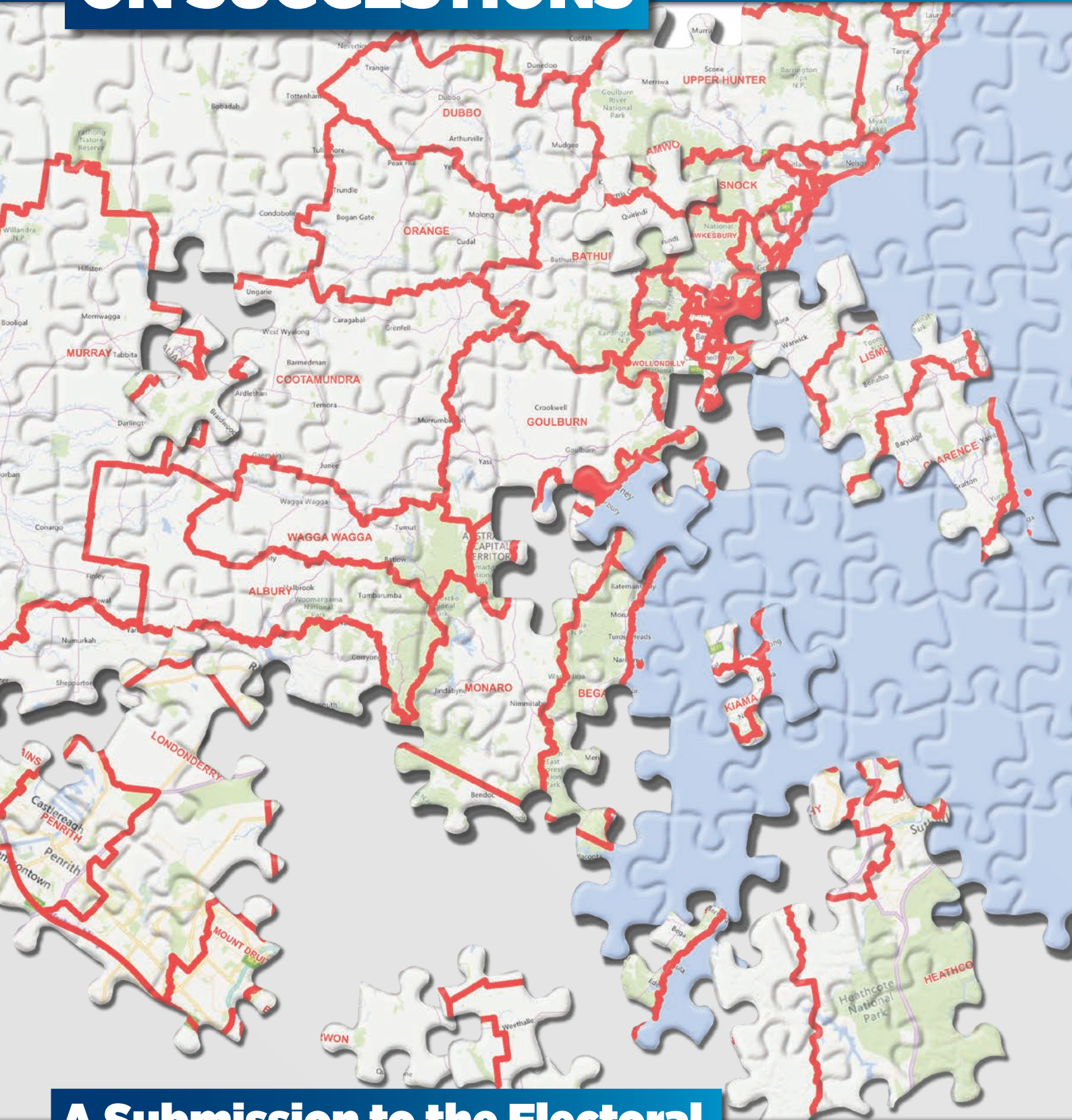
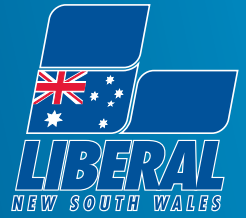


# COMMENTS

# ON SUGGESTIONS



## A Submission to the Electoral Districts Redistribution Panel

On behalf of The Liberal Party of Australia, NSW Division



# LIBERAL PARTY OF AUSTRALIA

NEW SOUTH WALES DIVISION

State Director

Electoral Districts Redistribution Panel  
c/o New South Wales Electoral Commission  
GPO Box 832  
SYDNEY NSW 2001

Dear Commissioners,

I am pleased to submit Comments on Suggestions on behalf of The Liberal Party of Australia, New South Wales Division.

