

OBJECTION

The Federal Redistribution 2009
NSW



Objection Number 183

by

Ben Franklin, State Director, National Party of Australia - NSW

33 Pages



4 September 2009

Mr Ed Killesteyn
Electoral Commissioner
Level 3, Roden Cutler House
24 Campbell Street,
Haymarket, NSW 2000

Dear Mr Killesteyn,

Please find attached the objections from the National Party of Australia – NSW to the proposed redistribution of New South Wales federal electoral boundaries.

Yours sincerely,

Ben Franklin
State Director

Introduction

The Nationals accept the overall premise of the Committee's proposed boundaries. In particular, we support the Committee's decision to abolish a metropolitan division and to retain all regional divisions. We do, however, have concerns about the proposed boundaries between certain divisions, and those concerns inform these objections.

As The Nationals are the only party dedicated to representing the interests of regional communities, the focus of our objections are the boundaries in regional areas, especially those affecting the Divisions of Parkes and Calare. However, we have also taken this opportunity to address boundaries in the Illawarra and outer metropolitan areas that we believe should be amended to better represent local communities of interest.

We note that many of the Committee's proposed boundaries either match or bear a strong similarity to those suggested by The Nationals, including Richmond, Page, Cowper, Lyne, Charlton, Shortland, Berowra, Mackellar, Warringah, North Sydney, Bradfield, Mitchell, Wentworth, Kingsford Smith, Sydney, Fowler, Lindsay, Hughes, Cook, Cunningham and Eden-Monaro.

Although the Committee's proposed boundaries for the inner south western Sydney Divisions of Grayndler, Barton, Watson, Banks, Blaxland and McMahon differ substantially from our suggestion, this is a necessary consequence of the Committee's proposal to abolish the Division of Reid, as compared to our submission which proposed the abolition of the Division of Banks.

Notwithstanding this difference, we support the Committee's proposal to abolish a division in this region and have no objection to the boundaries that result from this proposal.

For these reasons, our objections are confined to only a few areas.

While we do not agree with all the other boundaries proposed, we do not believe that our concerns can reasonably be addressed within the context of the overall proposal. For example, we do not support the inclusion of Broken Hill and Albury in the same division, but do not believe that this anomaly can be addressed within the broader framework of this redistribution. Likewise, we do not support the inclusion of St Clair and Erskine Park in Prospect, but do not believe the consequential amendments that would be necessary to resolve this issue can be justified at this stage of the redistribution. This further confines the scope of these objections.

We have therefore sought to focus our attention on those objections that can reasonably be addressed by relatively minor amendments to the proposed boundaries, and recognise that those other objections we have, while serious, are not sufficient to justify the substantial consequential amendments across numerous divisions that would be necessary if they were to be dealt with.

The proposed boundaries to which we object are the boundaries between:

- Calare and Parkes
- Gilmore and Throsby
- Hume and Macarthur
- Macarthur and Werriwa
- Chifley and Greenway

In each case, we suggest alternative boundaries that we submit better represent communities of interest in the area affected.

Significantly, under our proposals the boundaries between all divisions to which we object can be improved without requiring consequential amendments to any other divisions.

We submit that in any case where upholding an objection would require amendments to a division or divisions other than those which are the subject of the objection, the objector must establish a more compelling deficiency in the proposed boundaries than for those which are capable of being addressed by amending only the boundary in the area that is the subject of the objection.

Our detailed objections, the reasons for those objections and suggested amendments follow in the order listed above.

Proposed Divisions of Calare and Parkes

Objection: The boundary between the proposed Divisions of Parkes and Calare does not reflect the best outcome on the grounds of communities of interest or transport linkages. The proposed boundary also needlessly transfers electors between divisions.

Proposed amendment: Transfer those parts of the Mid-Western Regional and Wellington LGAs proposed to be located in Calare to Parkes, and transfer the Parkes and Forbes LGAs to Calare.

The proposed redistribution in Central Western NSW resembles the situation prior to the 2006 redistribution - Calare has returned to the Central West and Macquarie has crossed back into the Hawkesbury. Whilst accepting the premise of the proposal, The Nationals note that none of the major parties advocated this course of action in their submissions, for the reason that it would cause disruption in areas that had seen seismic shifts in electoral boundaries at the previous redistribution.

Section 66(3)(b)(iv) of the Commonwealth Electoral Act 1918 (the Act) provides for the consideration of existing boundaries in the undertaking of a redistribution. Whilst this provision is subordinate to all others listed in the Act, its inclusion ensures that there is a "default setting" for electoral boundaries.

In other words, if there exists no basis under the numerical or qualitative criteria set out under the Act for transferring an area into another division, then that area should be left *in situ*.

Under the proposal, 57.7% of the electors in Calare will be transferred into that division at this redistribution. Almost 15,000 of these electors have been taken from the Division of Parkes, yet that division is proposed to include more than 34,000 electors who are currently in Calare. This means that the 14.8% of electors in the proposed Calare are currently in the Division of Parkes, and have been directly swapped for areas in the existing Division of Calare.

Under the Act an arbitrary swap of this nature is not permissible – the Redistribution Committee must show cause under the qualitative criteria of the Act as to why over 14,000 people in Mid-Western and Wellington have been moved into Calare when there was no numerical imperative to do so. If sufficient cause cannot be established, the Committee must revert to the existing boundaries and leave these parts of Mid-Western Regional and Wellington LGAs in Parkes.

Consequently an equivalent number of electors transferred to Parkes under the proposal must be left *in situ* in Calare.

The Nationals propose that the LGAs of Parkes and Forbes be retained in Calare. We maintain that:

- Parkes and Forbes share much stronger ties with Orange than with Dubbo.
- The part of Mid-Western Regional LGA that is proposed to be transferred to Calare has much stronger ties to Dubbo than to Bathurst and Orange.
- The southern part of Wellington LGA, transferred to Calare under this proposal, has equivalent links to areas in both divisions, and should only be transferred if there is a numerical imperative to do so.
- There is no numerical basis for this transfer – retaining Parkes and Forbes LGAs in the Division of Calare and the relevant parts of Mid-Western Regional and Wellington LGAs in the Division of Parkes does not move either division beyond the allowable deviation from the state mean for either current or projected enrolment.

Despite the superficial attraction of including Parkes LGA in the division of the same name, the guidelines for the naming of divisions specifically advise against the use of geographical references, and the AEC itself recognises that the Division of Parkes is named after Sir Henry Parkes, and not the town. The Redistribution Committee acknowledged this fundamental separation of place and division name when they removed the town from the division in 2006.

Community of interest

Whilst the name Calare has been used ubiquitously for many years as a general term for the region west and south from Orange, it does in fact refer to the Lachlan River. The city of Orange, however, lies outside of the Lachlan Valley (the proposed division barely includes the river at all, utilising it as a boundary with the Division of Parkes for a little over 20km between Bandon and Goolongong). The readiness with which the inhabitants of Orange and its satellites identify with a name that actually refers to the Lachlan Valley highlights the strong community of interest that has historically existed across the region. This community of interest continues today, with societal and commercial ties flourishing between Orange and the areas to its west.

In stark contrast, the ties between Mudgee and Dubbo are such that when the ABC introduced ABC Western Plains in 1992, produced in Dubbo for a community which the ABC thought was not adequately served by the Orange-based ABC Central West, they saw fit to broadcast the new station from Mudgee¹². In doing this the ABC firmly acknowledged the town as part of the Orana community of interest, based around Dubbo, rather than any community of interest based around Orange.

The community of interest links described above are very evident in the organisation of both health services and local government.

Health

Bathurst, Dubbo and Orange Base Hospitals are the major teaching and referral hospitals in central-western NSW. For residents of Parkes and Forbes LGAs, the closest Base Hospital is Orange; for residents of Mudgee the closest Base Hospital is Dubbo. People living in these smaller centres have a clear interest in the governance of their closest Base Hospital, and where possible should be considered for inclusion in the same division.

