



Submission CS68

Liberal National Party

The Chair
Redistribution Committee for Queensland
Australian Electoral Commission
Locked Bag 4007
Canberra ACT 2601

Dear Chair,

Thank you for the opportunity to comment on the suggestions received for the redistribution of Queensland into federal electoral divisions.

The Liberal National Party has considered all 63 suggestions and respects the effort that has clearly gone into a number of them, many from individuals who have given their own time to this process.

We also appreciate the considerable task before the Redistribution Committee in weighing these suggestions against the requirements of the *Commonwealth Electoral Act 1918* and the needs of communities across the state.

We thank the Committee for its work and look forward to continuing to engage throughout this process. Please do not hesitate to contact me if you require any further information in relation to these comments.

Yours sincerely

[redacted]

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1. Overview

The Liberal National Party Suggestion

The Liberal National Party (LNP) has reviewed every suggestion lodged with the Redistribution Committee. On that review, the LNP's suggestion (S62) is the only suggestion from a major party that is fully mapped, meets both numerical requirements in every division, and sets out how each factor in section 66(3)(b) of the *Commonwealth Electoral Act 1918* has been applied.

As our original suggestion stated, it was prepared with one clear objective: stable, community-focused divisions, all 30 within quota, with each division built around the centres its residents rely on and the roads, rail lines and rivers that connect them. Nothing in the other suggestions has caused the LNP to depart from it.

Requirement	**LNP Suggestion (s62)**
Current enrolment within 10% of quota (114,534 to 139,984)	All 30 divisions within range
Projected enrolment within 3.5% of projected quota at 27 August 2028 (127,888 to 137,164)	All 30 divisions within range
Communities of interest	Each division built around the regional or suburban centres its residents rely on
Means of communication and travel	Highways, motorways, rail lines and local media markets used to link communities, not split them
Physical features and area	Rivers and the Great Dividing Range used where they divide communities
Boundaries of existing divisions	Retained where the other factors are met
Maps	A map of every proposed division

The Labor suggestion

Labor's suggestion gives the factors in the Act the wrong weight. It makes minimal change its first principle and council boundaries its organising rule, and sets the community of interests, means of communication and physical features to follow.

The result is a set of divisions that do not reflect the communities within them: a Bundaberg divided from its coast, a Hinkler that ends at Gympie, a Wide Bay stretched from Rainbow Beach to the outskirts of Caboolture, a Maranoa from the Northern Territory border, crossing the Great Dividing Range to touch Brisbane, and Logan divisions that cut across the routes people travel every day.

It achieves this with more disruption than the LNP's suggestion, not less, moving some 45,000 more electors statewide and three times as many through regional Queensland. And it leaves the Committee, and Queenslanders, without a map by which any of it can be tested. The LNP respectfully submits that Labor's suggestion should be given little weight, and that the Committee should adopt the LNP's suggestion as the basis for its proposed redistribution.

Two key decisions for the Committee

These comments concentrate on two decisions that will shape the redistribution, on which the LNP and Labor's proposals take opposite courses, and address suggestions from others where they bear on them.

Regional Queensland: inland, or down the coast

Dawson, Capricornia and Flynn must grow. The Committee can meet the shortfall inland. Under the LNP's suggestion Flynn grows into the South Burnett, whose cropping and grazing communities share the agricultural base Flynn already represents across the Burnett, and takes Bundaberg North across the river, so that Bundaberg stays in Hinkler and Maryborough in Wide Bay. About 62,000 electors move through the seven regional divisions from Kennedy to Wide Bay.

Labor instead moves Townsville's southern suburbs into Herbert and lets the consequences run down the coast, and each step offends a factor. It divides Bundaberg from its port, its high school and its beaches, sending the city to Flynn while 26,000 electors at Bargara, Burnett Heads and the southern surrounds stay behind. It ends Hinkler at Curra, cutting communities that shop and school in Gympie from the Gympie council area. It sends the Sunshine Coast hinterland to a division centred on Gympie, when its roads run east to Nambour and the coast. And it draws Wide Bay out of its own media market and down to the outskirts of Caboolture, so that it loses Maryborough and gains Woodford, which is closer to Brisbane than to Gympie. About 186,000 electors move through the same seven divisions, three times as many as the LNP's proposal. Having pushed Wide Bay south, Labor then holds Petrie and Lilley in place when the numbers call for them to change. Instead, the LNP's suggestion lets the Sunshine Coast's surplus flow south along the Bruce Highway to Longman and on to Petrie and Lilley.

The west: from the Darling Downs to Brisbane's western suburbs

Maranoa must grow, Blair must shrink, Ryan must grow, and the divisions west of Brisbane are out of balance as a result. The Committee can rebalance them in place, so that each grows from the communities next to it: Maranoa onto the Downs, Groom into the Lockyer Valley, Oxley into Springfield, and Ryan back into the Centenary suburbs. Each of those moves follows a connection that already exists: the Downs towns that look to Toowoomba, the Lockyer residents who travel up the Range to it every day, the Springfield suburbs divided today between two divisions, and the Centenary suburbs that were part of Ryan until 2009.

Labor's course offends a factor at every step. It carries Maranoa across the Great Dividing Range, the clearest physical feature in the state, into a shire that looks to Ipswich and watches Brisbane's news. It leaves the Lockyer Valley in Wright, cut off from the Toowoomba its residents travel to, so that Wright runs from the foot of the Range to the Pacific Motorway. It leaves Springfield divided between Blair and Oxley. And it grows Ryan, Brisbane's western suburbs division, north into the semi-rural Pine Rivers district on the strength of a boundary that is more than thirty years old. Having done so, it must rebuild Wright and Forde in an unintuitive way to make the numbers work.

One test for both

At each point the question for the Committee is the same: does the division grow along the roads, rivers and media markets its communities already share, or is it pushed into territory it has never covered, often without a clear connection? The LNP's suggestion takes the first course at every point, maps every division, and meets both numerical requirements in every one. Labor's takes the second, and maps none.

2. What the Act requires

The numerical requirements of the *Commonwealth Electoral Act 1918* are well understood: each division within 10 per cent of the current quota and, as far as practicable, within 3.5 per cent of the projected quota at 27 August 2028. The LNP's suggestion meets both in every division. The decisions above turn on the factors the Act then directs the Committee to consider for each division:

- community of interests, including economic, social and regional interests;
- means of communication and travel;
- physical features and area; and
- the boundaries of existing divisions.

These factors are not of equal weight. As the Committee's own notice states, "consideration of existing boundaries is subordinate to the other factors" (C2026G00607). Council and state electorate boundaries are not factors in their own right. They are often good evidence of a

community of interest and, where other factors are met, a sensible place to draw a line, but they cannot override the factors themselves.

Among the means of communication, local news deserves particular attention. Queenslanders receive news of their region, their councils and their representatives through local media, and television above all: separate local bulletins are produced for Brisbane and for each of the major regional centres, and radio, print and digital media are organised around similar centres. Electors who follow the same local news share a means of communication the Act asks the Committee to respect. Some divisions already span more than one media market, and their existing boundaries reflect that. What matters is whether a suggestion fragments a division's means of communication where there is no need to. The regional sections below show where Labor's suggestion does, and where the same evidence supports the LNP's.

3. Suggestion from the Australian Labor Party

Labor's suggestion falls well short of the standard the Committee, and Queenslanders, are entitled to expect from a major party. Its problems are of four kinds: it builds on principles of its own rather than those set out in the Act, and then abandons them; it cuts across the communities, corridors and physical features the Act puts first; it contradicts positions Labor itself has put to earlier redistributions; and it cannot be tested.

Labor builds on principles of its own, then abandons them

Labor lists the four factors in section 66 and then, "in addition to the matters expressly required in the Act", adopts four general principles of its own. The first is minimal change: Labor says it "first took the approach of a logical and minimally disruptive adjustment" and asks the Committee to preserve existing boundaries "as far as practicable". On Labor's own account, minimal disruption was the starting point for its map, not a consideration subordinate to the others as the Act requires. The last of its principles is local government boundaries, which Labor concedes are "not explicitly stated in section 66 of the Act", but which it applies as the organising rule for Blair, Rankin, Forde, Wright, Hinkler, Capricornia and Dawson, ahead of the factors that are.

Labor supports its first principle by pointing to the earlier projection time and to the belief that Queensland's entitlement "may change at the next determination". A possible future entitlement is not one of the factors in section 66(3)(b), and any further redistribution would begin from the boundaries settled in this one. That is a reason to get them right, not to leave flawed boundaries in place on the strength of a forecast.

