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NSW Electoral Districts Redistribution Committee
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Dear Sir,

I had earlier made a submission for the redistribution of boundaries in NSW. Its reference was NSW200608/2. I also made a comments contribution.

Observations

In my original submission I sought to minimise changes unless necessary and this served to preserve communities of interest, used existing boundaries, used significant man made or natural boundaries and proposed boundaries that met the numerical requirements of the electoral legislation.

Similarly, I have used a narrative and spreadsheet approach to make my comments, and again they are not unduly critical.

I would like to note the considerable areas of EDRC agreement with my proposals, or sufficiently similar that I have no issues. I have detailed them in a spreadsheet format at the bottom of this document.

There are a number of areas of changes by the EDRC and they affect multiple Districts, so it is appropriate to discuss them in a series of groups.

The Illawarra and Sutherland regions have been the subject of considerable changes. The slow elector growth of the Illawarra was highlighted by me in my original submission and in my comments on submissions. The point is still valid and more obvious now with the voter projections of the EDRC. I had proposed that Cronulla, Heathcote, Holsworthy and Miranda be left unchanged. I had proposed that Keira, Shellharbour and Wollongong be subject to some changes which did not transfer electors out of their current overall area. Maintaining the current boundary between Shellharbour and Kiama was proposed by me and the EDRC has maintained this current clear boundary.

The reasons for this are (refer to table below):

- That the Illawarra despite having Districts over quota is trending down in terms of relative enrolment. Whilst the current four essentially Sutherland Districts are marginally declining.

- Transferring electors from the Illawarra to the Sutherland region will actually make the underlying relative enrolment trend of decline obvious, as well as making a significant and unnecessary boundary change to Heathcote, which becomes more elongated and which has two population centres as a result, one in the Sutherland region and the other in the Illawarra.
- Transferring electors from Holsworthy out of this region actually exacerbates the coming shortfall of the combined two regions.

Mathematically the seven Districts have 2 Districts under quota and are 16.53% over quota, left unchanged the under quota Districts grow to 4 (by 2023) and Shellharbour exceeds tolerance. The combined region quota variance shrinks to 4.69% overall.

The EDRC by making the changes it has created a situation where there will be 3 Districts under quota (versus 2 now), rising to 6 out of 7 by 2023! The 2020 regions quota variance shrinks to -1.03% and will rise sharply to -10.9% by 2023.

The EDRC changes are totally in the wrong direction. Transferring electors from Shellharbour to Wollongong and Keira (directly or indirectly) will place them slightly over quota, but tolerably so, and as the trend in total is of relative decline, it is quite likely that by the 2029 redistribution that the transfers to Heathcote will need to be entirely reversed.

My suggestion is to make transfers from Shellharbour to Wollongong and Keira (directly and indirectly), leaving the current Keira/Heathcote boundary unchanged. North of this it is possible to leave all 4 Sutherland Districts unchanged (which the EDRC is doing with Cronulla). I would strongly recommend that those areas proposed to be removed in the west of Holsworthy be transferred back to Holsworthy. Additional electors can be added from Macquarie Fields in the area of Casula, which is in the Liverpool Council and oddly located in Macquarie Fields.

	Existing 2020	Quota variance	Existing 2023	Quota variance	Proposed 2020	Quota variance	Proposed 2023	Quota variance
Holsworthy	57228	0.06	57612	-2.75	56113	-1.89	57244	-3.38
Heathcote	56432	-1.33	57027	-3.74	57540	0.61	58346	-1.52
Cronulla	57511	0.56	58492	-1.27	57511	0.56	58492	-1.27
Miranda	55708	-2.6	56723	-4.26	57679	0.85	58626	-1.04
Keira	59068	3.28	59335	0.15	56289	-1.58	57060	-3.69
Wollongong	60693	6.12	62274	5.11	56655	-0.94	58377	-1.46
Shellharbour	63162	10.44	66027	11.45	57971	1.36	60108	1.46
		16.53		4.69		-1.03		-10.9

Western Sydney (Penrith, Londonderry, Mount Druitt) – I have group this area of Districts as some of the boundaries are quite sound (major roads, rivers, council boundaries, motorways etc), but some of the finer points of some EDRC boundaries involve odd transfers and offsetting adjustments.