For example, residents of Parkes who are likely to use Orange Base Hospital in the event of serious illness or injury have a demonstrable community of interest with Orange in that they should be able to lobby their local member of parliament to upgrade the services provided there.

Health facilities are a matter of the utmost importance to the people of regional NSW, who often have to travel long distances for basic services. In recent years the prospect of significant federal intervention in the health system is appearing more and more likely, and the case for the retention of areas which share common health services within the same federal division becomes stronger.

¹ ABC Western Plains Website: <http://www.abc.net.au/local/stories/2008/02/19/2166678.htm>.

² ABC Reception Advice – Frequency Information:
<http://www.abc.net.au/local/stories/2008/02/19/2166678.htm>

Local Government

Regional Organisations of Councils are playing an increasingly significant role in local government, allowing councils with common interests that arise from their geographical locations to pool resources and formulate policy on a regional basis. The two relevant ROCs to this discussion are Orana ROC (OROC), based on Dubbo and the north-west and predominantly incorporating areas in the proposed Division of Parkes; and Central NSW ROC (CENTROC), based on the Central West and incorporating areas primarily in the Division of Calare.

Parkes/Forbes

Parkes and Forbes are active members of CENTROC, with the Parkes Shire General Manager chairing the CENTROC Infrastructure Advisory Group and the Forbes General Manager holding the position of Sponsoring General Manager for the CENTROC Health Work Force Group. In addition, Forbes Shire Council currently holds one of six elected positions on the CENTROC executive³.

Parkes and Forbes Shire Councils also have a long history of working very closely with Cabonne and Blayney Shires and Orange City at a more local level. In 2006 these councils jointly negotiated a contract for a common waste disposal service, and initial discussions were held at the beginning of this year to float the idea of a "Water Supply Alliance" that included Orange, Parkes, Forbes, Blayney, Cowra, Lachlan and Weddin Shires⁴.

Mid-Western

Whilst a former member of CENTROC, Mid-Western sees itself as more closely aligned with Dubbo and the members of the Orana Regional Organisation of Councils (OROC).

In a report to Mid-Western Regional Council's Corporate Services Committee Meeting on June 3, 2009, Council's General Manager recommended that Council join OROC. The report detailed a number of reasons why Mid-Western Regional Council was more aligned with Dubbo and OROC than CENTROC.

"The reason why this report is recommending OROC is as follows:

- Dubbo is the closest city to the majority of this region.
- Health services for this region are based in Dubbo (the Orana region) including most specialist references from Doctors in the area are to Dubbo
- The major Government Departments we deal with are based in Dubbo, such as Planning, Regional Development, and Water and Energy.

³ Central NSW Organisation of Councils: <http://centroc.com.au/>

⁴ "Water supply alliance mooted for Cowra, Orange, Parkes, Forbes", Cowra Guardian 19th Jan. 2009
<http://www.cowraguardian.com.au/news/local/news/general/water-supply-alliance-mooted-for-cowra-orange-parkes-forbes/1410265.aspx?src=rss>

- Council Engineering staff and works Officers form part of the Orana professionals
- A number of the Orana based people travel through this region on their way to Sydney.
- This Council belongs to a number of Orana based organisations such as the Regional Development Board located in Dubbo
- Orana ROC is now refocussing their direction with the appointment of an Executive Officer and by becoming a member; this Council will have an opportunity of inputting into that direction to achieve an effective organisation.”⁵

The report went on to conclude that “A decision to join Orana ROC has considerable merit because of our community of interest, closer proximity and affinity with that part of the region.”⁶

While the final resolution of the Council was that they not join any ROC, the reason given was financial, rather than any repudiation of Mid-Western Regional Council’s strong links with Dubbo and the Orana region. Following the decision, Council’s General Manager made a statement that “[Council] hasn’t been disadvantaged by not being part of a regional organisation of councils so has decided that because we’re in tough economic times we had to make some cost-saving somewhere.”⁷

State and Federal Government Services

The Regional Development Board for the Orana region, Gowest, comprises 13 LGAs. All of its member LGAs are located within the proposed Division of Parkes, with the exception of Mid-Western Regional LGA. The former Orana Area Consultative Committee also covered the same area. In contrast, Regional Development Australia Central West incorporates all of the areas within the amended Division of Calare that we propose, including Parkes and Forbes.

The Home and Community Care program, a major tenet of aged care in NSW, divides the state into smaller local planning areas. Mid-Western Regional LGA is included in the Orana Far West local planning area, with all but three of the LGAs in the proposed Division of Parkes, while Parkes and Forbes LGAs are included in the Central West local planning area, along with Bathurst Regional, Blayney, Cabonne, Greater Lithgow, Oberon and Orange LGAs.⁸

⁵ Mid-Western Regional Council Corporate Services Committee Business Paper, 3 June 2009 pp70-71. http://www.midwestern.nsw.gov.au/mwrcwr/_assets/main/lib70144/corporate%20030609.pdf

⁶ Ibid at p72.

⁷ ‘Council won’t join Orana regional organisation’ ABC News 4 June 2009. <http://www.abc.net.au/news/stories/2009/06/04/2589311.htm>

⁸ ‘HACC Regional Plan 2008-2011: Western Region’ p2 <http://www.dadhc.nsw.gov.au/NR/rdonlyres/39C1876A-27F6-4C70-ABAD-CAD56D4F64E1/4501/HACCRRegionalPlanWesternregion.pdf>

Labour Markets

The Federal Department of Education, Employment and Workplace Relations classes Mudgee as part of the Central Macquarie Small Area Labour Market, centred on Dubbo⁹. The following case study illustrates the direction and size of labour flow in the Central West and Orana regions.

Method

Data from the 2006 Census was analysed in order to ascertain the place of employment of those residents who worked outside their home LGA¹⁰. Percentages used here are proportions of respondents who were recorded as working in an LGA in NSW other than that in which they were resident. For the purposes of this analysis, the LGAs of Bathurst, Oberon, Lithgow, Orange, Cabonne and Blayney were used to calculate statistics relating to the Division of Calare, and the LGAs of Bourke, Brewarrina, Walgett, Moree, Narrabri, Warrumbungle, Coonamble, Gilgandra, Dubbo, Wellington, Narromine, Warren and Bogan were used to calculate statistics relating to the Division of Parkes.

Wellington was counted with Parkes as the majority of its population and places of employment are located within the Committee's proposed boundaries for that division.

Lachlan was not included in calculation of statistics for any division – it is currently split substantially between Riverina and Parkes, and as shall later be demonstrated there exists an argument for the inclusion of some parts of the LGA in Calare.

Forbes/Parkes

Forbes residents working outside their LGA overwhelmingly work in Parkes Shire (over 50%). Of those who work somewhere other than Forbes or Parkes LGAs more than one third work in areas located within the proposed Division of Calare. Most of the remainder work in areas to the south, such as Bland and Cowra Shires. Less than 2% of those who work outside the LGA work in areas within the proposed Division of Parkes.

Being closer to Dubbo, the labour flows from Parkes Shire are a little more balanced. Regardless, more residents of Parkes LGA work in Orange/Cabonne than in Dubbo, and more in areas within the proposed Division of Calare than in the proposed Division of Parkes.

⁹ DEEWR Labour market information portal:

<http://www.workplace.gov.au/lmip/SmallAreaLabourMarketsData/NSW/NorthernFarWNWAndCentralWest/SA/LM/?cid=UnemploymentBySLA%7CNNFW%7C2018%7CSLA%7Canon%7CLabour%20Market&view=table>

¹⁰ Information obtained from ABS Information Consultancy.

Mid-Western

Whilst the numbers of Mid-Western residents working outside the LGA are not exceedingly large, the direction of labour flow indicates a distinct trend towards the proposed Division of Parkes.

Almost twice as many residents of Mid-Western are employed within Parkes as are employed within Calare. Warrumbungle Shire and Dubbo between them account for over one quarter of Mid-Western residents working in other NSW LGAs, with each having more than twice as many as Bathurst, which has the highest number of employees of the LGAs in Calare. In fact, more residents of Mid-Western Regional LGA work in the Sydney City LGA than in any LGA in the proposed Division of Calare.

