

2020 NSW REDISTRIBUTION

AUSTRALIAN LABOR PARTY (NEW SOUTH WALES BRANCH)

COMMENTS ON SUGGESTIONS

Introduction

In commenting on the forty suggestions which have been made to the Redistribution Panel we note that none of the ninety Members of the Legislative Assembly who represent a political party made a suggestion. That's because each of the parties have an internal consultative process allowing for MP's, branches and party members to submit proposals which, in turn, are then moulded to form a comprehensive submission covering the entire State.

Of the remaining suggestions, six were made by individuals covering the entire State and twenty eight pertain to a single electoral district, or else a region, or a handful of adjoining districts.

Unfortunately, in our view, the individual whole of State suggestions, and for that matter the suggestions of both the National Party and the Greens Party, fail to pay sufficient regard to the malapportionment provision embodied in s28A of the NSW Constitution Act.

To us, the redistribution should be a reasonably clear-cut affair. This is reflected in a degree of commonality in some aspects of the statewide submissions made by the parties. These include:

- All whole of State suggestions, including those made by the Liberals, the Nationals and the ALP agree that a middle western suburbs seat be abolished (the ALP says Cabramatta; the Liberals Canterbury; the Nationals Lakemba) and that a new electoral district should be created in south western Sydney. Both the ALP and the Liberal submissions agree that part of Camden should be transferred to the District of Campbelltown.
- Aside from proposed name changes, no-one suggests that an inland country district should be abolished.
- Many of the transfers required to give effect to one vote one value can be accomplished by wholly, or in part, restoring boundaries which applied prior to the last redistribution. While the major parties diverge, our submission is that members of the Redistribution Panel could consider, where appropriate, former boundaries.

Before discussing differences between submissions by Region we will outline:

- Our desire for an approach which emphasises political neutrality;
- A summary of the way in which the ALP suggestion, wherever practicable, restores boundaries which applied prior to the 2013 redistribution; and
- Some corrections to our earlier submission.

The effective political neutrality of the ALP suggestion

The report of the then Commissioners, following the last redistribution stated “The Commissioners did not consider the political effects of electoral boundaries”. The ALP completely agrees with that approach then, and now.

However, we note that this is also a public process and members of the Redistribution Panel should expect public discussion of the political consequences of the various submissions, including the ALP’s.

In that context we note our serious concerns with significant elements of other parties’ submissions which appear to be drafted with political considerations at their core – and little to no regard to the principles of apportionment.

We note, particularly, that if the Liberal Party submission were adopted in totality, the ALP would require a 57.1% 2PP to win a majority, whereas the Coalition would actually increase its majority with a 50% 2PP.

Indeed, on current boundaries, should the ALP win 50% 2PP, it would only win additionally Penrith and East Hills. Furthermore, on current boundaries, assuming the nine cross benchers hold their seats, the Coalition would be returned to Government with an absolute majority on a 2PP vote of 50.7%.

The ALP would require 55.5% to win an absolute majority.

All of this is to provide an advantage to the Coalition better than Thomas Playford enjoyed in his days running South Australia or that Bjelke Petersen ever had in Queensland.

Under our proposal, we expect that both Heathcote and Upper Hunter (as currently named) will convert from being marginal Coalition held seats to become marginal ALP held seats. That won’t be as a result of any brilliance on our part, but rather simply the way the elector numbers run.

No other seats change hands, although both Seven Hills and Holsworthy would become more marginal such that, if at the next election the ALP gained 50% 2PP, both it and the Coalition would hold 42 seats each.

That, in our view, is a fair and balanced outcome.

Restoration of boundaries wholly or in part which applied prior to the 2013 redistribution

Whenever it is reasonable to do so, and at the same time meeting the mandatory numerical requirements of the legislation, the ALP suggestion has reverted to the boundaries which applied prior to the last redistribution. We list these below.

The highest numbers of elector transfers, reverting to the former boundaries, are in our proposed districts of Seven Hills, Heathcote and Macquarie Fields. These will head our summary.

North West Sydney

At the last redistribution, those parts of Hawkesbury LGA, then in the districts of Londonderry and Riverstone, were transferred to the district of Hawkesbury. The overall effect of those transfers was that collectively, North Western Sydney districts were well over quota. To bring those districts to within quota, the suburbs of Winston Hills and Northmead were sent to Seven Hills and part of the suburb of Carlingford was transferred to Parramatta.

This time, the North Shore and North West Sydney combined are about a third of a quota short. Our suggestion, in order to replenish the shortfall, returns Winston Hills from Seven Hills to Baulkham Hills and also transfers from Parramatta the suburb of Carlingford to Epping. That is a far better arrangement, on community of interest terms, than the unnecessary fracturing, as proposed by the Liberal Party, of both Blacktown City Council and Hawkesbury Shire.

Here it should also be noted that Old Windsor Road, an electoral boundary since time immemorial at local, State and Federal levels is maintained in the ALP suggestion. Also, under the ALP suggestion, Seven Hills regains parts of Blacktown Council to Sunnyholt Road as was the case when this district was known as Toongabbie.

Illawarra

At the last redistribution, projections assumed incorrectly that the seats within the Illawarra would be significantly below quota. To make up for the assumed shortfall, Heathcote was forced to relinquish most of its share of northern Wollongong suburbs, all the way down to Bulli.

This time, the reverse situation applies. Consequently, it makes sense to restore to Heathcote those suburbs which it lost at the last redistribution.

Any other proposal, such as transferring parts of the South Coast to Monaro, can only be a political decision and one that denies electoral reality.

South West Sydney

Until 2015, Macquarie Fields contained the suburbs of Casula, Lurnea and Prestons. The then district of Menai's western boundary was the Georges River. This time, both the Liberal and Labor parties suggest that the suburbs west of the Georges River added at the last redistribution to Holsworthy are necessary to facilitate the establishment of an additional district in South Western Sydney.

The loss of those western suburbs from Holsworthy is made up in the ALP suggestion by uniting all of the currently split suburb of Liverpool plus Warwick Farm. The Liberal's suggestion adds the suburb of Glenfield to Holsworthy (from Macquarie Fields) and consequent to its remarkable proposed Miranda, adds additional territory from Sutherland Shire than what the ALP proposes.

But as earlier stated, both suggestions require the suburbs west of the Georges River now in Holsworthy to be placed in a different district. The ALP suggestion restores those suburbs to Macquarie Fields, exactly where they were prior to the last redistribution.

That arrangement eventually provides enough electors to allow the formation of Minto, our proposed new South Western Sydney district.

On the other hand, the Liberal Party uses these electors to allow the formation of their new district of Leppington. But as we will later see (in the ALP proposed compromise between both parties' suggestions) even though the Liberal Party places their proposed Leppington at the maximum lower end of quota it will, by the projected date, be at 3.7% above quota.