While we have reviewed each of the submissions made to the Panel, our comments relate specifically to the following submissions:

1. NSW200701/39: Submission by the Australian Labor Party (NSW Branch)
2. NSW200701/35: Submission by the National Party of Australia - NSW

We would again like to take the opportunity to thank the NSW Electoral Commission, particularly the staff of the Redistribution Secretariat for their assistance to date.

Yours sincerely,



State Director



# Comments Submission to the Electoral Districts Redistribution Panel

On behalf of The Liberal Party of Australia, NSW Division

## CONTENTS:

<b>EXECUTIVE SUMMARY</b>	<b>7</b>
<b>METHODOLOGY</b>	<b>11</b>
‘ONE VOTE, ONE VALUE’	12
DATA DISCREPANCIES IN THE LABOR PARTY’S SUBMISSION	14
<b>COMMENTS ON REGIONS IN DETAIL</b>	<b>17</b>
NORTH COAST	18
HUNTER TO THE CENTRAL COAST	18
WEST OF THE DIVIDE	19
SOUTH COAST (INCLUDING THE SUTHERLAND SHIRE)	20
WESTERN SYDNEY TO THE NATIONAL PARKS	21
SOUTHERN METROPOLITAN REGION	22
SYDNEY’S NORTH SHORE AND THE HILLS REGION	24



# EXECUTIVE SUMMARY





# EXECUTIVE SUMMARY

While the Liberal Party has reviewed all submissions made to the Redistribution Panel, the focus of our comments is the submissions made by the Labor and National Parties. The most important features of our comments are as follows:

1. The Liberal Party is concerned by the significant variance from quota that would occur if the submissions of the Labor or National Party were adopted. We continue to advocate that **electoral districts be drawn to secure a 'one vote, one value' principled outcome over the two election periods.**
2. While the Liberal Party submission would see only one district with a variation from quota of +/- 2.5 percent, **the Labor Party submission would result in fourteen districts with a variation greater than +/- 2.5 percent, while the National Party submission would see over one third of all electoral districts with a variation greater than +/- 2.5 percent.** The Liberal Party is strongly of the view that the margin of allowance is relevant at the objections stage of the redistribution process to take account of the geographic criteria, not as a starting point.
3. When viewed utilising the traditional "building blocks" methodology it is evident that **both the Labor and National Party submissions result in significant regional malapportionment.**  
  
The Labor Party proposal would leave Western NSW almost 10 percent over quota, while the National Party proposal would leave Western Sydney almost 20 percent under quota.
4. **There are concerning data discrepancies in the Labor Party's submission which call in to question its credibility.** The sum of electors in Labor's submission does not reflect the projections provided by the NSW Electoral Commission, and the calculation of voters in many districts do not add up.
5. **In many cases, the district boundaries proposed by the Labor Party result in communities of interest being split.** For example, the Liverpool CBD would be split from the bulk of the Liverpool LGA, the Toongabbie shops would be split from the suburb of Toongabbie and the Bankstown shops would not be in the district of Bankstown.
6. **There is agreement between parties that a southern metropolitan district should be abolished and replaced with a new district in south west Sydney.**
7. **The Liberal Party continues to argue that high growth areas be divided between multiple districts to balance them with established areas.** Containing growth areas within a single district results in significant quota variations.
8. **Not transferring the growth from the regions of the North Coast, Hunter and South Coast to districts West of the Divide results in significant malapportionment in other regions.**  
  
In particular, the impact of moving Goulburn further east is significant due to the flow on effects in the high growth south west of Sydney and should be avoided.



# METHODOLOGY

# METHODOLOGY

**The Liberal Party's comments focus on the suggestions submission made by the Labor Party and the National Party, which we believe contain issues that must be addressed.**

In making our comments, the Liberal Party has again taken careful note of the statutory provisions which constrain the Panel, as well as reference to the Commissioners' Reports published in 1998, 2004 and 2013, where reasons have been given for their determinations.

## **'ONE VOTE, ONE VALUE'**

The Liberal Party strongly believes that the statutory provisions of the Constitution Act 1902 and the Electoral Act 2017, taken in context of previous redistribution determinations, reinforces that **compliance with the provisions relating to the margin of allowance are mandatory**, with the others observed at the Panel's discretion, to facilitate fair, effective and efficient representation of electors.

This principle is the foundation of the Liberal Party's submission and central to our comments on submissions made by other parties. As stated in our suggestions submission:

*"From the Constitution Act and the Electoral Act it is clear that compliance with the provisions relating to the margin of allowance are mandatory, with the others observed at the Panel's discretion to facilitate fair, effective and efficient representation of electors."*

We also highlight that, in their 2013 report, the Redistribution Commissioners explored how in practice the statutory provisions relating to margin of allowance should be applied.