Water

Water is a very significant issue in the western part of the state – in particular to the Macquarie Valley which forms the heart of the proposed Division of Parkes. The two major storages on the Macquarie system are Lake Burrendong, near Wellington, and Lake Windamere, near Mudgee. These dams were built to mitigate floods and provide a regulated supply of water to landholders downstream of the dams. Retaining this part of Mid-Western Regional LGA in Parkes preserves the economic community of interest that exists along the Cudgegong and Macquarie Irrigation areas north to the Macquarie Marshes. The issues faced by stakeholders in this area are unique and would be best addressed within the context of a single division.

The towns of Parkes and Forbes, on the other hand, are in the Lachlan Catchment, south of the Murray/Darling divide. Here the rivers flow south-west, rather than north, and there exists no common interest in catchment management north with the Macquarie Valley.

Communication & Transport

Local Media

Of the major traditional media sources, television and ABC local radio are the most applicable when determining communication links in this situation. The relevant local newspapers and radio stations in the region tend not to have distribution/listening areas that extend far beyond LGA boundaries, and both the major metropolitan newspapers and The Land are well entrenched across the region.

Of the major television stations, WIN is the only network to deliver separate broadcasts based on Dubbo and Orange. The region is divided according to our suggested amendment to the Committee's proposed boundaries: Parkes and Forbes receiving their broadcast from Orange and Mudgee and Gulgong from Dubbo¹¹.

ABC Central West, broadcast from Cumnock, covers the entire region in question. Indeed according to the ABC the signal from Cumnock is strong enough to include parts of Queensland in its coverage area. As mentioned previously, an outpost of ABC Central West was created in the early 1990s in Dubbo to service the Western Plains, under the callsign 2WPR. Western Plains Radio is now a stand-alone ABC local station, managed and produced in Dubbo. It is broadcast from three locations – Dubbo, Mt Cenn Craich (in the Warrumbungles) and Mudgee¹².

The significance of this is twofold. First, it establishes a very strong communication link between Dubbo and Mudgee, especially given the importance of ABC Local Radio as a media source in regional communities. Second, the fact that the ABC saw fit to transmit a new radio service from Mudgee that was unique to Dubbo and the Western Plains firmly demonstrates the recognised community of interest that exists between these areas.

Parkes and Forbes, in contrast, are not serviced by ABC Western Plains.

¹¹ WIN Television: http://www.wintv.com.au/national/user/localisation_map

¹² ABC Reception Advice - ABC Transmitter Frequencies: <http://www.abc.net.au/reception/freq/>

Road Distances to Major Centres

Distances from Mudgee

Dubbo	126km
Bathurst	129km
Orange	185km

Distances from Parkes

Dubbo	120km
Orange	100km

Distances from Gulgong

Dubbo	109km
Bathurst	157km
Orange	174km

Distances from Forbes

Dubbo	150km
Orange	120km

For the purposes of calculating distances between Dubbo and Mudgee, the sealed route of shortest distance has been used. This route follows the Golden Highway, Gollan, Goolma and Guntawang Roads to the Castlereagh Highway north of Mudgee. It is commonly used as a thoroughfare from Dubbo and areas further out to Sydney.

As demonstrated in the tables above, Parkes and Forbes are indeed closer to Orange than Dubbo, and Mudgee and Gulgong closer to Dubbo than to Bathurst and Orange (Gulgong substantially so).

Lithgow has not been included in this comparison as with a population of 11,298 at the 2006 Census, it can hardly be considered a major centre for residents of Mudgee (pop. 8,249). Dubbo, Bathurst and Orange all have populations roughly three times this size. At any rate, Lithgow and Bathurst are both roughly equidistant from Mudgee and Gulgong.

When considering transport links it is also important to note the location of these areas in relation to major arterial roads to and from Sydney. Whilst Parkes and Forbes are connected to Dubbo by the Newell Highway, the volume of through traffic between the towns en route to capital cities at the end of the highway is minimal since residents of the Central West generally travel to Sydney in preference to either Brisbane or Melbourne. Orange on the other hand is located en route to Sydney from both Parkes and Forbes, and as such is an important part of the region's transport links.

Whilst none of the major centres in either division lies between Mudgee and Sydney, it bears mention that residents of Dubbo and areas to its north-west are increasingly travelling via Mudgee on their way to Sydney as an alternative to the Mitchell and Great Western Highways. The distances are roughly equivalent (254km via Mudgee as opposed to 268km via the Mitchell) and the lack of built up areas on the route through Mudgee generally ensures shorter travel time. The importance of Mudgee as a transport link from the Orana region to Sydney was mentioned by the General Manager of Mid-Western Regional Council in a report cited previously in this objection.

Although marginally closer to Orange, the major population centres in the southern part of Wellington LGA are less than one hour's drive from Dubbo.

Public Transport

Forbes/Parkes

Parkes and Forbes are linked to Orange by the following Countrylink services¹³:

- Sydney XPT Bus (daily to/from Parkes, four times per week to/from Forbes)
- Rail Bus (six times per week)
- Outback Explorer Train (weekly, to/from Parkes only)

Parkes and Forbes are linked to Dubbo by the following Countrylink service:

- Melbourne XPT Bus (three times per week).

That Parkes and Forbes are so well linked to Orange by public transport should come as no surprise: Parkes lies on the Transcontinental Railway Line, still a major national transport corridor and historically one of the principal rail lines operating in the west of the state. Dubbo and most of the old railway towns located in the Division of Parkes such as Nevertire and Narromine are connected by the Main Western Line, a separate radiating artery which meets the Transcontinental Line at Orange.

These lines were in place well before 1900, and as such proved deterministic in defining community of interest in western NSW. When they were built, the railway lines were the social and commercial lifeblood of the region, and trade and travel flourished along the them.

Present services across the west of the state still abide by these divisions, with Orange, rather than Dubbo retaining its place as the principal destination of the Countrylink coaches which are the most common form of public transport in Parkes and Forbes.

Mid-Western

Due to the radial nature of Countrylink services, public transport to and from Mudgee/Gulgong to the Central West is severely limited.

In theory, services from Mudgee link with Western Line Services to these centres at Lithgow. In practice, the lack of coordination of services means that the shortest trip time between Bathurst and Mudgee is 3 hours and 23 minutes (on Fridays only), more than twice the time required to travel between the two towns by car. The only services from Mudgee to Bathurst available every weekday take 5 hours and 38 minutes. Orange and Dubbo are even more inaccessible.

However, Mudgee does play a role as a major public transport link to areas in Warrumbungle Shire (which is retained in the proposed Parkes), who utilise the Gwabegar Line services that run through Mudgee for travel to and from Sydney. In fact with regard to public transport, Warrumbungle Shire is much more closely linked with Mudgee than with Dubbo.

¹³ All Countrylink timetable information current at 4th September 2009.

Physical Features/Area

Area

In our previous submissions to the Committee, The Nationals have expressed concern that the size of electorates in the west of the state might become so large as to dilute community of interest inside their boundaries. We note:

- That the area of the proposed Parkes is approximately 296,000 km²
- That this area is nearly 100,000 km² smaller than that proposed by the Australian Labor Party in their submission to the Committee.

The Nationals contend, as per our initial suggestions, that the remote areas of the state should ideally be distributed between three or perhaps four electorates, and are disappointed that Calare has been stripped of its remote component. However, we accept that given the premise of the redistribution proposal, particularly the restoration of Lithgow to Calare, the inclusion of substantial areas of western NSW in that division is not feasible.

We therefore accept that the size of the proposed Division of Parkes is reasonable under the circumstances, but would caution that any further modifications to the boundaries of that division which significantly increase its size would be detrimental to the representation of community of interest within the division.

