

# **COMMENT ON PUBLIC SUGGESTION**

The Federal Redistribution 2009  
NSW



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**Comment on Public Suggestion Number 15**

**by**

**The National Party of Australia - NSW**

**40 Pages**

15 May 2009

Redistribution Committee for New South Wales  
Level 3, Roden Cutler House  
24 Campbell Street,  
Haymarket, NSW 2000

Dear Commissioners,

For the benefit of the Redistribution Committee for New South Wales, please find attached the comments of the National Party of Australia - NSW on public suggestions concerning the redistribution in NSW for your consideration.

Attached is a CD-ROM which includes an electronic copy of these comments.

Yours sincerely,



**Ben Franklin**  
State Director

# **THE NATIONALS**

**Comments on public suggestions  
to the Redistribution Committee**

**The National Party of Australia – NSW**

**May 2009**

## Introduction

Of the 124 public suggestions that were made to the Redistribution Committee, only seven were comprehensive suggestions addressing boundaries across the state, including the suggestions of The Nationals, the Liberal Party and the Labor Party. The other suggestions addressed only individual divisions or regions of the state.

While we propose to comment upon most of the submissions made to the Committee, we will comment primarily on the Liberal and Labor suggestions, which were the most comprehensive of the other suggestions put forward.

From the outset it is necessary to declare that each of those suggestions contains some aspects that we support and some that we oppose.

For the sake of brevity, we shall concentrate on those aspects of each of the other parties' suggestions with which we disagree, and shall not seek to agree with those boundaries that are the same or very similar to our own suggestions. The exception to this will be in those small number of areas where we consider one alternative suggestion superior to another.

At this stage we shall make some general observations about the other suggestions that have been received by the Committee, before proceeding to address in more detail the issues raised in those suggestions.

First, The Nationals are absolutely dedicated to the retention of all non-metropolitan divisions. Our strident opposition to the abolition of a non-metropolitan division is strengthened all the more as a result of the decision to abolish a non-metropolitan division at the last redistribution just three years ago. The abolition of another non-metropolitan division at this redistribution would have a very substantial negative impact on representation for people living in non-metropolitan NSW.

The Liberal Party suggests the abolition of both Riverina & Hume, with the creation of a hybrid division of "Bradman" covering the areas around their current shared boundary. Without addressing the specific problems with the constitution of that division, or the myriad irregularities in other divisions that flow as a result of its creation (these will be discussed in detail when the Liberal Party's complete suggestions are considered later), the abolition of a non-metropolitan division is strongly opposed by The Nationals.

The Labor Party, while not directly suggesting the abolition of a non-metropolitan division, proposes boundaries that seriously threaten the integrity of the division of Hume as a non-metropolitan seat. Not only does the Labor Party suggest bringing Hume into the Camden LGA, their suggestion would see the new suburban housing estate of Harrington Park transferred to that division. While there might be some argument for bringing some of the areas around the town of Camden itself into Hume (such as Grasmere and Ellis Lane), to suggest that a non-metropolitan division should include a new suburb of metropolitan Sydney defies logic.

Second, the suggestions of both the Labor and Liberal parties are damaged by their overtly partisan nature. Labor strategist Shane Easson openly admitted as much last week, telling The Australian newspaper on 5 May that Labor's suggestions to the Committee had been designed with the intention of "redressing the imbalance" in election outcomes created by the existing divisional boundaries.

We note in particular the divisions of Macarthur and Paterson, the two most marginal Liberal-held divisions in the state. In the Labor Party's suggestion, Paterson is drawn in such a way that it would notionally return a Labor Party member (based on the 2007 election results for the areas in question) while Macarthur is abolished altogether. That is, under the Labor Party's submission, the Liberal Party would lose both seats. However, the reverse is the case in the Liberal Party's suggestion. The Liberal Party suggest redrawing the boundaries so that both divisions would (notionally) comfortably return a Liberal Party Member.

While both the major parties have structured their suggestions in such a way as to improve their position in marginal divisions, we have not done so. By recommending the boundary of Cowper be redrawn, we have notionally reduced our party's margin in the most marginal division we hold. Despite the fact that our margin is slightly reduced by the change, we nevertheless continue to support our suggestion because we consider it is appropriate that Yamba and Maclean be united in the same division.

Third, the concept of "malapportionment" was introduced in the suggestions of the Liberal Party, with a declaration that they have not sought to "systemically malapportion any part of the state." There are three things about this concept that ought to be recognised.

The first is that, with an allowable variation of only 3.5% from the divisional average at projection time, it is not possible to malapportion divisions in any meaningful way. Indeed, the most significant example of "malapportionment" occurs in areas of high projected growth, because they will at the next election return a Member with a significantly lesser number of electors than divisions with average or below average growth (witness Macarthur in the 2007 federal election). This is further exacerbated by the possibility that the boundaries will not survive to realise their projection time enrolment if another redistribution is required following the next election, which would require their boundaries to be again redrawn, having the same effect once more (assuming their growth projections remain high.)

The second is that there is nothing within s66 of the Commonwealth Electoral Act that requires divisional boundaries to be drawn in such a way that ensures as many divisions as possible approach the average divisional enrolment at projection time. There is not so much as the suggestion that average divisional enrolment should be the target enrolment for divisions. Rather, the section requires the Committee to ensure that "the number of electors enrolled in each Electoral Division in the State or Territory would not, at the projection time determined under section 63A, be less than 96.5% or more than 103.5% of the average divisional enrolment of that State or Territory at that time" [s66(3)(a)].

That is, the projected enrolment for each division should fall somewhere within that range. In our suggestion, as in those of both the Labor and Liberal parties and Dr Charles Richardson, this requirement has been met. The same cannot be said for some of the other suggestions.

The third thing that must be said about the Liberal Party's comments regarding "malapportionment" is that they have been very careful in the manner in which they have framed their statement. Of those divisions they have suggested which have a projected enrolment of more than 1.75% above the average divisional enrolment at projection time, 12 out of 14 are Labor held divisions. Of those divisions they have suggested which have a projected enrolment of more than 1.75% below the average divisional enrolment, only 4 out of 10 are Labor held divisions. Where our suggestions would create divisions beyond that range from the average divisional enrolment, a majority are Labor held divisions (both above and below average projected enrolment) broadly consistent with the proportion of seats held by the parties at present.

While our suggestions do result in a significant number of divisions between the Hawkesbury River and Queensland border near the limit of the allowable range of projected enrolment, we have done so to preserve communities of interest throughout this area. We consider it both impractical and inappropriate for any division to cross the Great Diving Range, and there are compelling reasons for retaining the western boundaries of New England and Hunter (with Parkes) which shall be addressed in detail later.

These constraints necessitate a lower average enrolment in this region than elsewhere in the state. However, all divisions remain within the allowable range of projected enrolment and meet all legislative requirements.

## **Seats suggested for abolition**

We shall now turn to those divisions that other suggestions have proposed be abolished. A significant number of suggestions proposed that a metropolitan division be abolished, without specifying which division that ought to be. Those suggestions relied on the importance of retaining all existing non-metropolitan divisions, and the problems that would arise from the abolition of another non-metropolitan division.

We strongly support the general sentiment of those submissions, although not all of the specific claims contained within them. We recognise that the Committee is bound to abide by the Commonwealth Electoral Act in their determination, and that appeals for the quota requirements to be modified cannot be considered in the current process.

### Macarthur

The Labor Party's suggestion to abolish Macarthur is extraordinary.

The division of Macarthur is projected to have the highest rate of growth in the state, just six one-hundredths of one percent short of being three times the state average growth. The division of Macarthur is projected to undergo even greater growth than at the last redistribution. Then, as now, its growth projection was the highest in the state.

However, relative to the state average growth, Macarthur's growth is expected to be significantly higher than at the last redistribution, notwithstanding a slight decrease in the division's growth projections in absolute terms. Its boundaries contain much of the South-West Growth Centre, which will see the subdivision of existing acreage lands for suburban development, with plans for 110,000 new dwellings and a likely increase in population of more than 300,000 over the next 20-25 years.

Just three years ago at the last redistribution, the Labor Party used this growth expectation to argue for the creation of a new division in South West Sydney. Now they are trying to suggest there are already too many divisions in that region.