This is unacceptably high, given that the boundaries will apply for two elections.

Northern NSW

Lismore returns Tenterfield Shire to Northern Tablelands, which that district held until 2015.

Please also note suggestion 10 from the Mingoola Progress Association:

<https://www.elections.nsw.gov.au/NSWEC/media/NSWEC/Redistribution/Suggestions/10-R-South-obo-Mingoola-Progress-Association-redacted.pdf>

Mingoola is within Tenterfield Shire. Consider the fact that Lismore as a State District has existed continuously since 1913, except for 1920-27 when it was incorporated into Byron. Tenterfield was a seat from 1859-1981, except for 1920-27 when it was included in Northern Tablelands and again from 1981-2015.

In our view, it is problematic that a coastal seat goes over the Great Dividing Range as has been the case with Lismore since 2015.

Other regions

- With Coogee, the ALP proposes to restore the Anzac Parade boundary which applied prior to the last redistribution, plus a small additional extension into the suburb of Kingsford, all coming from Heffron.
- Sydney is able to regain Moore Park and most of Surry Hills, which it lost at the last redistribution.
- Drummoyne regains Haberfield, which had been in this seat until 2007.
- East Hills adopts, at its western end, the Marion Street boundary which was its northern boundary until 2015.
- Mulgoa sheds its Fairfield LGA component which it only gained at the last redistribution. Similarly, it gains parts of Liverpool Council back from Camden.
- Coffs Harbour regains Urunga which was in that district until 2015.
- Barwon regains Lachlan Shire which it lost last time.
- As was the arrangement with the former district of Murrumbidgee, abolished in 2015, the district of Murray is able to contain all the Murrumbidgee Irrigation Area Shires covering Griffith, Leeton and Narrandera.
- Cootamundra is able to regain Boorowa and Crookwell which were previously in the former district of Burrinjuck which was renamed at the last redistribution.

Two corrections to the ALP submission and a proposed compromise between both the Liberal and Australian Labor Parties suggestions regarding Camden and Campbelltown

When submitting our suggestion, the ALP incorrectly and inadvertently put in the wrong draft for the districts of Goulburn, Cootamundra and Monaro in one instance and in the other, for the districts of Bankstown and Lakemba.

The corrections are detailed below and have separately been supplied early this morning to the Redistribution Panel both as corrected maps and in MapInfo.

In the first case our final submission was intended to include Gunning as continuing to remain in the district of Goulburn, such that the Hume Highway threads from east to west through the centre of that district.

In the second, we simply provided the wrong transfers between our proposed Villawood and Bankstown.

Our narrative for all the above mentioned districts remains the same as originally put in our original submission. The members of the Redistribution Panel might also wish to assume that these corrections can be taken as a response to suggestions made by others.

The correct transfers involving the aforementioned districts are detailed below.

Bankstown/Villawood

1. LAKEMBA (Rename Bankstown)	55 449(-3.1)	56 921(-3.9)
Less SA2 Lakemba (Part suburb of Lakemba south of Railway Line)		
To Canterbury SA1's 1157301-2;5;8-10;12;15;20;22;26;29	-3 348	-3 558
Less part SA2 Roselands (Its entire share)		
To Canterbury SA1's 1136701-12	-3 949	-3 918
Less part SA2 Wiley Park (part below Railway Line)		
To Canterbury SA1's 1157401;4;7-8;10;13-18;21	-2 900	-2 925
Less part SA2 Punchbowl (That part south of Canterbury Rd)		
To Canterbury SA1136601-9;41-47	-4 048	-4 369
Less part SA2 Riverwood (Lakemba's share)		
To Oatley SA1's 1137307-17;20-25	-4 521	-4 633
Less Plus part SA2 Narwee-Beverley Hills (Narwee)		
To Oatley SA1's 1137011;14-16;30	-1 401	-1 399
Less part SA2 Narwee-Beverley Hills (part Beverley Hills)		
To Kogarah SA1's 1137011;17	-741	-745
Plus part SA2 Bankstown North (Its share)		
Ex Bankstown SA1's 1157101-5;7-17;20-40	+8 538	+8 915
Plus part SA2 Bankstown South (East of Stacey St)		
Ex Bankstown SA1's 1157218	+4	+4
Plus part SA2 Punchbowl (Its share)		
Ex Bankstown SA1's 1136624-26	+897	+888
Plus part SA2 Chullora (Its share=suburb of Potts Hill)		
Ex Bankstown SA1 1135502	+719	+705
Plus part SA2 Yagoona-Birrong (Its share of the suburb of Yagoona plus that part of Birrong east of Auburn Rd)		

Ex Bankstown SA1's 1136103;5-34;36-37;39-44;46	+12 201	+12 503
Plus part SA2 Yagoona-Birrong (Its share)		
Ex East Hills SA1 1136104	+426	+418
TOTAL	57 326(0.2)	58 807(-0.7)

2. BANKSTOWN (Rename Villawood) 54 774(-4.2) 57 207(-3.4)

Less part SA2 Bankstown South (East of Stacey St)

To Lakemba SA1's 1157218 -4 -4

Less part SA2 Bankstown North (Its share)

To Lakemba SA1's 1157101-5;7-17;20-40 -8 538 -8 915

Less part SA2 Punchbowl (Its share)

To Lakemba SA1's 1136624-26 -897 -888

Less part SA2 Chullora (Its share=suburb of Potts Hill)

To Lakemba SA1 1135502 -719 -705

Less part SA2 Yagoona-Birrong (Its share of the suburb of Yagoona plus that part of Birrong east of Auburn Rd)

To Lakemba SA1's 1136103;5-34;36-37;39-44;46 -12 201 -12 503

Less part SA2 Bankstown-South (That part west of Stacey St and south of Marion St and the Railway Line)

To East Hills SA1's 1157201-6;8-9;11-12;14-16;19-31;34;36;38;40-41;43-44 -7 132 -8 181

Plus part SA2 Bass Hill-Georges Hall (Its Share)

Ex East Hills SA1's 1135402;11;16;18;25-26;28-34;44;51 +3 377 +3 295

Plus SA2 Fairfield East

Ex Fairfield +9 485 +9 752

Plus part SA2 Canley Vale-Canley Heights (Its share of Canley Vale)

Ex Fairfield SA1's 1151301-2;15-17;22-25;29-32;40-41;46-48

	+4 390	+4 392
Plus SA2 Cabramatta-Lansvale		
Ex Cabramatta	+15 156	+14 917
Plus part SA2 Canley Vale-Canley Heights (Its share of Canley Vale)		
Ex Cabramatta SA1's 1151304-5;42-45	+1 998	+2 019
TOTAL	59 689(4.4)	60 386(2.2)