The approximate size of the areas affected by this objection are as follows:

- Combined Parkes/Forbes: 10,675 km²
- Combined Mid-Western/remainder Wellington: 9,500 km²

Leaving Mid-Western and the remainder of Wellington in the Division of Parkes, and excising Parkes and Forbes will lessen the size of that division by no more than half of one percent. The changes proposed in this objection therefore have no significant impact upon the geographical size of either electorate.

Physical Features

Dubbo is not separated from either Parkes/Forbes or Mid-Western Regional LGA by any major physical features.

Comparison must therefore be made in this case between the country separating Mid-Western Regional LGA from the major centres in the proposed Calare, and that separating those same major centres from Parkes and Forbes LGAs.

The terrain between Orange and Mudgee is rugged hill country with few roads and sparse population. The area is bisected by the Macquarie River which forms a definitive natural boundary. There are few river crossings between Bathurst and Burrendong Dam. Passage along the Long Point Road (accessible only by 4WD), the shortest link between Orange and Mudgee by distance, is limited to times of low flow in the Macquarie River. For this reason traffic between Orange and Mudgee generally passes through Wellington, some distance to the north-west.

In short, there is a significant natural divide running through the Committee's proposed Division of Calare.

In contrast, the hills between Parkes/Forbes and Orange are much more closely settled. The towns of Manildra, Eugowra and Canowindra are strongly linked with both Orange to the east and Forbes and Parkes to the west, and provide a continuity of population that does not exist between Orange and Mudgee.

Secondary Numerical Considerations

In the preceding discussion we have provided thorough and detailed evidence addressing the qualitative criteria of the Act and demonstrating the importance of retaining Parkes and Forbes in the Division of Calare, and retaining in the Division of Parkes those areas proposed to be transferred to Calare.

We note that under the proposed redistribution the Committee has seen fit to place Parkes in the upper quartile of divisions in terms of both current and projected enrolment. It is not alone - the five divisions with the lowest projected growth in enrolment make up five of the top nine divisions by projected enrolment.

If these divisions have deliberately been placed above average enrolment, there may be two explanations. Either the Committee is unsure about its enrolment projections for these low-growth areas or it wishes to ensure that in the event of future redistributions in NSW, the changes required to bring these divisions within numerical tolerance would not be as radical as if they were left with lower projected enrolments at this redistribution.

Whatever the reason, there appears to be a deliberate effort to boost enrolment in these divisions, and the underlying logic must be even more powerful for Parkes which has a projected enrolment growth of less than a quarter of the next lowest division.

Whilst The Nationals recognise that the Committee appears to have a motive for placing the Division of Parkes above average enrolment, we caution that this must not occur at the expense of community of interest, physical features and area, means of transport and communications or the continuity of current boundaries.

The retention of Mid-Western Regional LGA (Part A) and the remainder of Wellington LGA in the Division of Parkes in place of Parkes and Forbes LGAs (as proposed in this objection) results in a net transfer of 1,893 electors (2012) to the Division of Calare.

It must be stressed that both Divisions remain well within the 3.5% margin of tolerance at the projection time.

However, if the Committee holds the view that there should be as many electors in the Division of Parkes as possible, The Nationals suggest two alternative options:

Option 1: Transfer of the northern part of Parkes LGA into the Division of Parkes.

Net Gain to Parkes (2012): ~1,000 electors

Under this option the northern areas of Parkes LGA, including the towns of Peak Hill and Tullamore, are transferred to the Division of Parkes. Both towns are considerably closer to Dubbo than are the towns of Parkes and Forbes, and both share community of interest links with areas to their north.

Tullamore is closely linked to both Narromine and Dubbo, being closer to the former than to Parkes and closer to the latter than to Orange. It shares close proximity and community of interest to other towns on the Bogan River flood plain such as Albert and Tottenham.

Peak Hill is located little more than 70km from Dubbo, and as such is closely connected with its northern neighbour and surrounding towns such as Narromine. In school sports both Peak Hill Central School and St. Joseph's Catholic School (Peak Hill) compete in school sports competitions with the Macquarie Valley towns of Narromine, Trangie and Warren rather than Parkes and Forbes.

Peak Hill Central School is also part of the Western Access Program, a secondary distance education program that includes Trangie, Tottenham and Tullamore.

Ultimately these two towns could conceivably be included in either Parkes or Calare. However, if the Committee desires to keep enrolment in Parkes towards the upper end of the allowable range, we suggest that they be transferred to that division.

Option 2: Transfer of the remainder of Mid-Western Regional LGA (Part B) into the Division of Parkes.

Net Gain to Parkes: ~1,950 electors

Obviously by virtue of their location in the same LGA it is well understood that Kandos and Rylstone have strong community of interest links with Mudgee. Their inclusion in Hunter is due in no small part to the recent completion of the Bylong Valley Way which links these towns to the Hunter Valley.

Although this has improved transport links to the extent that the Committee has seen fit to include Rylstone and Kandos in Hunter, the fact that these two areas were until recently not connected by sealed road indicates that the community of interest between them is not as strong as between these areas and Mudgee.

Due to numerical constraints an amendment of this kind would necessitate the transfer of Liverpool Plains LGA from New England to Hunter. We note that the majority of Liverpool Plains LGA is located in the State Electoral District of Upper Hunter, and recommend that if this option were to be adopted, the boundary between the State Electoral Districts of Tamworth and Upper Hunter be utilised as the boundary between Hunter and New England. Liverpool Plains LGA has commonalities with both Tamworth and Gunnedah to the north and the Upper Hunter Valley to the south – in fact it was not included in the Division of New England until 2006.

That said, the Liverpool Plains do enjoy strong links with Tamworth and Gunnedah, and the cost to community of interest of this move would need to be considered against the benefits to community of interest and the future stability of the Division of Parkes that would be associated with the reunification of Rylstone and Kandos with the remainder of Mid-Western Regional LGA in Parkes.

Growth

If stability in the face of future redistributions is indeed a consideration, the key drivers of growth in the Division of Parkes cannot be ignored.

The Nationals, when commenting upon the Australian Labor Party's suggestions for this redistribution, took issue with the composition of their suggested Parkes. We noted that:

"A Parkes that is moved from its growth base in the south and east will continue to experience population growth at a slower rate than the rest of the state, undermining the stability of the redistributed boundaries into the future."

The Division of Parkes under the current proposal is of similar concern in that it effectively removes the main centres of growth from the division (outside of Dubbo). The projected growth in enrolment for Parkes over the period to 2012 is 0.53%, by far the lowest of any division in the state (the next lowest is Cunningham at 2.27%, the median 4.05%).

In its proposal for the 2008 Redistribution of Western Australia, the Redistribution Committee "sought to construct divisions so that each contained localities with projected positive growth to ensure sustainability over the projection period."

In the opinion of The Nationals, the removal of the growth areas of Mudgee and Gunnedah from Parkes has negative implications for the future sustainability of the division. The restoration of Mid-Western Regional LGA to the Division of Parkes, in exchange for Parkes and Forbes LGAs, as proposed in this objection, addresses this issue.

The combined projected enrolment growth (to 2012) of those parts of Mid-Western Regional and Wellington LGAs included in the Division of Calare under this proposal is 2.8%. In contrast, the projected growth for Forbes and Parkes LGAs is only 0.5% (See Figure 1). The inclusion of Mid-Western Regional LGA and the remainder of Wellington LGA in the Division of Parkes would help to ensure that the division remains viable into the future, and potentially lessen the extent of future boundary changes in the area.

Nowhere in the Act is the Committee given license to manipulate enrolment numbers to the detriment of the qualitative criteria of the Act, except to comply with the 10% and 3.5% margins of allowance prescribed by the Act.

However if the Committee wishes to ensure a higher than average enrolment in the Division of Parkes, we contend that:

- the growth rate of the areas in question should be taken into account, and
- there are other options, as described here, that ensure the future stability of the Division of Parkes yet better fulfill the requirements of the Act with regard to community of interest, means of transport and communications, the physical features within the division and continuity of current boundaries.

