



**THE FEDERAL  
REDISTRIBUTION  
NEW SOUTH WALES**

# Comment on suggestion 70

Liberal Party of Australia, NSW Division

16 pages



# **COMMENTS ON SUGGESTIONS TO THE REDISTRIBUTION COMMITTEE FOR NEW SOUTH WALES**

**ON BEHALF OF THE LIBERAL PARTY OF AUSTRALIA, NSW DIVISION**



# LIBERAL PARTY OF AUSTRALIA

## NEW SOUTH WALES DIVISION

### State Director

Redistribution Committee for New South Wales  
c/o Australian Electoral Commission  
Locked Bag 4007  
Canberra ACT 2601

Dear Members of the Redistribution Committee for NSW,

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 Committee, the focus of our comments relate primarily to the following suggestions submissions:

1. S48: Suggestions by NSW Labor
2. S50: Suggestion by NSW Nationals

We also note and make reference to some other suggestions where relevant, particularly those by incumbent Members of Parliament.

We would again like to take the opportunity to thank the Redistribution Committee for New South Wales, and particularly the staff, for their assistance to date.

Yours sincerely,



Chris Stone  
State Director



# COMMENTS ON SUGGESTIONS TO THE REDISTRIBUTION COMMITTEE FOR NEW SOUTH WALES

ON BEHALF OF THE LIBERAL PARTY OF AUSTRALIA, NSW DIVISION

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# EXECUTIVE SUMMARY

While the Liberal Party has reviewed all Suggestions made to the Redistribution Committee for New South Wales, the main focus of our comments is the suggestions made by the Labor and National Parties, with reference to suggestions made by some relevant federal MPs. The most important features of our comments are as follows:

1. In relation to Sydney's north shore and northern beaches, the Liberal Party notes that the majority of relevant suggestions align with our suggestion that the Division of Mackellar should remain a northern beaches division, with the Divisions of Warringah and North Sydney in effect being merged into a single Division.
2. Despite the Labor Party's acknowledgement of the importance and history of LGA boundaries being 'used' as boundaries for federal electoral divisions, the Liberal Party notes that a significant number of Labor's suggestions, if adopted, would result in the splitting of LGAs across divisions. In contrast, our suggestions demonstrate that, particularly in relation to Sydney's north shore, there is a clear option to draw electoral divisions which 'use' LGA boundaries.
3. There is a strong case made in several Suggestions submissions, including the National Party's, that the abolition of a division on Sydney's north shore as well as in Sydney's south allows for more sensible boundaries in the rest of Sydney, particularly in the west and south west.
4. Labor's suggestions for divisions south of the harbour, particularly merging Sydney suburbs in the Sutherland Shire with the Wollongong based Division of Cunningham and abolishing the Division of Hughes, ignore historical precedent and communities of interest for no credible reasons other than electoral advantage, and should be dismissed.
5. The Liberal Party notes that there is agreement between our suggestions and those of both the Labor and National parties of the community of interest between suburbs in the lower Blue Mountains and the plains suburbs around Emu Plains. However, we believe it is important to also acknowledge the community of interest between these suburbs and the Penrith CBD.
6. There are several differing suggestions about how electors can be 'transferred' between Sydney and regional NSW. However we note that whether this is done via the Great Western Highway corridor (as suggested by the Liberal Party for example) or via the Hume Highway corridor (as suggested by the National Party), either option can be drawn without the need to disrupt the existing south coast and Wollongong based electoral divisions.



# **COMMENTS**

## **IN DETAIL**

# COMMENTS IN DETAIL

The Liberal Party offers ten key observations about the Suggestions received by the Redistribution Committee for New South Wales.

## NORTH OF SYDNEY HARBOUR

### W(h)ither Warringah?

The Liberal Party notes that there are two options canvassed in Suggestions about the future shape of electoral divisions covering the Northern Beaches Council and the lower north shore.