The Commissioners noted that it was Parliament's intention that **boundaries be drawn to ensure an outcome securing "the important 'one vote, one value' principle over the two election periods"**.

The Commissioners also chose to highlight that their record in drawing a greater number of electoral districts within plus or minus 2 percent of the quota compared favourably with their predecessors in 2004.

This makes clear that the 2013 Commissioners in no way saw the 10 percent margin of allowance as weakening the 'one vote, one value' principle.

Indeed, the Constitution Act provides that a redistribution can be triggered prior to the expiry of the statutory period whenever more than one quarter of electoral districts have more than +/-5% electors than the average, clearly identifying this as 'malapportionment'.

This serves to highlight the importance of minimising variation between electoral districts, rather than considering the 10 percent margin a license to create willfully malapportioned electoral districts.

The Liberal Party raises this point as it forms a significant part of our commentary on the suggestions of other parties at this redistribution, as both the Labor and National Party submissions suggest that variation from the target is almost encouraged.

The following table overleaf shows a comparison of the margins of variation across the Liberal, Labor and National Party submissions:

	Largest deviation (+/-)	# of districts with a variation < 1%	# of districts with a variation < 2.5%	# of districts with a variation > 2.5%
<b>Liberal</b>	3.67%	41	92	1
<b>ALP</b>	4.84%	35	79	14
<b>Nationals</b>	7.94%	31	58	35

As evident from the table above, the boundaries proposed by the Liberal Party have only one district with a projected variance greater than +/- 2.5 percent (our proposed district of Leppington, which is large to balance the statutory requirement for sufficient current enrolments).

In contrast, 14 of Labor's proposed districts have projected variances greater than 2.5 percent (assuming their figures were accurate, as noted below) and one third of all districts proposed by the National Party have a variance greater than +/-2.5 percent.

In addition, when comparing the deviations across the traditional 'building block' regions, it becomes clear that both the Labor and National Party submissions are premised on a malapportionment.

The following table shows the number of electorates and quotas for each 'building block' region as suggested by the Liberal, Labor and National Party submissions:

Region	Districts	Quotas		
		Liberal	Labor	Nationals
<b>North Coast</b>	8	7.97	7.98	8.08
<b>Hunter to the Central Coast</b>	13	13.04	12.96	13.11
<b>West of the Divide</b>	11	11.01	11.09	11.02
<b>South Coast (incl the Sutherland Shire)</b>	11	11.01	10.97	11.13
<b>Western Sydney to the National Parks</b>	19	18.97	18.94	18.74
<b>Southern Metropolitan Region</b>	15	15.01	15.02	14.93
<b>Sydney's North Shore and the Hills Region</b>	16	15.99	16.04	15.98

First examining the Labor Party's submission, they have the eleven seats West of the Divide collectively almost 10 percent over quota. While the Liberal Party is loath to bring politics into the redistribution, we feel it necessary to note that this is an old political tactic of 'packing' – that is, locking up as many of your opponents votes as possible in safe seats, to minimise your opponent's votes in marginal seats.

In a similar fashion, the Labor Party's submission has the sixteen safe Liberal seats in the North Shore and Hills region collectively 4% over quota, while the marginal Liberal Seats in Western Sydney are collectively 5.6% under quota, and the marginal Coalition seats in the South Coast and Sutherland Shire are collectively 4.1% under quota.

**This is nothing more than a thinly disguised attempt to lock-up Coalition votes in safer seats, particularly regional NSW, improving Labor's chances in the marginal seats in metropolitan Sydney.**

Notional two-party preferred estimates confirm this, with four Coalition held electorates becoming notional Labor electorates (Heathcote, Upper Hunter, East Hills, Seven Hills) under Labor's proposal, demonstrating Labor's attempt to change the result of the election through redistribution.

In contrast, the Liberal Party's submission does not alter the political makeup of the NSW parliament as it currently stands. When using the 'building blocks' to analyse the National Party's submission, the malapportionment is equally as stark.

As can be seen from the previous table, the submission by the National Party sees the country NSW regions of the North Coast, Hunter & Central Coast and West of the Divide collectively 21 percent over quota, while

Western Sydney is 26 percent of a quota short.

This is a result of pushing Goulburn further into south west Sydney, and locking up the growth on the south coast and north coast, creating significant variations in all three regions. In contrast, **applying the 'one vote, one value' principle, as recommended by the Liberal Party, avoids this significant malapportionment** and removes the need for votes to be transferred from metropolitan Sydney to regional NSW. In effect, the growth projected on the south coast and north coast offsets the enrolment deficit in Western NSW, and there seems no credible reason not to use this balance.