That consideration could be given to the abolition of a division that is projected to experience so much growth is unreasonable, but unsurprising. We have already mentioned the political motivation behind the Labor and Liberal Party submissions, and the decision to advocate the abolition of Macarthur, the most marginal Liberal held seat in the state, is evidence of the Labor Party's motivations. Their suggestion is constructed less for the purpose of preserving communities of interest than preserving and improving their own electoral performance.

Not only is the abolition of such a high growth division totally unjustifiable, the effects it has on the surrounding divisions is far from ideal when considering communities of interest. Bringing the division of Hume into Harrington Park, bringing the communities of Teresa Park and Werombi into Fowler, separating

Mount Annan and Currans Hill from Narellan and forcing Macquarie Fields and Sutherland into the same division are all severely negative outcomes that should not be supported.

These issues will all be discussed in more detail in relation to the specific proposals for each division, but the one common thread (other than their illogical community groupings) is the fact that they all stem from Labor's politically motivated and unsustainable suggestion for the abolition of Macarthur.

### Riverina and Hume

Leaving to one side the very serious concerns we have already raised about the possibility that a non-metropolitan division will be abolished, there are a number of other reasons that the Liberal Party's proposed amalgamation of Riverina and Hume should not be supported.

In the first instance, it would be inappropriate to abolish those divisions because they are federation divisions. Following the decision at the last redistribution that the federation division name of Gwydir should be abolished, adoption of the Liberal Party's proposal would result in the abolition of three federation divisions in NSW in just two redistributions. Not only should the abolition of these federation divisions be rejected on that basis, and because it would cause the abolition of a second non-metropolitan division in as many Parliamentary terms, but also because the boundaries that would necessarily flow from the creation of a hybrid division are sub-optimal in community of interest terms.

As well as being flawed in itself, the creation of the division of "Bradman" creates even more substantial problems when communities of interest are taken into account to the west of the suggested division. The situation whereby the Far West of the state is in the same division as Albury continues. The Liberals also suggest that the western Riverina be included in the same division as Orange despite those areas sharing no common interests.

Likewise, the suggestions of Mr Alan Jenkins and Dr Mark Mulcair to abolish the division of Riverina would create a substantially negative outcome on community of interest grounds in their suggestions for the division of Calare.

### Eden-Monaro

Due to the location of the existing division of Eden-Monaro in the south-eastern corner of the state, the abolition of this division would necessarily lead to some other division moving into that area, which would in large part be the same as the existing division. The abolition of Eden-Monaro would therefore be ill-advised and self-defeating.



### Blaxland

The suggestion of Dr Charles Richardson to abolish the division of Blaxland is generally supported to the extent that the division proposed for abolition is in the Sydney metropolitan area.

As with the suggestions of The Nationals, Dr Richardson's suggestions demonstrate that a redistribution of boundaries in NSW is possible without necessitating the abolition of non-metropolitan division. However, we contend that the neighbouring seat of Banks is a better candidate for abolition than Blaxland.

In so doing, we acknowledge the decision of the last Redistribution Committee to not adopt suggestions that advocated the abolition of Blaxland.

### Greenway

The suggestion of M Gordon for the abolition of Greenway is not supported.

Greenway is projected to experience the third highest rate of growth of any division in the state, and more than twice the state average growth. It also contains the North-West Growth Centre, which will see the subdivision of existing acreage lands for substantial suburban development, with a likely increase in population in the order of 200,000 people over the next 20-25 years.

The abolition of such a high growth division is unrealistic and not supported.

### Berowra

The suggestion of Mr Stephen Lush for the abolition of Berowra primarily facilitates the unnecessary creation of the division of "McMahon". For that reason this suggestion is not supported.

## **Creation of new divisions**

There is simply no need to create new divisions. This redistribution was triggered by the requirement for NSW to have one less seat in the House of Representatives and for Queensland to have one more. In these circumstances, the suggested creation of new seats is contrived. There is simply no justification for the creation of a new division anywhere in NSW, be it "Bradman" (as in the Liberal Party's suggestion) or "McMahon" (as in Mr Lush's suggestion).

In particular, the proposal to create a division of "McMahon" in north-western Sydney is totally unsustainable. While it is acknowledged that north-western Sydney is growing at a rate above the state average, its growth, both short term and long term, will be less than that in south-western Sydney. That not only makes the proposal for a new division in north-western Sydney untenable, it likewise reveals the nonsense of suggesting, as the ALP does, the abolition of a south-western Sydney division.

The reasons that the suggested division of "Bradman" should not be created have already been mentioned above, and will be addressed in more detail later in these comments.

## Comments on the Labor Party Suggestions (western and southern NSW)

### Parkes

The inclusion in this suggestion of a division of Parkes which covers approximately 396,000 square kilometres is extraordinary.

The suggested Parkes covers a very similar spread of western communities to the Parkes that was rejected by the augmented Commission at the last redistribution, where the Commission declared that "there were good reasons, relating to physical features and area, communities of interest and means of communication and travel, to reduce the area of the proposed Parkes, if possible". The difference is that the Parkes suggested here is roughly 20,000 square kilometres larger than the Parkes deemed too large at that redistribution. It bears mention that Labor's suggested Parkes is also 39,000 square kilometres larger than Germany.

The Labor Party, in its suggestion, pre-empts our objections to the size of the proposed Parkes. They cite a recent LNP suggestion that the division of Maranoa be expanded in size across western Queensland, and imply that any argument against larger divisions in NSW on our part might be hypocritical.

However, contained in the Queensland ALP's objections to that particular suggestion is a rather lengthy discussion of the increase in the size of Maranoa and the negative impacts of such an expansion upon the maintenance of communities of interest in western Queensland. Trivial arguments of this nature can quite obviously be drawn in both directions and are distractions from the more important issues at hand; namely ensuring effective representation of communities of interest in the current redistribution.

The Nationals maintain that the division of Parkes as suggested by the ALP is *unnecessarily* large. The sheer geographical size of the electorate can only diminish the Parliamentary representation of its constituents, due to the inevitable dilution of communities of interest within its boundaries.

In the 2008 redistribution of Western Australia, the Committee saw a need to keep growth centres within regional seats so as to stabilise divisions and minimise the impact of future redistributions. From 2007-2008, the population of Parkes was stabilised by strong growth in the south and east of the division.

The Labor suggestion replaces the more stable areas of Parkes in the east, (including Gunnedah and the high growth areas of the Wellington and Mid-Western Regional LGAs), with areas to the west and north experiencing slight population decline. It is no surprise that the seat had to be stretched to the South Australian border to meet quota requirements for 2012. 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 Nationals are particularly concerned at the suggested loss of Gunnedah to New England. The geographically equivalent divisions of Parkes and Gwydir have traditionally been centred on the central northern plain, an area of which Gunnedah is an integral part. Further encroachment of the division of New England into Gwydir, Moree and Gunnedah dilutes the presence of the central north in Parkes, particularly as Dubbo in the south continues to experience strong growth. Moving Gunnedah into New England therefore seriously disrupts the centre of balance in Parkes and undermines the rationale behind maintaining Narrabri/Moree and Dubbo in the same division.

Federal boundaries have for the most part recognised Gunnedah's role as a dynamic population centre in the region. With the exception of a brief interlude in Paterson for one redistribution cycle (1977-1984), Gunnedah has always been in Gwydir (now Parkes). It has never been included in New England.

The population of Gunnedah has been much more stable than the other shires to the north and west. With expected recovery due to recent rainfall, and the prospect of substantial employment growth due to increased mining activity in the area, the outlook for Gunnedah is positive. As an integral part of Parkes' growth base, and of the strong community of interest that lies across the north-western plains, Gunnedah remains essential to the future viability of the division. This was quite rightly recognised at the last redistribution.

Arguments concerning its gargantuan size and future viability aside, Labor's proposed division of Parkes contains two curious additions.

First, given the extent to which the remainder of the suggestion follows LGA boundaries, the separation of rural areas of Inverell Shire from the town itself seems puzzling and in no way representative of community of interest considerations. Inverell as a regional centre is comparatively remote and services a large rural area, connected with good roads in every direction. When one considers that these rural areas are proposed to be in the same division as Broken Hill (over a thousand kilometres away), but not Inverell itself, the difficulties with Labor's submission become apparent.

The proposed boundary in Inverell Shire is not a strong one – in fact there are few boundaries in this area which are both strong and appropriate, as major roads and the Macintyre River all pass through the town of Inverell itself. Clearly, with respect to both community of interest and physical features, there exists no reasonable argument for the partition of Inverell Shire along a north-south axis as suggested by Labor. In the interests of delineating properly between the Western Plains division of Parkes and the highland division of New England, The Nationals argue that the current western boundary of New England should remain where it is.