Monaro/Goulburn/Cootamundra

1. MONARO	57 772(1.0)	60 385(1.9)
Less part SA2 Goulburn Region (Its share)		
SA1 1154013 To Goulburn	-116	-111
Less part SA2 Queanbeyan Region (Its share of Bywong ;Sutton and Tarago plus part Lake George)		
SA1's 1101104;18;27;33-36; To Goulburn	-1 534	-1 538
TOTAL	56 122(-1.9)	58 736(-0.9)
2. COOTAMUNDRA	53 064(-7.2)	53 557(-9.6)
Less part SA2 Griffith Region		
SA1 1125706 To Murray	-56	-53
Less Its share of SA2 Narrandera (Shire of Narrandera)		
To Murray	-4 250	-4 239
Less SA2 Gundagai (former Shire) To Wagga Wagga	-2 658	-2 664
Plus Its share SA2 Condobillin (entire Lachlan Shire)		
Ex Barwon	+4 381	+4 436
Plus Goulburn's share of Hilltops LGA:		
Part SA2 Young Region SA1's 1154401;5;8;10;17-18	+1 752	+1 762
Ex Goulburn		
Plus part SA2 Yass Region SA1 1154206 Ex Goulburn	+204	+202

Part Goulburn's share of Upper Lachlan Shire:

Plus part SA2 Yass Region SA1's 1154207;29	+316	+325
Ex Goulburn		
Plus part SA2 Goulburn Region Ex Goulburn	+4 657	+4 673
SA1's 1154003;5-6;8-11;14;17-19;21;24;26;30-31		
TOTAL	57 410(0.4)	57 999(-2.1)

3. GOULBURN	58 084(1.6)	60 287(1.8)
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Less Goulburn's share of Hilltops LGA:

Part SA2 Young Region SA1's 1154401;5;8;10;17-18	-1 752	-1 762
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To Cootamundra

Less part SA2 Yass Region SA1 1154206 To Cootamundra	-204	-202
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Less part Goulburn's share of Upper Lachlan Shire:

Less part SA2 Yass Region SA1's 1154207;29	-316	-325
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To Cootamundra

Less part SA2 Goulburn Region To Cootamundra	-4 657	-4 673
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SA1's 1154003;5-6;8-11;14;17-19;21;24;26;30-31

Plus part SA2 Goulburn Region (Its share)

SA1 1154013 Ex Monaro	+116	+111
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Plus part SA2 Queanbeyan Region (Its share of Bywong ; Sutton and Tarago plus part Lake George)

SA1's 1101104;18;27;33-36; Ex Monaro	+1 534	+1 538
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Plus part SA2 Bowral (suburb of Burradoo)	+1 966	+1 984
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SA1's 1128423-26;30 **Ex Wollondilly**

Plus part SA2 Southern Highlands (suburb of Woodlands north of Hume Motorway)

SA11128905 Ex Wollondilly	+183	+189
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Plus part SA2 Hill Top-Colo Vale (suburb of Colo Vale) Ex Wollondilly

SA1's 11208-11 **+1 061** **+1 100**

Need to split SA1 1128515 (whole SA1 =375/380) at suburb boundary

Allocate to Goulburn only part SA1 1128515 within Colo Vale

+190 **+190**

TOTAL **56 205(-1.7)** **58 437(-1.4)**

Campbelltown/Camden

With the earlier start to the redistribution process than in most previous times, both the ALP and the Liberal parties have had difficulties with containing growth in several south western Sydney districts. For example and as earlier mentioned, we think that the Liberal Party's proposed district of Leppington, which would have a plus 3.7% deviation from the projected quota, is unacceptably high. On the other hand, we were uncomfortable with the fact that our proposed district of Campbelltown with a deviation of 1.6% at the projected time is also a little high.

It should be noted that both proposals remove and send north the Liverpool LGA component from the existing district of Camden. In both cases the suggested district of Camden contains only parts of Camden LGA. However, whereas the ALP removes the Camden LGA excess in one movement, (to Campbelltown), the Liberal Party transfers parts of Camden LGA twice, some electors are sent to Campbelltown itself and others are sent to its proposed new seat of Leppington.

The ALP proposed compromise involving Camden and Campbelltown has the following features:

- Only a single excision is made from Camden LGA.
- The ALP now adopts the Liberal Party suggestion that the suburbs of Currans Hill and Smeaton Grange along with Gregory Hills and Gledswood Hills be sent to Campbelltown.
- Instead of making an additional transfer of parts of Camden LGA at its Leppington end, the ALP compromise involves *continuing* the transfer out of Camden to Campbelltown the three high growth SA1's in Oran Park and Catherine Fields which are south and south west of Peter Brock Drive and Springfield Road.
- The effect of the above, albeit dispensing with the Liberal Party's suggested Leppington, results in Camden alone, of all the high growth south western Sydney seats, having a plus sign next to its deviation from the future quota. And that plus sign is just 0.6%. Overall, our compromise arrangement employs the best features from both suggestions and, at the same time contains future growth better than both original suggestion.

1. CAMPBELLTOWN	54 810(-4.2)	56 136(-5.3)
Less SA2 Rosemeadow-Glen Alpine	-14 552	-14 837
To Minto		
Less its share SA2 Leumeah-Minto Heights	-8 117	-7 971
To Minto		
Less part SA2 Bradbury-Wedderburn (All except east of Appin Rd and north and west of St Johns Rd) SA1's 1143601-3;5-14;18-24;26-29;34-39;42-46		
To Minto	-9 476	-9 715
Plus part SA2 Claymore-Eagle Vale-Raby (Its share)		
SA1 1143859 Ex Camden	+26	+67
Plus part SA2 Mount Annan-Currans Hill (Suburbs of Currans Hill; Smeaton Grange and part Gregory Hills) SA1's 1143503-4;8;10-13;30-32;46-48;57;60;71		
Ex Camden	+3 792	+4 317
Plus part SA2 Cobbitty-Leppington (Balance of Gregory Hills and Gledswoods Hills and those parts of Catherine Fields and Oran Park South of Peter Brock Dr plus south west of Springfield Rd SA1's 1150620;22;24-25;27;33		
Ex Camden	+12 095	+16 792
Plus Its share of SA2 Claymore-Eagle Vale-Raby		
Ex Macquarie Fields	+8 032	+8 009
Plus part SA2 Minto-St Andrews (St Andrews; Bow Bowling and that part of Minto west of Railway Line) SA1's 1144301-11;15-17;22-25;28;32-33;42		
Ex Macquarie Fields	+5 125	+5 053
TOTAL	51 735(-9.5)	57 851(-2.4)

2. CAMDEN	75 379(31.8)	90 387(52.6)
Less Camden's share of Liverpool Council:		
Less SA2 Badgerys Creek SA1's 1159201-2	-11	-27
To Mulgoa		