Far from improving regional electors' access to their local MP, the result of the National Party's submission would be that the Member for Barwon would represent some 7,738 more electors than the Member for Seven Hills, over an area more than 7,000 times the size. This would leave the Member for Barwon representing 14% more electors than the Member for Seven Hills, effectively reducing regional electors' access to their member of parliament.

## **DATA DISCREPANCIES IN THE LABOR PARTY'S SUBMISSION**

In analysing the submission made by the Labor Party, it quickly becomes evident that there are many significant data discrepancies in their submission. These discrepancies throughout the ALP submission are disturbing and call in to question the credibility of the document.

As a starting point, the sum of current and projected enrolments for all districts proposed in the Labor Party's submission do not match the total current and future enrolments projected by the NSW Electoral Commission:

	Current Enrolments	Projected Enrolments
ALP Submission	5,319,547	5,509,015
Actual Electoral Commission	5,318,924	5,509,652

While these may not seem like large variances, the reality is it means the Labor Party's submission has allocated some 600 voters to more than one electorate. This indicates that the Labor Party did not use the BoundaryMaker software made available by the NSWEC, as the BoundaryMaker software specifically prevents the double counting of or failure to allocate electors. While use of BoundaryMaker is not compulsory, the data errors in the Labor Party's submission are glaring.

A particular result of not using BoundaryMaker is the inability of the Labor Party to accurately allocate electors in 'split' SA1s. While BoundaryMaker allows users to split SA1s accurately using built in spatial data, the Labor Submission appears to simply rely on a 'best guess'.

For example, in the Labor Party's proposal for the district of Goulburn, Labor splits the SA1 1128515, which contains 375 current electors and 380 projected electors.

The Labor Party has simply split these numbers in half for numerical estimates (allocating 190 current and future electors to Goulburn). **Not only does this effectively create 5 current electors who do not exist, but it is also an inaccurate division of electors.**

Using the NSWEC BoundaryMaker software shows that **in actual fact splitting SA1 1128515 as suggested by the Labor Party would result in only 90 current electors being allocated to Goulburn, but 226 projected electors.**

This inaccuracy is just one of the numerous data errors throughout the Labor Party's submission. The following table highlights other examples of districts where Labor's 'best guesses' do not add up. There are further examples, however the Liberal Party did not have the time to double-check every Labor error.

In contrast we note that both the Liberal Party and National Party submissions used the NSWEC software, avoiding double counting or failure to allocate electors.

Electorate	Labor Submission		BoundaryMaker	
	Current	Projected	Current	Projected
Coogee	59,214	59,825	59,327	59,938
Goulburn	56,261	58,498	56,066	58,127
Heathcote	59,943	60,756	59,952	60,772
Liverpool	57,735	59,456	57,979	59,695
Penrith	56,918	58,640	56,535	58,129
Riverstone	52,003	60,837	52,003	60,817
Singleton*	57,001	60,287	55,650	58,873

\* Note: The Labor Party's written submission (cited in the above table) contains different current and projected enrolment estimates for Singleton to the estimates on the Labor Party's individual maps. The Labor Party's individual map page estimates current enrolments for Singleton of 56,800 and projected enrolments of 60,070.





**COMMENTS ON**

**REGIONS IN DETAIL**

# COMMENTS IN DETAIL

## NORTH COAST

Both the Liberal and Labor Party submissions agree that the significant projected growth on the North Coast must be moved to ensure the region as a whole is not malapportioned. However, we disagree with Labor's suggestion that the Pacific Highway towns of Woodburn and Broadwater be joined with Lismore. Labor's suggested boundary divides towns above the Richmond River and severs them from Evans Head to which they have strong links.

Rather, we continue to advocate that the Northern Rivers transport hub of Casino, which is strongly linked with **Lismore**, be returned to the Lismore electorate. As noted in our submission, the town of Casino is only 32km from the Electorate Office of the Member for Lismore, but over 100km from the Electorate Office of the Member for Clarence.

This enables the Pacific Highway towns of Ballina, Woodburn, Evans Head and Maclean to be linked with the remainder of the Clarence Valley LGA in the electoral district of **Clarence**. The Liberal Party's submission allows the district of Coffs Harbour to continue to contain the entire LGA of the same name, expanding only slightly to achieve quota and leaving **Oxley** unchanged.

We would suggest this is preferable to splitting the Coffs Harbour LGA as per the Labor Party's suggestion, with the flow on effect of splitting the Port Macquarie-Hastings LGA at its northern end. The Liberal Party's suggestion also allows the district of **Port Macquarie** to adopt the Port Macquarie-Hastings southern boundary as its southern boundary, a much clearer boundary which maintains community of interest.

The Liberal Party's submission also transfers the excess electors from the North Coast south through Myall Lakes, which we suggest is preferable to transferring votes through Lismore into the already geographically large district of Northern Tablelands.

