



**Comments on Suggestions to the
Proposed Boundaries Submission**
to the Electoral Districts Redistribution Panel
for New South Wales

THE NATIONALS
for Regional NSW

The Secretariat of the Electoral Districts Redistribution Panel
C/- The NSW Electoral Commission
GPO Box 832
SYDNEY NSW 2001

Dear Commissioners

It is our pleasure to submit our Comments on Suggestions Submission to the Electoral Districts Redistribution Panel's Draft Determination of the names and boundaries of electoral districts in New South Wales on behalf of the NSW Nationals.

As The Nationals are the only political Party dedicated solely to representing the people living in regional New South Wales, our comments on others suggestions to the proposed boundaries are limited to the those referencing electoral districts that make up regional NSW.

However, The Nationals would appreciate the opportunity to be able to bring forward evidence in support of any aspect of the Panel's draft determination where a suggestion or objection has been lodged by another interested person or party in rebuttal during the holding of a Public Hearing in the new year.

If you require any further information relating to our Suggestions or Comments, please don't hesitate to contact me on (02) 9299 5811.



Deputy State Director

Comments on Suggestions to the Proposed Boundaries Submission to the Electoral Districts Redistribution Panel for New South Wales

on behalf of the NSW Nationals

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INTRODUCTION

There were 77 Suggestions Submissions lodged in response to the Electoral Districts Redistribution Panel's Draft Determination of the names and boundaries of electoral districts in New South Wales.

Further, there was one reference number allocated in relation to an enquiry which did not result in a submission - NSW201110/161- and correspondence received by the Redistribution Panel on behalf of Richmond Valley Council after the close of the submissions period prescribed by the Electoral Act 2017.

However, the Redistribution Panel has resolved to take into consideration the correspondence as the view of Richmond Valley Council and make it publicly available in the interests of transparency of the redistribution process.

Of the formal submissions lodged, 32 relate solely to the transfer of Lord Howe Island from the electoral district of Port Macquarie to Sydney, 20 to metropolitan and central coast electoral districts and the remainder referencing regional NSW electorates.

As The Nationals are the only political Party dedicated solely to representing the people living in regional New South Wales, our comments on suggestions are limited to those remaining submissions.

REGIONAL NSW

As detailed in our earlier submission, The Nationals strongly support a large number of the guiding principles contained in the Report of the Electoral Districts Redistribution Panel on the draft determination. In particular, Sections:

25. The decline of the rural population in NSW, particularly in the Far West of the state, is not a new phenomenon, and is likely to continue. It soon became apparent to the Redistribution Panel that a rigid attempt to achieve equal elector numbers among districts would have necessitated a wholesale redrawing of almost all electoral district boundaries across the State.

That course also would have resulted in a significant increase in the size of some rural electoral districts. The Redistribution Panel therefore gave consideration to the other statutory criteria in section 21(1)(b) of the Electoral Act, including community of interest, means of communication/travel, and existing electoral districts;

26. In the case of large rural electoral districts, the Redistribution Panel adopted the approach of making limited boundary adjustments with a view to maintaining projected variances from the quotient by 2023 within the allowed statutory margin of +/- 10% in electors between electoral districts;

32. Electoral districts in rural and regional NSW tend to be of such a size as to encompass more than one LGA, and dividing LGAs between electoral districts may cause administrative complexities. Therefore, in applying the community of interest criterion the Redistribution Panel considers that giving particular consideration to local government boundaries in rural and regional NSW is a desirable approach; and

38. The Redistribution Panel considers that not only will the boundary choices referred to above provide clarity to electors, but they will be more easily referenced in future redistributions.

There is also no legislative requirement that each Electoral District must be drawn so that their actual enrolment has negligible variation from the quota, or that the projected enrolment should have negligible variation from the average Electoral District enrolment at the 'relevant future time'.

Therefore, would like to reiterate our support for the Panel's decision to utilise the full permissible variation to allow a large number of existing regional electoral districts to maintain or have minimal changes to their current boundaries.

This will also assist in minimising voter disruption during the ongoing and unprecedented wide-spread community disruption caused by the COVID-19 Pandemic.

Introduction - **Comments on Suggestions Submission**

It was therefore disappointing that both The Greens and the Australian Labor Party (NSW Branch) appear to be playing political mischief by undermining the logical and commonsense approach taken by the Panel in regards to regional NSW.