Having made minimal disruption its organising principle, Labor then fails to achieve it. Its suggestion moves more electors than the LNP's, both statewide and through the divisions that already met both numerical requirements. Those divisions are not islands, and some

change to them is often unavoidable as their neighbours are rebalanced. The LNP's suggestion makes such changes too. Oxley, which already complies, takes in Greater Springfield from Blair and passes the Centenary suburbs to Ryan, about 50,000 electors in all, and Brisbane exchanges about 18,000 with its neighbours. Each of those moves serves a neighbour that must change and unites a community that is divided today. The test is whether a change to a complying division is proportionate to a neighbour's need and follows the communities on the ground. Labor's changes to complying divisions are driven less by any neighbour's need than by its own choices elsewhere: the coastal cascade through Hinkler and Wide Bay, the Townsville transfer through Herbert, and a chain that moves Annerley and Tarragindi into Griffith and Carina and Cannon Hill out of it to reach Bonner, when Bonner's need can be met from Rochedale South without touching Griffith at all.

Electors moved	**Labor (s60)**	**LNP (s62)**
Statewide	435,701 (11.4%)	390,094 (10.2%)
Seven regional divisions, Kennedy to Wide Bay	186,382	61,594
Ten divisions that already complied	167,792	100,042
Hinkler alone	74,196	4,321

Figures come from an SA1-level analysis of both suggestions, counting each elector once. Because Labor provided no maps, its suggestion was rebuilt from the transfers it describes and matched to its published figures. Each division's net change is within about 450 electors of Labor's, and most are within 150.

Labor's council-boundary principle fares no better. Council boundaries are often good evidence of a community of interest, and the LNP's suggestion aligns with them, and with the new state electorates, "where it sits comfortably with the statutory criteria" (S62). But they are evidence of a community of interest, not a substitute for one. Where a community straddles a council line, as at Rochedale, or shares a travel corridor across one, as along the Pacific Motorway, the factors in the Act should prevail. Labor applies the principle the other way around. It holds to the council line in Logan, where it cuts across how people travel, and departs from council lines wherever its numbers require, carrying Hinkler into the Gympie Regional Council and Wide Bay into the City of Moreton Bay. And where Labor does accept that a community can cross a council line, moving Carbrook into Bowman because "Carbrook's established connections run north and east towards the Redlands", it will not apply the same reasoning to the motorway corridor.

Labor's map cuts across communities, corridors and the Range

The result of putting its own principles first is a map that gives weight to the factors the Act puts first only where they happen to coincide with those principles. Its coastal cascade draws a line through Bundaberg, splits Curra from Gympie and the Sunshine Coast hinterland from Nambour, and draws Wide Bay away from its own media market. Its Maranoa crosses the Great Dividing Range. Its Logan divisions run east to west across the corridors people use to travel to work, and its Rankin straddles the Pacific Motorway. Its Petrie and Lilley stay locked in place when the numbers call for change. Each of these is taken up in the regional sections that follow.

Labor's suggestion contradicts its own earlier submissions

On the communities that matter most to these decisions, Labor's view appears to depend on which redistribution it is responding to.

- **Somerset.** In 2017, Labor wrote that "The heart of Blair is Ipswich" and that the Brisbane Valley Highway connects "Somerset regional towns such as Fernvale, Lowood, Esk and Toogoolawah with Ipswich" (AEC 2017, S22). In its comments that year, it insisted that "Blair should remain unchanged", describing a division "based firmly within Ipswich City Council and Somerset Regional Council boundaries" (AEC 2017, CS12). It now says those same towns have "more in common with the rural shires to their north and west than with Ipswich's suburbs".

- **Gympie.** At state level, Labor objected that a proposed boundary "unnecessarily removes rural localities from the Gympie local government area", and asked that they be "transferred back into Gympie" (QRC O-0724). Federally, it removes Curra, Anderleigh, Kia Ora and Neerdie from the Gympie district and places them in Hinkler.

- **The Sunshine Coast hinterland.** At state level, Labor described Nambour as "an electorate defined by its connection of hinterland communities" (QRC CO-0055). Federally, it would cut Mapleton and Kenilworth away from Nambour and send them to a division centred on Gympie.

- **Logan's growth corridors.** At state level, Labor said the Mount Lindesay Highway and Waterford-Tamborine Road "provide a clear way of north-south communication for localities like Jimboomba and Yarrabilba", and proposed using them to "separate the two distinct growth areas of Jimboomba and Flagstone, and Yarrabilba" (QRC S-115). Federally, it places both in a single Forde, together with Beenleigh and Eagleby on a third corridor.

The Committee may reasonably ask which of Labor's positions reflects its actual view of these communities, and why proposals it has already declined should fare differently now.

Labor asks the Committee to take its boundaries on trust

Labor's suggestion contains no maps and, for most of its changes, no list of the SA1s or localities that would move. Where it does describe a boundary, it is often open-ended: Wide Bay is to extend into the Sunshine Coast hinterland and Moreton Bay "as far as necessary", and into the Gympie Regional Council "only as far as necessary to satisfy enrolment", and Ryan is to take in "Samford Valley, Mount Nebo and surrounds". None of these is a boundary an elector could locate on a map.

Individual members of the public lodged maps or boundary files for their proposed divisions using freely available tools (S10, S37, S38, S43, S57, S59), as did the Queensland Greens (S63). Labor, with far greater resources, did not. Whatever the reason, the effect is that neither the Committee nor the communities concerned can see exactly what Labor proposes for them, or test it against the Act. The LNP's suggestion, by contrast, maps all 30 proposed divisions with full enrolment figures.

4. Other Suggestions

The LNP notes the range of suggestions lodged by individuals. Rather than respond to each in turn, we refer to them in the regional comments that follow. Some general observations apply across them.

The Queensland Greens' suggestion (S63) was lodged with map files and, on several regional questions, reaches conclusions similar to the LNP's: it moves only Bundaberg North from Hinkler to Flynn, keeps the Somerset Region out of Maranoa, and moves the Glass House Mountains to Longman and Mooloolaba to Fairfax. It does not, however, show that every proposed division meets both numerical requirements, and indicates that split SA1s would be needed in places to bring divisions within tolerance.

Suggestions that cannot be relied on numerically. A number of statewide suggestions provide no enrolment figures for their proposed divisions, or figures for only some of them (S25, S34, S42, S58). Others place divisions outside the numerical requirements on their own figures (S14, S50), or acknowledge that they are not a complete quota-compliant map (S55). However well reasoned, these suggestions cannot be tested against the Act and should be given limited weight.

Matters outside the Committee's remit. Suggestions addressing the voting system, digital voting, the number of seats in the Parliament or transport infrastructure (S8, S19, S30, S40, S41) fall outside the scope of the redistribution.

5. North and Far North Queensland

Leichhardt, Kennedy and Herbert already meet both numerical requirements, and Dawson is the only division in the region that must gain electors. The LNP's suggestion therefore keeps change in the north to a minimum.

Leichhardt and Kennedy

There is general acceptance, including in Labor's suggestion, that Leichhardt requires no change, and the LNP supports this. Several suggestions move Bentley Park and other southern Cairns suburbs from Kennedy into Leichhardt (S23, S34, S37, S43, S47, S58, S59), but Leichhardt would then have to shed electors elsewhere, by moving Kuranda into Kennedy (S43, S47, S59) or, in one case, Cape York, the Torres Strait and the Daintree (S37). That is change without need.

Herbert and Dawson

Labor and a number of other suggestions move Townsville's southern suburbs from Dawson into Herbert, and then move the balance of the Mackay Regional Council area from Capricornia into Dawson to compensate. Labor itself says the Townsville move "facilitates a series of changes in Queensland's regions". The LNP considered this approach. It turns a small adjustment into a chain:

- Herbert, which already complies, would see more than 18,000 electors move under Labor's suggestion, against around 1,300 under the LNP's.
- Dawson would see more than 39,000 electors move to achieve a net gain of around 13,000.
- Capricornia would then see more than 60,000 electors move, for a net gain of around 8,000.

The Townsville change is not needed. It does nothing for Herbert, which is within quota on both current and projected enrolment, and it deepens the shortfall in Dawson, the one division in the north that must gain electors. It also replaces the Ross River, which already forms much of the boundary, with a line along Abbott Street.

Labor's stated goal for Mackay, to unite "all of urban Mackay in a single electoral division", can be met with a far smaller change. The parts of urban Mackay outside Dawson are its southern suburbs of Ooralea and Bakers Creek, which share the same city services as the rest of the city. The LNP's suggestion moves them into Dawson, as does every suggestion that addresses them. Labor drew the same distinction between urban Mackay and its rural surrounds at state level (QRC S-115). The Pioneer Valley is not part of urban Mackay, and it

remains in Capricornia, where its rural communities share the agricultural and resource interests of the division's inland towns.

Dawson also gains Collinsville, whose principal link to the coast is the Bowen Developmental Road to Bowen, bringing it together with the Whitsunday communities already in Dawson and aligning the division with the Burdekin state electorate boundary. This change is widely shared (S24, S34, S37, S61, S63). As S63 puts it, it helps "restore connection with their Local Government in the Whitsundays".

Dawson has long served as the connector division between Mackay and Townsville along the Bruce Highway, and the LNP's suggestion preserves that role while moving no elector out of it.

Several suggestions also move Townsville's Northern Beaches from Herbert into Kennedy (S37, S43, S47, S59). The LNP's suggestion instead aligns Herbert with the northern edge of the Townsville City Council area, keeping Herbert a wholly Townsville based division.