Less part SA2 Mulgoa-Luddenham-Orchard Hills	-611	-605
SA1's 1146303;10;20-21 To Mulgoa		
Less part SA2 Austral-Greendale	-4 705	-7 187
SA1's 1150501-5;7-10;16-19;21;23 To Mulgoa		
Less part SA2 West Hoxton-Middleton Grange	-212	-217
SA1's 115971204;7;12;17 To Liverpool (rename Green Valley)		
Less part SA2 Camden-Ellis Lane (All that part within Wollondilly Shire)		
SA1's 1143305-6;16 To Wollondilly	-1 574	-1 561
Less part SA2 Douglas Park-Appin (All is in Wollondilly Shire)		
SA11144618 To Wollondilly	-24	-31
Less part SA2 Claymore-Eagle Vale-Raby (Its share)		
SA1 1143859 To Campbelltown	-26	-67
Less part SA2 Mount Annan-Currans Hill (Suburbs of Currans Hill; Smeaton Grange and part Gregory Hills) SA1's 1143503-4;8;10-13;30-32;46-48;57;60;71		
To Campbelltown	-3 792	-4 317
Less part SA2 Cobbitty-Leppington (Balance of Gregory Hills and Gledswoods Hills and those parts of Catherine Fields and Oran Park South of Peter Brock Dr plus south west of Springfield Rd		
SA1's 1150620;22;24-25;27;33		
To Campbelltown	-12 095	-16 792
TOTAL	52 329(-8.5)	59 583(0.6)

We now have arrived at that part of the ALP's commentary where we discuss differences between suggestions by region. Let's deal initially with those regions outside Sydney:

North Coast- Hunter

We have already discussed Tenterfield Shire but we note that the Liberal Party proposal to move Port Macquarie's surplus south rather than north is a consequence of refusing to agree with the proposition that the Great Dividing Range should be again respected, as it is at the Federal level. There is a natural boundary separating the coast from the Tablelands.

Our focus will be on those seats at the northern end of the Hunter and in particular the districts of Port Stephens and Upper Hunter. The first thing to note is that both the major parties effectively transfer about the same number of electors to the rural inland districts from the coastal band that runs from Gosford to the Queensland border. Both major parties transfer Liverpool Plains Shire and Upper Hunter Shires west. Where we significantly differ is with our treatment of Port Stephens.

Since its inception in 1988, Port Stephens has always contained the bulk of Port Stephens LGA. It has always included both Raymond Terrace and Nelson Bay and since the last redistribution has contained all of Port Stephens Council. The National Party also agrees with the ALP that for this redistribution, the boundaries of Port Stephens Should be unchanged.

Inland NSW

In the rural parts of NSW, where the Liberal Party does not seek to acquire a political advantage, it proposes electoral arrangements very similar to the ALP. For example, we transfer Gunnedah to Barwon; return Lachlan Shire to Cootamundra and unite the MIA towns together in the district of Murray.

The big, unnecessary change here is that proposed by the National Party for the districts of Barwon and Murray. Their justification for their proposal is the size of seats but once you examine the areas involved it loses credence. For one thing, Griffith is split from the other MIA towns which the Liberals, the ALP and most other suggestions say should be contained in a single district.

If you take the five Shires of Bourke, Brewarrina, Central Darling, Cobar, and Walgett plus the area of unincorporated NSW surrounding Broken Hill, you find an area of 275,257 square kilometers, representing 34.4% of the land area of NSW. This area contains 10,770 electors today, projected to be 10,967. They are all within the Western Division of NSW, established following the Royal Commission of 1900 and all share common interests. It would be absurd to split these communities from Broken Hill as under the National Party suggestion.

South Coast to Cronulla

At both the Monaro and Miranda ends of this area, the Liberal Party has gone for major changes when none are required and all to prevent the natural flow of electors into Heathcote and also to improve its hold on the district of Holsworthy. Let's deal with Monaro first.

From the time of its creation in 1988, Bega has included most of the coastal area previously in Monaro. Since the 2004 redistribution, Monaro has no longer held a coastal strip. That's because growth in Queanbeyan and its surrounds has allowed Monaro to no longer contain the strip.

The ALP strongly agrees with the National Party submission that the coastal strip from Merimbula to the Victorian border (including Eden) should remain in the Seat of Bega. The Liberal Party proposal is an artificial contrivance designed to prevent the Seat of Heathcote returning to its more traditional boundaries, which include more of the northern Illawarra.

It fails every test for the **Criteria for distributions** set out under **S21 (b) of the Electoral Act 2017 No 66.:**

- (i) *community of interests within the electoral district, including economic, social and regional interests*
There are virtually no communities of interests between Cooma and Queanbeyan on one hand and Eden and Merimbula on the other
- (ii) *means of communication and travel within the electoral district*
There is no direct road connection between Cooma and Queanbeyan, and Eden and Merimbula. You can't drive from one part of the proposed Monaro electorate to the other part unless you drive through the electorate of Bega
- (iii) *the physical features and area of the electoral district*
Most of the proposed electorate is inland, while the proposed addition is coastal
- (iv) *mountain and other natural boundaries*
The proposed coastal addition is separated from the rest of the electorate by the Great Dividing Range
- (v) *the boundaries of the existing electoral districts*
The proposal explicitly ignores the existing boundaries

There is projected to be future very strong growth in Queanbeyan and its surrounds but outside the time frame that the Redistribution Panel needs to consider. In that case, the movement of electors out of Monaro will in future go the other way to what the Liberal Party now suggests.

But what is important now is that Queanbeyan and its surrounds be kept together. All suggestions other than that of the Liberal Party achieve this objective.

Miranda

Since Tom Uglys Bridge was opened in 1929 and the later Captain Cook's Bridge was opened in 1964, no Shire district has straddled both sides of the lower reaches of the Georges River. We've gone back to 19th Century NSW boundaries and we can't find an instance of the lower part of the Georges River ever being crossed at the State district level.

The proposal to shift the boundary of the electoral district of Miranda over the Georges River creates a number of issues relating to communities of interest affecting both the Sutherland Shire and the St George region (previously defined by the Rockdale, Kogarah and Hurstville local government areas).

The Sutherland Shire local government area currently has a population of approximately 2.6 state electoral districts, and by shifting Miranda such that a significant portion of the seat will be in St George there will only be one seat, Cronulla, which wholly represents the Sutherland Shire as Heathcote is split between the Sutherland Shire and the northern Illawarra, and Holsworthy is split between the Sutherland Shire and Liverpool. The Sutherland Shire is a longstanding community of interest with a strong regional identity and this shift would diffuse its identity.

Similarly, while currently the vast majority of the former Rockdale Council area is represented within one electoral district, Rockdale, this proposed boundary shift would result in a further diffusion of the now Bayside Council, which already runs over 4 state electorates, and will have a significant impact on the regional identity of St George. Rockdale also currently has particularly well defined boundaries on its north, east and south, being the Cooks River to the north, Botany Bay to the East and Georges River to the south, and these boundaries should be strictly maintained as defining a clear community of interest. In particular, the Sans Souci peninsula (suburbs of Sans Souci, Sandringham, Dolls Point, Ramsgate, Ramsgate Beach) shares highly similar interests with the remainder of the St George Botany Bay foreshore (suburbs of Brighton-Le-Sands, Kyeemagh, Monterey) and it is highly desirable that these areas remain in one electorate.

