

BEFORE THE ELECTION COMMISSION OF PAKISTAN
(Through Secretary Election Commission of Pakistan)

REPRESENTATION UNDER SECTION 21(3) FOR AMENDMENT OF THE NUMBER OF THE DRAFT/PRELIMINARY CONSTITUENCY NA -31 AS NA-1 AND ADMENDMENT TO THE PROPOSED NATIONAL ASSEMBLY CONSTITUENCY NUMBER 31 PESHAWAR-V AND THE NATIONAL ASSEMBLY CONSTITUENCIES OF DISTRICT PESHAWAR IN PARTICULAR THE PROPOSED CONSTITUENCY NA-30 PESHAWAR IV, NA 27 PESHAWAR I AND NA-28 PESHAWAR II AS PUBLISHED IN THE DRAFT LIST OF PROPOSED CONSTITUENCIES

Respectfully Sheweth;

Essential facts necessitating this representation are:

FACTS:

1. **That** applicant is permanent resident of Peshawar bearing CNIC number *17301-8328205-9* and is enrolled as voter (**VOTE No. 366, BOOK No. 037080504**) in the proposed National Assembly constituency NA-31 Peshawar V, which was earlier national assembly constituency number one, NA-1 Peshawar I. The applicant has contested elections from the same constituency since 1970 and was elected member National assembly from the same constituency a number of times.
2. **That** being a registered voter and as candidate of the national assembly constituency which includes old historical city of Peshawar as its heart, the applicant prefers this representation for (a) amendment of the constituency number, and (b) amendment of the constituency by including the partial area of the walled city which has been excluded in the draft list of constituency which make the former constituency of NA-1 Peshawar.
3. **That** in the draft list of constituencies as numbered and published under Section 21 of the Election Act, 2017 read with Rule 10(7) and 11 of the Election rules the applicant prefers this representation on the following grounds:

GROUNDS

A. **Because** the draft/preliminary constituency NA-31 was earlier numbered as NA-1 Peshawar. Peshawar is a historical city and has been a major route of trade, invasions and incursions towards the Indian Subcontinent/South Asia through millennia. The thousands years of history is witness to the historical significance and prominence of this old city. For decades Peshawar remained the first in sequencing of the National Assembly constituencies of Pakistan, named as NA-1 Peshawar I. The applicant as well as Peshawarites has a special attachment with the old city of Peshawar numbered as NA-1 and had always took pride in their area and the old historical city they inhabit as the first constituency in the sequencing of the national assembly constituencies of Pakistan. Given the historical background and the sense of attachment and identification and the pride that the electorate of this historical city takes in its number, the same number i.e. NA-1 Peshawar I, should be maintained as it has been.

B. **Because** the old city of Peshawar is one geographic stretch. The walled city of Peshawar as it was called has a historical significance. The population that lived in the city has developed a distinct culture of its own that has a peculiar history of its own spread over centuries. The *Sikhs Raj* initially demarcated the boundaries of the old city and built mud-walls around the perimeter and constructed different gates for access to the city. During the British Raj the walls around the old city perimeter was constructed with hardened bricks. In view of the gates constructed on the perimeter wall, the city area is divided into three different areas

- a) The highest ground spread around Gor Khatri lies on the East of Channels with Karimpura to its north-west and Pipalmandi to the South-west.
- b) The other part of the city starts from Pipalmandi leading towards Ganj and Yakatooth gates. The channel near Chowk Yadgar separates this pre-Muslim city from Androon Sheher where Masjid Mohabbat Khan is located and adjacent to this lies the Mohalla of Dhaki Nalbandi.
- c) Third part of the city is the area of Kohati Darwaza channel to Qissa Khwani channel that lies at Jahangir pura.

