



## Wamboin Community Association Inc.

Address for all correspondence: The Secretary, Wamboin Community Association Inc.,  
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27 February 2016

Mr John Rayner  
Council Boundary Review  
Submitted online at

<https://www.councilboundaryreview.nsw.gov.au/proposals/palerang-and-queanbeyan-city-councils/>

Dear Mr Rayner

### **Submission regarding Council Boundary Review for Palerang (part) and Goulburn Mulwaree councils**

Thank you for the opportunity of providing a submission relating to the State government's proposal to split Palerang LGA and merge the eastern part of it with Goulburn Mulwaree Council and the western part with Queanbeyan City Council. We understand that the scope of your review covers the proposal to merge part of Palerang with the Goulburn Mulwaree Council. We find it troubling, and a likely source of confusion in the review process, having two different Delegates reviewing the proposals to split Palerang.

The Wamboin Community Association Inc. (WCA) is the representative body of residents living in Wamboin, which is a rural residential locality in the western part of the Palerang LGA, with a 2011 Census population of 1,672, 11 percent of the total population of Palerang. Our Parish is slated to be merged with Queanbeyan City Council in the government's split and merge proposal.

The government's proposal is characterised as 'A New Council for the Southern Tablelands'. It fails to acknowledge, however, that the people whom the Wamboin Community Association represents are residents of the Southern Tablelands of NSW. The proposal to make us part of Queanbeyan City Council is inconsistent with the constitution of a 'New Council for the Southern Tablelands'.

**Our submission is that the split and merge proposal is unsound and should be rejected. This is because it does not provide sufficient evidence about the benefits and costs of the split and merge, it is opposed by the people of Palerang and, we understand, by many of Goulburn Mulwaree, and it does not meet the criteria specified in section 263 (3) of the *Local Government Act (1993)*.**

The merger proposal is problematic on many criteria, including those set out in the *Act*. The State Government's January 2016 merger proposal document has a table, at page 17, that purports to show the ways in which the proposal is justified in terms of these criteria. In our judgement, based on our intimate knowledge of our own community, of Palerang generally and of the Goulburn Mulwaree LGA, most of the arguments presented in the merger document are either factually wrong, incorrect or so weak as to be insignificant.

We submit that a fair assessment of the arguments against the criteria set out in the *Act* will readily lead to the outcome that you, as Delegate, should conclude that the merger proposal is not justified and hence that the status quo should be maintained. Our submission is that Palerang Council should continue to exist and that its boundaries should not be changed.

*Criterion (a): The financial advantages or disadvantages (including the economies or diseconomies of scale) of any relevant proposal to the residents and ratepayers of the areas concerned*

There is nothing in this proposal accurately demonstrating that the people of eastern Palerang, nor of Goulburn Mulwaree, will be better off financially as a result of the proposed split and merge. The NSW government refuses to release the full financial modelling upon which they have based their proposals, on the spurious grounds that they are cabinet-in-confidence. This is a ridiculous situation in that it puts community members, and yourself as Delegate, in the position of being unable to assess the comprehensiveness and accuracy of the KPMG modelling upon which the government has apparently relied! The statements about finances in the 'Benefits, opportunities and impacts' section of the proposal document are, in a large part, factually incorrect, as demonstrated in Palerang Council's and Goulburn Mulwaree Council's submissions to you. What stands out, in particular, is the government's claim that the merged Council will provide \$22 million benefits to the community over 20 years 'that can be reinvested in better services and more infrastructure'. This is a farcical statement considering how little can be achieved with simply \$1.1 million per year, only a tiny proportion of the annual income and expenditures of either of the two councils, let alone the combined council.

The proposal document states that the split and merge will provide the benefits of 'potentially reducing the reliance on rate increases through Special Rate Variations (SRVs) to fund local infrastructure;' and also claims that the new financial arrangements could fund 'services related to education or healthcare to help improve these services in the new council area'. It is impossible to see how the merged Council could possibly expand into whole new areas of activity, such as education and health, without very significant increases in rates.

It is widely believed, in our area of western Palerang, and as reported in the mass media, that Queanbeyan City Council has colluded with the State Government to split Palerang so that the Queanbeyan City Council can gain access to the rates paid by the people of Wamboin and other parts of western Palerang, without having to cope with the financial burdens of maintaining infrastructure in the eastern part of the Shire. We do not know the truth of these assertions but nonetheless our community finds it disturbing that the State government allegedly supports this approach.

**The government's proposal fails to meet this criterion.**

*Criterion (b): The community of interest and geographic cohesion in the existing areas and in any proposed new area*

Wamboin is a rural residential community with a strong connection with the rural village of Bungendore and greater Palerang. This proposal does not reflect an appreciation that most of the people of eastern Palerang have a communities of interest with Braidwood, not with Goulburn. Their cultural, services expectations, sporting and lifestyle are more closely related to Palerang's current structures; they have little association with Goulburn city nor with its rural hinterland.