The other interesting feature of the proposed Division of Parkes is the separation of Hillston from its neighbours along the Lachlan and from Griffith. Hillston is an isolated community which has its strongest transport and community of interest links south to Griffith and east along the Lachlan. Whilst the Kidman Way does extend 250km north to Cobar, Lake Cargelligo and Griffith are both less than half this distance from Hillston. Any proposal which isolates Hillston from both Griffith

and Lake Cargelligo/Condobolin demonstrates poor understanding of the social landscape in western NSW.

The separation of Wellington from Dubbo (whilst not as ridiculous as the partition of Inverell Shire or the inclusion of Hillston in the proposed Parkes) is also undesirable. Wellington and Dubbo share strong ties, strengthened by the recent opening of the Wellington Correctional Centre. Additionally, travel time to Dubbo from Wellington is less than half that to Orange.

### **Macquarie**

The Nationals support the principle that, given the effects of the last redistribution in this area, Macquarie should remain largely unchanged in the interests of stability. However, that part of Hawkesbury LGA still remaining in Macquarie (around Mt Tomah/Bilpin) should be transferred to the seat of Greenway.

As LGA boundaries suggest, this area has strong ties to the Hawkesbury, as distinct from the remainder of the division which is centred upon the Great Western Highway. Adjustment of this anomaly is unlikely to affect the numerical considerations in either Macquarie or Greenway.

### **Calare**

With the relatively low population growth in western NSW and the loss of a non-metropolitan seat in 2006, the return of Calare as a purely Central Tablelands division is unrealistic.

Given the numerical constraints of movement to the north into Parkes and south into Riverina and Farrer, the ALP has sought to make up the numbers in Calare through movement to the south-east into Hume. Whilst this is an effective method of moving electors away from Hume following that seat's absorption of a large part of the former Macarthur, the extension of Calare into Upper Lachlan is a little too optimistic. Rugged terrain and poor transport links from Crookwell and Taralga across to Bathurst and Orange, coupled with the reliance of both towns on Goulburn as their regional centre, make this an undesirable outcome.

Clearly Calare has been moved too far to the south east and cannot feasibly be drawn in to this extent from the west of the state.

## **Hume**

Hume is used by the ALP to absorb much of the fallout from the abolition of Macarthur, so understandably it will change a great deal. However, we question the separation of Camden from the rural areas to the north which traditionally look to Camden as the last major rural centre in the region, and also the inclusion of the urban sprawl of Harrington Park and the western parts of Narellan. These were appropriate in semi-rural Macarthur but they are not reasonable in a Hume that still includes Goulburn-Mulwaree Shire. The boundary here is untidy, careless and ultimately unjustifiable.

## **Eden-Monaro**

We note that contrary to the wishes of the local community, the ALP has severed more of the southern part of Eurobodalla Shire from Batemans Bay.

It appears that these areas have been treated as a convenient tool for the adjustment of numbers in other divisions with little regard to the obvious community of interest that exists from Batemans Bay down the coast.

## **Throsby and Cunningham**

Whilst The Nationals recognise the need for adjustment along the Illawarra, and the subsequent necessity of moving Cunningham into the southern parts of Sutherland Shire, we find the Labor suggestion concerning the southern boundary of Cunningham quite unusual.

The suggested Throsby now encompasses two major central business districts – Wollongong and Shellharbour, whilst Cunningham is left without any recognisable centre in the Illawarra. The Nationals suggest that if Cunningham is to move into Sutherland and become a division that encompasses two distinct communities of interest, then it should retain a recognisable centre in both communities.

We therefore suggest that expansion of Throsby north into Cunningham should take place along the western side of the Southern Freeway rather than along the coast into the Wollongong CBD.

## **Comments on the Labor Party Suggestions (north-eastern NSW)**

### **Hunter**

The first apparent problem with this proposed seat is the suggestion that parts of the Bathurst Regional LGA, not ten kilometres from the city itself, be included in the division of Hunter. On these grounds, Labor's public criticism of the Liberal Party's proposed division of Paterson may only be described as brazen. The logic behind such an indefensible position seems to be purely contrived. We do not believe it is necessary to elaborate on the unreasonableness of this suggestion – suffice to say that the following arguments against the inclusion of Mudgee in Hunter apply tenfold to the northern part of Bathurst.

Whilst it may be true that Mid-Western Regional Council may have been included in various electorates, both state and federal, that were centred upon the Hunter Valley, it should be clearly recognised that Mudgee, Gulgong and the surrounding pastoral districts are part of the Central West.

Mid-Western is part of the CENTROC group of councils which covers the Central West, along with Bathurst, Orange, Dubbo and Wellington. Ideally, it would be placed in an electoral division that includes at least some of these neighbouring LGAs.

The Mudgee Wombats compete in the Central West Rugby Competition and the Mudgee Dragons in the Central Western Group 10 Rugby League Competition. Mudgee is part of both the Anglican and Catholic Dioceses of Bathurst, and the Uniting Church Presbytery of Macquarie Darling – which are all based in the Central West. Mudgee is linked by public transport with Lithgow in the south and Warrumbungle Shire in the north. Major television stations servicing the region originate from Dubbo and Orange, and the local ABC station is ABC Central West in Orange.

Mudgee lies at the centre of the Mid-Western Regional LGA, and it is recognised that at the periphery of the LGA the links through to neighbouring areas become stronger. However these links are primarily with Bathurst, Lithgow and Orange to the south, and with Dubbo and Wellington to the west. It is clear that on community of interest grounds Mid-Western Regional LGA could conceivably be part of Parkes or Macquarie (or a Calare that included Bathurst or Wellington).

In contrast, this area has very few ties to the Hunter Valley in the north east due to the presence of the Goulburn River National Park – a vast expanse of rugged wilderness that follows a spur of the Great Dividing Range along the southern edge of the Hunter Valley.

Whilst there are some road links through this area into the Hunter Valley, the presence of this vast wilderness provides an ancient physical barrier between the Mudgee region and the Hunter Valley.



So although it is fair to say that as transport and communications improve physical barriers become less important, the social divides that may have developed over the years as a result of these physical barriers mean that it is as difficult to justify the inclusion of this region in a division based upon the Hunter as it was in the days when one crossed the range on horseback.

A valid argument for inclusion in Hunter may be made in the case of some of peripheral areas such as Bylong (which is isolated from the remainder of the LGA as it is), but that argument is seriously diminished by the time the boundary reaches Mudgee, looks decidedly silly at Kandos, and falls apart entirely ten kilometres from the city of Bathurst.

### **Cowper**

The Australian Labor Party is quite rightly concerned about the rather disjointed Cowper-Lyne boundary along the Clarence River. However their proposed solution takes the last major centre in Clarence Valley LGA from Cowper, whilst leaving the rural hinterland and smaller villages behind.

The Nationals believe that Cowper needs a greater foothold in the towns along the Clarence in order to justify its extension north of the Coffs Harbour LGA boundary, and thus recommend that the boundary in this area be extended to include the town of Yamba.

We agree in principle to the unification of Kempsey Shire in a single division. However, one only need examine the flow on effects to the division of Lyne (already under quota) and the subsequent distortion of Paterson, to see that this end, although noble, is ultimately not justifiable under the circumstances. The only change necessary to the Cowper/Lyne boundary in this redistribution is the consolidation of the Upper Macleay in a single division.

### **Lyne**

Labor's suggested division of Lyne commits a serious breach of community of interest guidelines in the incorporation of Bulahdelah.

Bulahdelah is an integral part of the Great Lakes region and should be included in the same division as Forster and Tuncurry (which have sensibly not been divided in this suggestion).

### **Paterson**

The logic behind this suggested division makes little sense.

If Stroud has been moved into Lyne because it shares agricultural ties through Taree and Gloucester, as opposed to Paterson which is to be a more coastal seat, then why exclude Port Stephens from Paterson, which shares substantial commonalities with the coastal communities to its north? And if Paterson is to be



more of a coastal seat, then why move it so much further into the inland town of Maitland?

If Stroud has been added to Lyne in order to move Paterson into Maitland so as to recapture its "Hunter" identity, why not move Forster/Tuncurry into Lyne, as they share much fewer ties with Maitland than Stroud?

