māori Electoral Population	General Electoral Population	Total Population	Total Members (Current)	Number of General Wards ¹⁴	Number of Māori Wards ¹⁵	Number of General Members	Number of Māori Members	Population per General Electoral Member	Māori Electoral Population per Māori Electoral Member	Number of Community Boards	Māori Ward Members ¹⁶	Māori Ward Members (Rounded)
Gisborne District	19,900	32,800	52,700	13	1	1	8	5	4,100	3,980	0	4.91	5
Tasman District	2,780	57,100	59,880	14	5	1	13	1	4,392	2,780	2	0.65	1
Nelson City	3,570	50,800	54,370	12	2	1	8	1	4,618	3,570	0	0.53	1
Nelson City (at large)							3		18,123				
Marlborough District	3,900	46,900	50,800	14	3	1	13	1	3,608	3,900	0	1.07	1
Total	30,150	187,600	217,750	52	11	4	45	8	34,842	14,230	2	7.16	7
Average	7,538	46,900	54,438	13	3	1	11	2	8,710	3,558	1	1.79	2

¹³ <https://www.lgc.govt.nz/assets/Resources-Representation-Review/MEP-and-GEP-statistics-2025-estimates-2023-base-2025-membership.xlsx>

¹⁴ [Ward 2025 | Stats NZ Geographic Data Service](#)

¹⁵ [Ward 2025 | Stats NZ Geographic Data Service](#)

¹⁶ LGC indication of possible proportional calculation of Māori members based on the number of Māori electors to general electors.



Comparative community local board representation for Wairarapa councils (as at 2025)¹⁷

District	Community /Local Board Area & Subdivision	Population	Members	Population-member ratio
Masterton District	No communities	28,900		
Carterton District	No communities	10,300		
South Wairarapa District	Greytown Community	4,220	4	1,055
	Featherston Community	3,800	4	950
	Martinborough Community	4,170	4	1,043
	Total	12,190		

¹⁷ <https://www.lgc.govt.nz/assets/Representation-Reviews/Representation-tables-2025-estimates-2023-census-base-2026-boundaries-v2.xlsx>



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