This "walled city of Peshawar" area makes the heart of the national assembly constituency of Peshawar city. In the draft/preliminary delimitation of the constituency which is number NA-31 this historical city which is compact, homogenous in all aspects of linguistic, ethnographic and cultural features stands divided in awkward manner. Census Charge No. 10 which includes Lahori and Karimpura, Charge 11 which includes Ganj and Jehangirpura are made part of the proposed NA-31 while Charge No. 12 which includes the areas like Qissa Khawani, Andar Shehr, Jehangir Pura, Mohalla Jangi, Kochi Bazar, Marwiha

No.1 and 2, Shah Qabool Colony, Namak mandi, Dabgari, Lakar Mandi, Mohalla Bhar, Bajawri Kalan, Ghori Khan, Bajuri Khurd, Jogan Shah, Mohalla Afridi Khan, Mohalla Nau, Mohalla Nau Dabgari, Assia, Quwat ul Islam, Dhandyan, Mohalla Moti, Ghari Mir Ahmad Shah. In this manner the old city of Peshawar is bifurcated/divided in a brazen manner without any regard to its historical significance, cultural and linguistic homogeneity and above all public convenience and communication facilities and compactness and inseparability of the area.

- C. **Because** the awkward manner of splitting the old city in two different constituencies is typical case of gerrymandering. Instead of moving in the clockwise zig-zag manner, and considering the geographic compactness, and the accessibility/road/routes, a candidate/elector has to pass from a different constituency to access the other part of the constituency.
- D. **Because** Census Charge 14 Census Circle 01 which includes Bairun Ganj Gate, Hashnagar Colony, Chisti Abad, Chona Bhatti and Phandu road which is contiguous to and inseparable from the Walled city area, and with these characteristics always remained part of the former NA-1 constituency, (now draft/preliminary NA-31) has been made part of NA-28. Excluding this area lying deep inside the city and including it in the constituency which is largely a rural constituency of the district is unwarranted and unjustified.
- E. **Because** the population inhabiting in the Census circle No.01 of the Charge No. 15 is distinct from the other census circles in the Census Charge. Kohat Road is dividing line of the proposed NA-30 and NA-31. On the opposite side of Kohat Road lies Kotla Mohsin Khan, Dheri Baghbanan and Landi Arbab areas inhabited by indigenous pashtun population and the same area didn't made part of the Peshawar city and was a suburb of the city. People inhabiting these areas are culturally and linguistically distinct from the people inhabiting the said Census circle No. 01. Population of the same census circle is culturally and linguistically homogeneous with the community in the proposed NA-31, and this important factor has not been considered while drawing up the constituencies.
- F. **Because** the exclusion of the above mentioned areas is against the rules and principles of the delimitation and has greatly violated the principle of geographical compactness of the areas as well as the homogeneity of the communities and has caused serious inconvenience to the public in the proposed NA-31. Carving out of Census Charge 15 Census circle No. 01 across the Kohat Road and Charge No. 12 which includes almost half of the old walled city of Peshawar is unjustified and amount to gerrymandering.

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NA-27 PESHAWAR-I

BABU ZAI	32,410
BUNYADI	10,614
HARYANA PAYAN	38,851
ISA KHEL HAMID	17,665
KANKOLA	20,831
KHAZANA	65,525
LARAM	54,959
ALI ZAI	16,091
BARBAR	11,061
CHAGHAR MATTI	19,336
DAG	32,146
GARAH TAJAK	12,959
GARHI CHANDAN	22,921
GARHI SHER DAD	18,138
HARYANA BALA	25,449
KAFOOR DHERI	39,831
KANIZA	24,437
LAKRI KANIZA	15,086
MAMUN/KHATKI	11,464
MATHRA	25,518
MULA ZAI	24,008
NAIMI	7,870
PAJAGGI	71,770
PANAM DHERI	18,423
QILA SHAH BEG	23,546
REGI UFTI ZAI	19,413
SARKHANA	5,833
SHAGHALI BALA	11,211
SHAHI BALA	39,181
SHIGGI BALA	10,546
TAKHAT ABAD AWAL	19,124
MAHAL SALO SHAQI HINOKIAN	18,672
Palusi Muqadamzai	1801
Palusi Attuzai	1202
Palusi Talarzai	4019
The following circles of Charge No.07 of Peshawar MC;	
Circle No.13	32,360
Circle No.17	30,772
TOTAL:	855,043

