SUBMISSION TO THE LOCAL GOVERNMENT REPRESENTATION COMMITTEE

Opposing the introduction of wards to the City of Palmerston

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Executive summary

I oppose the introduction of wards to the City of Palmerston. Palmerston should remain an undivided municipality in which the Mayor and all seven councillors are elected by and accountable to the whole community, with residents able to approach any councillor.

The decisive question is not whether ward boundaries can be drawn. It is whether Palmerston's existing system is failing to provide fair and effective representation, what concrete problem wards would solve, and whether wards are a necessary and proportionate response. The published material from the 2022 review did not establish such a failure.

The threshold question
What problem is the Committee seeking to solve, how does the current structure cause or fail to address it, and what evidence demonstrates that wards would improve municipal outcomes?

The documentary record strengthens the case for retaining the present structure. The City of Palmerston repeatedly opposed wards from its initial submission in June 2022 through to its final correspondence and consultation with the Committee in December 2022. The published individual submissions concerning the proposed Palmerston ward structure also opposed its introduction. The former Committee stated that the proposal was largely driven by current and predicted population growth and applied its own non-statutory threshold of 18,000 electors as the basis for commencing consideration of wards. Consultation then concentrated increasingly on the number and location of wards rather than whether wards were justified.

Although the former Committee stated that it had considered the statutory criteria, its published explanation of the proposed boundaries focused predominantly on elector numbers, elector-to-member ratios, distribution of members, major roads and keeping suburbs whole. Equal elector-to-member ratios are relevant if wards are to exist, but they do not themselves justify wards. The published reasons did not expressly identify a coherent economic, social or regional community of interest for each proposed ward, or explain why those particular groupings would provide better representation than the existing municipality-wide electorate.

Recommendation: retain Palmerston as an undivided municipality. Do not introduce wards unless a Palmerston-specific representation failure is demonstrated and wards are shown, through evidence, to be superior to the existing model.

1. Purpose and perspective

This submission is made in my personal capacity. I served as a councillor of the City of Palmerston during the previous representation review and was closely involved in considering its practical, governance and community implications. I am well acquainted with Palmerston's municipal structure, the way residents engage with elected members and the arguments previously advanced for and against wards.

My opposition is not resistance to change. Electoral arrangements should change where a demonstrated deficiency exists and an alternative can reasonably be expected to improve fairness, accountability or outcomes. The concern is that the case for wards has started with a preferred mechanism and then sought reasons to justify it. Sound administration requires the reverse: identify the problem, test the evidence, assess options and select the least disruptive effective response.

2. The proper test for structural change

The Local Government Act 2019 permits the Committee to retain an undivided area or divide it into wards. That discretion creates no presumption in favour of wards. The ward-design considerations in section 32 do not answer the preceding question of whether wards are required.

1. Identify a concrete deficiency in the existing structure.
2. Demonstrate its extent and practical consequences.
3. Explain why the undivided model cannot address it.
4. Assess less disruptive alternatives.
5. Demonstrate that wards would improve representation and that their benefits outweigh reduced voter choice, complexity and parochial risk.

Demographic differences between suburbs are not evidence of representative failure. They describe a normal urban community. The Committee must identify the causal link between those differences and an actual inability of city-wide councillors to represent residents.

3. Palmerston's scale and representative context

The 2026 Discussion Paper records approximately 26,412 electors, seven ordinary councillors, an elected Mayor and a municipal area of about 72 square kilometres. Palmerston is a compact urban municipality, not a large inter-state council with several hundred thousand electors or geographically distinct towns.

Measure	Current review figure
Enrolled electors	26,412
Ordinary councillors	7
Principal member	1 elected Mayor
Area	about 72 km^2

Scale matters. Wards may be practical where electorates are too large for at-large representation or where distinct towns, remote communities, cultural groups or physical barriers require guaranteed territorial representation. Those conditions are not demonstrated in Palmerston. Residents travel throughout the city for work, schools, shopping, sport and recreation, and may readily approach any councillor.