6. Central Queensland and Wide Bay-Burnett

The numbers require Dawson, Capricornia and Flynn to gain electors, and how that is done is the first of the two decisions set out in section 1. The LNP's suggestion draws Flynn inland to the South Burnett, which shares the agricultural interests Flynn already represents. Labor instead pushes every division one step south along the coast, from Townsville to the Sunshine Coast and Moreton Bay.

Capricornia

There is general acceptance across the suggestions, including Labor's, that the Rockhampton Regional Council area should be united in Capricornia. The LNP supports this. As S47 notes, the change "unites all of Rockhampton in this seat", and for Gracemere and its neighbours "local services are located in Rockhampton City" (S63).

The suggestions part ways on what follows. Labor moves Sarina, Walkerston and the Pioneer Valley into Dawson and then, because "the electors from Rockhampton Regional Council alone are not enough", adds the Central Highlands from Flynn. The LNP opposes both steps.

- **The Mackay hinterland shares Capricornia's interests.** Walkerston and Eton sit on the Peak Downs Highway, the main supply corridor for the Bowen Basin mines in Capricornia's Isaac region, and the Goonyella rail line carries Bowen Basin coal to the terminals at Hay Point, near Sarina. Labor justifies the Central Highlands transfer by pointing to their connections with the Isaac region, yet would cut the Isaac region off from the communities at the coastal end of its own road and rail links. In 2017, Labor

itself moved rural areas south of Mackay into Capricornia as "matching the existing rural communities of interest" (AEC 2017, CS12).

- **Sarina is widely kept in Capricornia.** Even suggestions that move much of the Mackay council area into Dawson leave Sarina in Capricornia (S24, S34, S38, S42, S43).

- **The Central Highlands belong with Gladstone.** Much of the region's coal is railed to Gladstone's ports on the Blackwater system, and the Dawson Highway links Gladstone with the Central Highlands at Springsure. The suggestions that would move the Central Highlands cannot agree where they should go: Labor and several others send them to Capricornia, while S43 would send Emerald to Maranoa.

With the whole Rockhampton council area and its Mackay hinterland, Capricornia comes within quota without disturbing Flynn's western boundary.

Labor's coastal cascade

The cost of Labor's approach shows in the number of electors each regional division must exchange to achieve a modest net change. Net changes and electors moved are both measured on the same SA1-level data as section 3, so net changes differ marginally from the figures published in each suggestion.

Division	Labor net change	Labor electors moved	LNP net change	LNP electors moved
Kennedy	+5,104	5,502	−1,522	1,522
Herbert	+7,830	18,436	+1,283	1,283
Dawson	+13,509	39,377	+5,789	5,789
Capricornia	+7,965	60,851	+9,775	21,353
Flynn	+5,877	74,693	+9,639	41,385
Hinkler	−6,374	74,196	−4,321	4,321
Wide Bay	−1,012	66,810	+7,188	18,608
Electors affected		**186,382**		**61,594**

Across these seven divisions, Labor moves almost three times as many electors as the LNP to achieve a comparable result. The consequences for communities of interest are just as significant:

- **Bundaberg is divided, and its city removed from Hinkler.** Labor transfers the urban centre of Bundaberg to Flynn but leaves Bargara, Burnett Heads and Bundaberg's southern surrounds in Hinkler, then itself raises the question of renaming Hinkler given the name's "strong historical connection" to the city. Removing a division's

anchor city, dividing it from its coast and inviting a change of name is the opposite of stability for electors.

- **Flynn becomes a division of two cities.** Labor's Flynn would combine Gladstone and the whole of urban Bundaberg, two regional centres with distinct economies, ports and services.

- **Maryborough is removed from Wide Bay.** Wide Bay loses Maryborough, one of its two centres, and is pushed south into the Sunshine Coast hinterland and Moreton Bay, among communities that look to Nambour and Caboolture, as set out in section 8.

Keeping Bundaberg together south of the Burnett

Ideally, the whole of Bundaberg would sit in a single division. The numbers do not allow it. Flynn must gain around 10,000 electors, its other neighbours have none to spare, and Hinkler is the only division that can supply them. A line has to be drawn somewhere in the Bundaberg region, and the question is where.

The LNP's suggestion draws it at the Burnett River, the clearest physical feature in the area, and keeps Bundaberg's city centre together with its coastal communities. Labor's suggestion draws it through the middle of Bundaberg's community, sending the city to Flynn while Bargara, Burnett Heads, Innes Park and Bundaberg's southern surrounds, about 26,000 electors, remain in Hinkler.

- **Economic interests.** The Port of Bundaberg at Burnett Heads exports the region's raw sugar and molasses. Labor would place the port in a different division from the city and the industry it serves.

- **Social interests.** Bargara, Burnett Heads and Innes Park have no state high school. Their students attend Kepnock State High School in Bundaberg, and under Labor's suggestion would cross a divisional boundary to get to school.

- **Means of communication and travel.** Bundaberg's bus network links the coast to the city. Route 609 runs from the city to Burnett Heads via Kepnock and the port, and route 608 runs from Sugarland Plaza and the university, via the hospitals, to Bargara and Innes Park. Every destination on those routes would be in Labor's Flynn.

- **Regional interests.** Bargara is about 11 kilometres from Bundaberg, separated only by cane fields, and shares its 4670 postcode. It is more than 60 kilometres from Hervey Bay and 80 kilometres from Maryborough, the centres of Labor's Hinkler.

Labor's own principle is that "major population centres and directly linked satellite communities should be contained within a single electoral division", and it applies that principle to Rockhampton and Mackay. Its Hinkler would leave one in five of its electors cut off from the city they rely on.

Labor's line follows the new state electorate of Bundaberg. The LNP's suggestion aligns with state electorates where that sits comfortably with the factors in the Act, but it does not here. The state electorate is drawn for a seat less than a third the size of a federal division, and separating the city from its coast was never its purpose. At federal scale, a line through Kalkie and Kepnock divides a community that the Burnett River does not.

Labor's Hinkler ends on the outskirts of Gympie

Having removed Bundaberg, Labor rebuilds Hinkler from the whole of the Fraser Coast. Because that "alone is not enough", Labor then extends Hinkler into the Gympie Regional Council "only as far as necessary to satisfy enrolment", taking in "localities along the Bruce Highway as far south as Curra and areas around the Tuan State Forest such as Anderleigh, Kia Ora and Neerdie". This southern boundary makes no sense.

- **Curra is Gympie's northern gateway.** Curra sits on the Bruce Highway about 17 kilometres from Gympie, and proximity to Gympie has encouraged rural/residential settlement. It marks the northern end of the Gympie Bypass, and rejoins the existing highway just north of Curra.

- **These are Gympie communities in daily life.** Curra, Gunalda, Anderleigh, Kia Ora and Neerdie all share Gympie's 4570 postcode. None has a secondary school. Their students attend James Nash State High School or Gympie State High School in Gympie, or Tin Can Bay State School, none of which would be in Labor's Hinkler.

- **Far from the centres of Labor's Hinkler.** In a straight line, Curra is about 15 kilometres from Gympie, but about 60 kilometres from Maryborough and 90 kilometres from Hervey Bay. Labor would place it in a division whose name Labor itself ties to Bundaberg, without Bundaberg in it.

- **Labor breaks its own principle to get there.** Labor justifies uniting the Fraser Coast on the strength of local government boundaries, then immediately splits the Gympie Regional Council to make its numbers work. At state level, Labor objected to exactly this, complaining that a proposed boundary "unnecessarily removes rural localities from the Gympie local government area" (QRC O-0724).

- **The boundary cannot be found.** "Only as far as necessary" is not a boundary, and even Labor's landmark is imprecise. Neerdie adjoins the Tuan Forest, but Anderleigh

borders the Curra State Forest and Kia Ora the Toolara Forest. With no map and no list of SA1s, electors from Curra to Kia Ora cannot tell whether they would be moved.

The LNP's suggestion keeps the Mary River as Hinkler's southern boundary and leaves these communities in Wide Bay with Gympie, the centre they rely on.

Other suggestions following the coastal approach

The LNP notes that a number of individual suggestions also move Bundaberg into Flynn and unite the Fraser Coast in Hinkler (S14, S34, S37, S38, S42, S43, S47, S53, S58, S59). They share the same disadvantages as Labor's suggestion. Several of them, like Labor, then find it necessary to question whether Hinkler should keep its name or to reshuffle division names along the coast (S34, S43). That alone shows how far this approach departs from the existing divisions.

Other suggestions keep Bundaberg as the centre of Hinkler (S25, S28, S52, S61, S63), although S25, S52 and S61 do so by abolishing Flynn, which the LNP does not support. S63 moves only Bundaberg North to Flynn and grows Flynn inland into the South Burnett, as does S14.

The LNP's inland approach

The LNP's suggestion achieves the same numerical outcome and upholds community links with a fraction of the disruption:

- Capricornia gains the balance of the Rockhampton Regional Council area and keeps the Pioneer Valley.