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NA-28 PESHAWAR-II

BUDHNI	11769
CHAMKANI	45247
DEH BAHADUR	12,135
DALAZAK	21,299
DAMAN AFGHANI	7,615
DAMAN HINDKI	37,034
GUL BELA	17,231
LANDI DAUD ZAI	4,948
MAIRA KACHORI	30,799
MIAN GUJAR	10,015
MUSA ZAI	19,152
NAHAQQI	22,125
PAKHA GHULAM	58,917
PHANDU	29,859
RASHIDA	30,046
SORI ZAI PAYAN	107,079
SARDAR GARHI	35,122
TARNAB	34,496
URMUR BALA	36,460
URMUR MIANA	33,848
URMUR PAYAN	29,548
WAD PAGGA	20,605
Charge NO.14 ex. Cir No.01 218320-14691=203629	203629
TOTAL:	858978

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NA-29 PESHAWAR-III

ADE ZAI SHER KERA	22,681
AHMAD KHEL	23402
AZA KHEL	33,847
BADH BER HURI ZAI	35,953
BADH BER MARYAM ZAI	26,912
BAGH MIAN KHEL	15,920
BAZID KHEL	18,525
GARHI CHANDAN	25,908
KHULI ZAI	20,448
MARYAM ZAI	16,593
MASHU GAGGAR	75,069
MASHUKHEL	24,693
MATTANI	49,672
SHEIKH MOHAMMADI	28,073
SHEIKHAN	29,096
SORI ZAI BALA	35,757
SULEMAN KHEL	33,522
ULI ZAI	13,987
UTMAN ZAI	21,876
Achni Bala	29872
Achni Payan	76532
LANDI AKHUN AHMED	21,797
PESHAWAR CANTT. PC	10,108
Pishtar khara Bala	23613
Pishtar khara Payan	27254
SANGU	28,186
SARBAND	32,101
Sufaid Dheri	27873
The following circles of Charge No.16 of Peshawar MC	
i) Circle No.9	23,357
ii) Circle No.10	15,578
TOTAL:	868,205

NA-30 PESHAWAR-IV

a) Regi Lalam PC OF Mathra QH	22,507
b) Peshawar University TC	5,940
c) Peshawar Cantonment	70741
d) The following Census Charges of Peshawar MC.	
CHARGE NO.07	
i) Circle No.14	18,070
ii) Circle No.15	10,062
iii) Circle No.16	11,843
Charge No.15 EX. CIR.01(105283-15980=	89303
Charge No.17	224952
d) The following Census Circles of Charge No,16 of Peshawar MC.	
Circle No.1	16,430
Circle No.2	11,623
Circle No.3	8,760
Circle No.4	8,607
Circle No.5	19,514
Circle No.6	13,807
Circle No.7	17,913
Circle No.8	14,750
Circle No.11	16,900
Circle No.12	8,554
Circle No.13	29,949
Circle No.14	18,181
Circle No.15	9,103
Circle No.16	15,659
Circle No.17	22,375
Circle No.18	16,236
Circle No.19	18,647
Circle No.20	8,089
Circle No.21	23,081
Circle No.22	29,993
Circle No.23	35,498
Circle No.24	6,811
Circle No.25	24,313
TOTAL:	848211

NA-31 PESHAWAR-V


a) The following Census Charges of Peshawar MC.

i) CHARGE NO. 07 ex. The following circles; a) Circle no.13 b) Circle no.14 c) Circle no.15 d) Circle no.16 e) Circle no.17 (383985-103107=280878)	280878
ii) CHARGE NO. 08	40113
iii) CHARGE NO. 09	169257
iv) CHARGE NO. 10	37550
v) CHARGE NO. 11	28112
vi) CHARGE NO.12	45469
vii) CHARGE NO. 13	206592
b) CIR.01 of Charge No.14	14,691
c) CIR.01 of Charge No.15	15980
Total	838642
Total Population of Peshawar	4269079
Quota of NA Seat Peshawar	858815

(4)

NA #	NOTIFIED BY ECP	PROPOSED
NA 27	814,036	855,043
NA 28	851,544	858,978
NA 29	868,205	868,205
NA 30	869,685	848,211
NA 31	865,609	838,642
	4,269,079	4,269,079

It is therefore prayed that on acceptance of the instant representation in view of the above the delimitation of the National Assembly constituencies of District Peshawar may kindly be delimited as proposed in this representation.


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