The first is that of Ms Zali Steggall MP, the Member for Warringah, and supported by the Liberal, National and Labor parties. We all suggest that the division currently named Warringah should expand and incorporate all or most of North Sydney LGA and oppose the linkage of the Division of Mackellar with any part of the existing Division of Bradfield. In this, we are joined by Ms Sophie Scamps MP, the Member for Mackellar, who explicitly opposes the inclusion of any part of the upper north shore in Mackellar.

The second option, supported by Ms Kylea Tink MP, Member for North Sydney, argues the opposite proposition with the support of the Greens. However, she provides no reason at all why the consequential inclusion of any part of the Upper North Shore is a good fit with Mackellar.

The local government boundary along the Middle Harbour waterway should remain a divisional boundary. Clearly there would be strong objection to do otherwise. The weight of opinion in the Suggestions supports that view.

The focus and debate about divisional names among some reminds us that sometimes people 'can't see the wood for the trees'. The Liberal Party acknowledges that the issue of the naming of a merged Division of Warringah and North Sydney, as supported by the majority of relevant Suggestions submissions, is a matter for the Redistribution Committee.

### LGA boundaries don't matter to Labor after all

*"Local government areas (LGAs) describe associations of constituents that manage their own community facilities and local services. While not explicitly stated in section 66, LGAs often represent areas of shared economic, social and regional interests as described in section 66 (2B), especially in regional NSW. Moreover, LGA boundaries have a long history of being 'used' as part of, or entirely as the boundary for an electoral division. Where appropriate, LGA boundaries should be considered."*

NSW Labor Suggestions, Oct 2023,  
(emphasis added)

In the eastern half of Sydney, where local government boundaries are as much as 150 years old, and council areas are smaller, there are considerable shared interests reflected in a wide range of community activity.

For this reason, we tried as far as possible to be mindful of local government boundaries when we had to assess options in areas likely to be impacted from an abolition of a division. Our aim was to build divisional boundaries reflecting them.

By contrast, Labor appears to have “talked the talk”, but is not “walking the walk”.

How do they explain their totally avoidable splitting of Hawkesbury, Hornsby, Ku-ring-gai and Ryde Local Government Areas? They don't.

The Liberal Party wholly includes Hawkesbury, Ku-ring-gai and Ryde LGAs as the anchors of the Divisions of Reibey, Bradfield and Bennelong, while 98.3 percent of Hornsby LGA anchors Berowra. It follows that our Suggestions better reflect community of interest.

Finally, we note that the Suggestions by the Liberal, National and Labor parties support a linkage of Lane Cove and Hunters Hill LGA with Ryde LGA in a federal division. The Liberal approach achieves the best outcome given its fidelity to LGA boundaries.

### **What happens in the north after a division is abolished**

It was always obvious that, if there was an abolition of a division north of the harbour, there would be about half a division in the proximity of the Division of Mitchell that would need to be transferred to either the Divisions of Parramatta, Greenway or Macquarie.

The Liberal Party has suggested a linkage to Macquarie; the Nationals prefer Parramatta. We think ours has more merit but see a transfer to Parramatta as the clear “runner-up”.

Labor have not abolished a division north of the harbour, despite clear enrolment trends. The consequence is a mess: split LGAs and odd-shaped divisions that would do Governor Gerry proud.

Labor provided this description in their submission's 'General Principles' in relation to

the Windsor Road corridor:

*“A longstanding barrier between the distinct communities of Blacktown LGA and the Hills LGA, it has served as an electoral boundary at the federal and state level for many years and is used for a number of community planning purposes including school catchment zones.”*

So it came as a bit of a surprise that Labor have abandoned this stoutly defended general principle extending the Division of Berowra west across Windsor Road and including Vineyard, Riverstone and Schofields, as well as the newer areas of Tallawong, Grantham Farm, Angus and Richards, in the Division of Berowra.