4. Strengths of whole-of-city representation

4.1 Maximum voter choice

Every elector may vote for all seven councillor positions rather than being confined to candidates in a smaller district.

4.2 Collective accountability

Every councillor is answerable to every elector. Residents may approach the councillor best suited or available to assist.

4.3 Whole-of-city mandate

Candidates must present policies for Palmerston as a whole and councillors must balance needs across one municipal budget.

4.4 Representation of dispersed interests

Seniors, sporting networks, cultural communities and other interests are distributed across Palmerston. At-large voting allows those communities to support candidates across the city.

5. Repeated opposition in the 2022 record

The 2022 record was not a single unexplained objection. Council opposed wards in its initial submission of 8 June 2022, again in its detailed response of 19 October 2022, and in further submissions and correspondence during November and December. It participated in meetings and a workshop while maintaining that wards were unnecessary. Council's two-ward scenario was expressly advanced as a conditional alternative if wards were imposed and did not constitute support for introducing wards.

Council's objections were substantive. It said the present structure was functional, no community demand or dissatisfaction had been demonstrated, communities of interest were dispersed, voter choice would be reduced, wards would not necessarily improve candidate diversity or voter engagement, and low-member wards created risks of uncontested or failed elections.

The final report also recorded public opposition. Jenny Armour emphasised Palmerston's small size and ready access to councillors. Sarah Gotch said she had not felt unfairly represented and regarded wards as unnecessary. Election analyst Ben Raue argued that low-magnitude wards reduce diversity, proportionality and voter choice. He also cited NSW election data showing that two-member wards were materially more likely to be uncontested than three-member wards.

The Committee's own correspondence contained important concessions: governance and cohesion arise from leadership rather than the presence of wards; wards do not guarantee diversity; and wards would not resolve voters being unfamiliar with candidates. Those concessions undermine any general claim that wards inherently improve representation.

6. The former Committee's non-statutory threshold

The former Committee adopted an 18,000-elector threshold and a minimum of three wards for growing municipal councils without wards. Its final report expressly stated that the threshold was not prescribed by legislation. The Committee derived the threshold by adopting a minimum of three wards and using the then

average Legislative Assembly enrolment of 5,932 electors as a guide, producing a rounded threshold of approximately 18,000 electors.

That methodology may justify examining wards. It cannot establish that wards are necessary. Population growth is one matter under section 31, not a statutory trigger. Passing an internally selected numerical threshold does not prove that residents are under-represented, that councillors are inaccessible or that municipal decisions and services are deficient.

The threshold also risks circular reasoning: Palmerston exceeded 18,000 electors; the methodology therefore required consideration of at least three wards; boundaries were then designed to make three or four wards work. The statutory task should instead begin with Palmerston's actual communities and representative performance.

7. The former proposed boundaries were primarily arithmetic

The published proposals appear to have been driven principally by distributing electors and councillor positions across a predetermined number of wards. Equal elector-to-member ratios are relevant under section 32 if wards are introduced, but they are only one consideration and cannot substitute for the section 31 analysis.

The preliminary report initially proposed four wards because three-ward scenarios made it difficult to keep elector numbers proportionate. Following Council's objections, the Committee accepted that neither four-ward scenario adequately addressed Council's concerns and moved to three-ward models. It also recommended an eighth councillor to make the distribution more equitable.

The consideration of Council's conditional two-ward alternative, the Committee's preliminary four-ward proposals and its eventual three-ward determination demonstrates the difficulty of identifying a ward model that could be justified by Palmerston's local circumstances rather than electoral arithmetic alone. The Committee also recommended an eighth councillor on the basis of current enrolment and anticipated growth, noting that the additional position would facilitate a more equitable elector-to-member ratio across three wards. While increasing representation may be independently defensible, its interaction with the proposed three-ward structure reinforces the extent to which the resulting model depended on numerical distribution. Where natural communities exist, boundaries should be explainable by reference to those communities.