In the case of large regional NSW electoral districts, the Redistribution Panel has quite rightly adopted the approach of making limited boundary adjustments with a view to maintaining projected variances from the quotient by 2023 within the allowed statutory margin of +/- 10%. They have also given priority consideration to the other statutory criteria in section 21(1)(b) of the Electoral Act, including community of interest, means of communication/travel, and existing electoral districts.

For these reasons, The Nationals are urging the Panel to reject these comments which are clearly of a partisan nature.

Conversely, The Nationals would like to acknowledge the large number of submissions that support the approach of Panel in regional NSW - either entirely or in large part.

In conclusion, we wish to note that it was also extremely disappointing to see the Shooters, Fishers and Farmers Party - who currently represent three regional electoral districts - adopt a lazy approach and fail to advocate for their local communities by not engaging in this critically important phase of the redistribution process.



COMMENTS

IN DETAIL

OVERVIEW

There were 77 Suggestions Submissions lodged in response to the Electoral Districts Redistribution Panel's Draft Determination of the names and boundaries of electoral districts in New South Wales.

Further, there was one reference number allocated in relation to an enquiry which did not result in a submission - NSW201110/161- and correspondence received by the Redistribution Panel on behalf of Richmond Valley Council after the close of the submissions period prescribed by the Electoral Act 2017.

However, the Redistribution Panel has resolved to take into consideration the correspondence as the view of Richmond Valley Council and make it publicly available in the interests of transparency of the redistribution process.

Of the formal submissions lodged, 32 relate solely to the transfer of Lord Howe Island from the electoral district of Port Macquarie to Sydney, 20 to metropolitan and central coast electoral districts and the remainder referencing regional NSW electorates.

As The Nationals are the only political Party dedicated solely to representing the people living in regional New South Wales, our comments on suggestions are limited to those remaining submissions.

In conclusion, we wish to note that it was extremely disappointing to see the Shooters, Fishers and Farmers Party - who currently represent three regional electoral districts - adopt a lazy approach by failing to engage in this critically important phase of the redistribution process and advocate for their local communities.

NSWR201110/135 - W WEAKLEY

The Nationals fully support the comments and sentiments expressed by this submitter as they relate to the retention of the Gunnedah Shire Council within the electoral district of Tamworth.

For the sake of brevity, we do not see the need to restate our own arguments on the closeness of the relationship

between the LGAs of Gunnedah and Tamworth that were included in our previous three submissions.

However, The Nationals do wish to highlight this submitter's further strong arguments on the relationship, including how it is:

"...a very strong relationship with Tamworth, built on trust, community of interest and dependence on professional, health and educational facilities in that city. Many Gunnedah residents travel each day to Tamworth for these requirements, together with those of their work, which is reciprocal with residents of Tamworth working in the Gunnedah area."

**NSWR201110/136 - M MCDERMOTT,
NSWR201110/139 - D HANCOX,
NSWR201110/141 - G MCAULIFFE,
NSWR201110/149 - TEMORA SHIRE COUNCIL,
NSWR201110/150 - NARRANDERA SHIRE COUNCIL,
NSWR201110/169 - C GOLDBER,
NSWR201110/173 - G & P COMMENS, &
NSWR201110/209A - COOLAMON SHIRE COUNCIL**

The Nationals support these submitter's comments as they affirm the minimal changes proposed by the Panel to the electoral district of Cootamundra - which is a common sense, logical realignment that manages the necessary enrolments and enhances communities of interest under Section 21 of the Electoral Act.