We have kept these Blacktown LGA suburbs in Greenway. Labor's Berowra has part of four different LGAs. The Liberal Party's Reibey, Greenway, Mitchell and Parramatta are a far better solution.

## **SOUTH OF SYDNEY HARBOUR**

### **Labor's mismatch: Putting Sydney suburbs in a Wollongong division**

Labor's suggestion of combining Sydney suburbs with a Wollongong based Division of Cunningham fails to reflect communities of interest.

Reflecting on the geography and urban growth of our transport corridors brings this into sharp focus. The four main transport corridors into Sydney fall broadly into two categories.

First, there are the Hume and Great Western Highway corridors. Along these corridors, the boundary between regional NSW and metropolitan Sydney blurs; where does the city stop and the provincial/regional communities start?

The LGA boundary between Camden and Wollondilly does not represent a break with city growth, as Appin and Wilton are showing as they develop.

While the Blue Mountains LGA might start a few kilometres west of Penrith CBD, the economic, social, sporting and cultural influence of the latter strongly extends into the mountains towards Springwood.

The second category is the Pacific and Princes Highway corridors. Here, urbanisation ends abruptly before the Sutherland Shire LGA boundary is crossed into the City of Wollongong. The same applies to the Hornsby and Central Coast LGAs, with urbanisation finishing at Berowra and no substantial urbanisation until Kariong.

In both cases, there are substantial green belts in the national parks stretching for kilometres. There are also natural barriers; in the north it is the Hawkesbury River and in the south the steep Illawarra escarpment (Bulli Pass and Mount Ouseley). As a consequence, there are far fewer community linkages along the Pacific and Princes Highway corridors compared to the Hume and Great Western Highway. This is why, for example, the Division of Robertson has not included any Sydney suburbs for over fifty years.

There is only one precedent in the same period for a linkage between the Division of Cunningham and suburbs north of Royal National Park, during the period 2009–2016 (and even then, only as far north as Heathcote), and it was reversed at the first opportunity. It was strenuously opposed by the local communities then and undoubtedly will be again if proposed by the Redistribution Committee.

The suburbs of Woronora, Woronora Heights, Loftus, Yarrawarra, Engadine, Heathcote

and Waterfall are in the Sutherland Shire LGA and preferably should remain in a division with Sutherland. Residents of these suburbs are taken to Sutherland Hospital (in the South East Sydney Local Health District). Loftus is over 50km from Wollongong Hospital (in the Illawarra–Shoalhaven Local Health District).

While Loftus, Engadine and Heathcote are on the same rail-line, they have no rail services south connecting them to communities in the Division of Cunningham. Instead, residents in those suburbs would need to get a suburban train service back north to Sutherland, and then change to catch an inter-city train service to take them south.

The media demonstrates another very clear divergence between the Sutherland LGA suburbs and communities in the Division of Cunningham. Residents in Heathcote receive Sydney TV broadcasts and their local newspaper is the St George and Sutherland Shire Leader. In contrast, in Thirroul and the northern suburbs of Cunningham, TV programming is from the Illawarra, and the radio stations are different as well.

To access government services or visit a department store, residents of Sutherland LGA suburbs look to Westfield Miranda; a resident of Engadine would not go south to shop.

Clearly, Labor's suggestion that Sutherland Shire suburbs – clearly in metropolitan Sydney – should be included in a Wollongong based division does not reflect community of interest and should be rejected.

### **Abolishing Hughes**

Moving the Division of Cunningham into metropolitan Sydney is only necessitated by Labor's determination to abolish the Liberal-held Division of Hughes.

This proposal is not in any way justified by the patterns of growth across metropolitan Sydney.

The Division of Hughes may have low enrolment, requiring it to grow, but as the Liberal Party's Suggestions show, this is relatively easy to achieve.

