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**From:** Electoral Boundaries Review Mailbox  
**Sent:** Friday, 25 August 2023 2:45 PM  
**To:**  
**Subject:** 495 OB  
**Attachments:** 230820\_Letter\_WA Electoral Commissioners.pdf

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**From:** Tay Alers <  
**Sent:** Monday, 21 August 2023 10:24 AM  
**To:** Electoral Boundaries Review Mailbox <boundaries@waec.wa.gov.au>  
**Subject:** Objection / Further Comment - Electoral Boundary Suggestions

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Dear Electoral Boundary Commissioners,

Please see attached Objection / Further Comment relating to the draft boundaries as proposed for the 2023 Boundaries Redistribution Process.

Kind regards,

TW Alers  
Address withheld  
Quindalup WA 6281

W.A.E.C. RECORDS	
FILE No.	DST 0152
DATE:	21 AUG 2023
ACTION BY:	

*Acknowledgement of Country: The Western Australian Electoral Commission acknowledges the Traditional Owners of the lands on which our electoral activities take place. We pay our respects to Elders past, present and emerging.*

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Western Australian Distribution Commissioners  
Electoral Boundaries WA  
GPO BOX F316  
PERTH WA 6841

Via email: [boundaries@waec.wa.gov.au](mailto:boundaries@waec.wa.gov.au)

Dear Commissioners

## **2023 BOUNDARY REDISTRIBUTION: OBJECTION REGARDING DRAFT BOUNDARIES**

Thank you for the opportunity to comment on the draft boundaries proposed as part of the 2023 electoral distribution process. I advise that the comments below have been made in a personal capacity.

The Commissioners have focused primarily on population growth as a reason for the proposed boundaries, which would see the creation of a hybrid district – Secret Harbour – and the loss of North West Central. The Gascoyne, Pilbara, Mid West and Goldfields regions would be split.

My comments put that there are still many opportunities to retain sixteen non-metropolitan districts. Some solutions were simple – for example, reuniting the Shire of Northampton with Kalbarri would bring North West Central into the allowed limits of the Electoral Act.

As outlined in my comment previously, 73% of the State's population is in Perth and 73% of the Legislative Assembly districts are located within the metropolitan region.

Population trends, however, are not the sole consideration of the Electoral Act.

As the Commissioners are aware, the following clauses are all relevant to a boundary redistribution:

### **16G. Districts, how State to be divided into**

- (1) *For the purposes of this section the Commissioners shall divide the number of electors by the number of districts, and the result of that division is referred to as the **average district enrolment**.*
- (2) *The Commissioners shall divide the State into districts in accordance with the principle that, for each district, the number of electors that the district would have had at the relevant day must not be more than 10% greater, or more than 10% less, than the average district enrolment at the relevant day.*
- (3) *If a district has an area of 100 000 square kilometres or more, subsection (2) does not apply but the sum of —*
  - (a) *the number of electors that the district would have had at the relevant day;*
  - and
  - (b) *the large district allowance,*
  - (c) *must not be more than 10% greater, or more than 20% less, than the average district enrolment at the relevant day.*
- (4) *In subsection (3) —*  
**large district allowance** *means 1.5% of the number of square kilometres in the area of the district.*

**16l. Dividing State, matters Commissioners to consider when**

*In making the division of the State into districts the Commissioners shall give due consideration to —*

- (a) community of interest; and*
- (b) land use patterns; and*
- (c) means of communication, means of travel and distance from the capital; and*
- (d) physical features; and*
- (e) existing boundaries of districts; and*
- (f) existing local government boundaries; and*
- (g) the trend of demographic changes.*

By focusing on population trends, the other considerations appear to have been not 'front of mind'. Whether a non-metropolitan fifteen or sixteen district model is pursued, the requirements of the Electoral Act could be better met.

Regarding metropolitan districts, while there are substantial areas of potential infill to the south east of the city limits there is also substantial growth anticipated in the north. As put in my Comment submitted 14 May, creating a series of peri-urban districts may better unite communities with a more rural focus. The reunification of the Shire of Mundaring into the district of Kalamunda partially addressed that aim.

The proposed 'Oakford' will still mean that Darling Range still mixes some highly suburban areas with agricultural areas. Other than greenfields development, I struggle to see what the distinct community of interest would be for the proposed district of Oakford – Piara Waters and Aubin Grove are very urbanised and different to Wandi or Oakford (the suburb), which both have more of a 'bush living' or rural acreage focus.

Similarly, Swan Hills / 'Walyunga' would still have a disparate mix of highly urban development connected to a (soon to be constructed) metro-style train line with communities such as Gidgegannup and Brigadoon.

For non-metropolitan districts:

- Roughly twelve regional Local Governments are split;
- Communities with little or no interest are combined, often across regional development areas or geographic regions;
- The default land use pattern justification falls on 'primary industries' when there's some nuance across the regions for the focus of primary industry; and
- The distance from the capital consideration does not appear to apply to the creation of Mid West.

Taking the proposed boundaries as a guide, these concerns could be addressed under both the fifteen or sixteen non-metropolitan district model/s. These suggestions relating to non-metropolitan district are outlined below:

**Kimberley**

The proposed district stretches across Kimberley, Pilbara and Goldfields regions and split three local government boundaries. Other than being 'remote', there is a lack of similar land use pattern and community of interest.

There may also be a level of under-enrolment in the region, with the Australian Electoral Commission seeing a reduction in unenrolled voters between January and June this year.

The Shires of Wiluna and Ngaanyatjarraku are both within the Goldfields-Esperance Development Commission remit, with populations tending to travel south for business.

A simpler solution would be for the remainder of the Shire of East Pilbara to be moved north and potentially seeing the district renamed 'Kimberley-Pilbara' to reflect.

### **Kalgoorlie**

Kalgoorlie has capacity to absorb the Shires of Wiluna and Ngaanyatjarraku in their entirety. I estimate that the district of Kalgoorlie would be at the upper end of the allowable limit, at roughly 9.78 per cent VFADE, however this may be beneficial if population growth is a major factor of consideration. Importantly, it would keep the Goldfields-Esperance region contained to two districts – Roe and Kalgoorlie.

### **Proposed seat of Mid West / North West Central and Moore**

The proposed district of Mid West would stretch across the Gascoyne, Murchison, Mid West, Coastal Wheatbelt and Avon Valley regions. These are and have been distinct regions over the course of Western Australia's history. The district would still stretch some 1132 kilometres from Guilderton to Coral Bay and 772 kilometres from Guilderton to Meekatharra.

Communities such as Meekatharra and Coral Bay are considerably further from the capital compared to Gingin, Jurien Bay, and Lancelin. The residents in these communities also share little in common interest.

While Kalbarri was split from the rest of the Shire of Northampton at the last redistribution, there is an opportunity to reunite the Shire of Northampton regardless of whether there are or sixteen or fifteen non-metropolitan districts. Kalbarri was previously in the former Agricultural region and while tourism is a shared industry with the towns to the north, Geraldton and Northampton are the main business hubs.

### **Albany / Warren-Blackwood / Roe**

The proposal for the Shire of Plantagenet splits the communities within the Shire unnecessarily. The Shire could remain in Warren-Blackwood in its entirety if there was further amendment to the north boundary of Warren-Blackwood.

Kind regards,

TW Alers  
*Address withheld*  
Quindalup WA 6281