- Flynn gains Bundaberg North, so that the Burnett River forms a clear boundary with Hinkler along its full length, together with the South Burnett towns of Kingaroy and Nanango and the rural surrounds of Kilkivan, Kingaroy and Maryborough. These cropping and grazing communities share the agricultural base Flynn already represents across the Burnett. Flynn already spans more than one regional media market, as a division of Gladstone, the Central Highlands and the Burnett must, and adding the South Burnett does not change that character.

- Flynn keeps the Central Highlands with Gladstone, and remains a Gladstone-centred division representing the mining and agricultural interests of Central Queensland.

- Hinkler remains balanced between Bundaberg and Hervey Bay, its two major centres.

- Wide Bay keeps Maryborough alongside Gympie, aligning with the state electorates of Gympie and Maryborough.

Bundaberg stays in Hinkler and Maryborough stays in Wide Bay, where electors expect to find them. Labor's Flynn, by contrast, takes the whole of urban Bundaberg because, as Labor acknowledges, once the Central Highlands go to Capricornia, Flynn "then needs to grow southward".

7. Darling Downs and South-West Queensland

Maranoa must gain electors, and few neighbouring regional divisions have electors to spare. Which way it grows is the heart of the second decision set out in section 1, the rebalancing of the divisions west of Brisbane. The LNP's suggestion draws Maranoa east onto the Darling Downs towards Toowoomba, its natural service centre, keeping it west of the Great Dividing Range and allowing Groom to gain the Lockyer Valley. Labor instead carries Maranoa across the Range into the Brisbane Valley. As set out at the end of this section, that follows from Labor's decision to leave the Lockyer Valley in Wright.

Labor's Maranoa: across the Range to the edge of Brisbane

Labor proposes that the whole of the Somerset Region transfer to Maranoa. The transfer fails the factors the Act puts first.

- **To the boundary of Brisbane City.** The Somerset Region shares a boundary with Brisbane City. With the balance of Brisbane City in Blair moving to Ryan under Labor's suggestion, Maranoa would border a division of inner-western Brisbane.

- **Across the Great Dividing Range.** Somerset lies in the upper Brisbane River valley, home to the Wivenhoe and Somerset dams that supply South East Queensland. Labor itself describes the D'Aguilar Highway as carrying traffic from Kilcoy "across the Great Dividing Range" to the South Burnett, conceding that Somerset sits on the other side of the Range from the division it would join.

- **Onto Brisbane's local news.** Somerset is served by the Brisbane television bulletins, alongside Ipswich and Brisbane. No part of Maranoa is today. Its eastern towns, from Dalby to Warwick and Goondiwindi, are served by the Toowoomba and Darling Downs bulletin. Labor's transfer would put about one in six of Maranoa's electors in a different media market from the communities they would join, a split in the division's means of communication that the numbers do not require, since Maranoa can be restored from the Darling Downs, as set out below.

- **Without precedent.** Somerset's communities have been represented by divisions oriented towards Ipswich, Brisbane and Moreton Bay. In 2007, for example, the former Esk Shire sat in Dickson alongside Samford and the Pine Rivers district. We

are not aware of any occasion on which Maranoa has extended into the Brisbane Valley.

Labor's claim that Somerset has "more in common" with the rural shires to its north and west does not reflect how its residents live. Somerset is a member of the Council of Mayors (SEQ), and its residents are served by the West Moreton Hospital and Health Service alongside Ipswich, the Lockyer Valley and the Scenic Rim. Fernvale and Lowood look to Ipswich and Brisbane for work, health care and retail. Labor itself said as much in 2017, describing the Brisbane Valley Highway as connecting "Somerset regional towns such as Fernvale, Lowood, Esk and Toogoolawah with Ipswich" (AEC 2017, S22).

Somerset is also one of the 12 councils covered by the State's South East Queensland regional plan, ShapingSEQ. Maranoa's councils, by contrast, belong with Toowoomba to Regional Development Australia Darling Downs and South West and to the Darling Downs and South West Queensland Council of Mayors. Somerset belongs to neither. Under Labor's suggestion, about one in six Maranoa electors would live in a South East Queensland council.

Labor's evidence of means of communication and travel is also weak. The D'Aguilar Highway's principal role is to carry Kilcoy residents east to Woodford, Caboolture and Brisbane, yet Labor's suggestion would split that corridor three ways: Kilcoy into Maranoa, Woodford and Wamuran into Wide Bay, and Caboolture into Longman. Labor also cites the Brisbane Valley Rail Trail, a recreational walking and cycling trail, as a connection between communities. A rail trail is not a means of communication and travel for electors going about their daily lives.

Other suggestions on Somerset and Maranoa

Of the other suggestions that address the Somerset Region, only two would place it in Maranoa (S38, S53). Eleven place it outside Maranoa (S14, S25, S34, S37, S42, S43, S52, S56, S58, S59, S63), four of them keeping it substantially in Blair as the LNP proposes (S42, S58, S59, S63). S56 notes that Maranoa does not have "the capacity to absorb the entirety of Somerset", and the Queensland Greens' approach expressly "avoids the alternative of Maranoa moving into yet another region" (S63).

The suggestions are also broadly agreed on how Maranoa should instead be restored. Most draw it east into the rural fringe of the Toowoomba Regional Council, around Jondaryan, Pittsworth and Cambooya (S25, S28, S31, S37, S47, S58, S59, S61, S63). This is the approach the LNP has taken. These broadacre and grazing communities share Maranoa's agricultural identity and already look to Toowoomba, the centre that serves the eastern half of the division. They are also served by the same Toowoomba and Darling Downs news bulletin as Maranoa's existing eastern towns, so the LNP's suggestion extends Maranoa's south-eastern edge without crossing into another media market. S31, lodged by a Groom elector, proposes

moving Jondaryan, Acland and Quinalow into Maranoa because those localities "share many similar characteristics".

The LNP notes that Labor and some other suggestions place Crows Nest in Groom (S28, S31, S43, S47). The LNP's suggestion keeps Crows Nest with the other rural communities of the Toowoomba Regional Council in Maranoa, as does S38. Labor needs the change only because its Somerset transfer pushes Maranoa over quota.

Lockyer Valley and Groom

The LNP's suggestion moves the whole of the Lockyer Valley Regional Council area, including Gatton and Laidley, from Wright to Groom. A large proportion of Lockyer Valley residents travel up the Range to Toowoomba for health, education and retail services, and the Warrego Highway binds the two together. The valley also sits within Toowoomba's regional television signal rather than Brisbane's. That makes Groom a more logical home for the valley than the alternatives, which would keep it in Wright or move all or part of it to Blair, both divisions within the Brisbane licence area. The change gives Groom a clear identity as the division of Toowoomba and the communities that depend on it, and allows Wright, which is more than 16 per cent over quota, to refocus on the Scenic Rim and the hinterland behind Logan and the Gold Coast.

This is one of the most widely supported changes among the suggestions. Eleven suggestions move all or part of the Lockyer Valley into Groom (S14, S25, S28, S34, S37, S38, S42, S58, S59, S61, S63), two of them the whole council area (S25, S37). S37 puts the case simply: it "keeps Toowoomba as Groom's primary centre, but transfers the entire Lockyer Valley LGA from Wright to Groom", which in turn "allows for much of rural Toowoomba Regional LGA to be transferred to Maranoa".

Labor, by contrast, is silent on the Lockyer Valley and leaves it in Wright, as discussed in section 11. Its changes to Groom are driven largely by its Somerset transfer, which in Labor's own words leaves Maranoa over quota "and so areas will need to be transferred to Groom".

The LNP opposes the alternatives raised in other suggestions:

- **Lockyer Valley to Maranoa (S47).** This would carry Maranoa down the Range into South East Queensland, the same objection that applies to Labor's Somerset transfer. S47 itself concedes that Maranoa "would now stretch from the NT border to the outer fringes of Brisbane".

- **Lockyer Valley to Blair (S43).** Blair is already nearly 17 per cent over quota. Adding the Lockyer Valley would require still larger transfers out of Ipswich.

- **A new rural division (S52, S56).** Both require existing divisions to be abolished, which the LNP opposes for the reasons set out in section 4.

- **Splitting the council area.** Several suggestions divide the Lockyer Valley between Groom and Blair (S42, S59, S61). The LNP's suggestion keeps the council area whole in a single division.

The knock-on effects of Labor's map

Labor's choices in Logan do not stay in Logan. Having handed the Logan hinterland to Forde, Labor's Wright depends on the Lockyer Valley to make up its numbers. Without it, Labor's Wright would be more than 20 per cent below quota. So the Lockyer stays in Wright, and the consequences run west.

- **Groom cannot grow towards the communities that rely on Toowoomba.** With the Lockyer Valley locked in Wright, Groom, itself below quota, has no room to take in the valley whose residents travel up the Range every day.

- **Maranoa has nowhere sensible to grow.** With Groom unable to release its rural fringe, Maranoa, more than 7 per cent below quota and projected to fall further, is carried across the Great Dividing Range into the Somerset Region, stretching from the Northern Territory border to within 40 kilometres of the Brisbane CBD.