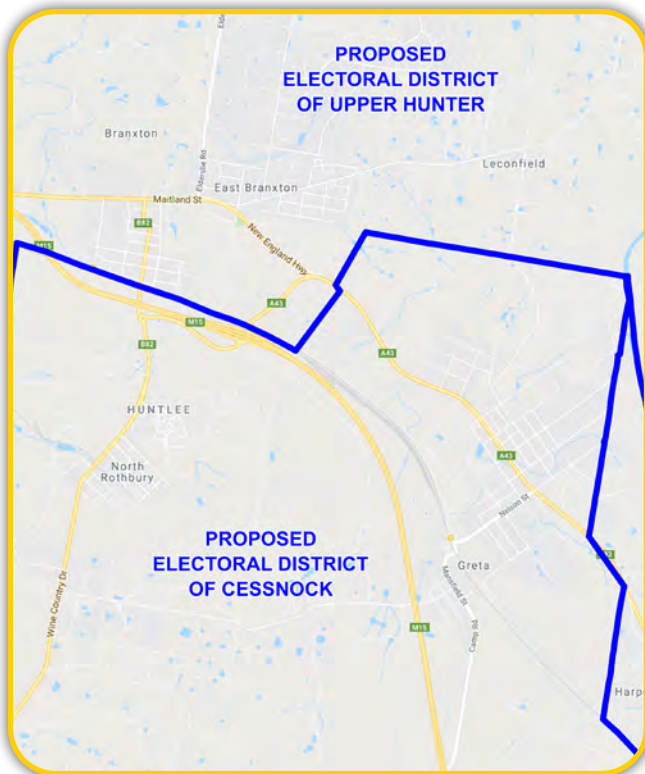
NSWR201110/137 - A WEBB

Although The Nationals believe the Panel missed an opportunity to retain existing boundaries for the electoral districts of Ballina and Lismore, The Nationals acknowledged and supported the approach of the Panel in our Suggestions Submission. This was due to the fact that this appears to be a common-sense minor realignment.

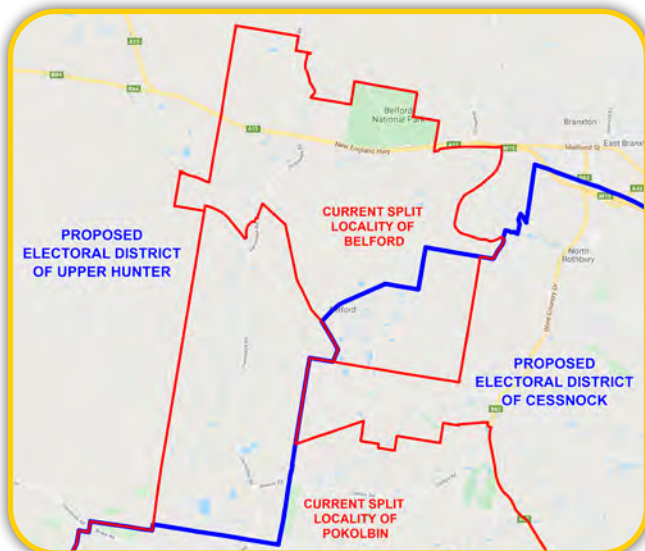
However, this submitter makes a valuable contribution, and should the Panel adopt this suggestion, The Nationals would have no objection.

NSWR201110/140 - G HAMILTON & NSWR201110/209 - G JACOBS

The Nationals acknowledge the concerns raised by these two submitters regarding the twin highway localities of Branxton and Greta that are now split between the electoral districts of Cessnock and Upper Hunter (see below).



This split was highlighted in our own Suggestions Submission where we also identified the inadvertent splitting of the localities of Pokolbin and Belford in half - going against the intent of Section 21(1)(b)(i) of the Electoral Act (see below).



In its determination, The Panel's statistical summary of the composition of the proposed electoral districts also proposes Upper Hunter current enrolment to be +4.37 and +4.1 on projected - while Cessnock is closer to the statewide average at -0.85 and +1.86.

Therefore, and consistent with our own submission, The Nationals would like to suggest that the Panel adopt two minor boundary realignments between the electoral districts of Upper Hunter and Cessnock. If adopted, this would not constitute a "significantly different" proposal, would improve the sharing of enrolment and will help to improve the communities of interest in both electorates.

To this end, The Nationals suggests reverting the proposed boundary between Branxton and Greta back to the current electoral boundary. This will result in ensuring that these twin highway towns that share so much in common, are located within the one electoral district which would be strongly supported by both these local communities.

Secondly, The Nationals suggest relocating and reuniting the split localities of Pokolbin and Belford - along with the locality of Rothbury west of Wine Country Drive - from the electoral district of Cessnock to Upper Hunter.

Following the adoption of these two minor realignments, the new enrolments and elector transfers for the electoral districts of Cessnock and Upper Hunter would be:

ELECTORATE	MAR 2020		APRIL 2023	
	ENROL	VARIANCE	ENROL	VARIANCE
ALL NSW	5318924	-	5509652	-
AVERAGE	57193	0.00%	59244	0.00%
Cessnock	57902	1.24%	61509	3.82%
Upper Hunter	58374	2.07%	60449	2.03%

NSWR201110/167 - M RODDA

Although The Nationals support this submitter's comments on the Panel's proposed boundary for the electoral district of Tamworth - as it is identical to the changes put forward in our own Suggestions Submission - we are somewhat perplexed with Mr Rodda's 'changing views' as it relates to Gunnedah Shire Council.