In contrast to the Liberal and Labor Party submissions, **the National Party submission makes no effort to manage the growth on the North Coast, instead allowing the North Coast to grow almost 10 percent over quota.**

As discussed above, doing so has flow on impacts to the rest of the state, as recognised by both the Liberal and Labor Party submissions.

We urge the Commissioners to redistribute the projected growth on the North Coast rather than risk the districts of Ballina and Port Macquarie being seriously malapportioned.

## HUNTER TO THE CENTRAL COAST

Again, the Liberal and Labor Party submissions agree on the need to balance the enrolments in the Hunter and Central Coast Region. Both Parties agree that **Terrigal** does not need to change, and that a minor adjustment is required between **The Entrance** and **Wyong** in Berkeley Vale to ensure The Entrance meets quota.

The Liberal Party also suggests a minor boundary adjustment between **Gosford** and Wyong, but the difference between submissions here is minor.

However, in relation to the Hunter, the Liberal Party's proposal to move the excess enrolments from the North Coast through Myall Lakes, results in significantly different proposals.

While our suggested changes to the Newcastle based seats of Lake Macquarie, Swansea, Charlestown, Wallsend and Newcastle are minor, similar to those proposed by the Labor Party, we suggest a reconfiguration of the Hunter seats to better reflect community of interest and to absorb the excess votes from the North Coast.

Separating Branxton from the remainder of the Cessnock LGA, as proposed by the Labor Party, would split the Cessnock communities of interest for no apparent reason, instead linking Branxton with Aberdeen in the Upper Hunter LGA and Gloucester in the Mid-Coast LGA, currently two LGAs away from Branxton.

We would suggest that our proposal of linking the communities of Cessnock, Branxton, Singleton and Muswellbrook makes eminently more sense from a community of interest perspective, allowing Gloucester to be linked with other Mid-Coast LGA towns, as well as neighbouring Dungog LGA and part of Port Stephens LGA, which have existing community of interest and which have been together in the Federal division of Paterson at various times in the last twenty years.

This allows the excess votes from both the North Coast and Hunter regions to be transferred directly as a block by the transfer of Liverpool Plains and the Upper Hunter LGA in their entirety to the district of Tamworth.

In this respect, we note that the National Party submission similarly suggests the inclusion of Liverpool Plains into Tamworth. Unlike the National Party, **we do not believe it is reasonable to leave the Hunter to Central Coast region 11% over quota** (with Cessnock beyond the 5 percent malapportionment trigger at 6.2 percent over quota), hence our recommendation to also transfer the Upper Hunter LGA to Tamworth.

## WEST OF THE DIVIDE

The submissions from the Labor Party and the National Party suffer serious deficiencies in Western NSW as a result of both Parties' malapportionment of voters in other regions.

The Labor Party's efforts to lock-up Coalition votes in regional electorates results in Western NSW being almost 10% over quota at the relevant future time under their proposal, **with seven of the eleven districts a collective 6,500 electors over quota.**

This results in electoral boundaries which simply defy common sense, particularly in relation to the districts of Goulburn and Cootamundra. The Labor Party's proposed district of **Goulburn** forms a 'bowtie' shaped electorate 200km east-west, with a narrow neck only 3.7km wide near Lake George, electorally linking Goulburn with Yass, but effectively isolating the two communities.

The only logical route between Goulburn and Yass under Labor's proposal, would be to drive through Cootamundra, or alternatively through Canberra. This is simply nonsensical.

Similarly, the proposed district of **Cootamundra** places Taralga and Tottenham in the same district, but the only route between these two towns is through Forbes in the district of Orange.

The Liberal Party suggests that placing Yass and Sutton into Cootamundra and Crookwell in Goulburn creates two far more reasonable electoral districts with historical precedent and strong communities of interest.

The National Party's submission for Western NSW similarly suffers from locking up the growth on the south coast and north coast, and creating significant quota variations in all three regions.

By not transferring the excess growth from these regions, the National Party is instead forced to push Goulburn further toward south west Sydney in order to gain sufficient votes for Western NSW, which in turn results in Western Sydney being significantly under quota.

The impact of unnecessarily moving Goulburn further toward metropolitan Sydney is that the National Party's proposed district of Cootamundra also moves east. The Liberal Party strongly opposes this suggestion, as it is only necessitated by the failure to transfer growth from the growing regions of the North Coast, Hunter and South Coast.

In contrast, applying the 'one vote, one value' principle, as recommended by the Liberal Party, avoids this significant malapportionment and removes the need for votes to be transferred from metropolitan Sydney to regional NSW.

In effect, the growth projected on the South Coast and North Coast offsets the enrolment deficit in Western NSW, and there seems no credible reason not to use this balance.