- **Then Maranoa must be cut back.** Somerset overfills Maranoa, so Labor moves Clifton and Crows Nest into Groom.

- **And Wright still does not fit.** Even after all of this, Labor's Wright remains over tolerance and must shed part of Tallai to McPherson.

The LNP's suggestion resolves the same region as one connected set. The Lockyer Valley joins Groom, Groom's broadacre fringe joins Maranoa, Maranoa passes Kingaroy and Nanango to Flynn, and Flynn grows inland rather than taking Bundaberg. Each division gains communities that already look to its centre, and none is carried across the Range.

8. Sunshine Coast and Wide Bay

Fisher is well over quota and Fairfax is over projected quota, so the Sunshine Coast must shed electors. The LNP's suggestion keeps Fairfax and Fisher running east to west, each with a coastal centre and the hinterland behind it. Labor instead condenses both to the coast and hands the hinterland to Gympie.

Labor's Wide Bay

Having pushed Maryborough into Hinkler, Labor must find more than 32,000 electors for Wide Bay. It takes them from the Sunshine Coast hinterland and Moreton Bay, moving Kenilworth, Maleny, Mapleton and Peachester into Wide Bay and "extending as far as necessary" to Woodford and Wamuran. This should be resisted.

- **The hinterland looks to the coast, not to Gympie.** The hinterland communities of Maleny, Montville, Mapleton and Kenilworth are part of the Sunshine Coast Council area and look to Nambour, Caloundra and the coast for health care, schooling, work and retail. Maleny is less than 30 kilometres from Caloundra but more than 60 kilometres from Gympie, measured in a straight line. At state level, Labor itself described Nambour as "an electorate defined by its connection of hinterland communities" (QRC CO-0055). Its federal suggestion would cut Mapleton and Kenilworth away from Nambour and send them to Gympie.

- **The roads run east to the coast.** The hinterland's traffic runs east and west, not north. Maleny-Landsborough Road and Steve Irwin Way carry Maleny's residents down the Range to Landsborough and Caloundra, Nambour-Mapleton Road links Mapleton and Montville to Nambour, and Eumundi-Kenilworth Road carries Kenilworth's to Eumundi and the Bruce Highway. These routes, and the services at the end of them, are why Fairfax and Fisher have long paired a coastal centre with the hinterland behind it. None of them leads to Gympie.

- **Woodford and Wamuran belong with Caboolture.** Wamuran is around 10 kilometres from Caboolture, and Woodford is closer to the Brisbane CBD than it is to Gympie. Both are linked to Caboolture by the D'Aguilar Highway and lie within the City of Moreton Bay.

- **Wide Bay's local news.** Wide Bay's electors are served today by two local bulletins: the Wide Bay bulletin, which covers Maryborough with Hervey Bay and Bundaberg, and the Sunshine Coast bulletin, which covers Gympie and Noosa. Labor's change would see the division drift further from the Wide Bay media market and encroach into Brisbane's. It adds Woodford and Wamuran, which are served by the Brisbane bulletins, fragmenting its means of communication where there is no need to. The LNP's suggestion keeps Maryborough in Wide Bay and adds no community from the Brisbane market.

- **Fairfax and Fisher lose their hinterland.** Labor would condense both divisions to the coast, ending the long-standing pairing of coastal centres with the hinterland towns that sit behind them.

Labor justifies this by noting that it is "not possible to draw divisional boundaries within the Sunshine Coast LGA such that it is entirely represented by two divisions". That is true, and no suggestion proposes otherwise. But it shows only that some Sunshine Coast electors must sit in a neighbouring division, not which ones. The sensible choice is the communities whose ties already run to a neighbouring centre: the Glass House Mountains and Beerburrum to Caboolture in the south, and Peregian Springs, Eumundi and Verrierdale to Noosa in the north. Labor does the opposite, moving the hinterland communities most closely tied to the coast north to a division centred on Gympie.

Other suggestions

There is broad agreement among the suggestions that the northern edge of the Sunshine Coast, around Peregian Springs and Eumundi, looks to Noosa and can join Wide Bay (S6, S37, S38, S42, S47, S53, S58, S59, S63). The LNP's suggestion makes this change. S6 notes Eumundi's links with Cooroy and Noosa.

Only one other suggestion follows Labor deep into the hinterland and on into Moreton Bay. S43 would rename Wide Bay and extend it through the hinterland west of the Bruce Highway to Woodford, and on into the Somerset Region. It should be rejected for the same reasons as Labor's.

Even among suggestions that move more of the northern hinterland into Wide Bay, the hinterland around Maleny and Mapleton is kept with the coastal divisions. S42 retains Mapleton in Fairfax "because of its strong links to Nambour". S47 also keeps Mapleton in Fairfax, and S59 places Mapleton and Kenilworth in Fisher.

Mooloolaba, the Glass House Mountains and Woodford

Fisher is 13 per cent over quota and projected to reach 16 per cent, so it must shed electors in more than one direction. The LNP's suggestion moves Mooloolaba and Alexandra Headland from Fisher to Fairfax, making the Mooloolah River and the Spit at its mouth the boundary between the two divisions on the coast. It is the clearest natural boundary on the central Sunshine Coast. As the Queensland Greens observe, Alexandra Headland and Mooloolaba are "physically disconnected from the rest of Fisher by the natural boundary of the Mooloolah River" (S63). The change also aligns Fairfax with the state electorate of Maroochydore, and allows Fisher to remain the southern Sunshine Coast division centred on Caloundra and Kawana, with Maleny and the Caloundra hinterland behind it.

This change is supported by Labor and by most suggestions that address the area (S28, S37, S38, S47, S53, S58, S59, S61, S63). S43 alone keeps Mooloolaba in Fisher, and it does so while sending the Sunshine Coast hinterland to a renamed Wide Bay.

The LNP's suggestion moves the Glass House Mountains and Beerburrum from Fisher to Longman, linked to Caboolture by the Bruce Highway and the North Coast rail line. Several suggestions make the same change (S14, S25, S34, S43, S63).

A number of suggestions move Woodford from Longman into Fisher (S28, S37, S38, S42, S53, S59). The LNP's suggestion keeps Woodford in Longman with Caboolture, the centre it relies on, linked by the D'Aguilar Highway and within the same council area. Moving it to Fisher would carry a Caloundra-based division into the City of Moreton Bay.

The LNP's approach

The LNP's suggestion resolves the Sunshine Coast's growth by sending the Glass House Mountains and Beerburrum south to Longman, and by moving Peregian Springs, Eumundi and Verrierdale, which look to Noosa, into Wide Bay. The hinterland stays with the Sunshine Coast divisions, Fairfax and Fisher keep their coastal and hinterland nature, and Woodford stays with Caboolture.

9. Moreton Bay and North Brisbane

Growth along the Bruce Highway corridor places sustained pressure on the Moreton Bay divisions, and Fisher's surplus must also move south into Longman. The LNP's suggestion moves Longman north, makes Petrie a division wholly within the City of Moreton Bay bounded by the North Pine River, and reshapes Dickson and Lilley as the divisions of north-west and north-east Brisbane respectively.

These divisions are drawn around how people in the north actually travel. At the 2021 Census, almost two in five employed residents of the City of Moreton Bay worked in Brisbane, compared with 1.9% on the Sunshine Coast. Daily life in the north runs along the routes into and out of the city: the Bruce Highway and the Caboolture and Redcliffe Peninsula rail lines, Gympie Road, Sandgate Road and the Gateway Motorway, and Old Northern Road in the north-west. The LNP's suggestion builds each division around those routes, as set out below.

Labor's approach

Labor starts from a rule of its own making: that Petrie and Lilley should exchange electors only with each other, because "neither electorate should be adjusted when resolving the enrolment of other neighbouring electorates in an effort to minimise voter disruption". Nothing in the Act supports such a constraint, and it hampers Labor's ability to propose boundaries that reflect the communities beneath them. Because Petrie's surplus and Lilley's shortfall roughly match, Labor pairs them off and leaves the rest of the north to Dickson and Longman.

The effect is to lock in place a Petrie that reaches across the North Pine River into Brisbane City suburbs, to pull Kallangur and Dakabin off the Anzac Avenue corridor they share with North Lakes and the Peninsula, and to cut Longman off from the D'Aguilar Highway communities that depend on Caboolture, while the Glass House Mountains, on the same highway and rail line as Caboolture, stay in a division centred on Caloundra. Each of these cuts across the routes people use, and none of it is required by the numbers.

Labor's approach also runs against the direction of growth. Sustained growth on the Sunshine Coast and in Moreton Bay will keep drawing the divisions of Brisbane's north, where growth has been slower, further north, and a redistribution that resists that pull only stores up a larger correction for the next one. Petrie is more than 8 per cent over quota and Lilley more than 6 per cent under, and projected to fall further, while Longman, more than 16 per cent over, must shed electors to the south. In those circumstances, moving Petrie's Brisbane suburbs to Lilley and bringing Murrumba Downs, Kallangur and Dakabin into Petrie brings all three within quota, unites suburbs that are currently divided, and moves each division in the direction the numbers will keep pushing it. Labor's approach moves fewer electors in this part of Moreton Bay, but existing boundaries are subordinate to the other factors, and here they would keep Murrumba Downs divided and hold Petrie and Lilley in place when the numbers call for change.

