

COMMENTS ON SUBMISSIONS ON THE DRAFT DETERMINATION



A Submission to the Electoral Districts Redistribution Panel

On behalf of The Liberal Party of Australia, NSW Division



LIBERAL PARTY OF AUSTRALIA

NEW SOUTH WALES DIVISION

State Director

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

Dear Commissioners,

On behalf of The Liberal Party of Australia, New South Wales Division, I am pleased to make comments on submissions on the Electoral Districts Redistribution Panel's Draft Determination of the Names and Boundaries of Electoral Districts of New South Wales.

The Liberal Party notes the many submissions on the Draft Determination, however our comments focus on the submission made by the Labor Party, which we believe contains serious issues that must be addressed.

We thank the NSW Electoral Commission, particularly the staff of the Redistribution Secretariat for their assistance to date.

Yours sincerely,

[Redacted Signature]

State Director



Comments on Submissions on the Draft Determination of the Electoral Districts Redistribution Panel

On behalf of The Liberal Party of Australia, NSW Division

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EXECUTIVE SUMMARY



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

1. **The Liberal Party urges the Redistribution Panel not to adopt the proposals by the Labor Party in relation to Liverpool, Holsworthy, Parramatta, Auburn and Granville.**
2. The submission by **the Labor Party advocates substantial changes which significantly disrupt communities of interest** and propose confusing electoral district boundaries with no credible justification.
3. The Labor Party's submission runs counter to the position of the Redistribution Panel, splitting communities of interest and adopting minor roads or arbitrary lines as electoral boundaries.
4. In relation to Liverpool, **the ALP submission worsens the existing split of the Liverpool locality**, needlessly moving electors into new districts while failing to address the issue of the split suburb.
5. **Labor's proposal to unite Warwick Farm and Chipping Norton in the same electoral district ignores the fact there are no community of interest links**, and indeed not even public transport links, between these communities.
6. Similarly, Labor's proposal to significantly redraw the draft boundaries around Parramatta, Auburn and Granville would lead to poorly defined boundaries, split suburbs, weakened communities of interest and significant voter confusion.
7. Despite advocating significant redrawing of the draft boundaries, **the Labor Party offers no significant or credible justification for any of their proposed changes.**
8. However, in relation to Oatley, there is some agreement between the Liberal and Labor Parties with regards to retaining the suburb of Blakehurst in the Oatley electoral district.
9. **The Liberal Party also notes the ongoing impacts of the COVID-19 pandemic in relation to population growth** and believes this further reinforces the position that the full variance from quota should be utilised by the Redistribution Panel.
10. The impact of COVID-19 on population projections is particularly relevant in relation to districts predicted to be under quota at the relevant future time, as **it is likely the margin of variance will be considerably less than anticipated.**



METHODOLOGY

METHODOLOGY

The Liberal Party notes the many submissions on the Draft Determination, however our comments focus on the submission made by the Labor Party, which we believe contains serious issues that must be addressed.

The submission by the Labor Party is most concerning due to the substantial changes advocated which significantly disrupt communities of interest and propose confusing electoral district boundaries with no credible justification.

In particular, the Labor Party submission lumps suburbs with little to no connection into the same electoral districts while splitting significant communities, such as Liverpool, and creating arbitrary electoral boundaries.

In their Draft Determination, **the Commissioners made clear that community of interest concerns taken as a whole were a significant factor in determining electoral district boundaries**, while also using “prominent features as boundary markers”, a position accepted by the Liberal Party and used as guiding principles in our submission on the Draft Determination.

In contrast, **the Labor Party’s submission runs counter to the position of the Redistribution Panel**, splitting communities of interest and adopting minor roads or arbitrary lines as electoral boundaries.

Under the Labor Party proposals, suburbs with no community links, such as Warwick Farm and Chipping Norton, are placed in the same electoral district, despite not even having public transport links between the two.

Similarly, significant localities, such as Merrylands, are divided between electoral districts with no justification.

This is despite the ALP’s arguments in their original suggestions submission arguing against splitting suburbs, in which the ALP stated:

“..splitting a suburb might assist with growth in a particular District but at the expense of other criteria”

This simply highlights the lack of understanding the Labor Party has of the local communities they propose be carved up or lumped together across west and south west Sydney.

To make matters worse, **the Labor Party offers no significant or credible justification for any of their proposed changes**, simply asking the Redistribution Panel to adopt their proposals without thought or question.

The Liberal Party continues to advocate for strong and clear boundaries and avoiding unnecessary splitting of localities, especially in relation to major localities such as Liverpool and Merrylands.

We believe our proposals are far more consistent with the approach adopted by the Redistribution Panel in its draft determination and urge the Commissioners not to adopt the Labor’s proposed changes.

Variance from Quota

The Liberal Party also notes the concerns raised by the ALP in relation to the Commissioner’s adopted position that the full statutory margin of variance from the quota can be utilised where doing so strengthens community

of interest consideration or allows clearer boundaries.

The COVID-19 pandemic continues to have ongoing impacts across the entire spectrum of Australian society, but most notably in relation to population growth.

The Australian Government forecasts that population growth will fall to just 0.2% **with a return to previous growth rates not anticipated until 2027-28 – the end of the period for which this redistribution will apply.** Indeed, under the Australian Government's Annual Population Statement, Sydney is forecast to experience negative growth for the first time since 1952-53.