Comments on Suggestions Submission - Comments in Detail

In his Comments on Suggestions Submission lodged earlier in this redistribution process, this submitter clearly stated that:

I recommend the following:

- Excise Gunnedah Shire LGA from Tamworth and add to Barwon since their community of interest is aligned with the adjoining town of Narrabri Shire and similarities with Narrabri with a combination of farming and mining enterprises. Gunnedah Shire LGA is in the Federal Division of Parkes not New England. Gunnedah shire has often been associated with Castlereagh and Upper Hunter electorates in the past not Tamworth.***

It is heartening to see this submitter has now seen the light on his 'Road to Damascus'.

NSWR201110/170 - S HARBISON

The Nationals are a little confused as to the intent of this submitter's suggestion, as it relates to the electoral district of Albury.

The submitter states:

"In Albury electorate, there is no community connection between Jerilderie and Khancoban."

Given the Panel has proposed in its determination that the former Jerilderie Shire Council be relocated from the electoral district of Albury to Murray, one can only assume that the submitter is therefore supportive of this change.

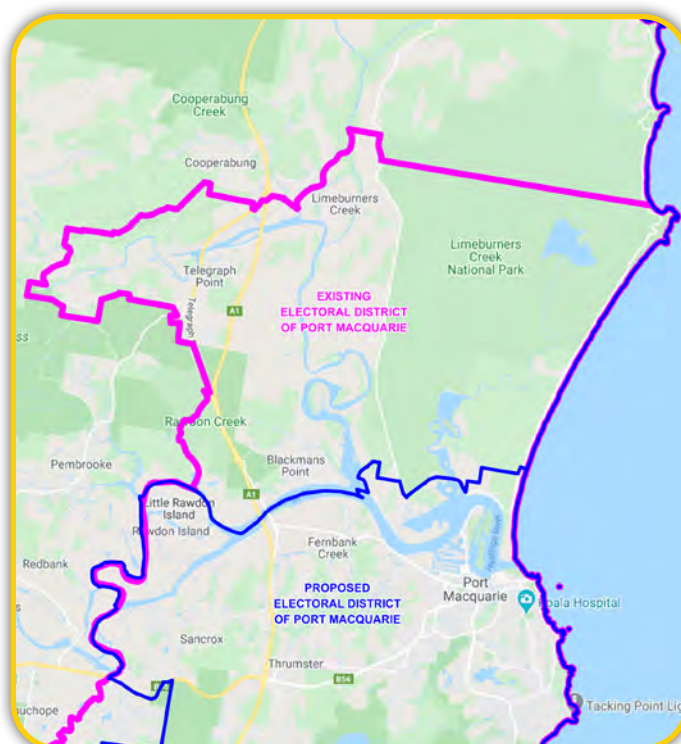
To this end, The Nationals also support this change proposed by the Panel as it is a common sense, logical realignment that manages the necessary enrolments and enhances communities of interest under Section 21 of the Electoral Act.

NSWR201110/171 - C FRANCIS & NSW201110/206 - M RICHARDS

Although The Nationals believe the Panel missed

an opportunity to retain existing boundaries for the electoral districts of Port Macquarie, The Nationals acknowledged and supported the approach of the Panel in our Suggestions Submission. This was due to the fact that this appears to be a common sense minor realignment.

However, one of these submitters (M Richards) makes a valuable contribution on these communities direct linkages with Port Macquarie, and should the Panel adopt this suggestion, The Nationals would have no objection.



NSWR201110/178 - K FITZMAURICE & NSW201110/208 - D & C BRIDGLAND

Both these submitters claim that proposed changes to the electoral district of Murray will make the electorate larger than the size of Scotland - with one suggesting that the proposed extension of the Murray electorate to the South Australian border is also not justified.