As noted in the methodology section of this submission, far from improving regional electors' access to their local MP, the result of the National Party's submission would be that the Member for Barwon would represent 7,738 more electors than the Member for Seven Hills, over an area more than 7,000 times the size.

In relation to both the Labor and National Party submissions, the Liberal Party continues to argue that Tumbarumba, which is now in the Snowy Valleys LGA with Tumut, be transferred to the district of Wagga Wagga, with which Tumbarumba has always had a far greater community of interest than it does Albury.

Finally, we note that the Liberal and Labor Party have both suggested the same additions to Barwon and Murray.

## **SOUTH COAST (INCLUDING THE SUTHERLAND SHIRE)**

As with Western NSW, the submissions of the Labor and National Parties are impacted by the proposals to lock up enrolment growth in either Western NSW districts (Labor's proposal) or in the North Coast and Hunter regions (the Nationals' proposal).

As noted previously, there is significant projected growth on the South Coast, which should be transferred to districts to the west to ensure all districts are balanced at the relevant future time, as per the Liberal Party's submission.

The failure to do so by both the Labor and National Parties results in quite different submissions.

In relation to the Labor Party's submission, the decision to lock-up almost 10% of a quota in Western NSW means the seats in the South Coast and Sutherland Shire are all dragged further south.

In **Bega**, Labor's proposal results in the localities of Durras and Benandarah, plus the Batemans Bay localities of Surfside and Maloneys Beach (all in the Eurobodalla LGA) being moved into the district of South Coast, splitting them from the remainder of Batemans Bay and the Eurobodalla LGA. This clearly splits a strong community of interest around Batemans Bay unnecessarily.

The flow on impact at the northern boundary of **South Coast** is that central Nowra is moved into **Kiama**, splitting it from Worrigeer and South Nowra. In contrast, the Liberal Party's submission proposes the very clear boundary of the Shoalhaven River, which would be very easy for electors to understand.

We do agree with the Labor Party's recommendation that Albion Park Rail is better placed in the district of Shellharbour, however by avoiding adding Nowra to Kiama, the locality of Shell Cove can in turn be returned to Kiama (as it was at the 2007 and 2011 elections) and Marshall Mount and Calderwood can remain in the Kiama.

As noted, the result of Labor's changes is that the districts further north are all dragged south, with Heathcote being forced as far south as Bulli and Woonona.

With over 70% of Heathcote's current electors being in the Sutherland Shire, Heathcote is clearly a Shire centred electorate, and as such the Liberal Party suggests that Heathcote's projected deficit in electors should primarily be addressed by adding additional electors from the Shire, rather than from the Wollongong region. This retains Heathcote as a Sutherland Shire district, with its strong community of interest, rather than artificially merging two distinct regions into one district.

The Labor Party's proposed changes to the south also result in Holsworthy absorbing the Liverpool CBD, effectively separating the locality of Liverpool from the majority of the Liverpool LGA, and pairing it with Alford's Point, in the Sutherland Shire LGA.

This does not make any sense from a community of interest perspective and the Liberal Party strongly opposes the idea of separating Liverpool from its community of interest.

As per the Liberal Party's submission, we suggest Holsworthy and the surrounding districts are better served by adopting the Hume Highway as a very clear and easily understood boundary and adding additional electors to Holsworthy's east.

In relation to the National Party's submission for the South Coast, the decision not to transfer the excess electors on the South Coast through to Western NSW results in the districts of Bega, South Coast, Kiama and Kiera being collectively almost 10 percent over quota.

The district of Bega in particular is 2,000 electors over quota in what is already a geographically large electorate, again reducing regional electors' access to their local member of parliament.

**This again serves to highlight the importance of maintaining the 'one vote, one value' principle and minimising variance from the quota.** It also demonstrates why the National Party's submission overall is not feasible.

## **WESTERN SYDNEY TO THE NATIONAL PARKS**

As noted in the Liberal Party's suggestion submission, the challenge in relation to Western Sydney comes from the five districts of Wollondilly, Camden, Macquarie Fields, Mulgoa and Londonderry, which have sufficient projected enrolment growth for six districts.

**The Liberal, Labor and National parties all agree that an electoral district in the Southern Metropolitan region must be abolished and a new district created in south west Sydney.**

There is also some agreement between the Liberal and National Party submissions in relation to specific district boundaries. The Liberal and National parties agree that Penrith should expand north to take in Londonderry and Jordan Springs, with the district of Londonderry moving south and being renamed St Marys. We also agree with the National Party suggestion that Warragamba and Silverdale be transferred to the district of **Mulgoa.**

However, we believe the projected growth centred around Leppington is best split between multiple districts. In contrast, the National Party's proposal to place a large portion of the growth into a single district of Narellan results in the proposed district growing from 7 percent under quota to almost 7 percent over quota at the relevant future time, placing it outside of the malapportionment trigger margin.