I find that a clear boundary is a good boundary. Similarly, a simple boundary is usually better also.

I have included the same format of current and proposed boundaries enrolments as used above. I have done this for consistency, having said that, I have not great issue with enrolments with the EDRC.

Starting from the most westerly of these Districts, **Penrith** loses those areas of the Blue Mountains Council to the Blue Mountains District. This seemed to be the most agreed point for any of the submissions, comments and even now.

Having used the western edge of the Penrith Council boundary as a boundary it would seem to make considerable sense to make full use of it. Penrith having lost areas to the Blue Mountains does need to expand into most logically Londonderry. I had originally proposed expanding Penrith to the north with areas west of the Northern Road and Londonderry Road (although on reflection the entire length of the Northern Road till it reaches Richmond Road is clearer). As well it is not obvious why the EBRC is proposing Cranebrook (which is in Penrith) be removed and less well defined suburbs to the east of the Northern Road added. It would simply make more sense to have a clear boundary along the Northern Road and add those bits of Londonderry to Penrith and remove those to its east to Londonderry.

Londonderry (St Marys) – the discussion above implies acceptance of the locality of Londonderry been in Penrith. This District has previously been called St Mary's and its restoration is neither remarkable as it is a well known suburb and it is at the epicentre of a number of populous suburbs along a Motorway.

The jig saw shape of Londonderry is both jarring and of unclear purpose. If the Northern Road is a long continuous boundary in its west; and Richmond Road, Eastern creek to it north and east; the addition of Colbee from Blacktown (which is north of a existing Motorway); the logical extension westwards of the course of a proposed Freeway/Motorway (which is largely used to define Mount Druitt) makes considerable sense as a boundary.

I would exclude Ropes Crossing and Wilmott from the EDRC proposals (transferring them to Mount Druitt and make some minor compensating transfers to Blacktown). This enables a long continuous boundary along a well-defined water course (and council boundary), which links to a long southerly boundary of another Motorway.

Whilst there are always community of interest arguments, my boundaries meet those requirements and are clear and well-defined as well. I would urge the EDRC to visualise the boundaries they have proposed and the alternative I propose. I think my options are better as they are simply clearer and easily explained. The option is trying to explain the Penrith and Londonderry boundaries the EDRC has proposed to ordinary people and they will be totally confused.

	Existing 2020	Quota variance	Existing 2023	Quota variance	Proposed 2020	Quota variance	Proposed 2023	Quota variance
Londonderry	67090	17.3	72165	21.81	52562	-8.1	57631	-2.72
Penrith	56970	-0.39	58703	-0.91	57865	1.18	60034	1.33
		16.91		20.9		-6.92		-1.39

Southern Sydney (Kogarah, Oatley and East Hills)

I have no great issues with Kogarah, Oatley, Rockdale noting that the EDRC has made some incremental changes. I had proposed that with the abolition of Canterbury a series of changes to Rockdale, and Kogarah and Oatley which pushed Oatley slightly eastwards into Kogarah, and Kogarah eastwards and Rockdale slightly northwards into Canterbury. The EDRC has proposed a movement of Kogarah east into Rockdale and west into Oatley, and a northwards expansion of Oatley to the M5 Motorway. These boundaries are quite reasonable. The striking thing is the use of a well-defined boundary in a Motorway and water and major road boundaries. One for example the King Georges Road had been a long continuous boundary (only changed in a minor way now) but which until I suggested a change in a previous redistribution had a strange crossover over King George Road.