Serious questions must be raised as to the motivation behind such a creative reimagining of this division.

Like The Nationals, the ALP has attempted to draw the majority of Maitland into one division. But whilst our suggestion quite successfully included the bulk of central Maitland in Hunter, the ALP suggestion only managed to move it partially into Paterson. The result is a weak boundary and a large proportion of the Rutherford area being isolated from the city in Hunter.

## **Newcastle**

In Newcastle, the rare potential exists to contain the majority of a close knit and iconic urban community within the one division. Unfortunately this opportunity has been passed over by Labor as they attempt to deconstruct the electorate of Paterson for political gain.

The Nationals believe as much of the Newcastle LGA should fall within the bounds of the division of Newcastle as possible. There are precious few strong boundaries in the area, and the LGA border should be utilised to its full potential.

The Nationals strongly disagree with removing suburbs quite proximal to the centre of Newcastle in an attempt to fit Port Stephens into the division.

## **Comments on the Labor Party Suggestions (Sydney)**

The suggested abolition of Macarthur causes several communities of interest to be dislocated in south-western Sydney. This is the area where the bulk of the unsatisfactory outcomes in the Labor Party's suggestions in Sydney arise, and most can be directly attributed to the suggestion that the division of Macarthur be abolished.

While there are significant problems in other parts of the metropolitan area, they affect defined local areas, rather than a whole region.

### **Fowler**

There are significant areas in the Labor Party's proposed Fowler that have little or no connection to the suburban Liverpool base of the existing and proposed division. In particular, the transfer of the communities of Cobbitty, Rossmore, Leppington and Catherine Field from the abolished Macarthur to Fowler destroys the very close community of interest ties from these communities to Camden and Narellan. Cobbitty is approximately a 15 minute drive from Camden, but 40 minutes from Liverpool, the main centre for the residents in the suburban base of Fowler. School students in these areas attend schools in the Camden area, and some students in the Camden area travel to schools in that area proposed to be transferred to Fowler, such as Macarthur Anglican College.

Likewise, the communities of Werombi and Teresa Park in the Wollondilly LGA look to Picton and Camden (both in the ALP's proposed Hume) for their services. The communities of Warragamba and Silverdale look to Picton, Camden and also Penrith. Wallacia, Luddenham and Bringelly, although currently within Fowler, also connect much more strongly south and north to Camden and Penrith, rather than east to the Liverpool area. Although some of these areas are within the Liverpool LGA, its boundaries were established long before suburban development in Sydney, and are therefore incapable of being used to implicitly define a community of interest in this area.

All of these areas proposed to be transferred to Fowler would be better served by variously being in the divisions of Macarthur (which the ALP suggests be abolished), Lindsay and Hume (as the Wollondilly LGA was prior to 2006).

### **Werriwa**

The boundary between the proposed divisions of Werriwa and Hume is difficult to justify (at best). It divides the Camden LGA between three divisions (Werriwa, Fowler and Hume) and does so in a location where there is a strong community connection spanning the suggested boundary.

The separation of the suburbs of Mt Annan and Currans Hill from Narellan and Camden, which are not only their closest neighbours but also the areas with which they share the strongest community of interest ties, cannot be justified.

Likewise, the exclusion of the new suburban housing estate of Harrington Park from a south-western Sydney division in favour of the non-metropolitan division of Hume is difficult to understand.

If Macarthur is to be abolished (and we certainly do not believe that it should be), Harrington Park needs to be retained within a metropolitan division.

### **Hughes**

The Labor Party's suggested boundaries for the division of Hughes are hugely problematic.

There simply is no justifiable link between the communities of Glenfield and Sutherland, which they suggest be incorporated in the same division. Glenfield, within the Campbelltown LGA, is connected to both Campbelltown and also to Liverpool. To include it with a division that also encompasses Sutherland makes no logical sense. The eastern boundary that is proposed with Cook is also unreasonable.

### **Cook**

Despite the Illawarra railway line already forming most of the boundary between the divisions of Hughes and Cook, the Labor Party suggestion unnecessarily crosses that boundary, rather than seeking, as in our submission and that of the Liberal Party, to consolidate the railway line as the boundary for the small remaining part of the boundary.

This change is more than sufficient to deliver to Cook the additional electors it requires, even if Bundeena and Maianbar are transferred to Cunningham as the Labor Party suggests.

### **Wentworth and Kingsford Smith**

Both the divisions of Wentworth and Kingsford Smith are within the allowable range of projected enrolment, and therefore do not require change.

It is especially unreasonable to propose any change to the boundary between the two divisions, when there were such significant public objections at the last redistribution that the final boundaries were changed from those originally proposed.

### **Mackellar**

The proposal to include part of St Ives in the division of Mackellar defies community of interest considerations. The only reasonable road access from this area is into the existing division of Bradfield.

This is also the area where this community has its strongest ties – it is very much part of the upper North Shore community rather than the northern beaches, and should be retained in a division with other like communities.

### **Warringah**

The suggestion that Warringah's crossing of Middle Harbour should be reinforced at this redistribution is not supported. Most of the areas in Warringah to the west of Middle Harbour have no road access across it to the east and even in the case of Roseville Chase, which does have direct road access, there are much stronger community ties to the west.

It is therefore appropriate that Middle Harbour be re-established as a divisional boundary as it is a strong physical feature, there is no transport access for most of the residents currently brought into Warringah by its crossing, and community ties are stronger with areas to the west in Bradfield and North Sydney.

### **Bennelong**

The Labor Party's proposal to transfer the suburb of North Epping from the division of Bennelong defies any consideration of communities of interest.

While it is true that North Epping is north of the M2 motorway, which is otherwise used as a divisional boundary in this area, it must be recognised that the only road into or out of North Epping runs south across the motorway – the suburb is surrounded to the north, west and east by bushland. North Epping ought therefore to be retained with the areas to the south in Bennelong.

### **Mitchell**

The proposed boundaries of Mitchell continue to split the suburb of North Rocks. This is an undesirable outcome, which our suggestions have demonstrated can be addressed through this redistribution.

### **Reid**

By suggesting that the Auburn area be transferred to Blaxland, the Labor Party's proposed boundaries would isolate Rydalmere not only from the surrounding areas on the north side of the Parramatta River (as is presently the case) but also from those areas along Silverwater Road (which runs across the river) on the south side.

In contrast, the Liberal Party's suggestion makes the Parramatta River the boundary, and our suggestion unites Rydalmere with Ermington on the north side of the river, while retaining the link to those areas to the south along Silverwater Road. Both provide a much better outcome in this area.

## **Banks and Blaxland**

The continued existence of Banks in a form similar to its current constitution means that the Bankstown CBD, one of the largest commercial centres in the Sydney Basin, is effectively split between two electorates.

The abolition of Banks, as suggested by The Nationals, would allow the Bankstown area to be better consolidated within a single division. Its retention, as in the Labor Party's suggestion, does not allow this opportunity.

## **Prospect**

The division of Prospect, under the Labor Party suggestion, continues to suffer from the totally unjustified inclusion of the suburbs of St Clair and Erskine Park. Travel from these suburbs to Fairfield takes about half an hour, while travel to St Marys and Mt Druitt, with which there are strong community of interest ties, takes just a few minutes. These suburbs should only be retained in the division of Prospect if there is no other option available to the Committee.

Our suggestions demonstrate a viable alternative, and the Labor Party's suggestion that they be retained in Prospect is therefore not supported.

## **Greenway**

There is no justification for the continued exclusion of that part of the Hawkesbury LGA around Bilpin from the division of Greenway, and the Labor Party's suggested division of Greenway is not supported in relation to the western boundary at this location. It is logical that this small additional part of the Hawkesbury LGA be united with the rest of the Hawkesbury LGA in Greenway.

## **Berowra**

The suggestion that the area around Pitt Town and Oakville be transferred to the division of Berowra is totally unjustifiable. This community is only a few minutes from Windsor, at the heart of both the Hawkesbury LGA and the current division of Greenway.

On the other hand Hornsby, the population base of Berowra, is about an hour's drive away. The proposed change cannot be supported in any way on community of interest grounds.