By implementing this proposal, the people of eastern Palerang will largely lose their representation on their local Council as they will compose just six percent of the population of the new council. We believe that this proposal actually reduces the sense of community and geographic cohesion in eastern Palerang, and invites a divisive divide between the people of the two halves of the Palerang LGA who have so much in common.

**The government's proposal fails to meet this criterion.**

*Criterion (c): The existing historical and traditional values in the existing areas and the impact of change on them*

In earlier times, the area which now comprises Palerang, was predominantly rural in economy and culture so the values in the population were constant, with little change. With the establishment of the ACT, the impact of Canberra, its population growth and technology (communications and transport), has greatly affected the current Palerang area. For example, Palerang has the largest rural residential population of any shire in NSW

and this has had a considerable demographic effect in the immediate and surrounding areas. Employment in Canberra, and to a lesser extent Queanbeyan, combined with ease of transport, have been major factors.

The historical and traditional values of a grazing and agricultural population are being subject to a gradual change as the conservatism is influenced by the influx and expansion of village-based and rural residential communities. These communities have developed as people, mainly urban, often from other states or countries and with other employment skills, seek a village, rural or semi-rural life to further their interests, e.g. large animal breeding, organic farming or a more spacious natural environment. While some inhabitants of Palerang's villages have indicated a wish to merge with the QCC, the majority of the rural inhabitants have indicated that they value the independence and self-sufficiency of their life-styles and do not seek the more formal urban environment of a city like Goulburn.

Should the NSW Government force the merger of Palerang with Queanbeyan City Council, or the eastern part of Palerang with Goulburn, there is valid apprehension in the rural communities that, although there might be minimal changes to established standards, traditional community values will, of necessity, not be understood, will be ignored, or will be discounted by the dominant urban representation in a larger new Council.

**The government's proposal fails to meet this criterion.**

*Criterion (d): The attitude of the residents and ratepayers of the areas concerned*

The government's proposal document correctly states that 'There is a public consultation process which includes a public inquiry allowing for the views of residents and ratepayers to be considered'. As you know, our Vice-President, Peter Evans, made an oral presentation at your public consultation in Goulburn on 9 February. While we appreciated that opportunity, it is no substitution for a professionally-conducted survey of a representative sample of the potentially-affected population.

During 2015 the thoughts and wishes of the residents and ratepayers of Palerang became very clear. As you know, the 2015 survey clearly showed that the majority of the residents of Palerang wish Palerang Council to stand alone.

(Source: Winton Sustainable Research Strategies Pty Ltd 2015, *Report on the 2015 Community Survey (including FFTF Questions)*. Final 5 July 2015. Presented to Palerang Council by Les Winton 5 July 2015, the author, <http://www.palerang.nsw.gov.au/report-july-2015-community-survey> .)

Specifically, Winton revealed that

'More than half the population (54.8%) would like Palerang to continue as an independent council in its own right, three in ten (31.9%) want it to amalgamate with Queanbeyan (20.5%), Goulburn (8.6%), Yass (0.4%) or some other council (1.4%), while less than one in ten (8.3%) would like to see it split up among adjoining councils, with 6.0% unsure' (p. 6).

They provided a regional breakdown (*loc. cit.*) confirming that people in all three main parts of Palerang prefer the option of 'Continue as an independent council in its own right':

**Table 2: Amalgamate or not**

Q.G As you may know, the State Government is seeking to amalgamate various councils throughout NSW, and it has been suggested that Palerang Council be merged with Queanbeyan City Council. In your opinion, should Palerang Council:

READ OUT/ ROTATE	Total %	Area of:		
		Braidwood	Bungendore	Captains Flat
Continue as an independent council in its own right	54.8	62.7	51.2	57.1
Amalgamate with Queanbeyan Council	20.5	17.3	20.9	28.6
Amalgamate with Goulburn Council	8.6	9.3	9.3	0.0
Amalgamate with Yass Valley Council	0.4	0.0	0.6	0.0
Amalgamate with some other Council/s	1.4	1.3	1.1	4.8
Be split up among adjoining Councils	8.3	5.3	9.4	9.5
Unsure	6.0	4.0	7.6	0.0

**The government's proposal fails to meet this criterion.**

*Criterion (e): The requirements of the area concerned in relation to elected representation for residents and ratepayers at the local level, the desirable and appropriate relationship between elected representatives and ratepayers and residents and such other matters as it considers relevant in relation to the past and future patterns of elected representation for that area*

We find unconvincing the arguments put forward in the proposal document relating to local representation (page 10). Rural communities such as those in eastern Palerang need, and are entitled to receive, meaningful access to local government. They have it now through the Palerang Council. They have ready access to both councillors and council staff and find them responsive to, and understanding of, the needs, challenges and opportunities that people face in the villages and rural parts of eastern Palerang.

We cannot see that rural residents' interests will be adequately represented in a merged entity. The very strong view of the ratepayers of the eastern part of Palerang is that a Goulburn-based council will have a limited concept of rural living and will not be able to adequately service a rural and village environment to the extent that Palerang Council does. We have no reason to expect that an urban council (Goulburn city with a population of over 20,000) will have any interest in the far-flung, low population density parts of eastern Palerang. On this basis the proposal fails to meet this criterion.