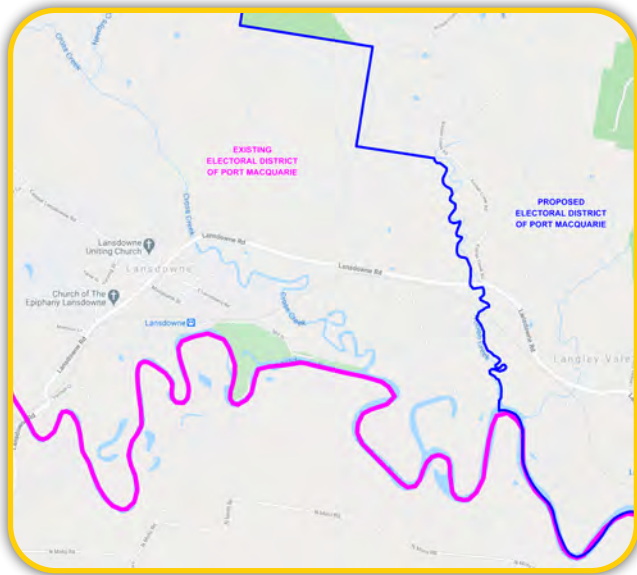
Given that the electoral district of Murray has included the South Australian border - and has been greater than the size of Scotland due to the tyranny of distance between population centres since its recreation for the 2015 State Election - The Nationals are a little mystified as to what the submitters are actually requesting.

Therefore - and as indicated in our suggestions submission to the Panel's proposed boundary - The Nationals acknowledge and support the approach of the Panel to make minimal change to Murray.

NSWR201110/182 - S MORRISON

This submitter makes some very strong and sensible objections to the Panel's proposal to transfer Landsowne and Upper Landsdowne from the electoral district of Port Macquarie to Myall Lakes.

To this end, The Nationals supports this submitter and their objections. Further, we urge the Panel to strongly reconsider this boundary realignment - particularly given the potential detriment to local community/sporting organisations and their much-needed infrastructure - that may ensue from the change.



NSWR201110/189 - D FERGUSON - QUEANBEYAN-PALERANG REGIONAL COUNCIL (QPRC)

As indicated in The Nationals own submission on the Panel's determination, the one puzzling boundary change proposed is in relation to the transfer of parts of Queanbeyan-Palerang Regional Council (Collector, Currawang, part of Tarago, and part of Lake George) from the electoral district of Monaro into Goulburn.

This concern has also been raised by this submitter. However, in Section 32 of its determination, the Panel clearly states that:

Electoral districts in rural and regional NSW tend to be of such a size as to encompass more than one LGA, and dividing LGAs between electoral districts may cause administrative complexities. Therefore, in applying the community of interest criterion the Redistribution Panel considers that giving particular consideration to local government boundaries in rural and regional NSW is a desirable approach.

With this mind - and knowing that the electoral district of Goulburn would be at approximately -2.21 on current electors and -1.98 on projected should this particular change NOT have been made - we too are struggling to understand the necessity of this change.

Therefore, The Nationals support this submitter's objections and request that the Panel review this particular change again to see whether it is actually necessary and also what impacts it would cause the Queanbeyan-Palerang Regional Council when undertaking their administrative activities.

NSWR201110/193 - M GRAHAM

Although this submitter makes a valuable and considered environmental argument regarding what he believes should form the new electoral district of Myall Lakes, it unfortunately needs to be discounted by the Panel - as the outcome would not be within the necessary numerical considerations and requirements as set out in Section 21(1)(a) of the Electoral Act.

NSWR201110/196 - R SCARCE - MURRUMBIDGEE COUNCIL

Although The Nationals support the minimal change proposed by the Panel to the electoral district of Albury - as it is common sense and a logical realignment - this submitter makes a valuable and locally driven contribution to the debate.

Should the Panel adopt this submitter's suggestion, The Nationals would have no objection, as the reversion to the existing boundary of the electoral district of Murray would still be consistent with the Panel's determination when it stated in its Guiding Principles of the Redistribution:

25. The decline of the rural population in NSW, particularly in the Far West of the state, is not a new phenomenon, and is likely to continue. It soon became apparent to the Redistribution Panel that a rigid attempt to achieve equal elector numbers among districts would have necessitated a wholesale redrawing of almost all electoral district boundaries across the State. That course also would have resulted in a significant increase in the size of some rural electoral districts. The Redistribution Panel therefore gave consideration to the other statutory criteria in section 21(1)(b) of the Electoral Act, including community of interest, means of communication/travel, and existing electoral districts.

26. In the case of large rural electoral districts, the Redistribution Panel adopted the approach of making limited boundary adjustments with a view to maintaining projected variances from the quotient by 2023 within the allowed statutory margin of +/- 10% in electors between electoral districts.

Adoption of this submitter's suggestion would also assist in minimising voter disruption during the ongoing and unprecedented wide-spread community disruption caused by the COVID-19 Pandemic.