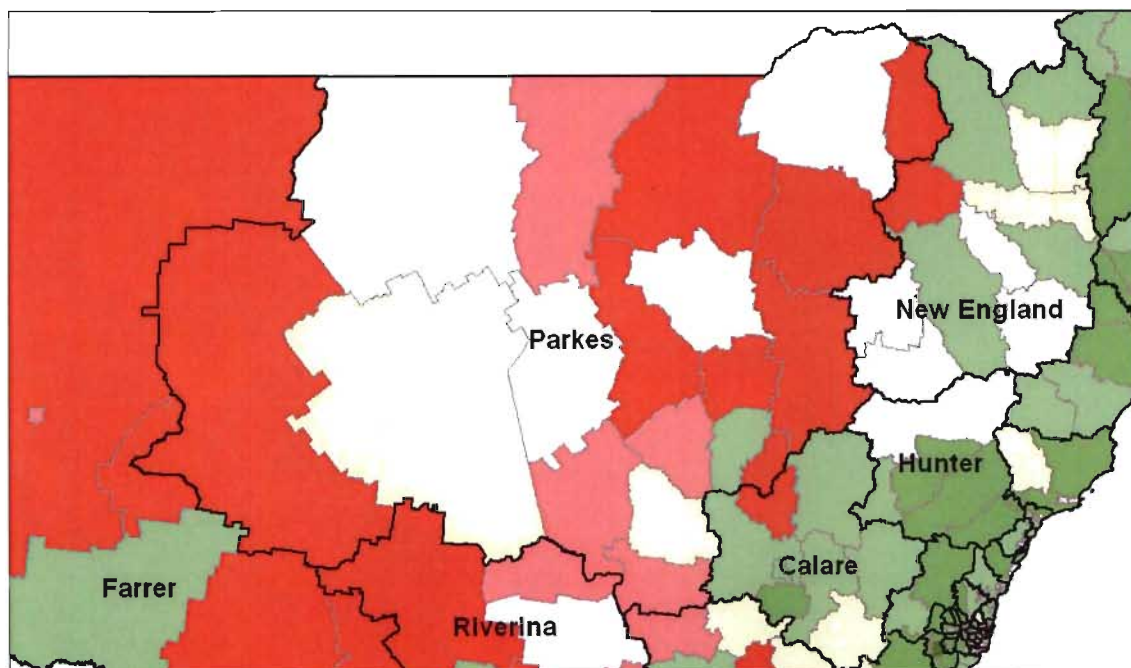


Figure 1: Projected Enrolment Growth to 2012 by LGA.
Negative growth is shown in red, positive growth above 2% in green.

Conclusion

If, as proposed by the Committee, Parkes and Forbes LGAs are to be transferred to the Division of Parkes, and Mid-Western Regional LGA and the remainder of Wellington LGA to the Division of Calare, a burden of proof is placed upon the Redistribution Committee – there must be sufficient grounds in terms of delivery of qualitative outcomes or the satisfaction of numerical criteria as specified by the Act to override the provision to ensure continuity in electoral boundaries.

Even under a *ceteris paribus* assumption, in which the net gain to other criteria such as community of interest and enrolment is zero, according to the Act Mid-Western Regional and Wellington LGAs must be retained in the Division of Parkes, and Parkes and Forbes LGAs in the Division of Calare.

The Nationals contend that the criteria in the Act do not justify the change in boundaries and that there in fact exists a strong case under these criteria for the retention of Mid-Western Regional and Wellington LGAs in the Division of Parkes, and of Forbes and Parkes LGAs in the Division of Calare.

The arguments addressed by this objection were as follows:

Numerical Criteria

The redistribution proposal, modified as suggested above, would still meet the numerical requirements of the Act.

Community of interest

- Mid-Western has a stronger community of interest with Dubbo and the areas to its north than with Bathurst or Orange.
- Parkes and Forbes share stronger community of interest ties with Orange and Cabonne than with Dubbo.
- The areas in the south of Wellington Shire have ties to both Orange/Cabonne and north to Dubbo and Wellington, and could be accommodated in either of the Divisions of Parkes or Calare.

Means of communication and transport

- Mudgee is roughly equidistant from Dubbo and Bathurst by road. Gulgong is roughly 50km closer to Dubbo than to Bathurst.
- Parkes and Forbes are both closer to Orange than to Dubbo and are both much better connected by public transport to Orange.
- The only major media/communications divides in the region – WIN local news and ABC Local Radio – include Mudgee in Dubbo broadcasts and Parkes/Forbes in Orange broadcasts.

Physical features and area

- The two areas in question are roughly equivalent in size. Exchanging one for the other would have a negligible effect on the area of the Divisions of Parkes and Calare.
- The Macquarie River and surrounding ranges form a natural barrier between Orange/Bathurst and the Cudgegong Valley. Parkes and Forbes, in contrast, are easily accessible from the main population centres in Calare.

We acknowledge the apparent desire of the Committee to ensure higher enrolment in those divisions projected to have low enrolment growth over the projection period.

Whilst we maintain that such considerations must always be subordinate to the provisions of the Act, we have demonstrated that options exist by which the Committee could deliver future stability for the Division of Parkes whilst better complying with the requirements of the Act.

Condobolin

Once Parkes and Forbes LGAs have been retained in the Division of Calare, the Committee may wish to consider the inclusion of the central part of Lachlan Shire (incorporating Condobolin) in that division. Arguments can be made for its inclusion in either the Division of Parkes or Calare – it is roughly equidistant from both Dubbo and Orange, although it shares more community links with the Central West.

We suggest that if the Committee does see fit to retain Condobolin in the Division of Calare, the boundary of the two divisions through Lachlan Shire should be that employed as the boundary between the State Electoral Districts of Lachlan and Murray-Darling at the 1998 State Redistribution. The northern parts of this shire are much more strongly linked to Dubbo than Orange.

Numerically, moving Condobolin into the Division of Calare would necessitate the transfer of Peak Hill and Tullamore into the Division of Parkes. This is a feasible option, the merits of which have been discussed previously.

Proposed Divisions of Throsby and Gilmore

Objection: The proposed boundary between the Divisions of Throsby and Gilmore needlessly splits a significant community of interest near the Shellharbour CBD, and places the majority of the Wingecarribee LGA in a division with which it shares few common characteristics.

Proposed Amendment: Retain the whole of the Shellharbour LGA in Throsby and transfer the Kiama LGA (except Gerringong and Gerroa) to Throsby. Transfer to Gilmore that part of the Wingecarribee LGA proposed to be transferred to Throsby.

Shellharbour divided

Under the current boundaries, the division of Throsby encompasses the whole of the Shellharbour LGA. This represents an obvious community of interest, which is strongest in the most substantially developed area of the LGA around the Shellharbour city centre. It is through this area that the proposed divisional boundary between Throsby and Gilmore has been drawn.

While the Committee's intention to move additional voters into the south coast is understandable, the manner in which it has been attempted does not satisfy the communities of interest test under the Act.

The Shellharbour LGA can very easily be incorporated into a single division by extending the boundary of Throsby to the south, and transferring that part of the Wingecarribee LGA proposed to be located in Throsby to Gilmore. To achieve numerical tolerance, Throsby would need to incorporate more of the Kiama LGA than it does on the current boundaries, extending south so that the boundary between Gilmore and Throsby is to the north of Gerringong and Gerroa.

We contend that there can be no justification for splitting Shellharbour at the edge of the CBD when a viable alternative exists that ensures an equivalent transfer of electors into the south coast while both Gilmore and Throsby achieve an enrolment that meets the numerical requirements, but does not disrupt the community of interest within Shellharbour. No other divisions would be affected by this simple amendment.

That a community of interest exists within the suburban area immediately surrounding the Shellharbour city centre is self-evident. It forms part of an uninterrupted suburban sprawl, sharing the same services and facilities; it is reasonably well-served by public transport, with several bus routes crossing the proposed divisional boundary; it looks to Wollongong as its regional centre and encompasses a significant Macedonian ethnic population.