The impacts of these changes in population forecasts are still yet to be fully understood or realised, but what is certain is that **the previously forecast growth will not be achieved, which has implications for the redistribution process.**

The Liberal Party believes this further reinforces the position that the full variance from quota should be utilised by the Redistribution Panel, especially so in relation to districts predicted to be under quota at the relevant future time, noting that **it is now highly likely that any predicted variance under quota is overstated.**



COMMENTS

IN DETAIL

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LIVERPOOL AND HOLSWORTHY

The submission by the Labor Party in relation to the districts of Liverpool and Holsworthy is both confusing and contradictory, while also representing a significant shift from the position taken by the Redistribution Panel in relation to communities of interest and clear boundaries.

The ALP acknowledges that the draft determination by the Commissioners currently splits the suburb of Liverpool between the districts of Liverpool and Holsworthy (an issue also highlighted by the Liberal Party in our submission).

Yet rather than rectify this situation, as proposed by the Liberal Party, **the Labor Party's submission recommends further confounding electors by simply rearranging the split**, needlessly moving electors into new districts while failing to address the issue of the split suburb.

In fact, the ALP proposal would not only make the current split worse, it compounds the issue by attempting to combine the suburb of Warwick Farm with the remainder of the district of Holsworthy, abandoning the distinct natural boundary that is the Georges River.

The ALP offers no justification for this radical adjustment, other than that Warwick Farm is next to Chipping Norton, demonstrating a lack of understanding of the region. While physically the two suburbs are adjacent, they share little if any community of interest.

Indeed, **there are no direct public transport links between Chipping Norton and Warwick Farm, meaning the journey between the two is over 30 minutes.**

Warwick Farm and Chipping Norton even have their own sports teams, which do not share facilities.

To suggest this implies a community of interest is simply ludicrous and the ALP submission should be disregarded on this basis alone.

Furthermore, on the Liverpool side of the ALP submission, the district of Liverpool contains a dog-leg around the Holsworthy electorate, crossing the M5 and taking the northern half of Casula.

This also causes the western-most boundary of Holsworthy to become an arbitrary line running down the minor residential streets of Calabro Ave and Liverpool Street, passing through a cul-de-sac.

As noted above, **the only justification offered by the Labor Party for this highly confusing dog's breakfast of boundaries is the physical adjacency of Warwick Farm to Chipping Norton** – two suburbs which, as demonstrated, have no community of interest.

As the Liberal Party noted in our submission, the split of the suburb of Liverpool creates confusion and splits one of the largest CBDs in NSW, an issue which is best resolved by transferring the entire suburb into the existing district of Liverpool, adopting the M7 and Hume Highway as the electoral boundary between Liverpool and Holsworthy.

This is patently preferable to the unjustified confusion and disruption proposed by the Labor Party and the Liberal Party urges the Commissioners not to adopt the Labor Party's proposal.

AUBURN, GRANVILLE AND PARRAMATTA

In relation to the districts of Auburn, Granville and Parramatta, the Labor Party's submission again advocates significant changes with arbitrary and confusing boundaries, **without providing any justification for doing so.**

The starting point of the ALP submission is to return Silverwater and Homebush to the district of Auburn, with the only justification being concern regarding the variance from quota.

However, as the Redistribution Panel has addressed this criteria in its draft determination and met the statutory requirements, this is simply not a justification for any radical alterations of the draft determination.

Indeed, **as with Liverpool and Holsworthy, the ALP's submission once again proposes confusing boundaries**, with the Parramatta-Granville boundary becoming another arbitrary line which briefly runs up James Ruse Drive, before making a sudden deviation which cuts Arthur Street in half at an obscure point, running through properties before rediscovering a road at Alfred Street and then changing again to the M4 motorway.

The boundary then again deviates to make brief contact with the rail line, before returning to the M4, and then again deviating down Burnett Street, dividing the suburb of Merrylands, and then returning again to the M4.

To describe this boundary as confusing is an understatement.

Yet as noted above, no significant justification for this confusion, splitting of suburbs and altering of boundaries is offered by the Labor Party.

The significant suburb of Merrylands becomes divided between electoral districts under the ALP proposal, with half of Merrylands separated

from the local shopping precinct (Stocklands Merrylands), Merrylands Public School and Merrylands railway station. This ignores the Merrylands community of interest, which is east towards Granville, both of which are on the T2 rail line, rather than north toward Parramatta, which is on the T1 line.

In contrast, the Liberal Party's suggestion of adopting the M4 and Wentworth Avenue as an electoral boundary is far preferable and offers electors clear and well understood boundaries, without splitting significant suburbs.

If the ALP's suggestion that Silverwater and Homebush should not be in Parramatta were adopted, it would make far more sense to redraw Parramatta to reflect the existing boundaries returning localities such as Oatlands, Telopea and Dundas Valley to the Parramatta district, rather than the boundaries suggested by the ALP.

Again, the Liberal Party urges the Commissioners not to adopt the amendments proposed by the Labor Party.

OATLEY AND KOGARAH

One area where there is some agreement between the Liberal Party and Labor Party submissions is in relation to the suburb of Blakehurst.

Both Parties recommend that Blakehurst be retained in the district of Oatley, rather than being transferred to the district of Kogarah and we encourage the Commissioners to adopt this proposal.

We note that the ALP suggests the retention of Blakehurst in Oatley be compensated by the transfer of the remainder of Beverly Hills and part of Narwee to Kogarah. While the Liberal Party does not consider this necessary, should the Commissioners believe compensation for Blakehurst is required, we could support this suggestion by the ALP.