Petrie

The LNP's suggestion makes Petrie a division centred on the Redcliffe Peninsula and the Bruce Highway corridor of Moreton Bay, with the mouth of the North Pine River and the council boundary as its southern edge. Petrie takes in Murrumba Downs, Kallangur and Dakabin, uniting suburbs that are currently divided: Kallangur between Dickson and Longman, and Murrumba Downs between Dickson and Petrie. The result echoes the cross-highway shape of the state electorate of Murrumba.

The division follows the Peninsula's own route to the city. Residents travel west along Anzac Avenue, or on the Redcliffe Peninsula rail line through Mango Hill, Murrumba Downs and Kallangur, to join the Bruce Highway and the main northern rail line into Brisbane. The North Lakes retail precinct on that corridor draws residents from across the division.

This is one of the clearest areas of agreement among the suggestions. Six suggestions make Petrie a wholly Moreton Bay division (S34, S43, S56, S58, S59, S61), and four of them also bring Kallangur, Dakabin and Murrumba Downs into Petrie (S43, S56, S58, S59). S56 describes Petrie's current boundaries as, "to be blunt, bizarre" and proposes that "everything south of the North Pine River be divested". S59 would make Petrie "a more compact electorate centred on the east of the Moreton Bay LGA", and S43 pulls Petrie's "southern boundary back to the Pine River".

Dickson

With Petrie withdrawn from Brisbane City, the LNP's suggestion places Bridgeman Downs and parts of Aspley, Carseldine and McDowall in Dickson. These suburbs function as one community with Albany Creek across the council boundary. Bridgeman Downs adjoins Albany Creek, its residents use Albany Creek State High School and the shopping centres of McDowall and Aspley, and Beckett Road, Albany Creek Road and Bridgeman Road carry residents through the area, each feeding into Old Northern Road. Albany Creek residents travel into Brisbane on the same roads and bus routes, so the council boundary here is crossed every day rather than marking a break. A number of suggestions likewise place Bridgeman Downs and neighbouring suburbs in Dickson (S28, S43, S58, S59). On its northern edge, Dickson moves up to Narangba, absorbing electors displaced as Longman moves north, and it keeps the semi-rural communities around Samford and Dayboro that give the division its character.

Labor's Dickson would lose Samford Valley and Mount Nebo to Ryan and in their place extend east to Kallangur and Dakabin, whose daily links run along Anzac Avenue to North Lakes and the Redcliffe Peninsula. It would give up part of the semi-rural west that defines Dickson in exchange for suburbs that are better connected to Petrie.

Lilley

The LNP's Lilley becomes the north-east Brisbane division, extending along the coast from the airport through Sandgate, Shorncliffe and Brighton, taking in Bracken Ridge and Bald Hills and the whole of the state electorate of Sandgate. The Gateway Motorway, Sandgate Road and Gympie Road run the length of the division, and its bayside suburbs share a foreshore, Moreton Bay and the Boondall Wetlands, giving it a clear coastal character distinct from the hills of Dickson.

Labor's Lilley gains only the balance of Aspley and part of Carseldine, on the basis that their connections run south along Gympie Road to Chermside. The LNP agrees with that reasoning, and it applies with equal force to Bracken Ridge, Bald Hills, Taigum and Fitzgibbon. Bracken Ridge and Sandgate in particular function as one community. Bracken Ridge Road and Telegraph Road carry residents between them every day, the catchments of Bracken Ridge State High School and Sandgate District State High School sit side by side, Sandgate's shops and banks serve both, and the Sandgate and Shorncliffe foreshore is where Bracken Ridge families go for recreation. With Lilley below quota and electors moving south into Petrie from Moreton Bay's growth corridors, the numbers now allow these suburbs to join Lilley with the bayside community they belong to.

Longman

Longman's move north is unavoidable. Growth on the Sunshine Coast requires Fisher to shed electors to the south, and Longman is its only southern neighbour. The LNP's suggestion moves Longman north along its own corridor. It gains the Glass House Mountains and Beerburrum, which sit on the Bruce Highway and the North Coast rail line, and whose residents look south to Caboolture and Morayfield as their nearest major centres. They share the semi-rural character of Woodford and the D'Aguilar Highway districts already in Longman. In turn, Longman cedes Narangba, Dakabin and Kallangur at its southern end to Dickson and Petrie. The division keeps its shape, centred on Caboolture and Morayfield, and moves up the corridor it already follows.

Labor instead leaves Longman's northern boundary in place, so that the Glass House Mountains remain in a division centred on Caloundra, and sends Woodford and Wamuran to Wide Bay, describing them as "connected communities" without saying what they are connected to. Their connections run east to Caboolture along the D'Aguilar Highway, a corridor Labor would split three ways: Kilcoy into Maranoa, Woodford and Wamuran into Wide Bay, and Caboolture into Longman. Woodford is closer to the Brisbane CBD than it is to Gympie. The LNP's suggestion keeps Longman whole along both of its corridors.

10. Blair, Oxley and Ryan

Blair and Oxley

Labor claims its Blair would align with the state electorates of the City of Ipswich, including the new electorate of Springfield. Yet Labor leaves the Blair and Oxley boundary unchanged, which keeps Springfield Lakes itself divided between the two divisions and leaves the Springfield district, which the Queensland Redistribution Commission created "centred on the highly populated Springfield area", split across two federal divisions.

The LNP's suggestion unites Springfield and Springfield Lakes in Oxley, together with Redbank Plains, Collingwood Park, Redbank and Ebbw Vale, cementing Oxley as a Brisbane and Ipswich connector division centred on the Ipswich Motorway and the Springfield rail line. The Springfield line branches from the Ipswich line at Darra, so Springfield commuters already travel through the eastern half of Oxley on their way to Brisbane. Springfield Central is the services hub for the surrounding suburbs, with Mater Private Hospital Springfield, campuses of the University of Southern Queensland and TAFE Queensland, and the Orion Springfield Central shopping centre.

This is one of the most widely supported changes among the suggestions, with twelve others uniting Greater Springfield in Oxley (S14, S25, S26, S34, S42, S43, S47, S57, S58, S59, S61, S63). It also allows Blair to remain centred on the City of Ipswich and the Somerset Region.

Ryan

Ryan is Brisbane's western suburbs division. It has been so since its creation, and that identity, rather than a line to the north or south, should be the starting point for restoring it. Ryan is more than 9 per cent below quota and must gain electors. The LNP's suggestion restores it from within the western suburbs by returning the Centenary suburbs, which were part of Ryan until 2009. Labor instead reaches north into Samford Valley and Mount Nebo, on the strength of a boundary from more than three decades ago, drawing a western suburbs division into the semi-rural Pine Rivers district of Moreton Bay LGA.

Labor's Samford Valley proposal

Labor proposes to bring Ryan back into quota by transferring "Samford Valley, Mount Nebo and surrounds" from Dickson, on the basis that "these communities have been included in Ryan previously". That history is more than three decades old, and it does not support what Labor now proposes.

- **Samford belongs with Dickson's rural west.** Samford Valley sits at the centre of the semi-rural belt along the D'Aguilar Range that gives Dickson its character, running from Mount Nebo and Mount Glorious through Samford and Highvale to Mount Samson and Dayboro. Samford Village is the service centre for that belt, and Mount Samson Road carries its residents north to Dayboro, the other half of Dickson's rural west, with which Samford shares its acreage living, its agricultural shows and its rural fire and community organisations, the LNP's suggestion keeps them together.

- **Labor would move the areas the old boundary left out.** Samford Village was last part of Ryan between 1984 and 1992. Even then, the boundary took in the Samford township and excluded Samford Valley, Highvale, Yugar and Cedar Creek. Labor's precedent does not extend to the localities it now names.

- **Samford has since grown with the Pine Rivers district.** For more than thirty years Samford has been represented alongside the Pine Rivers communities of the City of Moreton Bay. In 2007, for example, Samford Valley and Mount Nebo sat in Dickson with the Pine Rivers district, and today they sit in the state electorate of Pine Rivers.

Because Labor's boundary is undefined, it is also unclear whether Samford Village itself would remain in Dickson, leaving the Samford district at risk of division between two members, and leaving Dickson, which must itself gain electors, without part of the semi-rural west that gives it its character.

Other suggestions extending Ryan north

Several other suggestions extend Ryan north into the Hills District around Arana Hills, Ferny Hills and Everton Hills (S38, S43, S47, S52, S58), and one also takes in Samford Valley (S58). The same objection applies. These suburbs are part of the Pine Rivers district that Dickson represents, and Ryan's numbers can be met from the western suburbs it was built around. Notably, S43 keeps Samford Valley in Dickson, and S63 does not extend Ryan north at all.