## **Comments on the Liberal Party Suggestions (western and southern NSW)**

### *Abolition of two regional divisions*

The Liberal Party suggestions effectively result in a net loss of two regional divisions. Riverina, an electorate which bounds one of the most distinctly unique regions in New South Wales, and Hume are combined into the awkward division of "Bradman", which straddles the border of the South West Slopes and the Riverina Plain, removing Wagga Wagga from those towns to the west which look to it as the capital of the region. Such a radical outcome in this redistribution is clearly unnecessary.

Hunter shrinks back down to a fraction of its former size, losing its regional identity in the process, and creating a wedge through the middle of the Hunter Valley.

Regardless of the propensity for this proposal to draw lines straight through long established and recognised communities of interest, The Nationals strongly object to the effective abolition of two regional seats. For the sake of continuity and of regional representation, and just as importantly for practical considerations, this suggestion is untenable.

At the last federal redistribution over 18% of electors in the fifteen non-metropolitan divisions were transferred to a new electorate, and the confusion caused by this redistribution is still quite evident in these areas. Despite suggesting that "an adjustment which minimises unnecessary changes best complies with the 'letter' and 'spirit' of section 66 (3)(b)(v) of the [Commonwealth Electoral] Act", under the Liberal Party's suggestions almost 23% of electors in these same divisions are transferred to a new electorate (in contrast to less than 10% of these electors under our submission).

Under section 66 (3)(b)(v), the Act requires the Committee to consider existing divisional boundaries when undertaking a redistribution. Whilst this consideration is subordinate to others, its purpose is to provide continuity from one set of electoral boundaries to the next, and ensure that divisional boundaries are not completely redrawn at every redistribution.

Clearly, if existing divisional boundaries are unable to meet legislative enrolment requirements or seriously violate communities of interest, then there may be sound cause for a dramatic overhaul of the boundaries in a region.

However, given that the boundaries in western NSW were redrawn substantially three years ago, and given also that the majority of suggestions to the Committee see no need for such radical change to the makeup of regional seats, The Nationals consider any suggestion for radical change to be detrimental to the interests of sound and effective representation in these areas.

The Liberal Party, on the other hand, abolishes a division in the south of the state, yet a division on the mid-north coast (Paterson) is so altered that it contains less than 50% of the electors from the current division. This change is both radical and unnecessary.

The Liberal suggestions significantly lessen representation for residents in non-metropolitan areas. It creates three incongruous divisions (Paterson, Calare and "Bradman") and in doing so denies the communities within those divisions the right to effective representation.

Beginning with an unfounded assertion that there exists some need to radically alter the boundaries of the division of Paterson, the Liberal submission follows on through the west of the state until, quite arbitrarily, it decides that not one but two federation divisions must be abolished as a result of that assertion.

### *Practical Considerations*

The practical concerns surrounding this process must also be addressed. The 2005 Redistribution Committee noted the importance of seats such as Hume and Macquarie to the redistribution process, as corridors by which adjustments may be made between the metropolitan area and the rest of the state.

Given the imposing geographical constraints that are associated with such adjustments, the significance of the seats along these corridors to the redistribution process cannot be understated.

For example, much of the flexibility in boundaries along the Hume corridor exists at the Riverina-Hume boundary and at the Hume-Macarthur boundary, as witnessed by the changes in these boundaries over the years. The division of Hume therefore plays a major role in facilitating redistribution in the state of NSW, with particular emphasis placed on movement through Macarthur, Hume and Riverina.

Under the Liberal suggestion, the division of "Bradman" takes up that role. However, "Bradman" is much less suitable as a conduit than Hume. As the population distribution in NSW continues to move towards the metropolitan area (particularly the growth areas contained in South West Sydney), one would logically expect the suggested division of "Bradman" to move to the east at a future redistribution. Unfortunately "Bradman" is anchored firmly in place by the presence of Wagga Wagga at its western boundary. Although moving Wagga Wagga out of "Bradman" is desirable for community of interest reasons (as will be discussed later), it makes the proposed division unviable. The abolition of Hume and Riverina and the establishment of "Bradman" therefore severely limits adjustment along the Hume corridor in future redistributions.

Likewise, in the Hunter, the difficulties imposed in this suggestion by the division of Paterson limit the opportunity for future adjustment between the Newcastle/Central Coast divisions and those to the north. The proposed Paterson is, in itself, bizarre enough. However the suggested changes mean that future redistributions will be constrained in their ability to adjust the boundaries of Paterson effectively.



The southern boundary of Paterson is inflexible in that it will not be able to be moved to the north if necessary. Moving Singleton or more of Great Lakes out of the division will totally destroy what is, at best, a very tenuous community of interest. Therefore every possible avenue by which electors may be moved into or out of the Newcastle/Central Coast region is blocked by a sprawling division whose paltry community of interest links will be severed by the slightest attempt to move it in any direction but south.

### **“Bradman”**

The Liberal Party submission admits from the outset the problems inherent in the proposed division, stating “Yass, Upper Lachlan and Boorowa might be seen to be more within the sphere of influence of Canberra and Goulburn.”

The Liberal suggestion recognises that there exists some community of interest between Wagga and the LGAs of Junee, Cootamundra and Gundagai (which are already in Riverina), and Harden, Young, Tumut and Tumbarumba (to be drawn from Hume and Farrer). However Wagga plays a much different and much more important role in the western Riverina than in these areas.

The crucial difference is that areas such as Boorowa, Tumut and Young are in relatively close proximity to two or more large regional centres such as Canberra, Albury, Wagga or Orange. Areas to the west of Wagga Wagga along the Murrumbidgee look to Wagga alone, and the division of “Bradman” as proposed here severs the western Riverina from its nerve centre in Wagga.

Wagga Wagga is the gateway to the Riverina plain, and very much the focal point of the region. To nearby towns such as Temora, Coolamon, Ganmain and Aria Park, Wagga has always been the centre of commerce and social activity. So strong is the community of interest in this area that the Riverina Movement in the 1930's advocated secession from NSW and the formation of a new state of Riverina, with the capital based in Wagga.

Further out, irrigation towns such as Griffith, Leeton and Coleambally have a unique relationship with Wagga. Towns to the east of similar size and distance from Wagga, such as Yass and Young, grew up in competition with Wagga in a time when limited communication and travel meant more reliance on local towns rather than regional centres, thus developing a stronger sense of community in isolation from other nearby centres. In contrast, the irrigation towns, as relative latecomers on the scene, were established within the context of a Riverina closely linked by transport and communications to the regional hub at Wagga.

Evidence of the leadership role played by Wagga in the region is to be found in the Riverina Eastern Organisation of Councils (administered for many years from Wagga Wagga City Council), the Riverina Development Board, ABC Riverina and the Riverina Business Enterprise Centre which are all based in Wagga.



The evidence provided in the Liberal Party suggestion for a community of interest within the proposed division of “Bradman” is rather selective, and can be dealt with quite effectively by looking at other, closely related information ignored by the suggestion.

The first issue is that of religious congregations. The suggestion noted that some eastern communities in this division are in the same Catholic Archdiocese (Canberra Goulburn). However, what is ignored is that Wagga itself is a diocesan seat. The Diocese of Wagga Wagga extends south and west into the Riverina, covering a large number of parishes within the current division of Riverina and precious few within the proposed division of “Bradman” beyond Wagga itself.

Uniting Church congregations are not mentioned by the suggestion – possibly because the boundaries once again divide “Bradman” in two. The eastern towns of Crookwell, Goulburn, Gunning, Murrumbateman and Yass are all within the Canberra Presbytery, separated from the remainder of the division which lies in the Riverina Presbytery (along with towns to the west in the current and our proposed division of Riverina).

Sport is, in itself, a strong argument against the inclusion of Wagga in such a division. If the Murray River politically defines the north-south divide, the boundary between Riverina and Hume marks its sporting equivalent.

In stark contrast to areas to the north and east where two and sometimes three football codes do battle in country towns, in the Riverina it is Australian Rules Football which dominates Saturday sporting fixtures. The Riverina and Farrer Leagues, based in Wagga and administered by the Southern NSW Australian Football League, boast sixteen clubs from Wagga west to Griffith and do not currently include any clubs east of Temora and Wagga. Almost every club in the Southern NSW AFL lies within the boundaries of the current division of Riverina (the one exception being The Rock-Yerong Creek, in the division of Farrer).

If sporting competitions can be taken as a measure of community of interest (as suggested by the Liberal Party), then according to the strongest football code in the area, the boundaries of the division of Riverina are almost perfectly drawn in their current configuration.