Moreover, Hughes is projected to grow by 11.6 percent which, while still leaving Hughes under quota, is nevertheless greater than the state-wide average of 7.1 percent. This is in stark contrast to divisions like Sydney (minus 0.7 percent growth) and Grayndler (0.3 percent growth).

The next device Labor's suggestions use is to construct a false narrative about linkages between the Sutherland Shire and communities north of the Georges River. In fact, the ties are much stronger the closer you get to Botany Bay, reaching their strongest between Taren Point and Sans Souci. It is weakest between the Menai area and the Bankstown LGA.

Consider this: for Menai and Taren Point residents, the local newspaper is the St George and Sutherland Shire Leader, as it is for Sans Souci. Padstow residents (in the Division of Banks) read the Bankstown Torch. Menai residents are taken to the Sutherland Hospital, not Bankstown Hospital (again, in two different Local Health Districts).

Students from Sans Souci are within the Sylvania High School catchment, while in contrast, no students from the Menai area go to school north of the Georges River.

The evidence points to much stronger community links across the Georges River further east, casting further doubt over the credibility of Labor's Suggestions.

## **Boundaries for Banks**

What we agree with Labor on is the northern boundary of Banks and disagree with the Nationals, who move it to Canterbury Road. The M5 is more than just a physical boundary, in a way that Canterbury Road is not.

At the eastern end, the Nationals add parts of Punchbowl and Roselands to Banks. These suburbs are in Canterbury Bankstown LGA and have very little in common with the suburbs to its south. They are strongly linked to Bankstown as their regional centre for major shopping and government services, while suburbs like Narwee and Peakhurst are in Georges River LGA and strongly linked to the Hurstville regional centre.

At the western end, the principal transfer is in Milperra. While similar in character to East Hills and Picnic Point, this suburb has few linkages to suburbs in western Banks and fits better with the division that contains Bankstown.

The Nationals also support the retention of the current boundary between the divisions of Cook and Banks. We believe that Blakehurst and Kyle Bay should be returned to Banks and that other suburbs (Carss Park, Kogarah Bay and Beverly Park) with which they are closely associated should be transferred as well.

Bus routes clearly show the close linkages of these suburbs. Connells Point and Kyle Bay are served by the same bus route (route 953) connecting with Hurstville. Beverly Park, Kogarah Bay, Carss Park, Allawah and South Hurstville are linked by Bus Route 958 to Hurstville.

In schooling, the catchment for Blakehurst High School includes Kogarah Bay, Carss Park, Kyle Bay and Connells Point).

As a strong pointer to community identity, it is worth noting that the Connells Point Progress Association includes Kyle Bay, Blakehurst and Carss Park as being within its sphere of interest.

## WESTERN SYDNEY

### The Lower Blue Mountains and its linkages

The Liberal, Nationals and Labor parties have all included Blaxland East, Mount Riverview, Glenbrook, Lapstone, Leonay, Emu Plains and Emu Heights in the same division.

But all are more strongly linked to Penrith CBD than elsewhere and should be included in the Division of Lindsay.

## REGIONAL NEW SOUTH WALES

### Bird Walton set to fly?

There are many similarities in Liberal, Nationals and Labor proposals for the Divisions of Richmond, Page, Cowper, Lyne, New England, Parkes and Farrer. The variations are small and around the edges.

Labor and the Nationals agree on the additions to Riverina and make few or no changes to Calare, along with the Member for Calare, Mr Andrew Gee MP.

The major point of departure is how the parties adjust between the city and the country, noting the discussion of the transport corridors used to transfer electors in the previous section regarding the Division of Cunningham.

The Nationals believe the Hume Highway corridor should absorb all the adjustments. This approach has its advantages. Eden-Monaro picks up Goulburn, fitting comfortably with the "national capital" focus of the Division of Eden-Monaro, more of Wingecaribee LGA can be

included in the Division of Whitlam and a small Hume emerges, tightly focussed on Wollondilly and Camden LGAs.