With **East Hills** I had proposed no change, and the EDRC has come up with essentially the same boundaries except it has added sufficient electors to avoid it shrinking too far below quota.

The EDRC solution is numerically sound, but even allowing for the need to follow suburbs, or road boundaries to meet numerical requirements, some of the surrounding Districts are of somewhat odd shapes. Also, some suburbs are awkwardly split, or significant and obvious communities of interest are split (some into East Hills such as significant Bankstown centric schools, seniors clubs etc).

East Hills is largely defined by the Georges River, Salt Pan Creek, and a series of streets. I would recommend an alternative configuration as the proposed boundaries conform neither to major man made or natural features or even postcodes. Also, the boundaries with Bankstown actually include areas that are more likely to relate to Bankstown than suburbs or community of interests in East Hills.

Salt Pan Creek and the Georges River are very clear boundaries. I would suggest rather than cutting through suburban streets simply to make up numbers that some more substantial boundaries be used and shape a clear boundary between East Hills and Bankstown and Fairfield. I would recommend that the Georges River be used as a continuous boundary, then along Prospect Creek until it meets the Hume Highway (this is a major natural feature, a suburbs boundary and local government boundary). Then follow easterly along the Hume Highway till it meets the intersection with Edgar Street (which the EDRC proposes to use as a partial boundary) then southwards along Edgar Street and Queen Street till it meets the M5 Motorway, then easterly till it meets Salt Pan creek. The numbers of electors it gains in Georges Hall (which is split currently), Bass Hill, and parts of Yagoona would more or less equal the loss of electors east of Edgar Street in Condell Park. With the added advantage these parts of Condell Park which are physically much closer to the centre of Bankstown and where their community of interest would gravitate to is then included in the District of Bankstown.

I would request the EDRC revisit their proposals in respect of East Hills, Fairfield and Bankstown.

South Western Sydney (Camden, Badgerys Creek, Leppington)

The EDRC has made a series of changes in the south west of Sydney where the creation of a new District was proposed by many submissions and which the EDRC has embraced. I compiled a table of the current and projected elector numbers for the Districts.

In the table below I have included discussion of Campbelltown, Macquarie Fields, Cabramatta, and Liverpool. These are peripheral to the EDRC proposed Districts which I am particularly interested in (Leppington, Badgerys Creek and Camden). The table highlights the fact that the EDRC boundaries will produce a situation where the three fastest growing Districts will after 3 years, already be well in excess of quota and by the elapse of a further 4 years, will be even more in excess of quota.

Campbelltown could take in more or Macquarie Fields rather than parts of Wollondilly (which would provide numbers for more westerly Districts in regional NSW). Macquarie Fields awkwardly spans the Hume Highway; I describe below an alternative solution.

Liverpool and Cabramatta are now both been shaped by the need to extend the proposed Badgerys Creek southwards, taking electors from areas generally east of the M7 from the existing Mulgoa. I had originally proposed that Mulgoa be left unchanged, as it has very clear boundaries, it is very close to quota and whilst it is slightly declining in relative elector terms, it does not require to be changed. I note that its boundaries with Londonderry, Penrith, Blue Mountains have all be left unchanged by the EDRC and it is well defined. If the EDRC argument is that the population centres of Mulgoa are widely separated (at the eastern and western ends) so too is the proposed Badgerys Creek, where the population centres are near Penrith and near Camden. I would add the EDRC plans for Heathcote propose two widely disposed population centres (i.e. in the Illawarra and the Sutherland region).

In summary would recommend the retention of **Mulgoa** and its boundaries unchanged and with its current name unchanged.

Camden as proposed by the EDRC is well defined and apart from an awkward projection around Gledswood Hills and a slight over quota trend in enrolment could be left as proposed.