This situation highlights the flow on effects of the National Party's proposal to move Goulburn further east, which forces Wollondilly further north, absorbing the locality of **Camden**, resulting in the new Narellan district, and leaving Western Sydney almost 20 percent under quota.

Balancing enrolment growth as the Liberal Party consistently argues, prevents these flow on effects and allows the preferable outcome of maintaining the district of Camden, centred around the old Camden town.

As noted previously the Labor Party's proposal to lock up almost 10 percent of a quota in Western NSW results in the three Liberal held marginal seats in Western Sydney (Penrith, Camden and Wollondilly) collectively being 4.8 percent under quota at the relevant future time, while the safer seat of Mulgoa is over quota.

Labor proposes **Penrith** remain unnecessarily under quota, a suggestion with which the Liberal Party does not agree. The Liberal Party sees no compelling reason why Penrith should be left under quota and indeed Penrith offers a strong opportunity to balance the growing suburbs of Londonderry with the established areas in Penrith, bringing together communities of interest, to address high growth in Londonderry.

In relation to **Seven Hills**, as noted Labor's proposal for the district results in an unnecessarily under quota district by transferring the anchor locality of Winston Hills to an over quota Baulkham Hills. The Labor Party also suggests separating Toongabbie shops from the suburb of Toongabbie and splitting the suburb of Blacktown, despite trying to retain the name of Blacktown for another district.

The National Party proposal to leave Seven Hills unchanged is equally unacceptable as it results in Seven Hills being almost 7 percent under quota at the relevant future time, creating yet another district beyond the malapportionment trigger margin.

The Liberal Party argues that minimal change is required to bring Seven Hills up to quota at the relevant future time, and can be achieved by simply transferring the locality of Lalor Park and the remainder of the suburb of Seven Hills into the district of the same name.

To the south, the boundary contortions proposed by the Labor Party result in a new district of Minto which stretches from Ingleburn to Glen Alpine. We would argue there is little community of interest between these localities and indeed to drive between them would require leaving the electorate.

In contrast, dividing the growth areas between multiple districts and creating a new district of Leppington, as proposed by the Liberal Party, allows clearly defined districts such as the Hume Highway.

As stated earlier, the Labor Party's submission also results in the Liverpool CBD being separated from the bulk of the Liverpool LGA and communities of interest which we strongly oppose.

## SOUTHERN METROPOLITAN REGION

As noted in relation to Western Sydney, the three parties all agree that a district in the Southern Metropolitan region must be abolished due to below average growth in this region.

While the Labor Party's submission argues it is abolishing Cabramatta, in reality the Labor Party effectively abolishes the district of Canterbury, in line with the Liberal Party's submission, but by renaming Summer Hill as Canterbury, they argue that Canterbury is not abolished. This would appear to be related to internal politics within the NSW Parliamentary Labor Party.

The main difference between the two proposals for the district of Summer Hill (or Canterbury in the Labor Party's submission) is a result of the need to transfer electors into Drummoyne. The Liberal Party suggests the enrolment deficit in **Drummoyne** be addressed by simply including most of the remainder of Canada Bay LGA in Drummoyne, much of which was previously in Drummoyne. We note that the National Party's submission is almost identical in this respect.

In contrast, the Labor Party suggests Drummoyne expand south east into the Inner West LGA, taking in the locality of Haberfield, which we argue would be better placed in the district of Strathfield.

In relation to Sydney's eastern suburbs, as outlined in the Liberal Party's submission, the recent debate regarding council mergers highlighted the strong independent communities of interest of Woollahra and Waverley LGAs, which are currently merged in the district of Vacluse. Recognising these independent communities, the Liberal Party argues that these LGAs be the basis of two distinct electoral districts.

This would require the district anchored by the locality of **Coogee** to expand west, and we note that the Labor Party similarly suggests that Coogee expand west. We argue that the communities west of Anzac Parade should also be included in Coogee, based on their community of interest links centred around UNSW.

In doing so, the unnecessary 3.4 percent projected enrolment deficit in Heffron as proposed by the Labor Party, is addressed, with Heffron becoming the district of Coogee, ensuring minimal variance from the quota at the relevant future time.

These changes proposed by the Liberal Party avoid the Labor Party's contorted electoral district of **Earlwood**, which suffers the same absurdity as Labor's proposed district of Goulburn. In an attempt to link two separate communities in Earlwood, Labor's proposed district ends up with a tiny bottleneck of less than 600m north-south in the middle of the district, with no roads within the district actually crossing Bexley Road and joining the two communities.