All of these are basically sound arrangements, to which we have no 'in principle' objections. And they are achieved without disrupting south coast divisions and having a Wollongong-based division intruding into metropolitan Sydney.

The Liberals believe that a transfer of the Upper and Central Blue Mountains to Calare (with a name change) is the best option.

A much smaller transfer of the City of Orange from Calare to Riverina means Southern NSW divisions can largely keep their existing boundaries and fewer electors have their electoral associations disrupted.

And as part of our approach, anchored in evidence-based electoral planning, we suggest the new Division of Bird Walton in a region that is growing, along with abolitions that are consequential in low or no growth areas.

Labor's approach doesn't have the strengths of either the Liberal or Nationals approaches. It is designed to give effect to their plan to make the Division of Gilmore less marginal for them, abolish the Liberal-held Division of Hughes and effectively abolish the Division of Fowler, held by an Independent MP (see below).

At every link in the chain there is a problem. Our Hume only includes Camden ('Sydney's last country town') and adjacent rural areas. Labor's Hume mixes rapidly growing new suburbs like Oran Park with Goulburn and the villages and rural districts of Upper Lachlan Shire. It's a poor outcome. Labor also put Wollongong suburbs in the regional Division of Gilmore and Sydney suburbs in the provincial Division of Cunningham, breaking every rule in the book.

## OTHER MATTERS

### In case you missed it, Labor has virtually abolished Fowler

While the suggestions of the Labor Party claim to abolish only the Division of Hughes, in an effort to portray minimal change, the reality is that under Labor's suggestions both the Division of Hughes (currently held by the Liberal Party) and the Division of Fowler (currently held by an Independent, Ms Dai Le MP) are abolished and a new division created.

Only one quarter of the electors in the division which Labor's Suggestions call Fowler is made up of electors from the existing Division of Fowler. The following table shows the make-up of Labor's suggested Fowler by existing division:

<b>Labor's Suggested Fowler</b>	
<i>From</i>	<i>%</i>
Macarthur	34.2%
Fowler	25.3%
Werriwa	22.7%
Hughes	17.8%

In contrast, over 50 percent of electors in Labor's suggested Division of McMahon are from the existing Division of Fowler. It is clear that Labor's suggestion that this is in fact only an abolition of the Division of Hughes is nothing more than an attempt to hide the fact that the Division of Fowler, a division traditionally held by the Labor Party but lost by Labor to an Independent at the 2022 general election, has also been abolished.

In contrast, the Liberal Party's Suggestions submission is transparent in the case of the small number of divisions (McMahon, Watson/Blaxland and North Sydney/Warringah) where we have made very significant changes and less than 30 percent of electors remain.

### Electoral fairness vs gerrymanders

While the Liberal Party acknowledges that electoral fairness is not a criteria for the drawing of electoral boundaries by the Redistribution Committee, nor are members of the Committee barred from informing themselves of the electoral consequences.

In this respect we draw your particular attention to Labor's Suggestions for Bennelong, Berowra, Gilmore, Hughes, Cook, Banks and Lindsay, which are the source of electoral unfairness

An analysis of Labor's Suggestions, using two-party preferred (2PP) results from the 2022 federal election at the SA1 level shows that under Labor's Suggestions, a 50.0 percent 2PP would result in Labor winning 27 of their 46 proposed divisions (60 percent of divisions in NSW).

Labor gain an additional division (from 26 to 27) despite a 1.4 percent decrease in their 2PP and the number of divisions in NSW decreasing by one.

As noted earlier, it also may well remove the one Independent Member representing a traditionally Labor-held division.

In contrast, the Liberal Party's Suggestions would see the Coalition win 24 of 46 divisions with a 2PP of 50.0 percent notionally held by the Coalition. Of these 24, three are currently held by Independent Members).

If the Committee were minded to adopt Labor's Suggestions, we submit this would be a manifestly unfair outcome with clear boundary bias towards one political party.



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