*(e1) the impact of any relevant proposal on the ability of the councils of the areas concerned to provide adequate, equitable and appropriate services and facilities*

As indicated above, it is clear that the merged council will have less ability to provide adequate, equitable and appropriate services and facilities to the people of eastern Palerang than does Palerang Council at present. This is because the promised financial advantages of the merger simply will not be realised; representation will be inequitable as people of our area will be largely disenfranchised, being swamped by the far larger population of the City of Goulburn; the merged, urban-based Council will drain rates out of the rural area and expend them within Goulburn in an inequitable manner; they will have little interest in maintaining the expensive infrastructure of the rural areas; and a lack of understanding of the culture, history and society of the rural areas means that their decision-making with respect to us will be flawed.

**The government's proposal fails to meet this criterion.**

*(e2) the impact of any relevant proposal on the employment of the staff by the councils of the areas concerned*

We are not clear how the proposed split of Palerang Council will impact on the legislated protection of non-senior staff positions in Palerang. Nonetheless, it is clear that Palerang Council is a major employer throughout the shire and that it supports small businesses in our area. The split and merge proposals will destroy the excellent team of Council workers that have consolidated themselves as a major contributor to effective engineering design and construction throughout the Shire. It has

taken a decade to build up this expertise, plant and high work ethic and the loss of them will have significant negative impacts on western Palerang.

**The government's proposal fails to meet this criterion.**

*(e3) the impact of any relevant proposal on rural communities in the areas concerned*

As residents of a rural/rural residential area, we have no reason to expect that a Goulburn City-based council will have any real interest in the surrounding regional and rural communities. We are concerned that the eastern Palerang residents' interests will not be represented in a merged entity. So far as we are aware, the Goulburn Mulwaree Council has only a limited concept of rural living, since most of its population live in the urban centre of Goulburn, and may not be able to service adequately a rural and village environment.

Furthermore, the Queensland amalgamation, and now partial de-amalgamation, process has taught us that community expectations will be that all parties in a merged entity—in this case city dwellers, village dwellers and rural dwellers—would receive the same level of service. These expectations may not be met with respect to residents of the rural areas for the reasons given above.

**The government's proposal fails to meet this criterion.**

*(e4) in the case of a proposal for the amalgamation of two or more areas, the desirability (or otherwise) of dividing the resulting area or areas into wards*

The demographics of the new Council will be such that the ratepayers of the rural areas will largely lose their capacity to be represented on Council as, with just six percent of the population of the new entity, they may well have no councillors representing them. We have heard repeatedly that the State Government is opposed to having council wards, although we do not have any direct evidence of that. In the view of the Wamboin Community Association, were this undesirable split and merge to take place, serious consideration would need to be given to the establishment of wards within the new Council so that the people of eastern Palerang are guaranteed representation in the new council. Since the demographic work that would underpin this is not yet been undertaken, we do not have the data upon which to establish a firm position at this stage.

*(e5) in the case of a proposal for the amalgamation of two or more areas, the need to ensure that the opinions of each of the diverse communities of the resulting area or areas are effectively represented*

The Wamboin Community Association is particularly concerned that the government has apparently ignored the existing data covering the opinions of the people in Palerang with respect to the proposed split and merge. Our preference for Palerang to continue to stand alone and not merge with Goulburn Mulwaree Council and Queanbeyan City Council is based on the views of our members expressed in general meetings and, importantly, in the periodic surveys of representative samples of the Palerang population commissioned by Palerang Council. The most recent report in that series, mentioned above, is Winton Sustainable Research Strategies Pty Ltd 2015, *Report on the 2015 Community Survey (including FFTF Questions)*. Final 5 July 2015. Presented to Palerang Council by Les Winton 5 July 2015, the author, <http://www.palerang.nsw.gov.au/report-july-2015-community-survey> .

We will not repeat the details set out there as you have them to hand, but emphasise that the survey shows the community's strong opposition to the abolition of Palerang Council and splitting the LGA among Goulburn Mulwaree and Queanbeyan City Councils.

**The government's proposal fails to meet this criterion.**

*(f) Such other factors as it considers relevant to the provision of efficient and effective local government in the existing and proposed new areas*

As the representative body for the people of Wamboin, we emphasise that change is not synonymous with progress. Any changes should result in improvements. This proposal does not equal progress and will not result in improvements for the communities involved. Indeed, it will be detrimental to the communities of Palerang, including Wamboin.

**In conclusion**, as noted above the Wamboin Community Association Inc. submits that a fair assessment of the arguments against the criteria set out in the Act, such as we have provided in summary form above, will readily lead to the outcome that you, as Delegate, should conclude that the split and merge proposal is not justified and hence that the status quo should be maintained. **Our submission is that Palerang Council should continue to exist and that its boundary should not be changed.**

Yours faithfully



Jenny Richards  
President