Further south in the Georges River based districts, the Labor Party's proposed changes to the districts of East Hills and Oatley leave both districts a combined 4.8% over quota.

With regard to **East Hills**, Labor's proposal to split the suburb of Bankstown through the middle of the Bankstown shops and include it in East Hills is nonsensical. This arbitrary boundary would create voter confusion with no clear delineation of the borders between East Hills and Bankstown and is unnecessary as it puts East Hills well above quota. Minimal change is required to bring East Hills up to quota and the Liberal Party suggests the simple solution of including the remainder of the (currently split) suburb of Georges Hall in East Hills.

We also argue against the National Party's proposal to expand East Hills as far north as Lansdowne and Bass Hill, again drawing attention to the minimal need for change.

Similarly, Labor's proposed expansion of **Oatley** results in Oatley being well above quota. We also caution against the National Party's proposal for Oatley which has even greater change to the existing boundaries and which loses the current very strong and easily understood boundary of King Georges Road. This would lead to confusion among electors as to which electorate they are in. Again, the minimal change option proposed by the Liberal Party would seem a preferable boundary.

By abolishing Canterbury rather than Cabramatta, and transforming Maroubra into a district of Botany Bay, the unnecessary changes proposed by Labor and the Nationals to both Oatley and East Hills can be avoided.

## **SYDNEY'S NORTH SHORE AND THE HILLS REGION**

Significant change is required on the North Shore as a result of below average growth across the region.

The Liberal Party notes Labor's acknowledgement of the need for Wakehurst to take in the suburb of Davidson, making the district of Davidson no longer tenable. However, rather than leaving **Wakehurst** over quota, the North Shore districts are better served by transferring Killarney Heights and Forestville to **Willoughby**, which in turn allows the remainder of the suburb of Neutral Bay to be joined in the district of **North Shore**.

These changes result in very strong boundaries and communities of interest across all of the North Shore districts.

In contrast, the proposal by the Labor Party results in Forestville being separated from Killarney Heights and instead being placed in a new district of Gordon along with West Pymble. In turn, West Pymble is separated from Pymble which instead forms the south eastern boundary of Labor's truly impractical proposed Ku-ring-gai.

Labor's proposed **Ku-ring-gai** district connects the North Shore suburbs of Turramurra and Pymble with the Hills Shire LGA areas of Rogans Hill and Castle Hill, creating a district which is 2% over quota, and which takes in areas from an electorate currently two electorates west.

These communities have little if any commonality of interest and almost no public transport connections – to travel from the east to the west of this proposed Ku-ring-gai would require at best a train out of the electorate and then a bus back in, taking over an hour, or at other times, three different buses and/or trains.

Electors in the eastern half of the proposed Ku-ring-gai would shop at Hornsby or St Ives, while those in the west would focus on Castle Hill. This proposed district is simply not feasible.

The National Party's proposal to keep the district of Davidson is equally unworkable, resulting in the eleven North Shore districts being collectively more than 12.5 percent under quota at the relevant future time. This particularly violates the 'one vote, one value' principle and should be rejected.

Additionally, the proposal by the National Party results in the abolition of the district of **Ryde**, separating the Ryde localities and splitting the suburb of Epping. The new district of Beecroft is split in four by the M2 motorway and Pennant Hills Road, with the Hills Shire LGA locality of West Pennant Hills partnered with Epping and North Epping.



Similarly, Labor's proposal for Epping splits the suburb of Epping and merges it with West Pennant Hills as a result of their proposed changes to Ku-ring-gai, Parramatta and Castle Hill. The Liberal Party notes that very little change is required to **Parramatta**, and rejects the significant changes proposed by Labor which result in an under quota Seven Hills and districts of Epping and Ku-ring-gai with no community of interest.

Finally, the Liberal Party is concerned by the proposals of both the Labor and National parties, in relation to managing the high projected growth in the suburbs of Riverstone and Schofields.

As noted elsewhere, the Liberal Party believes that electoral boundaries are best drawn to divide growth between multiple districts to balance new areas with more established localities.

In contrast, the National Party proposal for Riverstone results in the district growing from 8.4 percent under quota to almost 8 percent over quota at the relevant future time, while Hawkesbury is 3.5 percent under quota at the relevant future time.

Similarly, Labor's proposal results in a Riverstone that is almost 3 percent over quota at the relevant future time, while Castle Hill (renamed Annangrove under Labor's proposal) is left almost 5 percent under quota. Labor's suggestions also results in the localities of Glenorie, Kenthurst, Dural and Annangrove being separated into three different electoral districts, ignoring the strong community of interest links between these localities.

**This serves to highlight the importance of dividing growth areas between districts, particularly in the interests of upholding the 'one vote, one value' principle.**