The LNP also notes S36, which suggests moving Keperra from Ryan to Dickson. With Ryan already well below quota, this would only deepen the shortfall.

The Queensland Greens' Ryan

The Queensland Greens (S63) take a different course, growing Ryan east rather than north. Their Ryan gains Milton south of Milton Road, the eastern part of Paddington, the northern part of Ashgrove and the balance of Enoggera from the division of Brisbane, with no transfers out. The LNP agrees with part of this: its own suggestion moves part of Ashgrove into Ryan, so that the suburb is better united, and brings Everton Park and part of Stafford into Brisbane in exchange. The rest should not be adopted, for three reasons.

- **Ryan has room for one or the other, not both.** With the Centenary suburbs restored, Ryan sits close to the upper limit of the projected tolerance. The Greens' inner-city additions are therefore not a supplement to the Centenary suburbs but an alternative to them, and the Committee must choose. The Centenary suburbs were part of Ryan until 2009, were moved out only because the numbers of that day required it, and share Ryan's schools, shopping centres and routes to the city.

- **It takes Ryan into the inner city.** A Ryan grown from Milton and Paddington would reach to the Inner City Bypass, within two kilometres of the CBD. The name of that road says how far the division would have travelled. Brisbane is the division for the inner city and its surrounds, and Milton and Paddington, with the dense urban character the Greens themselves describe, belong to it. Ryan is the western suburbs division and should be restored as one.

- **It disturbs boundaries that need no disturbing.** Brisbane requires no change on either numerical test, and the Enoggera Creek and Milton Road boundaries between Brisbane and Ryan are long established. The Greens' proposal would move around 15,000 electors across them. Where the community case for a change is no stronger than the case for leaving a boundary alone, the Act's fourth factor counts against the change. The LNP's suggestion touches Brisbane only to better unite Ashgrove and to bring Everton Park and part of Stafford, which look south along Gympie Road, into the division.

The Centenary suburbs

The LNP's suggestion brings Jindalee, Mount Ommaney, Westlake, Sinnamon Park and Seventeen Mile Rocks into Ryan. Jindalee, Mount Ommaney and Westlake, with neighbouring Centenary suburbs, were part of Ryan until 2009. Labor's preference for keeping the north and south of the Brisbane River apart should not override that history. When those suburbs were moved, the Augmented Electoral Commission accepted the river as a boundary only "on this occasion", because the numbers required it (AEC 2009 Final Report, para. 45). With Ryan now more than 9 per cent below quota, those numbers have reversed.

Labor's general principle of preserving a "northside" and "southside" divide at the Brisbane River has merit close to the river mouth and the city, and Labor itself frames it as applying "particularly in areas closer to the central business district". The LNP's suggestion respects the river there. Upstream, in Brisbane's western suburbs, the river has never worked that way. Residents of Jindalee, Mount Ommaney and Westlake, like their neighbours in Kenmore, Fig Tree Pocket and Indooroopilly, think of themselves as living in the western suburbs rather than on the northside or the southside, and their communities are enmeshed across the river:

- **Roads and buses.** The Centenary Motorway and Centenary Bridge carry residents north across the river through Fig Tree Pocket, Kenmore and Indooroopilly to Toowong and the city, and bus routes follow the same path.

- **Schools.** Schools in the Centenary suburbs compete in the same school sport district as those in Ryan, not with schools in Inala, Darra or Forest Lake.

- **Shopping and services.** Residents on both sides of the river share retail and services at Indooroopilly and Jindalee.

In the western suburbs the river joins communities rather than dividing them.
Some suggestions instead move the Centenary suburbs into Moreton to address its shortfall (S42, S43, S57, S59, S61). The LNP opposes this. Moreton is a southside division centred on Sunnybank, Moorooka and Annerley, whose residents travel to the city along Ipswich Road, Beaudesert Road and the South East Busway, and shop at Sunnybank and Garden City. The Centenary suburbs face the other way. Their route to the city is the Centenary Motorway, north across the river through Kenmore and Toowong, their retail centres are Mount Ommaney and Indooroopilly, and their schools play in the western suburbs' school sport district. In Moreton they would sit at the far western end of a division with which they share no corridor, shopping centre or school district. The LNP's suggestion meets Moreton's needs from its own side of the city, adding Pallara, Willawong and Durack, mirroring the existing state electorates, and Algester from Rankin. This leaves the Centenary suburbs free to rejoin the western suburbs division they belonged to until 2009.

Karana Downs, Mount Crosby and Kholo

Labor and several other suggestions move the Brisbane City localities of Karana Downs, Mount Crosby and Kholo from Blair to Ryan (S28, S37, S42, S43, S53, S59, S61). The LNP acknowledges the argument. These are western suburbs localities, and if the numbers allowed, the logical exchange would bring them into Ryan in place of areas on Ryan's northern edge. But with the Centenary suburbs restored, Ryan sits close to the upper limit of the projected tolerance, and growth in the north of Brisbane means the numbers do not allow it, and the LNP's suggestion leaves these localities in Blair.

Brisbane

Only minor changes are needed in Brisbane to balance numbers. The LNP's suggestion moves part of Ashgrove to Ryan and brings Everton Park and part of Stafford into Brisbane. Several suggestions similarly move parts of Ashgrove or Bardon from Brisbane to Ryan (S10, S37, S47, S59, S61).

11. Logan, Scenic Rim and Gold Coast

The Pacific Motorway corridor between Logan and the northern Gold Coast is among the fastest growing areas in the nation, and Wright and Forde are both well over quota. How they are resolved follows from the second decision set out in section 1, and the LNP's suggestion resolves them with clear, recognisable boundaries along the corridors people use.

How people travel in Logan and the northern Gold Coast

Labor builds its divisions in this region around council boundaries. The result is a set of east to west bands: a Rankin of Logan's northern suburbs on both sides of the Pacific Motorway, a Forde that runs in an arc across Logan's south from Eagleby to Greenbank, and a Wright that runs from the Lockyer Valley to the northern Gold Coast. That is not how people in this region live.

At the 2021 Census, 37.7 per cent of Logan's employed residents worked in Brisbane, almost as many as the 40.0 per cent who worked in Logan itself, and a further 7.9 per cent worked on the Gold Coast. Just 2.0 per cent worked in Redland City and 3.0 per cent in Ipswich. People here travel north to Brisbane and south to the Gold Coast, not east and west across the region, and they do so along a small number of corridors:

- **The Pacific Motorway**, with the South East Busway to Springwood, the Loganholme bus station at the Logan Hyperdome and the Gold Coast rail line from Beenleigh, linking Springwood, Daisy Hill, Shailer Park, Beenleigh, Eagleby, Ormeau and the northern Gold Coast to Brisbane.

- **The Beenleigh rail line west of the motorway**, through Woodridge, Kingston and Loganlea, serving Logan Central and the health and education precinct at Meadowbrook.

- **The Mount Lindesay Highway**, which Labor itself describes as one of the region's "clear north-south spines", running from Logan's south-western suburbs through Jimboomba to Beaudesert and the Scenic Rim.

The LNP's suggestion follows those corridors, as it does north of the river. Forde is the division of the Pacific Motorway between Logan and the northern Gold Coast, Rankin is established Logan west of the motorway, and Wright follows the Mount Lindesay Highway beyond Logan's suburbs to Beaudesert and the Scenic Rim. Each of Labor's divisions, by contrast, takes a slice of several corridors and joins them across lines that people less frequently travel.

Labor understands this way of thinking well enough when it suits. In its comments to the Queensland Redistribution Commission, it described the Mount Lindesay Highway and Waterford-Tamborine Road as providing "a clear way of north-south communication for localities like Jimboomba and Yarrabilba", and proposed using them to "separate the two distinct growth areas of Jimboomba and Flagstone, and Yarrabilba" (QRC S-115). Its federal Forde puts both of those growth areas, and Beenleigh and Eagleby on the motorway as well, into a single division. And in its 2017 federal suggestion, Labor itself argued that suburbs share "a close community of interest with areas to the east towards the city along major road and rail corridors" (AEC 2017, S22).

Forde

Forde is close to 10 per cent over quota and projected to grow further. The LNP's suggestion keeps it as the division of the Pacific Motorway corridor between Logan and the northern Gold Coast. Forde follows the eastern side of the motorway north into Daisy Hill and Springwood, and crosses it only at Beenleigh, in the same place as the state electorate of Beenleigh, keeping Eagleby connected to the Beenleigh town centre and railway station it relies on. It gains Pacific Pines, Gaven and parts of Oxenford and Maudsland, which cluster around the motorway's northern Gold Coast interchanges. The great majority of its electors would live in the suburbs along the motorway from Springwood to the northern Gold Coast, and the balance, around Park Ridge, Logan Reserve and Chambers Flat, look to Waterford and Loganlea on the same side of the division. S47 reaches the same view, proposing that with gains from Fadden, Forde "can be more clearly established as a Beenleigh and northern Gold Coast Division".