7.1 Scenario A and Scenario B did not demonstrate communities of interest

Scenario A grouped Berrimah, Driver, Durack, East Arm, Elrundie, Marlow Lagoon, Moulden, Pinelands, Tivendale and Wishart in one ward; Bakewell, Farrar, Gray, Gunn, Johnston, Palmerston City, the Palmerston Indigenous Village and Yarrawonga in another; and Archer, Bellamack, Mitchell, Rosebery, Woodroffe and Zuccoli in the third. The report provided enrolments and ratios, but did not identify a unifying social, economic or regional community of interest for each grouping.

Scenario B moved Bakewell and altered councillor allocations to improve elector-to-member ratios if Council remained at seven ordinary members. If a whole suburb could change wards to improve electoral arithmetic, the Committee needed to explain what community-of-interest analysis supported either placement. The published material did not provide that explanation.

7.2 The treatment of older suburbs was problematic

The former process treated demographic and geographic uniformity as supporting the grouping of established suburbs. Council objected that older suburbs were not a community of interest in themselves and that the

grouping would isolate those suburbs electorally and place a disproportionate representational burden for addressing associated social issues on a limited number of ward councillors. Council's evidence was that Palmerston's social groups, sporting interests, seniors and cultural networks are distributed across the city. Demographic difference should be represented across the chamber, not packaged into separate electoral districts.

8. Application of sections 31 and 32

Criterion	Palmerston evidence	Implication
Community of interests	Council's evidence was that significant social, sporting, cultural and recreational communities of interest are dispersed throughout Palmerston rather than confined to particular suburbs.	Supports at-large representation; proposed wards may fragment interests.
Communication and travel	Compact urban area without remoteness or material internal travel barriers.	No geographical necessity for wards.
Population trend	Growing enrolment and population.	Relevant to councillor numbers and monitoring, but not proof of wards.
Population density	Concentrated urban settlement.	Councillors can engage across the municipality.
Physical features	The published materials reviewed do not identify a physical feature that prevents effective city-wide representation.	No physical basis for division.

Section 32 requires consideration of near-equal elector numbers, rural and remote ward size, demographic and geographic uniformity, and keeping identifiable communities whole if practicable. These are not a licence to draw numerically balanced wards without first demonstrating that wards are warranted. A compliant map needs an explicit boundary-by-boundary account of the community preserved, the evidence that it is territorially concentrated and why the boundary improves representation.

9. Council functions and community outcomes

Palmerston Council's principal responsibilities include roads, drainage, parks, playgrounds, waste, animal management, libraries, community facilities, public spaces, rates and municipal finance. These functions are managed through a single constrained budget and are best prioritised according to need and whole-of-city benefit.

The review materials and submissions considered for this submission do not identify evidence that Palmerston's undivided structure has caused unequal service delivery, inaccessible councillors, neglected

suburbs, distorted budgeting or waste. Dividing councillors into wards does not increase revenue, expand statutory functions or create additional service capacity. It may instead encourage ward bargaining and claims for geographic equality even where facilities serve the whole city.

10. Informal voting is not a sufficient basis for wards

The former Committee linked larger candidate fields with unintentional informal voting and suggested wards would reduce the number of candidates on each ballot. Even accepting a relationship between ballot length and error, wards are an indirect structural response. They reduce ballot size by limiting each elector's vote to candidates contesting the elector's ward. As Ben Raue submitted, any reduction in informal voting may be offset by a substantially higher proportion of formal votes cast for unsuccessful candidates under low-magnitude wards.

The detailed public submission by Ben Raue argued that low-magnitude wards reduce proportionality, diversity and political choice, and cited comparative data concerning uncontested two-member wards. In my view, concerns about ballot informality should be addressed directly through voter education and consideration of the applicable voting rules, rather than indirectly by dividing an otherwise compact municipality into wards.