It bears mentioning that Rugby Union competitions in the proposed division are also split cleanly down the middle, between the Southern Inland Rugby Union (based in Wagga) and the ACT and Southern NSW Rugby Union (based in Canberra).

Whilst the reunification of the Cootamundra Police Local Area Command in “Bradman” is reasonable, it should be observed that the proposed boundaries dislocate the towns of Temora, Coolamon, Ganmain, Aria Park and Ardlethan from Wagga LAC.

Although there may be community of interest ties between Wagga Wagga and some areas to the east (as would be expected given the proximity of these areas to Wagga), the role that Wagga plays as the hub of the western Riverina cannot be overstated. The areas mentioned to the east all draw to other major centres as

well as Wagga – Tumut and Tumbarumba to Albury, Young to Orange, Yass to Canberra and Crookwell and Taralga to Goulburn. The western Riverina, however, looks to Wagga alone as its major regional centre, and the current division of Riverina represents a truly unique and ancient community within the state of New South Wales.

Finally we note the Liberal Party's proposal to create a new divisional name for the seat they call "Bradman".

The AEC's guidelines for naming divisions include the following:

*"When two or more Divisions are partially combined, as far as possible the name of the new Division should be that of the old Division which had the greatest number of electors within the new boundaries. However, where the socio-demographic nature of the Division in question has changed significantly, this should override the numerical formula."*

The Liberal Party's proposed division of "Bradman" draws from the division of Riverina more than Hume, and from Riverina much more than Eden-Monaro.

Following the AEC's guidelines, the initial presumption should be that the division the Liberal Party calls "Bradman" should be called "Riverina." The majority of its electors are drawn from the current division of Riverina, and its largest population centre, Wagga Wagga, is the capital of the Riverina region.

However, it is then necessary to consider the socio-demographic nature of the new division. It is at this point that the name Riverina ceases to be appropriate, and the illogical and incongruent nature of the suggested new division is revealed. As noted above, there are compelling reasons why Wagga should remain in a division with the Riverina communities to its west, and compelling reasons against the Liberal Party's suggested divisional boundaries for "Bradman". By suggesting a new divisional name, the Liberal Party has itself acknowledged as much.

## **Calare**

The Liberal proposal for Calare is an ill-fitting, Frankenstein's monster of a division obviously constructed from left-overs that did not quite fit into other electorates, and which encompasses quite diverse communities of interest.

At an electorate-wide level, a substantial divide in the seat is apparent between the communities of the Central West and the irrigation towns of the western Riverina. At a micro level, whilst the damage wrought by the southern boundary with "Bradman" has been addressed in the section dealing with that division, the peculiarities associated with the northern border (with Parkes) bear closer inspection.

A cursory glance at the towns included in Calare as suggested in the Liberal submission reveals two clusters of population at opposite ends of the division, with very little in the area between.

The inclusion of the lower Murrumbidgee in a division focussed otherwise on the Central Tablelands is as unlikely as it is unreasonable. The two regions share very little in common. Where Orange is grazing, Griffith is irrigation. Where Orange is heritage, Griffith is new. In fact the Liberal suggestion itself all but admits that their Calare is a division sewn together from two separate communities of interest and makes little attempt to justify the marriage.

Where it errs is in ascribing to Griffith a distinct community of interest, which includes areas less than 30 kilometres from Wagga Wagga, but not Wagga itself. As argued previously, the Riverina is a significant community of interest, but it is inseparable from Wagga, and made even more so when the suggested replacement is Orange.

Given numerical constraints and the vast distances involved in the west of the state, there are always isolated communities that will pose a conundrum to inclusion on grounds of community of interest. Broken Hill is a prominent example, and previous redistributions have struggled to determine a good fit for the Silver City. However Griffith is not Broken Hill – it has a strong community of interest with Wagga, less than two hours drive through an area which, compared to the vast stretch of the Newell Highway across the Bland, is quite heavily populated.

Even ignoring the bipolarity that exists across the proposed division, the southern and northern boundaries of the seat bisect communities of interest quite regularly. The Liberal suggestion at times seems to believe the inclusion of complete Local Government Areas is sufficient to establish community of interest, and that beyond this premise, boundary lines can be drawn with little thought given to the strong communities of interest that may exist between local government areas. The proposed Calare contains numerous instances where communities of interest between local government areas have been disregarded.

Calare is the aboriginal name for the Lachlan River and travelling from the west, it is along this river that the boundary becomes a little puzzling. Lachlan Shire is a sparsely populated area, consisting of Lake Cargelligo and Condobolin along the Lachlan in the south, which form one community of interest, and the small towns of Tottenham and Albert in the far north of the Shire which form another. To the unfamiliar eye Lachlan Shire is relatively easily divided into two parts as the Liberal submission does.

However The Nationals draw the attention of the Committee to the current NSW electoral boundaries. These also use the Lachlan as a strong and sensible boundary *until they reach the town of Condobolin*, around which they skirt to the north. The state boundaries recognise that two closely linked communities as isolated as Lake Cargelligo and Condobolin cannot be separated by an electoral boundary. Lake Cargelligo and Condobolin together form the heart of Lachlan Shire, and constitute the bulk of its population. To separate them severs one of the strongest communities of interest in western NSW.

Parkes and Forbes are separated by only 33km, and linked by many community groups – the Parkes/Forbes Business Enterprise Centre, the Parkes/Forbes branch of Central Western Group Apprentices, the Parkes/Forbes Joint Community Drug Action Team, the Parkes/Forbes Youth Support Service, and Parkes/Forbes Community Transport to name just a few.

A solid reason would be needed to justify the separation of the two towns which exist in the same division at both a state and federal level, but the only reason that is proffered by this suggestion is so that the Division of Parkes might contain the town of Parkes. However Parkes is named after 'Father of Federation' Sir Henry Parkes rather than the town, and the violation of such an obvious community of interest simply to make the name "fit" is not a reasonable justification.

The final area of concern is the Cabonne Shire. Cabonne almost completely encircles Orange – it is one of the few remaining rural "doughnut" shires – and its ties with Orange are so close that a merger between the two LGAs has previously been mooted. Some parts of Cabonne in the far north might conceivably have strong enough ties through to Wellington and Dubbo to warrant their inclusion in Parkes, but Molong and the areas immediately surrounding it belong with Orange.

## **Farrer**

As mentioned previously, the question of where Broken Hill fits into the electoral landscape is not easily answered. Not only does the city itself have a population large enough to ensure that its addition to or subtraction from a division requires significant compensatory changes, the dominant role it plays in the lives of residents across a huge swathe of far western NSW means that its inclusion may increase the size of a division sufficiently to cast questions upon the ability of that division to adequately represent communities of interest.

Although no perfect candidate exists amongst those divisions that could possibly incorporate this area, we contend that better options exist than Farrer. Public transport links from Broken Hill travel west rather than south, and the similarities between this region, based so strongly around the mining and pastoral industries, and the town of Cobar are striking.

The Nationals recognise that by leaving Broken Hill in Farrer, the Liberal Party is following the decision made by the Augmented Commission at the last redistribution. However we remain unconvinced of the merits of maintaining Broken Hill and Albury in the same division, and recommend that Broken Hill be returned to one of the north-western divisions. Given the massive increase in area that would accompany an extension of Parkes to the South Australian border, we recommend that Broken Hill be placed in Calare, which already contains a large proportion of the Western Division.

## **New England**

We note with concern that the Liberal Party suggests that Moree be moved from Parkes to New England. We continue to argue strongly that the western boundary of the division of New England represents the boundary between the pastoral New England and the agricultural north-west quite effectively. Moree is clearly a western river town – it shares close ties, similar issues and a common economic base to other nearby towns such as Narrabri and Walgett.

Moree is at the coalface of critical issues in western NSW – for example it is the birthplace of the Aboriginal Employment Strategy which has achieved a great deal for western communities since its inception in 1997. Moree needs a representative who is firmly rooted in the western plains, and its loss to New England, and representation from Tamworth, would be a great blow to the region.

Moree simply does not belong in New England.

## **Eden-Monaro**

The Nationals fully support the suggestion from Eurobodalla Shire Council that Eurobodalla be reunited within a single division. The current boundary drawn to the south of Batemans Bay appears to have been drawn out of numerical necessity, rather than on community of interest grounds. Contrary to the Liberal Party suggestion (which we believe further complicates the matter) we ask that the Committee take this opportunity to correct the boundary in this area to preserve a strong local community of interest.