Under Labor's proposal, only about half of Forde's current electors would remain. Fewer than one in three of the electors in Labor's Forde would live in the Beenleigh area, its only part on the motorway. The rest would live to the west, around Waterford, Logan Village, Park Ridge,

Jimboomba and Greenbank. Residents of Jimboomba travel north along the Mount Lindesay Highway, and residents of Eagleby travel along the motorway. Labor's Forde would join communities that share no corridor, centre or daily route.

Rankin

Rankin already straddles the Pacific Motorway, and Labor keeps it that way. Its Rankin retains Springwood and Daisy Hill on the eastern side and extends further east to Shailer Park and the Logan Hyperdome, while keeping Kingston, Woodridge and Logan Central to the west. Those communities sit on different corridors: Springwood and Daisy Hill on the motorway and the busway, Kingston and Woodridge on the Beenleigh rail line. The numbers already require Rankin to change, and this redistribution is the opportunity to resolve the straddle rather than extend it. In the recent state redistribution, the Queensland Redistribution Commission used the motorway as the boundary between the electorates of Woodridge and Waterford, recognising it as a barrier between the communities on either side. The LNP's suggestion follows that approach, as do several other suggestions (S34, S37, S47). In 2017 Labor itself proposed extending a division boundary "along the Pacific Motorway" in Brisbane's south (AEC 2017, S22).

The LNP's Rankin is built around established Logan west of the motorway and the outer southern Brisbane suburbs beside it. The Beenleigh rail line, with stations at Woodridge, Kingston, Loganlea and Bethania, runs through its heart, and its suburbs look to Logan Central for retail and council services and to Meadowbrook for health and education, home to Logan Hospital, Griffith University's Logan campus and TAFE Queensland's Loganlea campus. The suggestion also brings part of Boronia Heights and Park Ridge into Rankin, as S49 and S63 likewise propose.

Wright

Wright is more than 16 per cent over quota and projected to approach 20 per cent. It must shed a large number of electors, and the question is where that is to occur.

The LNP's suggestion moves the Lockyer Valley to Groom. Of all Wright's communities, the Lockyer Valley is the one whose residents look most clearly to another centre: many travel up the Range to Toowoomba for health care, education and retail, and the Warrego Highway binds Gatton, Laidley and the valley to the city at the top of the Range. Eleven suggestions move all or part of the Lockyer Valley into Groom, as set out in section 7. That leaves Wright to follow the Mount Lindesay Highway beyond Logan's suburbs, through Jimboomba and Flagstone to Beaudesert and the Scenic Rim, together with the hinterland behind the Gold Coast. Until 2008 the growth corridor around Jimboomba was part of the Shire of Beaudesert, and the communities along the highway still share its semi-rural character and concerns.

Labor takes the opposite course. It describes its Wright as "consolidated around the Scenic Rim and northern Gold Coast", yet is silent on the Lockyer Valley, which currently sits wholly within Wright and is not moved anywhere else. Labor's Wright would therefore run from the foot of the Toowoomba Range to Upper Coomera and Ormeau on the Pacific Motorway, joining three corridors that have almost nothing to do with one another: the Warrego Highway, the southern end of the Mount Lindesay Highway at Beaudesert, and the motorway. The share of its electors from the Jimboomba area would fall from about a third to about 3 per cent, and the northern Gold Coast would become its largest component. At state level, Labor opposed a proposal to bring a Beaudesert electorate into the Gold Coast, insisting that the Gold Coast "maintains a unique and distinct community" (QRC CO-0055). Its federal Wright does the reverse. Even then, Labor concedes Wright "remains marginally above the permissible tolerance" and must shed around 1,100 Tallai electors to McPherson to fit.

Wright gains the parts of Mudgeeraba and Bonogin west of the Pacific Motorway. Several suggestions instead move the balance of Mudgeeraba and Bonogin into McPherson (S28, S37, S38, S47); the LNP's suggestion uses the motorway as a clear boundary between the coastal and hinterland divisions.

Bonner, Griffith and Moreton

Bonner and Moreton are both well below quota. Labor's suggestion unites the parts of Murarrie, Cannon Hill and Carina currently in Griffith with the rest of those suburbs in Bonner, the reverse of what it asked for in 2017, when it proposed that Murarrie "be reunited" by moving it from Bonner to Griffith (AEC 2017, S22). Uniting those suburbs is a reasonable aim, but Labor pursues it through a three-way chain: Moreton would gain more than 25,000 electors from Rankin while losing almost 12,000 to Griffith, and Griffith would pass almost 12,000 on to Bonner. Griffith borders both divisions that need electors, so some adjustment to it is to be expected. A chain that changes Griffith's boundaries on two sides, moving almost 12,000 electors in from Moreton and almost 12,000 out to Bonner, goes well beyond that, when Bonner's need can be met from Rochedale South without touching Griffith at all. A number of other suggestions also reshuffle Moreton, Griffith and Bonner extensively (S43, S47, S57, S59, S61).

The LNP's suggestion achieves the same result with far less disruption by uniting Rochedale, already in Bonner, with Rochedale South and Priestdale, with a single small transfer of Holland Park West into Griffith. Rochedale and Rochedale South are one community in all but council name:

- **One suburb in origin.** Rochedale South was originally created from the larger suburb of Rochedale. Underwood Road and Priestdale Road now mark the council boundary, but they run through the middle of a continuous residential area.

- **Shared schools.** Rochedale South has no secondary school. Its nearest are Rochedale State High School and Redeemer Lutheran College, both in Rochedale about a kilometre to the north.

- **Shared shopping and transport.** Rochedale Shopping Village on Underwood Road serves residents on both sides of the council boundary, and Rochedale busway station serves commuters from both.

S37 proposes the same transfer, S34 supports moving Rochedale South into Bonner, and the Queensland Greens propose moving Rochedale South "as a block to retain the connected community of interest within the suburb" (S63). Crossing the Brisbane and Logan boundary here is no obstacle, as federal divisions commonly cross council boundaries in the South East. The LNP opposes S61, which would instead move Rochedale out of Bonner and into Rankin, separating it further from the community it belongs to. Moreton's remaining needs are met from its own side of the city, as set out in section 10.

Bowman

The LNP proposes no change to Bowman. It sits within quota now and at the projection time, Tingalpa Creek and the Logan River give it clear boundaries with Bonner and Forde, and under the current numbers neither neighbour needs electors from it: Bonner's shortfall is met from Rochedale South, and Forde's surplus moves along the motorway.

Gold Coast

Only minor changes are needed on the Gold Coast. The LNP's suggestion moves Miami from Moncrieff to McPherson, uniting it with Burleigh Heads and Nobby Beach along the Gold Coast Highway, as several suggestions also propose in whole or in part (S42, S50, S53). Fadden cedes Pacific Pines, Gaven and parts of Oxenford and Maudsland to Forde, returning Fadden within quota.

12. Division Names

The LNP submits that all 30 existing division names should be retained. They are well accepted, and the Committee's naming guidelines state that names "should not be changed or transferred to new areas without very strong reasons". Labor, S34 and S43 raise the renaming of Hinkler only because their own suggestions remove Bundaberg from it; under the LNP's suggestion the question does not arise. S43 and S54 would retire or reconsider names first used at the 1901 federal election, and other suggestions propose new names in honour of particular Queenslanders or in recognition of First Nations Country (S7, S21, S32, S33, S35, S45, S48, S54). The LNP respects the contributions nominated, but none of these suggestions demonstrates the very strong reasons the guidelines require, and such names may be better considered when a new division is next created.

13. Conclusion

The two central decisions before the Committee each turn on the factors the Act puts first, and at each of them Labor's suggestion gives those factors less weight than principles of its own. In regional Queensland it pushes every division one step down the coast, drawing a line through Bundaberg, splitting Curra from Gympie and the Sunshine Coast hinterland from Nambour, and drawing Wide Bay away from its own media market, when the shortfall can be met inland with a third of the disruption. It carries Maranoa across the Great Dividing Range into Somerset, a transfer that follows from leaving the Lockyer Valley in Wright and rebuilding Forde around a different corridor. It leaves Springfield divided and reaches into Samford Valley for Ryan when Ryan can be restored from within Brisbane. And it does all of this without a single map, with boundaries defined only as "as far as necessary", and with figures that assign whole SA1s to one side of boundaries that cut through them.

On each of these questions, other suggestions lodged with the Committee reach the same conclusions as the LNP: Flynn grown inland, the Lockyer Valley with Groom, Maranoa restored from the Darling Downs, Greater Springfield united in Oxley, and Petrie a Moreton Bay division.

A redistribution sets the boundaries of Queensland's representation for years to come, and a major party's contribution to it should be held to the standard the Act sets. Labor's suggestion does not meet it. It puts the subordinate factor first, substitutes principles of its own for the factors that matter most, fails even its own test of minimal change, and leaves the Committee with boundaries it cannot test. The LNP respectfully submits that it should be given little weight, and that the Committee should adopt the LNP's suggestion as the basis for its proposed redistribution.