NSWR201110/197 - THE GREENS NSW

The Nationals do not support the unnecessary scare mongering by The Greens regarding the risk of possible malapportionment in regional NSW - as they gaze into their crystal ball while located in their city-based offices.

If they were seriously that concerned about regional Western NSW, they should have spent more than only six (6) lines in their Suggestions Submission proposing possible changes for the Panel to consider to

enhance communities of interest and rectify enrolment imbalances.

As previously indicated The Nationals strongly support a large number of the guiding principles contained in the Report of the Electoral Districts Redistribution Panel on the draft determination.

In particular, Sections:

25. The decline of the rural population in NSW, particularly in the Far West of the state, is not a new phenomenon, and is likely to continue. It soon became apparent to the Redistribution Panel that a rigid attempt to achieve equal elector numbers among districts would have necessitated a wholesale redrawing of almost all electoral district boundaries across the State. That course also would have resulted in a significant increase in the size of some rural electoral districts. The Redistribution Panel therefore gave consideration to the other statutory criteria in section 21(1)(b) of the Electoral Act, including community of interest, means of communication/travel, and existing electoral districts;

26. In the case of large rural electoral districts, the Redistribution Panel adopted the approach of making limited boundary adjustments with a view to maintaining projected variances from the quotient by 2023 within the allowed statutory margin of +/- 10% in electors between electoral districts;

32. Electoral districts in rural and regional NSW tend to be of such a size as to encompass more than one LGA, and dividing LGAs between electoral districts may cause administrative complexities. Therefore, in applying the community of interest criterion the Redistribution Panel considers that giving particular consideration to local government boundaries in rural and regional NSW is a desirable approach; and

38. The Redistribution Panel considers that not only will the boundary choices referred to above provide clarity to electors, but they will be more easily referenced in future redistributions.

What The Greens have failed to acknowledge in their suggestion is that there is no legislative requirement that each Electoral District must be drawn so that their actual enrolment has negligible variation from the quota, or that the projected enrolment should have negligible variation from the average Electoral District enrolment at the 'relevant future time'.

Therefore, we support the Panel's decision to utilise the full permissible variation to allow a large number of existing regional electoral districts - including Barwon, Bega, Clarence, Coffs Harbour, Kiama, Orange, Port Stephens, South Coast, Tweed and Wagga Wagga - to maintain or have minimal changes to their current boundaries. This will also assist in minimising voter disruption during the ongoing and unprecedented wide-spread community disruption caused by the COVID-19 Pandemic.

To this end, The Nationals would urge the Panel to reject this comment by The Greens.

NSWR201110/201 - AUSTRALIAN LABOR PARTY (NSW BRANCH)

In a strikingly - but unsurprisingly - similar approach with consistent wording to The Greens comments in their submission, the Australian Labor Party (NSW Branch) have also claimed that there is a risk of possible malapportionment in regional NSW many years down the track.

As The Nationals have indicated on a number of occasions during this redistribution process, there is no legislative requirement that each Electoral District must be drawn so that their actual enrolment has negligible variation from the quota, or that the projected enrolment should have negligible variation from the average Electoral District enrolment at the 'relevant future time'.

Therefore, we once again state our support for the Panel's decision to utilise the full permissible variation to allow a large number of existing regional electoral districts to maintain or have minimal changes to their current boundaries.

As this will also assist in minimising voter disruption during the ongoing and unprecedented wide-spread community disruption caused by the COVID-19 Pandemic, The Nationals would urge the Panel to reject this comment by the Australian Labor Party (NSW Branch).

RICHMOND VALLEY COUNCIL

As detailed earlier, the correspondence received by the Redistribution Panel on behalf of Richmond Valley Council was after the close of the submissions period prescribed by the Electoral Act 2017.

However, the Redistribution Panel has resolved to take into consideration the correspondence as the view of Richmond Valley Council and make it publicly available in the interests of transparency of the redistribution process. To this end, The Nationals will make comments on this submission as it pertains to an electoral district in regional NSW - Clarence.

In their submission, the submitter has indicated their strong support for the Panel's determination to leave the electoral district of Clarence's boundary largely unchanged - with a proposed minor adjustment to incorporate the North Woodburn community as a logical addition. They went on to add that the proposal provides the best opportunity to support and develop community, economic and cultural links within the Richmond Valley local government area.

As indicated in our own suggestions regarding the draft boundary for the electoral district of Clarence, The Nationals support the Panel's decision to make this very minor realignment as it is consistent with our approach in our submission.



THE NATIONALS
for Regional NSW