We now turn to metropolitan Sydney.

Inner Sydney

Our main commentary for this region will focus on the Liberal Party proposed districts in the eastern suburbs. There is a lot to write but we note two things first. In his suggestion, the MP for Sydney, Alex Greenwich has implicitly rejected the Liberal Party proposal to make wholesale changes to the district of Vacluse, which has existed continuously since the resumption of single member districts in 1927. Only minor change is required for Vacluse.

Secondly, for all the major changes which the Liberal Party proposes in the eastern suburbs, by the time you've reached the end of the region in the inner western suburbs district of Summer Hill, they still make the same transfers required from Canterbury to supplement the overall shortfall in the region of 20% of a quota. Let's now examine those eastern suburbs seats in detail.

Heffron

The electorate of Heffron since its inception, other than for a brief period, has had at its core the suburbs of Mascot, including Kingsford Smith Airport, Rosebery, Eastlakes, Kingsford, Kensington, Beaconsfield and Waterloo. There have been similar community of interests and clear boundaries. Those suburbs identify with those communities of interests.

Previous boundary changes for Heffron have only occurred because of this electorate's continued population growth, which is predicted to continue unabated. The ALP's submission has maintained the core suburbs as best as possible, paying due regard to existing boundaries and the communities of interest.

Proposing to create a new seat of Botany Bay, as proposed by the Liberal Party, does not pay due regard to or respect the existing boundaries or community of interest as required by the statute. Proposing a boundary dividing the suburb of Maroubra, and Maroubra Junction by proposing a boundary that runs down Maroubra and Heffron Road, Maroubra, is contrary to the statutory provisions. It divides suburbs with identical community of interests for no legitimate purpose.

Significance of the suburb of Maroubra

To divide the suburb of Maroubra splits a key town-centre in Sydney's South East and separates it into two adjoining seats.

Maroubra is the main transport interchange, business and service hub for surrounding suburbs.

The linked corridor from Maroubra Junction to Eastgardens has been identified as a strategic centre in the Greater Sydney Commission's Eastern City District Plan and is identified as an area exceeded in current significance only by Bondi Junction along as a jobs hub. The proposed seat of Botany Bay splits this strategic centre in half.

The proposed 'Botany Bay' splits the enrolment catchment for Maroubra Junction Public School in half on a north-south basis. It cuts one third of the enrolment catchment area of Maroubra Bay Public School losing of the area north of Maroubra Rd to Liguria St to the 'Coogee'. Further, the proposed Liberal changes split the South Sydney Boys High School catchment area which is currently wholly contained in the Maroubra electorate.

To divide the suburb of Maroubra further separates all Maroubra centred sporting teams including Maroubra Uniting Football Club, Maroubra JRLC, Maroubra Missiles Junior Rugby

League, Maroubra Swimming Club, Maroubra Cyclones, and Maroubra Mermaids Netball Club. Moreover, the Maroubra Winter Swimmer's Club would be divided from their parent Surf Club – Maroubra SLSC and their swimming location Mahon Pool.

The inclusion of Eastlakes and Mascot into 'Botany Bay' and the removal of sections of Maroubra north of Maroubra Rd further forces the seat to take on a much more uneven socio-economic profile. On current boundaries, similar more affluent coastal suburbs are grouped together with Maroubra, Malabar, Little Bay, Phillip Bay and La Perouse all contained in the one seat. For example, Little Bay has a median weekly household income of \$2041 per week and Phillip Bay has a median household income of \$2139 per week. Maroubra with a median weekly income of \$1722, its northern more affluent sections in particular, represents a much closer economic fit with the aforementioned suburbs compared to the proposed inclusion of Eastlakes with a median weekly household income of just \$1051 per week.

The exclusion of Daceyville from the electorate of 'Botany Bay' retains only one third of the school catchment area for Daceyville Public School in 'Botany Bay'. It sends two thirds into the new Coogee. The catchment is currently entirely within 'Maroubra'.

Further, to remove the predominately social housing suburb of Daceyville from the division of 'Botany Bay' would separate significant social housing estates in the Matraville, Bilga, Namatijira, Soldier's Settlement, Edgehill, and Coral Sea estates from the one electorate. Moreover, the aforementioned housing estates would no longer have a Housing NSW office within the electorate of Botany Bay.

The inclusion of Daceyville in the proposed seat of Coogee, currently contained in Maroubra and previously in Heffron until 2015, arbitrarily places the only suburb located in the Bayside Local Government Area that is east of the airport in the newly constituted 'Coogee'. This fails as an attempt to unify an existing local government area boundary.

With the exception of the suburb of Botany, all other suburbs within the current electorate of Maroubra are covered by the Eastern Beaches Police Area Command. The inclusion of Eastlakes and Mascot would see the seat evenly split across two police area commands. Further, Mascot police station would be the only police station physically located within the electorate and at its north-westernmost tip at that.

- *The physical features and area of the electoral district*
- *Mountain and other natural boundaries*

The current seat of Maroubra has clear water boundaries on three sides: the coastline to the east, Botany Bay to the south and the East Lakes to the north west.

On the proposed boundaries of 'Botany Bay' the seat is required, at its north-eastern boundary to jump Eastlakes Golf Course, an entirely fenced facility with no public walking access. It then is required to traverse Southern Cross Drive, a several lane, elevated motorway and geographical boundary dividing the two current electorates of Maroubra and Heffron. On these

physical features the proposed seat suggests jumping a system of natural lakes, a golf course and then a multi-lane motorway.

Currently to the north, the Kingsford Light Rail terminus (located at the former nine-ways roundabout – the longstanding northern boundary) and The Juniors at Kingsford represents a clear built form geographical landmark. The suggested 'Botany Bay' removes this clear built form barrier.

Moreover, at the northern border with Heffron at Kingsford, currently the residential built form is single storey buildings on the Maroubra electorate side which jumps to several storey apartment buildings on the Heffron side representing a clear physical transition. The building where Churchill's at Kingsford is located is a clear example of this transition.

To the north east of the current seat of Maroubra, the large Defence facility at Randwick Barracks represents a clear built form boundary at Avoca St. The Randwick Environment Park, a beautiful restricted wetlands and wildlife sanctuary, forms an inaccessible green physical barrier separating the seats of Coogee and Maroubra as well as the suburb boundaries of Randwick and Maroubra. To cross this geographical barrier would be to ignore the clear physical features of the north-eastern boundary of electorate.