To take the southern suburbs of Shellharbour and divide them from their neighbouring suburbs while uniting them with Nowra and Ulladulla, (which are located 50km and 115km respectively to the south and with which they do not share common community characteristics), would only be viable if it were the only way by which to meet the numerical requirements set down in the Act. That is not the case in this instance.

As well as the community connections that necessarily flow from the proximity of the Shellharbour suburbs with one another, there are other characteristics that tie the community together and set it apart from both the Shoalhaven and Wingecarribee LGAs.

First, there is a significant proportion of housing in the Shellharbour LGA provided by the Department of Housing. More than 30% of rented dwellings in Shellharbour are managed by the Department of Housing, compared to just 11.8% in Wingecarribee and 15.0% in Shoalhaven¹⁴. In addition, there is a higher proportion of rented dwellings in Shellharbour than in Wingecarribee or Shoalhaven.

Shellharbour also has a significant Macedonian community, which is not present in either Shoalhaven or Wingecarribee. This community is fairly evenly spread within the suburbs around the Shellharbour city centre, and would be split in half by the proposed boundary between the divisions of Gilmore and Throsby.

As the maps overleaf demonstrate, there is a substantial Macedonian community (shown in red) in Shellharbour itself, and across the Shellharbour and Wollongong LGAs, with a small number in Kiama as well. However, in Wingecarribee and Shoalhaven, there are almost none.

The darkest red CCDs are those with 11-36% Macedonian populations. As can be seen (by the green divisional boundaries), this community is dramatically divided by the Committee's proposed boundary through Shellharbour.

¹⁴ Australian Bureau of Statistics 2006 Census Data Packs – Basic Community Profile Release 2, CD-ROM, ABS, Canberra

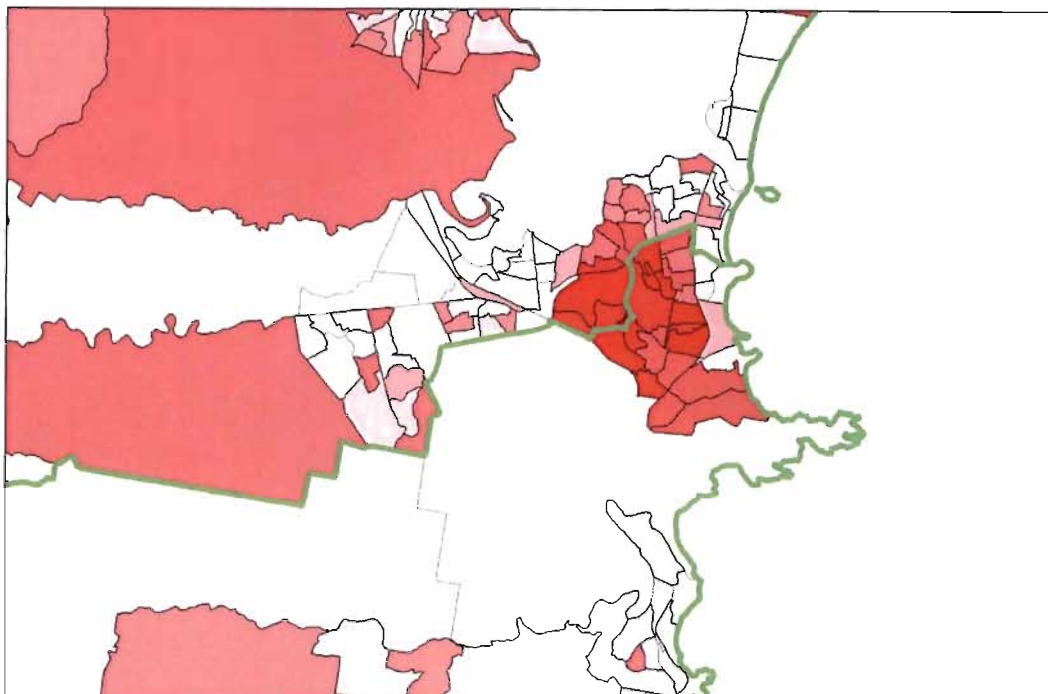


Figure 2: Shellharbour – Proportion of residents of Macedonian Ancestry
 CCDs shown in red have more than 1% of population identifying as Macedonian¹⁵

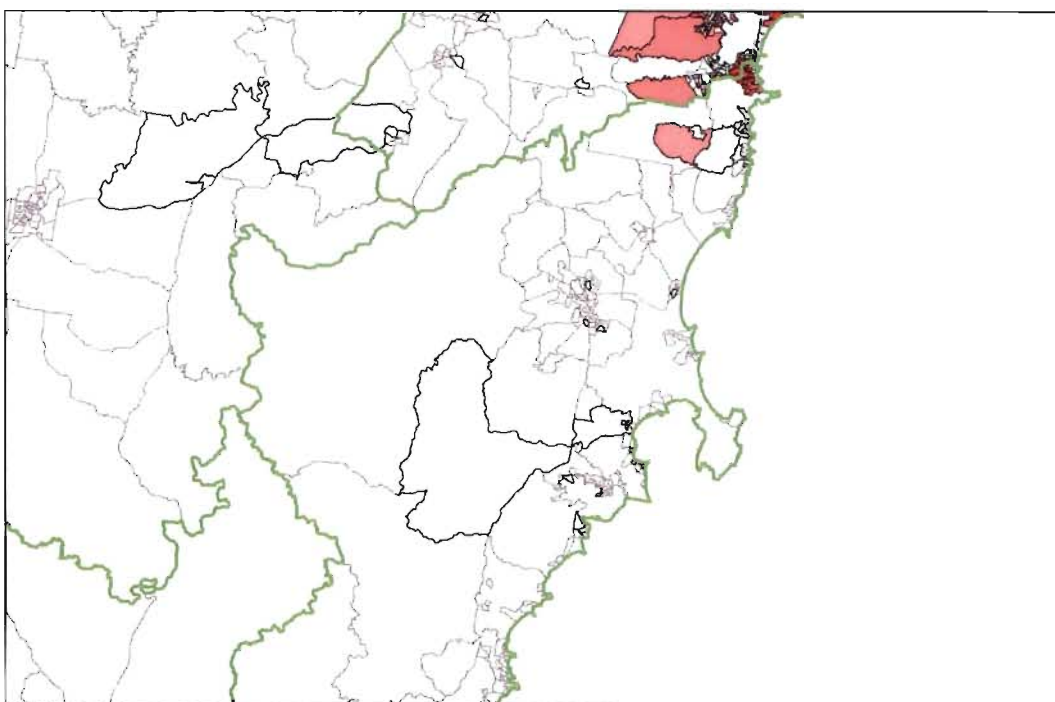


Figure 3: Gilmore/Throsby - Proportion of residents of Macedonian Ancestry

¹⁵Source: Australian Bureau of Statistics 2006 Census Data Packs – Basic Community Profile Release 2, CD-ROM, ABS, Canberra

Wingecaribee and Shoalhaven: A common community profile

We do not seek to assert that there is a substantially stronger link between the community of the southern highlands with Nowra than Shellharbour. However, at the same time it cannot be said that there is a stronger link with Shellharbour – there is little to connect the southern highlands community closely with either of its neighbours.

Both Nowra and Shellharbour are roughly equidistant from Bowral, Moss Vale and Mittagong, and there are similar travel times involved regardless of whether the destination is Shellharbour or Nowra. There are state roads linking the communities for the length of both routes.

The overall links between the southern highlands and both neighbouring areas are similar. They fall within the same Regional Organisation of Councils, the same Department of Education region, the same Catholic Diocese, and have many other loose associations. But whether this part of the southern highlands is in Gilmore or Thorsby, that division will be characterised by two independent communities.