11. Institutional design and consultation

The Local Government Act 2019 transferred representation reviews from councils to a three-member committee comprising the Electoral Commissioner, Surveyor-General and CEO of the prescribed corporation. Independent review may provide technical consistency, but the members are not elected by Palmerston residents and do not possess Council's direct experience of local services and community engagement.

This makes an open mind, transparent reasoning and genuine consultation essential. In 2022, formal responses repeatedly acknowledged Council's opposition but stated that the Committee believed wards were appropriate, then invited Council to propose boundaries. From Council's perspective, consultation had narrowed from whether wards should exist to how predetermined wards should be drawn.

The current Committee should expressly confirm that retaining an undivided Palmerston is a genuine outcome. It should answer Council's threshold arguments before seeking ward maps or names and explain the evidentiary basis for any rejection.

12. Questions requiring answers before wards could be recommended

- What precise representation problem presently exists?
- Which residents or communities are under-represented, and what evidence demonstrates this?
- Which council decisions, budgets or services have been adversely affected by the absence of wards?
- Why can the issue not be addressed under the city-wide model?
- How would wards improve roads, parks, rates, waste or other functions controlled by Council?
- How has demographic difference been distinguished from representational disadvantage?
- What community of interest unifies each proposed ward?
- Why does each boundary preserve rather than divide that community?
- What is the effect on voter choice, proportionality and candidate diversity?
- How will growth affect boundary stability?
- Why should the former non-statutory 18,000 threshold be given any decisive weight?
- How has the Committee demonstrated that no change remains a genuinely available outcome?

13. Recommendation

The Committee should recommend that Palmerston remain an undivided municipality with seven councillors and an elected Mayor. The present model maximises voter choice, maintains collective accountability and supports whole-of-city decision-making in a compact urban municipality.

The 2022 record does not demonstrate failure of the present structure. It demonstrates repeated informed opposition, public concern about reduced choice and low-magnitude wards, and difficulty drawing boundaries on any basis other than elector arithmetic. Population growth alone is not enough. The former 18,000-elector threshold was not legislated and should not become a presumption.

FINAL RECOMMENDATION

Retain the City of Palmerston as an undivided municipality. Do not introduce wards unless a specific representation failure is demonstrated by Palmerston-specific evidence and wards are shown to be necessary, proportionate and superior to whole-of-city representation.

Appendix A. Documents considered

- 2026 Local Government Representation Review Discussion Paper.
- Local Government Act 2019 (NT), particularly sections 24 and 27 to 32.
- City of Palmerston submission dated 8 June 2022.
- City of Palmerston submission dated 19 October 2022.
- City of Palmerston submissions and correspondence of November and December 2022, including its conditional two-ward scenario.
- Committee responses to the City of Palmerston dated 11, 22 and 28 November and 15 December 2022.
- 2022 Local Government Representation Reviews Preliminary Report, 31 August 2022.
- 2022 Local Government Representation Reviews Final Report, 9 February 2023.
- Public submissions by Jenny Armour, Sarah Gotch and Ben Raue opposing wards for Palmerston.
- Current City of Palmerston Council Report dated 15 September 2026.

Appendix B. Core propositions

- A proposed solution requires a demonstrated problem.
- Population growth is a consideration, not a statutory trigger for wards.
- The former 18,000-elector threshold was devised by the Committee and was not legislated.
- Equal elector numbers do not establish communities of interest.
- Palmerston's important communities of interest are substantially dispersed rather than territorial.
- The published explanations of the former ward proposals focused mainly on elector arithmetic, councillor distribution, suburb boundaries and roads.
- Every Palmerston elector currently votes for and may approach every councillor.
- Wards reduce each elector's geographic voting choice by limiting the vote to candidates contesting the elector's ward. Low-magnitude wards may produce less proportional outcomes than the existing seven-member municipality-wide election.
- The review materials considered do not identify evidence that wards would improve the municipal services Council actually controls.
- Retaining the undivided model is a valid statutory outcome and must remain genuinely available.