Maroubra Rd may represent a medium-sized road within the electorate, but this is its only relevant consideration. The road has a similar built form on both sides of the proposed boundary and does not mark any other significant geographical feature.

The proposed Maroubra Rd boundary at Maroubra Beach splits the Maroubra Bay Floodplain study area.

The proposed Maroubra Rd boundary splits Randwick Council's Southern Coast Local Character Statement area running from Torrington Rd in Maroubra to the southernmost point of La Perouse.

The proposed Maroubra Rd boundary splits Randwick City Council Maroubra Central Local Character Statement area running from South Coogee, Kingsford (southern part) and that includes all of Maroubra Junction on both sides of Maroubra Rd.

- *Means of communication and travel within the electoral district,*

The Liberal submission cites 10 existing east to west bus routes to justify the alleged transport links between the areas proposed in the new boundaries of 'Coogee' and 'Botany Bay'. Notably, the 302, 317, 376, and 377 bus routes cited in the Liberal submission are all proposed to be withdrawn in Appendix B of the Draft South East Sydney Integrated Service Plan by Transport for NSW.

10 other bus routes, plus their express iterations, within the seat of Maroubra operate on a north-south basis, in particular via Bunnerong Rd and Anzac Pde and travel past Maroubra

Junction. These link the south of the seat to the north of the seat and predominately head into the CBD.

Moreover, while Mascot train station, which is attached to the Airport & South line is included in the proposed 'Botany Bay' electorate, it does not connect to any other part of the electorate.

To travel via car from the southern-most point of the electorate of Maroubra from La Perouse to the most north-western point at Lord St Botany currently takes 18 minutes. On the proposed new boundaries, the trip blows out to between 25-27 minutes.

If travelling north via Anzac Parade or Bunnerong Rd and along Gardeners Rd, to reach the newly included sections of Eastlakes and Mascot under the proposed boundaries, a car commuter would be forced to leave the electorate of Botany Bay at the suburb Maroubra then travel through the suburbs Kingsford and Daceyville now in the proposed electorate of 'Coogee' before returning into 'Botany Bay' at Gardeners Rd, Eastlakes.

- *the boundaries of the existing electoral districts.*

The division of Maroubra has existed since 1950 and in all iterations of the seat, it has been centred around and wholly contained the suburb of Maroubra. The proposed changes split the whole suburb for the first time in 70 years. This would cause clear confusion for electors in identifying their electorate.

The proposed 'Botany Bay' would move the current electorate office which has remained in the same location since the early 1980s outside of the seat and into the newly proposed 'Coogee'.

On current boundaries, the suburb of Maroubra is contained entirely within the federal seat of Kingsford Smith, state seat of Maroubra, and Randwick City Council area. The proposed district of 'Botany Bay' would see the separation of the suburb for the first time at across any level of government.

Moreover, Maroubra Rd, currently does not represent any electoral boundary at federal, state, local government area or local government ward level.

To split the suburb of Maroubra would remove half of the Randwick City Council, Central Ward area from the seat of Maroubra which is currently contained entirely within the existing seat.

Moreover, the suburbs of La Perouse, Little Bay, Matraville, Chifley, Maroubra, and Malabar have not been located in the same state seat, in any iteration, as Eastlakes or Mascot since at least 1950 or potentially ever.

The proposed 'Botany Bay' is the same width as the federal seat of Kingsford Smith on an east – west basis despite both sharing the same coastline as a natural boundary.

Coogee

The Liberal Party's proposed seat of Coogee shifts the make-up of the electorate from a seat defined by a common high median weekly income and educational attainment to one with a large variation in both income and educational attainment across the seat.

According to the 2016 Census, the namesake suburb of Coogee has a median weekly household income of \$2,396 and 46.5% of its population has attained a bachelor's degree or higher. The suburb Coogee is currently linked in the same electorate with the adjacent and similar suburb of Clovelly, which is proposed to be shifted into the newly created division of 'Waverley'. Clovelly has a median weekly household income of \$2768 and 49.5% of its population has attained a bachelor's degree or higher. The existing seat of Coogee's least affluent and least educated suburb of Bondi Junction has a median weekly household income of over \$2026 per week and 42.9% of residents having achieved a bachelor's degree or higher. Under the proposed boundaries, the suburb of Coogee would now share an electorate with Daceyville, an almost entirely social housing suburb that has a median weekly household income of just \$498 and only 12.3% of the population having attained a bachelor's degree or higher. Clearly such a proposed amalgam would fail as an attempt to unite shared economic communities of interest.

Where there was previously a single health district covering the seat there are now two. The current seat of Coogee is entirely contained within the South Eastern Local Sydney Local Health District. By crossing Southern Cross Drive into Zetland and Rosebery, the proposed Liberal Party seat of 'Coogee' would now include the Sydney Local Health District for the first time.

The Mascot located JJ Cahill High School catchment area would now also cover the proposed 'Coogee' for the first time.

On current boundaries, the seat predominately covers the eastern suburbs areas traditionally associated with the Sydney Roosters rugby league football club. To shift the boundaries of the seat south and west moves the proposed 'Coogee' deep into territory historically covered by the South Sydney Rabbitohs. The proposed new boundaries also move the Sydney Roosters' associated Easts League Club out of the proposed 'Coogee' and the Rabbitohs' associated The Juniors into the electorate. The significance of this sporting identification to local identity and its historical nexus with socio-economic status, geography, and cultural enmity are difficult to overstate. In short, the proposed changes transform the existing seat of Coogee from a 'Roosters' seat into a 'Rabbitohs' seat'.

- *means of communication and travel within the electoral district*

The Liberal submission cites 10 existing east to west bus links to justify the alleged transport links between the areas proposed in the new boundaries of 'Coogee' and 'Botany Bay'. Notably, the 302, 317, 376, and 377 bus routes cited in the Liberal submission are all proposed to be withdrawn in Appendix B of the Draft South East Sydney Integrated Service Plan by Transport for NSW.

The 353 is a key north-south linkage between Coogee to Bondi Junction and the 400 bus route, which runs on a 'v' shape and cited in the Liberal submission carries the vast majority of its

commuters on a north-south basis along Anzac Parade, then via the University of NSW rather than on an east to west basis.

Green Square train station which located at the far western boundary of the seat, connects with no other section of the seat under the proposed liberal boundaries, unlike currently within the existing boundaries of Heffron.

- *the physical features and area of the electoral district, and*
- *mountain and other natural boundaries*

The existing seat of Coogee runs on a clear north-south axis with the eastern beaches of Tamarama, Bronte, Clovelly, Gordon's Bay, and Coogee Beach being the defining physical landmarks and giving the seat a coastal character as indicated in its name.

The Liberal Party's proposed seat of 'Coogee' removes this defining coastal character by removing four of the five beaches from the electorate. Instead, the Liberal Party's proposed seat while retaining the coastal name and a solitary beach takes on an inner-city / urban character to its west with high-rise urban development in Zetland and a suburban, low-rise residential character to its southern boundary Maroubra Junction and southern Kingsford.