Leppington was a name suggested in several submissions and taken up by the EDRC. I proposed that the new District be called **Badgerys Creek** as it will increasingly become part of the core of development in the outer west based in large part on the Second Sydney Airport. The retention of Mulgoa and creation of Badgerys Creek as the new District instead of Leppington is simply more workable as it is a well known name, is sited within the District, also within the boundary of the Liverpool Council which runs close to the airport site. The population growth of the areas west of the Hume Highway, the M7, and in the Camden, Edmondson Park area will in all likelihood at the next redistribution require another District to be created in this part of Sydney. The recreation of a District named Mulgoa is entirely likely, as is a significant reshaping of boundaries in this region.

I appreciate the difficulties the EDRC had in the south west of Sydney. Although I note that the easterly projection of Leppington into Prestons etc to follow the course of the M7 is awkwardly cut off from parts of the proposed Leppington (currently in Macquarie Fields and Campbelltown) west of the Hume Highway. This disconnect can easily be avoided by including areas such as Edmondson Park, Denham Court and Bardia which are all west of the Hume Highway and close to the locality of Leppington and as new and developing areas have more in common than Raby, Kearns, Eschol Park and Eagle Vale, which are older and which are clearly well connected to Campbelltown via several bridges, and are part of the same Campbelltown Council area.

In addition I would reiterate that clear boundaries are usually better, Cabramatta and Liverpool can be confined to better existing boundaries, and restoring electors to Holsworthy will avoid a cascade of changes all the way to Shellharbour, together with an awkward two population structure for Heathcote. An unchanged Mulgoa, the proposed Camden and the gap between can easily accommodate a District called Badgerys Creek. I would urge the placement of the outer Districts as far below quota as possible as the evident projected elector growth will see several Districts become significantly in excess of quota for at least half of their life (and two elections).

	Existing 2020	Quota variance	Existing 2023	Quota variance	Proposed 2020	Quota variance	Proposed 2023	Quota variance
Campbelltown	54810	-4.17	56151	-5.22	55901	-2.26	57541	-2.87
Macquarie Fields	64849	13.39	71119	20.04	54387	-4.91	58621	-1.05
Liverpool	58340	2.01	60083	1.42	58534	2.35	58953	-0.49
Leppington	0	0	0	0	51604	-9.77	60268	1.73
Badgerys Creek (Mulgoa)	58802	2.81	60850	2.71	55146	-3.58	60579	2.25
Cabramatta	55194	-3.5	54922	-7.3	60997	6.65	60648	2.37
Camden	75379	31.8	90346	52.5	55526	-2.91	61005	2.97
		42.34		64.15		-14.43		4.91

Conclusion

A clear boundary is usually a good boundary. There are areas that some minor modifications of the EDRC proposals would improve community of interest and manage elector growth better.

I wish the committee well in this important democratic endeavour.