We also believe that the shifting of the City of Goulburn into this seat is not justifiable, and becomes even less so when the isolation of Taralga and Crookwell from their major regional centre of Goulburn is considered.

## Comments on the Liberal Party Suggestions (north eastern NSW)

### Paterson

The inclusion of Mid-Western Regional LGA in a seat based upon the Hunter Valley has been dealt with previously in our comments on the ALP suggestion. The ALP made the mistake of crossing the Great Divide once. The Liberal Party's suggested Paterson crosses the Great Divide twice and then extends over the Barrington Tops for good measure.

It includes Forster (on the Great Lakes), Caroonna (on the Liverpool Plains), Kandos (in the Central West) and Singleton (from the Hunter) but extraordinarily *excludes* Tuncurry (on the Great Lakes). The "compelling rationale" used to justify the extension of this electorate to Goolma is superficial and flawed – what regional area in NSW is not home to a burgeoning wine industry at this point in time? Likewise, agriculture is indeed a common feature of some of the areas included, but there are great differences between irrigating cotton on the Liverpool Plains, dairying at Gloucester and running merinos at Mudgee.

The arguments concerning Upper Hunter and former divisions of Paterson are weak – Upper Hunter includes neither the coastal areas in Great Lakes Shire nor the majority of Mid-Western, and Paterson in its previous incarnations *never* spanned the entire distance from Mudgee to Forster.

The most ridiculous part of this proposed Paterson is the separation of Forster and Tuncurry, two towns so close that they are regularly referred to as a single entity: Forster/Tuncurry. Their separation would be no more reasonable than dividing the regional centre of Tamworth by using the Peel River to create an artificial and entirely meaningless boundary.

### Cowper

Whilst preferable to the ALP suggestion in that it maintains a population centre in the Clarence Valley section of Cowper, this suggestion does not address the incongruity of Cowper's current northern boundary. As stated in our comments on the ALP submission, The Nationals believe that the inclusion of Yamba in Cowper more firmly establishes that division on the south bank of the Clarence, and provides a stronger and more recognisable boundary than is currently the case.

Further south, we note that in this suggestion the Upper Macleay Valley remains divided along the river between Lyne and Cowper. Pursuant to our argument in our own suggestions to the Committee, we would submit that the Upper Macleay should be included as a single entity within either Cowper or Lyne.

## **Newcastle**

As discussed in our section dealing with the ALP submission, The Nationals believe that it is in the best interests of community representation to maintain as much of the Newcastle LGA as possible within the division of Newcastle.



## **Comments on the Liberal Party Suggestions (Sydney)**

### **Cook**

The Liberal Party's proposed boundary between the divisions of Cook and Hughes is supported, as it sensibly resolves the full length of the boundary to be the Illawarra railway line.

### **Hughes**

While the combination of Liverpool and Sutherland within one division is not considered an ideal outcome, and is negated within our own suggestions, it must be acknowledged that the Liberal Party's suggestion for the division of Hughes is more reasonable than that proposed by the Labor Party, which would unite Glenfield and Sutherland in the same division.

### **Banks**

The same considerations apply as in our comments on the ALP's suggested Banks.

### **Blaxland**

The proposed division of Blaxland maintains the separation of parts of Guildford West and Old Guildford from the rest of the Guildford area. This artificial separation is not justified, and is therefore not supported.

The proposed boundaries also continue to incorporate Cabramatta, which would much more appropriately be located in a division with either Fairfield or Liverpool, not Bankstown as suggested by the Liberal Party.

### **Prospect**

The division of Prospect proposed by the Liberal Party is not supported. St Clair and Erskine Park, as noted in our comments on the Labor Party suggestions, should not be contained within the same division as Fairfield.

The Liberal Party's suggested Prospect is weaker still, because it also contains Minchinbury (per the current boundaries). Minchinbury is accessible only from the north along the Great Western Highway, and is strongly connected to the Mt Druitt and Rooty Hill communities (and to a lesser extent Blacktown).

The only common interest this area has with Fairfield is the division of Prospect itself, which was done only out of necessity to ensure that there was an appropriate distribution of electors between divisions at the last redistribution.



Now that an opportunity has arisen in this redistribution to address the significant shortcomings in the current boundaries it should be seized.

### **Reid**

The Liberal Party's suggested division of Reid perpetuates the existing three-way split of the southern Holroyd area (with Blaxland and Prospect). This is far from an ideal situation, which our suggestions demonstrate can be addressed at this redistribution.

For this reason, we do not support the Liberal Party's suggestions for Reid, Prospect or Blaxland in this area.

### **Fowler**

The western parts of the proposed division of Fowler, and in particular Catherine Field, have strong community ties to Narellan and Camden, and should therefore be located in the same division as those areas, rather than being retained in and transferred to Fowler as in the Liberal Party's suggestion.

### **Greenway**

The Liberal Party's suggestion to unite the whole of the Hawkesbury LGA in Greenway is supported.

### **Bennelong**

The proposed boundaries of Bennelong in the Liberal Party submission are more reasonable than those of the Labor Party, particularly in relation to the suburb of North Epping, which is logically retained in Bennelong.

### **Warringah**

For the reasons outlined above in our comments on the Labor Party's proposed division of Warringah, the crossing of Middle Harbour by these suggested boundaries is not supported.

## **Wentworth and Kingsford Smith**

Both the divisions of Wentworth and Kingsford Smith are within the allowable range of projected enrolment, and therefore do not require change.

However, if there is to be any change in these divisions, the boundaries suggested by the Liberal Party are more reasonable than those suggested by the Labor Party, as they leave unchanged the boundary between the two divisions that was subject to significant discussion at the last redistribution.

## **Other Suggestions (statewide)**

### **Dr Charles Richardson**

We strongly support Dr Richardson's suggestion as it relates to the abolition of a metropolitan division in Sydney, and note that his suggestion is another demonstration of the fact that it is possible to redraw the electoral boundaries without abolishing a non-metropolitan division. Although we believe that Banks is a better candidate for abolition than neighbouring Blaxland, these suggestions nonetheless reveal the very real possibility that a metropolitan division can reasonably be abolished at this redistribution. We further agree with Dr Richardson's suggestion that this redistribution should involve minimal disruption, and note that The Nationals' suggestions involve transferring fewer electors into new divisions than the suggestions of either the Liberal or Labor parties.

On the north coast, we strongly oppose Dr Richardson's suggestion to split Forster/Tuncurry by using the Wang Wauk River as an artificial boundary at this location for the same reasons as those provided in our comments on the equivalent suggestion by the Liberal Party.

In the west of the state, Dr Richardson's proposal to transfer Mid-Western Regional LGA to Hunter is opposed for the same reasons as those detailed in our comments on Labor's Hunter and the Liberals' Paterson. Likewise, his proposal to transfer Gunnedah to New England is opposed for reasons already stated. The suggestion to retain Broken Hill and the Far West of the state in Farrer is less than ideal.

We also do not support the suggestion that Calare become a Central West division, due to the necessary flow on effects of that change. It would prevent the ready transfer of Broken Hill and the Far West from Farrer, and would also cause Macquarie to return to the Hawkesbury. Given the substantial change that was made to Macquarie at the last redistribution, we do not support it returning to its previous boundaries and causing such dramatic change again at this redistribution.

In the south of the state, we note that Dr Richardson's suggestions ensure the retention of the division of Riverina, however we continue to assert that the most appropriate expansion of Riverina is west to Hay, Balranald and Wentworth, as in our suggestions and those of the Labor Party. We further support Dr Richardson's suggestions for the eastward expansion of Hume into only the semi-rural areas of Wollondilly and Camden, along similar lines to our own suggestions. His suggestion in this area clearly respects local communities of interest far better than the Labor Party's suggestion, which would move the suburb of Harrington Park into Hume.

Finally, Dr Richardson's suggestion reestablishes Middle Harbour as the north-western boundary of Warringah, returning those communities to its west to Bradfield and North Sydney. We support that suggestion, and note its close agreement to our own suggestions.

### **Mr Stephen E Lush**

As previously noted, the suggestions that Eden-Monaro and Berowra be abolished, and that "McMahon" be created, are not supported.

However, Mr Lush's suggestions in relation to the divisions of Parkes, Calare and Riverina are supported in so far as they coincide with the boundaries that we have suggested (and it is noted that they are broadly similar.)