The Liberal Party's proposed seat of 'Coogee' having moved the seats westernmost boundary at Botany St, Kingsford by approximately 4km to Botany Rd in Zetland requires the crossing of several major geographical and built form landmarks including: Randwick Racecourse, Anzac Parade (a large north to south running state road), the Kingsford Light Rail Line and terminus, Dacey Gardens, the East Lakes – a major natural lake system, Eastlakes Golf Course, and then Southern Cross Drive a major several lane motorway.

Further, the proposed Alison Rd northern boundary west of Avoca St, is a particularly poor road boundary choice as its built form is broadly identical on both the northern and southern sides making identification of electoral boundaries difficult. Moreover, west of Avoca St, the classification of Alison Rd changes from a state road managed by Transport for NSW to a local road managed by Randwick City Council. This change in classification marks the fact that Alison Rd actually becomes a small, single lane local road with few defining characteristics where it is proposed to be the boundary. At it's furthest eastern end cars can barely pass one another due to the narrowness of the road.

The proposed Alison Rd northern boundary splits the suburb boundary of Coogee.

The proposed northern Cowper St boundary splits the suburb of Randwick.

The proposed northern Alison Rd boundary splits Randwick City Council's Northern Coast Local Character Area and Randwick Local Character Area.

The proposed northern Cowper St boundary splits the Randwick City Council North Anzac Local Character Area and Parklands North Local Character Area.

The proposed Alison Rd northern boundary splits the Coogee Bay floodplain study area.

The proposed Alison Rd northern boundary splits the Randwick Junction Heritage Conservation area.

The various issues with the southern Maroubra Rd boundary are addressed in the 'Botany Bay' response.

- *the boundaries of the existing electoral districts*

On a generous estimate barely 40% of the current seat of Coogee is retained in the Liberal Party's proposed 'Coogee'.

The suburbs of Maroubra, Kensington, Daceyville, Rosebery, or Zetland have never been contained in a single seat alongside the suburb of Coogee, excluding South Coogee.

The Liberal Party's proposed seat of 'Coogee' spans, for the first time, two additional Local Government Areas: Bayside LGA and City of Sydney LGA. The seat of Coogee has only ever covered the Randwick LGA and Waverley LGA. It has always contained a portion of the Waverley LGA.

The existing state seat of Coogee currently spans the Kingsford Smith and Wentworth federal electorates. The Liberal proposal by entering Zetland would push their new 'Coogee' into the federal electorate of Sydney. Their proposed new seat of Coogee is only 1.5 km narrower than the Federal Seat of Kingsford Smith on an east to west basis despite both sharing the coastline as a natural boundary.

The proposed Liberal Party of 'Coogee' would divide the Randwick City Council North Ward which is currently contained entirely within currently contained within the seat.

St George-Canterbury Bankstown

Although fewer than 11,000 electors need to be transferred from the district of Canterbury to Summer Hill, the required numbers include all electors in the suburb of Canterbury. We understand why the Liberal Party would then propose to keep the name of Summer Hill but there are compelling reasons why Summer Hill, which has only been an electoral name since 2015 should be renamed Canterbury. It is one of the few districts which have existed continuously since 1859 and for that reason, the electoral name should survive.

Kogarah/Earlwood

We have earlier discussed the Liberal Party proposal to extend the district of Miranda across the Georges River. The Liberal Party proposal that Kogarah be renamed Earlwood requires the Miranda intrusion to succeed. Below we will deal with snowball effect on the current Kogarah.

Before doing so, we acknowledge that Both the Liberal and Labor parties unite the suburbs of Kingsgrove and Beverly Hills in Kogarah. We both also adopt Moorefields Road as a boundary. And we also retain King Georges Road as the south western boundary for Kogarah/Earlwood. But there are significant flaws for a district which contains both Kogarah and Earlwood.

In particular, we note:

- The Liberal Party's submission takes no account of Canterbury Hospital. Canterbury Hospital is a major service provider, and the suburbs which it serves share a strong community of interest in seeing services at this hospital improve. Canterbury Hospital defines its catchment area as the boundaries of the former Canterbury local government area (see: Canterbury Hospital Strategic Plan 2019-24, p. 12: https://www.slhd.nsw.gov.au/pdfs/Strategic_Plan_19-24_Canterbury.pdf). Both the present boundaries of the seat of Canterbury and Labor's proposed boundaries for the seat of Earlwood place Canterbury Hospital at the centre of a State electoral district, recognising the strong shared interest surrounding suburbs have in this facility.
- Earlwood and Kingsgrove North were part of the former Canterbury local government area, and they are part of the current Canterbury Bankstown local government area. These local boundaries are indicative of a strong community of interest for the purpose of s 21(b)(i) of the *Electoral Act 2017*. They have a shared interest in issues such as planning, traffic management and service delivery by Canterbury Bankstown Council. The Liberal Party's submission asks the Panel to place Earlwood in a seat with St George suburbs like Hurstville 'despite [Earlwood] being in the old Canterbury Council'. In effect, the Liberal Party is asking the Panel to ignore the community of interest represented by the local government boundaries.
- The Liberal Party's proposed boundaries for the seat of Earlwood combine suburbs from the Canterbury and St George areas. This ignores the long-standing and well-defined communities of interest represented by the Bulldogs and Dragons National Rugby League teams. In contrast, both the present boundaries of the seat of Canterbury and Labor's proposed boundaries for the seat of Earlwood place Belmore Oval – the traditional home of the Bulldogs – at the centre of a State electoral district, thereby reflecting the well-established social communities around which NRL teams formed over many years.
- The Liberal Party's submission in respect of a proposed seat of Earlwood does not make any reference to many of the matters in s 21(b) of the *Electoral Act 2017* which the Panel is required to give due consideration to. For example:
 - The Liberals' proposal for a seat of Earlwood places the suburb of Earlwood in the same seat as Hurstville. However, there are no direct public transport or road links between these suburbs, which would indicate the Liberals' proposed boundaries are inconsistent with the 'travel' criteria provided by s 21(1)(b)(ii) of the *s Electoral Act 2017*; and
 - The Liberals' proposal for a seat of Earlwood makes no reference to any physical features, mountains or other natural boundaries, even though these are criteria are provided by s 21(1)(b)(iii)-(iv) of the *Electoral Act 2017*. It would appear the

Liberals did not address these criteria because there are no natural or physical features which support their proposal.