Although there are no substantial links between Wingecaribee and either Shellharbour or Shoalhaven, the general community profile of Wingecaribee more closely relates to that of Shoalhaven than Shellharbour. The population density of the Wingecaribee LGA is 15.7 people per square kilometre.¹⁶ This compares favourably to the population density of the Shoalhaven LGA (19.5 per square kilometre¹⁷), and stands in stark contrast to the Shellharbour LGA, which has a population density of 410 people per square kilometre.¹⁸

The contrast is made even stronger when it is recognised that the vast majority of the population of Shellharbour live in the suburban east of the LGA – the very part of the LGA the Committee propose to divide between the divisions of Thorsby and Gilmore.

The distribution of population in the Wingecaribee and Shoalhaven LGAs is also very similar. While the population of Shellharbour is concentrated in the eastern suburbs of Shellharbour and surrounds, both Wingecaribee and Shoalhaven are characterised by numerous small towns and substantial surrounding rural areas. Both also have more than one major population centre – Nowra/Bomaderry and Ulladulla in Shoalhaven and Bowral, Moss Vale and Mittagong in Wingecaribee.

Wingecaribee and Shoalhaven LGAs both have viable agricultural sectors operating within their boundaries, while in Shellharbour LGA there is almost no rural production any more. According to ABS data¹⁹, there are just 12 businesses in agriculture, fisheries and forestry that have employees in the Shellharbour LGA, and every one of them has

¹⁶ Pop. 42,272 (2006 Census) / Area 2,689 sq. kms (NSW Department of Local Government)

¹⁷ Pop. 88,405 (2006 Census) / Area 4,531 sq. kms (NSW Department of Local Government)

¹⁸ Pop. 60,337 (2006 Census) / Area 147 sq. kms (NSW Department of Local Government)

¹⁹ 2007, Counts of Australian Businesses, including Entries and Exits, 2003-2007 (cat. No. 8165.0)

fewer than five employees. Of the remaining 2,940 businesses in Shellharbour, a further 87 are defined as being agriculture, fisheries and forestry businesses which do not have employees. By comparison, both Shoalhaven and Wingecarribee LGAs have viable agricultural industries. In Wingecarribee, 13.4% of all businesses are in agriculture, fisheries and forestry. In Shoalhaven, the figure is 8.5%.

The age structure of the communities in the various LGAs is also telling. At the 2006 Census, the median age in both Shoalhaven (44) and Wingecarribee (42) was well above the national average (37), whereas in Shellharbour it was below the national average at just 35. The Wingecarribee and Shoalhaven LGAs have substantial ageing issues in common, with 31.9% and 35.2% of their respective populations aged 55 and over. These figures are significantly higher than the national average (24.3%), which is itself higher than the rate in Shellharbour (23.0%).

As a necessary consequence of the higher age structure in Wingecarribee and Shoalhaven, Shellharbour has a much higher proportion of pre-school and school aged children. Education is therefore a more significant issue within Shellharbour than the Wingecarribee and Shoalhaven LGAs.

While the southern highlands are undeniably a distinct community from those on the south coast, and linkages between the communities of the south coast and southern highlands are not strong, it is appropriate to enclose like communities within a single division.

For that reason, Wingecarribee and Shoalhaven are a far more appropriate combination than Wingecarribee and Shellharbour. Despite the commonalities of those areas, it is the substantial impact of dislocating the Shellharbour community that is the most compelling reason for amending the Committee's proposed boundaries of the Divisions of Gilmore and Throsby.

Proposed Divisions of Macarthur and Hume

Objection: The inclusion of Theresa Park, Brownlow Hill and part of Mt Hunter in Macarthur does not meet the community of interest test in the Act.

Proposed Amendment: Transfer to Hume the three CCDs in Theresa Park, Brownlow Hill and Mt Hunter that are proposed to be included in Macarthur.

In the report on their proposed boundaries, the Committee recognised "the similarity in the semi-rural characteristics between Cobbitty, Oran Park and Theresa Park." In reality, no such similarity can properly be said to exist between these areas.

Oran Park is part of the South West Growth Centre. Detailed precinct planning for the residential subdivision of Oran Park has concluded, and roadwork for residential streets in this new suburban development is already underway. Cobbitty is reasonably well developed, comprising about 140 small subdivided housing lots along Cobbitty Rd, and is served by Cobbitty Public School and Macarthur Anglican School.

In contrast to these areas, Theresa Park comprises allotments of several acres, without any residential subdivision and no town centre. In addition to this clear difference in the nature of the areas, Theresa Park, Brownlow Hill and Mt Hunter are also in the Wollondilly LGA. They are separated by the Nepean River, and the Camden/Wollondilly LGA boundary from Cobbitty and Oran Park (areas with which they do not share similar characteristics) and they are separated from the surrounding localities in the Wollondilly LGA only by the Committee's proposed boundary.

The Committee's proposed boundary also divides the community of Mt Hunter, using the main road through the area, Burragorang Road, as a crude dividing line. This is a very poor outcome on community of interest grounds. One of the local newspapers, the Macarthur Chronicle, ran a story about this very change on its front page on 25 August. Headed "Great divide", the article (attached) declares that the proposed boundaries "drive a wedge between the tight-knit community of Mt Hunter." The artificial division of this semi-rural community is not required to ensure either Macarthur or Hume meet numerical tolerance, and fails to take account of local communities of interest.


For this reason, and because of the differences between the general nature of this part of the Wollondilly LGA and the Camden LGA suburbs of Cobbitty and Oran Park, we object to the inclusion of this area in the Division of Macarthur, and submit that it is more appropriately located in Hume.

Adjusting the Hume/Macarthur boundary in this area so that it conforms with the Nepean River and the Camden/Wollondilly LGA boundary would not require any changes to other boundaries, but would encompass much stronger community of interest links. Indeed, it would bring both Macarthur and Hume closer to the average enrolment at the projection time.

It would also make the boundary between the divisions of Macarthur and Hume much more easily understood, as it would continue along the Nepean River (which is also the Camden/Wollondilly LGA boundary) rather than moving away from that strong natural boundary to travel along local roads.


Great divide

Electorate plan splits Mt Hunter



Burragorang Rd

HUME MACARTHUR




MPs Alby Schultz (left) and Pat Farmer (right) could share Mt Hunter.

DAVID CAMPBELL

IT WOULD take a lot to drive a wedge between the tight-knit community of Mt Hunter but the Australian Electoral Commission has done just that.

In its draft federal electorate boundary maps, released earlier this month, the commission moved the Hume-Macarthur boundary so it ran down the middle of Burragorang Rd, splitting the small Mt Hunter population of about 530 in two.

Wollondilly Council has expressed disbelief at the decision to break up Mt Hunter and has forwarded a



submission to the commission asking it to reconsider.

Cr Judith Hannan raised the issue at Wollondilly Council's August meeting. "That's exactly why they do a draft, so people can have time to write into the commission and let them know about problems like Mt Hunter," she said.

"Ideally, I'd like to see Mt Hunter brought into Hume with most of Wollondilly shire."

Hume Federal Liberal MP Alby Schultz said the electoral commission used several criteria when redistributing seat boundaries.

■ To Page 6

'Ridiculous' to divide Mt Hunter

■ From Page 1

"Their primary role is to try and keep council areas in the one seat," he said. "It doesn't always happen though because they have to try and make sure there's an equal number of voters in each Federal NSW seat."

Mr Schultz recommended people make submissions to the Australian Electoral Commission to try to rectify the Mt Hunter issue.

Macarthur Federal Liberal MP Pat Farmer, who has signalled his interest in the state seat of Wollondilly (report: Page 7), said

dividing up Mt Hunter was ridiculous.

"I've said this all along - the way the electoral commission draws these things up is mad," he said.

"To divide suburbs into neighbours having two different electorates is crazy because if you've got a member who cares about their constituents then it makes it hard to get things done.

"The electoral commission should look at natural boundaries like municipalities and rivers because they're more geographical."

Proposed Divisions of Macarthur and Werriwa

Objection: The Camden LGA is unnecessarily divided between Macarthur and Werriwa.