### **Dr Mark Mulcair**

Dr Mark Mulcair's suggestion that the division of Riverina be abolished is strongly opposed.

As a result of Dr Mulcair's abolition of Riverina, he suggests a curious division of Calare, which unites the Murray River communities of Wentworth and Balranald with Orange, despite the total absence of any community of interest ties between these areas. This is an even greater stretch than the suggestions of Mr Alan Jenkins and the Liberal Party that seek to unite the Murrumbidgee Irrigation Area with Orange in the division of Calare, and it is opposed even more strongly due to the additional distance involved.

### **M Gordon**

The suggestion of M Gordon to abolish the high growth division of Greenway is not supported.

While not only proposing the abolition of a high growth division, this suggestion also returns the Hawkesbury to Macquarie. Given the substantial disruption caused by the change in the boundaries of Macquarie at the last redistribution, there is not sufficient justification for reversing that change at this redistribution.

The suggestion also retains Broken Hill and the Far West in Farrer with Albury, and transfers a significant number of electors from the Southern Highlands to Gilmore, when these areas are more appropriately represented in a division with surrounding similar areas.

## **Other Suggestions (regional or division specific)**

### **NSW Farmers' Association**

We generally agree with the NSW Farmers' Association's suggestions. In particular, we agree that increasing the size of any non-metropolitan division will have the propensity to further disassociate communities that were significantly disrupted by the last redistribution process.

We further agree strongly that despite improvements in communication technologies, there is lesser uptake of these technologies, and indeed a generally poorer quality service in non-metropolitan areas than in metropolitan areas. The argument that technology has negated the impact of distance must be assessed in light of this reality.

Finally, we strongly agree with the suggestion of the NSW Farmers' Association that the abolition of another non-metropolitan division will diminish representation in regional areas.

### **Kay Hull MP**

Kay Hull's suggestion retains the division of Riverina, and all other non-metropolitan divisions. Mrs Hull also suggests returning the Hay Shire to Riverina.

We strongly support Mrs Hull's suggestion, in particular that all non-metropolitan divisions be retained.

### **Tony Windsor MP**

We strongly support the suggestion of Mr Windsor as it relates to the retention of all regional divisions. However, we do not support his suggestion that the Gunnedah LGA be transferred from Parkes to New England for the reasons outlined in our comments in relation to a similar suggestion by the Labor Party.

### **Robert Oakeshott MP**

We strongly support Mr Oakeshott's suggestion as it relates to the retention of all regional divisions and the abolition of a Sydney division.

We further support his suggestion that the communities of Forster and Tuncurry ought to be retained within one division – their separation would be perhaps the worst possible outcome of this redistribution on community of interest grounds other than the abolition of a non-metropolitan division. It is difficult to distinguish the separation of Forster and Tuncurry from drawing a line through the middle of any town in regional NSW.

## **Finley Chamber of Commerce, Industry & Agriculture**

This suggestion, recognising the challenges that face not only Parliamentarians but also residents within large divisions, opposes any increase in the size of Farrer.

We acknowledge the significant difficulties caused by large electoral divisions, and for this reason our suggestion shares the load between the large western NSW divisions of Parkes, Calare, Farrer and Riverina, which results in the division of Farrer actually reducing in size.

## **Alan Jenkins**

The suggestions of Mr Alan Jenkins are not supported. Not only does his suggestion abolish the federation division of Riverina, it also diminishes communities of interest substantially by transferring Griffith and Leeton into the same division as Orange. (The reasons this is not supported are provided in more detail in our comments on the Liberal Party's suggested Calare.)

Additionally, Mr Jenkins' suggestions fail to adhere to the legislative requirements in relation to projected enrolment for his suggested Hume. For all of these reasons, his suggestion is not supported.

## **Eurobodalla Shire Council**

Eurobodalla Shire Council's suggestion was that the entirety of the shire ought to be united within one division, as it was prior to the 2005 redistribution. The Nationals' suggestion achieves that objective, by bringing the LGA entirely within Eden-Monaro. The suggestions of both the Liberal and Labor parties continue to divide Eurobodalla Shire between Gilmore and Eden-Monaro.

## **Shoalhaven City Council**

Shoalhaven City Council's suggestion was that the whole of Shoalhaven be retained in Gilmore, that Gilmore remain a "regional seat" and that it not move into the southern suburbs of Wollongong. This suggestion is supported and our suggestions achieve all three of those objectives.

## **Kempsey Shire Council**

Kempsey Shire Council has suggested that the whole of the LGA be brought within the one division. While this is an agreeable objective, it is not reasonably achieved on this occasion. It is acknowledged that the Labor Party's suggestion does bring all of Kempsey Shire into Cowper, however as a result they transfer Maclean to Page.

This change means that there is no population centre to anchor the substantial part of Cowper within Clarence Valley LGA. It is our view that this represents a more serious failure on community of interest grounds than does the inclusion of a small rural part of Kempsey Shire with like areas to the south in Lyne.

The inclusion of the entire Kempsey LGA in Cowper also has unpleasant ramifications for the southern boundaries of the division of Lyne as previously discussed.

### **Willoughby City Council**

Willoughby City Council's submission presses two main points. One is the inclusion of the whole of the LGA within a single division, and the other is establishing Middle Harbour as a strong boundary, reflecting both local geography and local communities of interest.

The only two suggestions that substantially achieve this aim are The Nationals' and that of Dr Richardson. While not quite bringing all of the remaining area of Willoughby LGA within one division, we remove it entirely from Warringah, and mostly from Bradfield, with only a small part of the north-western corner of the LGA being apart from the remainder. We also use the strong natural boundary of Middle Harbour to separate Warringah from divisions to the west.

### **Various regional councils and individual submissions**

There were almost 100 suggestions received from local government authorities and residents in non-metropolitan areas, who made clear their opposition to the abolition of another non-metropolitan division at this redistribution. The overwhelming theme of those suggestions were that large electorates are more difficult for a Member of Parliament to service, that the tyranny of distance weakens community ties, and that in the interests of equity a metropolitan division should be abolished. We strongly support the sentiment expressed in these submissions, and our initial suggestions ensured the retention of all non-metropolitan divisions for precisely these reasons.

It is acknowledged that some suggestions included a review of the quota formula in conducting redistributions, and we recognise that the Committee is bound to abide by the Commonwealth Electoral Act in which these formulas are proscribed. However, we would draw to the Committee's attention that our suggestions were able to meet the quota requirements of the Act while at the same time retaining all non-metropolitan divisions and ours were not the only suggestions to do so.

In light of this, and the overwhelming majority of suggestions that sought to ensure the retention of non-metropolitan divisions, we believe there is a compelling case for the Committee to abolish a metropolitan division in Sydney.

## Conclusion

The retention of all non-metropolitan divisions ought to be a driving consideration in the development of the new boundaries required by this redistribution. On community of interest grounds, the abolition of another non-metropolitan division at the second redistribution in as many Parliamentary terms would have a devastating effect. It would further dilute representation for residents in regional areas and, as suggested by the Farmers' Association, would further disassociate regional communities.

This would be a most unfortunate outcome, especially given that there is no need for the abolition of a non-metropolitan division. The suggestions of The Nationals, the Labor Party and Dr Charles Richardson all demonstrate that it is possible to redraw the boundaries without abolishing a non-metropolitan division. We therefore strongly suggest that the division to be abolished must be a metropolitan division.

There are a number of systemic problems with the suggestions of the Labor and Liberal parties. The Liberal suggestion, and in particular the abolition of Riverina and Hume, is based on the flow on effects of the needless westward expansion of Paterson, and a central component of the Labor suggestion is the abolition of the division with the highest projected growth in state. Both suggestions have been framed to meet political objectives, ignoring community of interest considerations and suffering as a result.

That is not to say that there are not elements of each suggestion that are well-founded. This much has been acknowledged in our comments above. However, each has more substantial failings, which have been explained in detail in our comments. It is these failings on community of interest grounds that have led to our opposition of those suggestions, in particular the suggested abolition of Riverina and Hume, and the creation of a highly inferior division of "Bradman".

Having had the opportunity to view the public suggestions, and especially those which have made comprehensive recommendations, we are only more committed in our view that the suggestions made by The Nationals provide the best way forward in the current redistribution – by retaining strong community links within divisions, sharing the load between the four large western NSW divisions, and ensuring minimal disruption to electors throughout the state.