Accordingly, we ask the Panel not to accept the Liberal Party's suggestion for boundaries for a proposed seat of Earlwood. Instead, we respectfully ask the Panel to adopt the proposed boundaries for a seat of Earlwood set-out in our submission. Labor's proposed boundaries for Earlwood:

- Recognise the strong community of interest among suburbs which belong to Canterbury Bankstown Council and which are served by Canterbury Hospital, in accordance with s 21(1)(b)(i) of the *Electoral Act 2017*;
- Take account of means of travel, including major thoroughfares like Canterbury Road and public transport in the form of the T3 railway line, in accordance with s 21(1)(b)(ii) of the *Electoral Act 2017*;
- Takes account of physical features and natural boundaries such as the Cooks River and Wolli Creek, in accordance with s 21(1)(b)(iii)-(iv) of the *Electoral Act 2017*; and
- More closely aligns with existing electoral district boundaries, in accordance with s 21(1)(b)(v) of the *Electoral Act 2017*.

Western Sydney

Earlier in our comments and for that matter in our suggestion, we have explained why the Old Windsor Road boundary which is a boundary across all three levels of Government should be maintained. And we have also explained why the shortfall of numbers in North Shore districts should be filled by returning electors only added at the last redistribution to the districts of Seven Hills and Parramatta.

All relevant suggestions propose that the district of Blue Mountains should consist of the entirety of the Blue Mountains City Council.

However, there is a significant difference between the suggestions for Penrith which has to be compensated for the loss of its Blue Mountains section.

The ALP and others suggest that Penrith add the suburb of Cambridge Park. The Liberal Party thinks that Penrith should be compensated by gaining more rural suburbs to its north.

Penrith/Londonderry (renamed St Marys in the Liberals' suggestion)

Cambridge Park

Cambridge Park is best suited to join the seat of Penrith in order for it to be united with Cambridge Gardens to its North and Kingswood to its south which are already part of the Penrith seat.

Penrith is the nearest major centre for residents in Cambridge Park, as it is for Cambridge Gardens to its north.

Cambridge Park has strong communities of interest with the areas of Kingswood north of Kingswood Station and Cambridge Gardens.

Reflecting communities of interest, Cambridge Park Public School, which is currently located in Londonderry, has a school catchment zone extending into the areas of Kingswood north of the station and south of Victoria Street. These areas are currently in the seat of Penrith.

Moving Cambridge Park into Penrith would unite the schools catchment within the seat of Penrith.

Kingswood Station, currently in the seat of Penrith, is also the key transport station for Cambridge Park, and moving Cambridge Park into Penrith would bring the suburb into the same seat as its transport hub.

Kingswood and Jordan Springs

The Liberals' suggestions move Jordan Springs from Londonderry to Penrith and Kingswood and Cambridge Gardens from Penrith to Londonderry are unnecessary. It will cause confusion for residents when these large scale movements are not necessary on the projected enrolment numbers.

The Liberals' proposal to transfer Kingswood to Londonderry (renamed St Marys) is not supported on communities of interest grounds. Penrith and Kingswood have strong community connections and have existed in the same seat for some time and should remain united. Penrith is the large shopping and community centre for residents in Kingswood, not St Marys.

Furthermore, Kingswood also has strong ties with South Penrith, including the Kingswood South Public School catchment taking in approximately 50% of its enrolments from South Penrith and 50% from Kingswood. These two suburbs should remain united. Kingswood High School's catchment area also covers large portions of the suburb of Penrith and parts of South Penrith.

Jordan Springs and Jordan Springs East should be retained in the same seat as Ropes Crossing (that is, Londonderry), with the three precincts forming the three stages of development on the formed ADI site. These suburbs have similar community profiles with newer housing, young families and development infrastructure issues. The Jordan Springs/Ropes Crossing Connector Road is due to open shortly, expanding connections between these three precincts.

Castlereagh and Londonderry

Castlereagh, Agnes Banks and Londonderry should remain united with Llandilo and Berkshire Park as communities of interest with similar rural identities. All of these suburbs have large rural blocks, with small community shops located in Londonderry and Llandilo.

Castlereagh, Londonderry and Llandilo share a common interest in the Castlereagh Corridor, which is reserved for future connection between the M7 and Castlereagh Road and runs through the three suburbs.

Londonderry, Agnes Banks, Berkshire Park and parts of Castlereagh should also remain united as the three suburbs within Penrith LGA that fall into the catchment zone for Richmond High School.

Mount Druitt

The Liberal Party has suggested that the southern portion of Mount Druitt, including the suburbs of Minchinbury and Rooty Hill be sent to Prospect, even though there is a large industrial estate between the southern suburbs of Mount Druitt and the populated parts of Prospect.

This will result in the constituents of Rooty Hill, Plumpton and Eastern Creek, being disadvantaged in accessing their State Representative by being located some two railway stations away from their nearest local Member.

This is a change to the situation where they are currently within approximately a 2 kilometre radius of their Mount Druitt MP.

For example, the Mount Druitt office conducts a Justice of the Peace service for local constituents, the current Mount Druitt boundary has made this service the most popular JP Service within the district.

Further, the Mount Druitt electorate has a large denomination of social housing properties within the area, these properties are serviced and managed by the Mount Druitt, Department of Communities and Justice, Housing Services, whose office is located in the Mount Druitt CBD and within a minutes' walk of the Mount Druitt Electorate Office. Currently the tenants/clients of Housing Services are able to easily seek assistance through the Mount Druitt Office. Under the Liberal proposal, those tenants residing in the suburbs of Rooty Hill, Plumpton, and Eastern Creek will have to travel to the Prospect Electorate Office to seek assistance, which will then be referred back to the Mount Druitt DCJ Housing Services who encompass these suburbs.

The Liberal Party submission places importance on the use of Local Government boundaries when deciding State boundaries. Given that all suburbs within the Mount Druitt electorate fall within the Blacktown Local Government area, the inclusion of North St Marys in the Mount Druitt electorate is not logical and will add further confusion for the constituents of St Marys whose addresses are within the Penrith Local Government district.

As mentioned earlier, currently the two electorates have a major commercial centre used by the residents in the two electorates. In addition, each area has its own large RSL Club, Blacktown servicing its surrounding areas and Rooty Hill servicing the areas of Rooty Hill, Eastern Creek, Plumpton, Oakhurst and Mount Druitt.

The Mount Druitt-Minchinbury Public Schools cluster includes the Rooty Hill High School, Rooty Hill Public School, Eastern Creek Public School and Minchinbury Public School, all of which will be transferred out of the Mount Druitt electorate under the Liberal submission.

South Western Sydney

We have earlier dealt at length with the challenges faced by the Redistribution Panel as it considers drawing an additional district in south west Sydney. We have also explained our proposed Mulgoa.

The only additional comment we wish to make is to support the proposal by Mark Latham that the M4 should be maintained as the northern border of the district of Mulgoa. The Liberal Party's proposed St Marys, which would absorb Saint Clair, which is south of the M4 is another construct which attempts to replace the arrangements in Londonderry which since its establishment in 1988 has contained parts of Blacktown.