Proposed Amendment: Transfer to Macarthur that part of the Camden LGA which is proposed to be located in Werriwa, and retain in its current location the southern boundary of Werriwa with Macarthur.

Part of the Camden LGA (the area north-west of Rileys Creek at Catherine Field) was transferred from Macarthur to Werriwa in the last redistribution, splitting the Camden LGA for the first time. In proposing this change to the boundaries at that time, the Committee did not suggest there were any community of interest grounds for doing so, referring only to the need for the two divisions affected to meet numerical tolerance. They also noted that the change that was made still resulted in reasonably clearly identifiable boundaries.

This redistribution provides an opportunity to address the anomaly that was created by the last redistribution, and reunite the whole of the Camden LGA within the division of Macarthur. While it is true that the existing boundary between Macarthur and Werriwa at Catherine Field is relatively easily understood, so too is the boundary of the Camden LGA along Bringelly and Cowpasture Roads.

While it is not always possible to unite whole LGAs within a single division, especially in metropolitan areas, it is preferable that where a split LGA is to occur there still be a substantial part of the affected LGA in each division in which it is co-located. In this instance, there is only a very small part of the Camden LGA that is located in Werriwa, while the entirety of the remainder of the LGA is in Macarthur. This may be acceptable if it was necessary to ensure each division fell within numerical tolerance, but that is not the case in this instance.

Reuniting the entirety of the Camden LGA in a single division, namely Macarthur, is not only more inclusive of the community of interest which exists in the Camden LGA, it also allows for the retention of the southern boundary of Werriwa in its present location. Returning the electors in the north-west of Camden LGA to Macarthur causes Werriwa to fall below the allowable enrolment range at the projection time. However, this relatively minor change allows a much larger number of electors to be retained in their existing division near the southern boundary of Werriwa with Macarthur.

The Committee has proposed transferring 4,263 electors in Woodbine and Blairmount from Werriwa to Macarthur. However this change in the boundaries can be avoided and those electors retained in Werriwa if the northwest of Camden LGA is transferred to Macarthur. In summary, we suggest amending the proposed boundaries of Werriwa and Macarthur to produce two key benefits: reuniting the community of interest within the Camden LGA in a single division; and retaining the existing boundary between Macarthur and Werriwa around Woodbine, resulting in the transfer of fewer electors between divisions.

Proposed Divisions of Greenway and Chifley

Objection: The use of the Blacktown-Richmond railway line as the boundary between the divisions of Greenway and Chifley disrupts local communities of interest.

Proposed Amendment: Retain the boundary between Chifley and Greenway at its current location (except at Shanes Park) and use the current Chifley/Parramatta boundary as the boundary between the two divisions north of Lancelot Street to the current Greenway/Chifley boundary.

At the northern end of the proposed boundary between the divisions of Greenway and Chifley, the railway line separates very like communities in the area that is to be redeveloped as part of the North West Growth Centre (NWGC). The growth corridor straddles the railway line and land on both sides of the line will be developed in the near future.

Construction has already begun at Colebee (in the Committee's proposed Chifley), detailed precinct planning has been completed in Riverstone and Alex Avenue precincts (in the Committee's proposed Greenway), and by Government Gazette on August 7, 2009 land was rezoned in the Riverstone West precinct (in the Committee's proposed Chifley) to allow detailed precinct planning to commence.

Residents on both sides of the railway line share common interests, not only in the nature of the land in the area at present, which is dominated by market gardens and lifestyle blocks, but also in relation to the development issues facing that area. The railway line, while offering a neat line along which to draw the boundary, provides a sub-optimal outcome for the local community.

The planned duplication of part of the railway and the development that is to occur along that corridor will only reinforce the common interests that exist along the railway line on both sides. At Riverstone there is still a level railway crossing, one of very few that remain in the Sydney basin. While the majority of existing development in the Riverstone and Schofields areas is to the east of the railway line, those residents west of the railway line generally drive to Riverstone to do their grocery shopping, and many also use the bank, post office and other services available in the town.

As development in the area proceeds, the links between residents on opposite sides of the railway line are likely to be strengthened. It is reasonable to assume that as new developments proceed, these new areas will associate most strongly with the neighbouring newer suburban developments of Kellyville Ridge and Stanhope Gardens, which are located within Greenway on both the current and proposed boundaries.

Residents in those new developments are more likely to travel to Rouse Hill and Castle Hill rather than Blacktown or Mount Druitt for their shopping, and also for employment.

The State Government's on-again off-again north west rail link proposal recognises the current and future ties from this area to the Hills district, connecting them by rail. (While the State Government has recently scrapped this rail proposal, this was done for budgetary rather than practical reasons.)

The links between the northern part of the Blacktown LGA (proposed by the Committee to be split between Chifley and Greenway) and Baulkham Hills LGA are far stronger than those between the remaining areas of the proposed Chifley and Baulkham Hills LGA. Residents in the Blacktown North Statistical Local Area (SLA) are far more likely to work in Baulkham Hills than residents of the remainder of the Blacktown LGA.

At the 2006 Census, 4,414 residents of Blacktown North SLA worked in the Baulkham Hills LGA, compared to only 1,052 residents of Blacktown South-West SLA, which makes up the majority of the current and proposed Division of Chifley. Although there were fewer residents in the Blacktown South-West SLA who worked, when taking into account the difference in working population, residents of Blacktown North SLA are still more than 3¼ times more likely to work the Baulkham Hills LGA than residents of Blacktown South-West SLA.

At the southern end of the proposed boundary, the use of the railway line unnecessarily disrupts a close community of interest. The existing boundary, along Breakfast Creek, provides an equally well defined boundary, with the parkland to the north of Breakfast Creek offering a more substantial physical separation between residents either side of the boundary.

While the M7 motorway does run through this area, there are three road underpasses across it, and there is little real division between the community from one side of the motorway to the other in this area. Differences in the community either side of the M7 are far more pronounced between Kings Park and Acacia Gardens, and between Kings Langley and Glenwood, all of which are proposed by the Committee to be included in Greenway.

To improve the representation of communities of interest within both divisions, we would suggest the boundary between Chifley and Greenway north of Blacktown be returned to its current location for the most part, thereby bringing the whole of Schofields, Riverstone and Marsden Park into the division of Greenway. (It is significant to note in this respect that for those residents of Marsden Park who are west of Richmond Road, the only access to and from their properties is via Richmond Road.)

We believe the Redistribution Committee has done the right thing by proposing Shanes Park be transferred back into the division of Chifley. Shanes Park enjoys a road linkage to the Mt Druitt area via Palmyra Avenue. There is also road access to Richmond and Windsor via Berkshire Park, (and for that reason it was practical to locate Shanes Park in Greenway at the previous redistribution) and to Penrith via Llandilo.

It would not be justifiable to include the area in a division that does not include one of Mount Druitt, Penrith or the Hawkesbury.

To balance enrolment numbers between the divisions following the above transfer, it is necessary to transfer electors from Greenway to Chifley in the vicinity of the Blacktown CBD. While this will result in some electors very near to the east of the CBD in Greenway being separated from the CBD itself by the divisional boundaries, this is no different to the situation in the Committee's proposal which draws the line between electors very near to the west of the CBD and the CBD proper.

We acknowledge that it does not seem plausible that all electors around the Blacktown CBD be included in the same division, whether that division be Greenway or Chifley (or Parramatta, which is very near to the CBD on existing boundaries). As such, we would recommend retaining the existing boundary between Chifley and Parramatta as the boundary between Chifley and Greenway, with the exception of the area to the south of Lancelot Street, which is required to be transferred to Greenway as in the Committee's proposal to ensure that both divisions meet numerical tolerance.

If our objection were to be adopted in the final boundaries, it would deliver an improved outcome under community of interest criteria and provide greater continuity of the existing boundaries. Both divisions would remain within their numerical tolerances.

All requirements under the Act are therefore met, and our suggestion improves upon the Committee's proposal on two grounds: communities of interest and adherence (where possible) to existing boundaries.