Regards

Martin Gordon
20/11/2020

EDRC names	EDRC Proposals	Similarity with my Proposals
Albury	EDRC has accepted my logic but could add additional areas from Albury.	Fair degree of conformity
Auburn	EDRC has accepted my logic of using the motorway as a boundary for Drummoyne, Strathfield, Auburn and Parramatta. I have sought this result for some years.	Fair degree of conformity
Badgerys Creek	To do justice to the EDRC proposal I have created a discussion about Badgerys Creek, Camden, Leppington, Macquarie Fields, Liverpool,	See my discussion
Ballina	The EDRC has accepted the logic of reducing the enrolment of Ballina, to increase that of Lismore.	Fair degree of conformity
Balmain	No change.	Complete Agreement
Bankstown	EDRC like me has accepted the need to abolish an inner south western District.	Fair degree of conformity
Barwon	The EDRC has failed to increase the enrolment of Barwon, which I think is a weakness of the draft boundaries. I had proposed electors from Upper Hunter and no changes to Tamworth. Both of the latter Districts will be over quota, reinforcing my point that change is possible, and necessary here.	Disagree over under enrolment of draft boundaries.
Bathurst	The EDRC changes are unnecessary.	Fair degree of conformity
Bega	The EDRC lack of changes mean the overenrolment of Bega continues, whilst westerly Districts fall increasingly below quota. I had proposed a modest change with Bemboka. In time a much larger change will be necessary, such as sending Eden back to Monaro.	Fair degree of conformity
Blue Mountains	Several submissions and the EDRC arrived at the same conclusion.	Complete Agreement
Cabramatta	The EDRC intrusion into Mulgoa and west of Cowpasture Road creates a series of awkward changes to Districts west and south west of Cabramatta.	Disagree over overall boundary solutions to south western Sydney.
Liverpool	To do justice to the EDRC proposal I have created a discussion about Badgerys Creek, Camden, Leppington, Macquarie Fields, Liverpool,	See my discussion
Macquarie Fields	To do justice to the EDRC proposal I have created a discussion about Badgerys Creek, Camden, Leppington, Macquarie Fields, Liverpool,	See my discussion
Blacktown	The slight westward movement of Blacktown into Mount Druitt was proposed by me to sort out a range of boundary problems in this region of Sydney.	Fair degree of conformity
Camden	To do justice to the EDRC proposal I have created a discussion about Badgerys Creek, Camden, Leppington, Macquarie Fields, Liverpool,	See my discussion

Campbelltown	To do justice to the EDRC proposal I have created a discussion about Badgerys Creek, Camden, Leppington, Macquarie Fields, Liverpool,	See my discussion
Canterbury	Given the EDRC has proposed an alternative abolition of Lakemba, the proposed Canterbury is reasonable.	Fair degree of conformity
Castle Hill		Fair degree of conformity
Cessnock		Fair degree of conformity
Charlestown		Fair degree of conformity
Clarence		High degree of conformity
Coffs harbour	I had sought a greater degree of voter equality between Coffs Harbour, Oxley and Port Macquarie. This should be addressed by the EDRC	Fair degree of conformity
Coogee		Fair degree of conformity
Cootamundra	I had sought a greater enrolment in Cootamundra, which I would prefer to the proposed low enrolment.	Disagree about extent of elector shortfall proposed.
Cronulla	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion
Drummoyne		Reasonable solution
Dubbo		I had proposed no changes and believe this is still viable. The electors from Upper Hunter would facilitate transfers of electors to Barwon, which is seriously below quota.
East Hills	To do the EDRC proposal justice, I have created a discussion about East Hills, Oatley and Kogarah.	Fair degree of conformity
Epping		Fair degree of conformity
Fairfield		Fair degree of conformity
Gosford		Reasonable solution
Goulburn	Failure to address electors shortfalls in westerly Districts.	Failure to address electors shortfalls in westerly Districts.
Granville		Fair degree of conformity
Hawkesbury		Fair degree of conformity
Heathcote	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion
Heffron		Fair degree of conformity
Holsworthy	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion

Hornsby		Reasonable solution
Keira	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion
Kellyville (Baulkham Hills)		Fair degree of conformity
Kiama		Fair degree of conformity
Kogarah	To do the EDRC proposal justice, I have created a discussion about East Hills, Oatley and Kogarah.	Fair degree of conformity
Lake Macquarie		Reasonable solution
Lakemba	EDRC abolition is reasonable solution to region of under enrolment.	Reasonable solution
Lane Cove		Reasonable solution
Leppington	To do justice to the EDRC proposal I have created a discussion about Badgerys Creek, Camden, Leppington, Macquarie Fields, Liverpool,	See my discussion
Lismore		I believe the further transfer of electors from Ballina to Lismore would enable a better series of boundareis for Northern Tablelands and in turn Barwon.
Londonderry	To address the EDRC proposals I have combined the discussion of Penrith, Londonderry, Mount Druitt and Blacktown.	See my discussion
Maitland	The EDRC using the Hunter River as a boundary as I had proposed is clearly agreed with. It is simply the easiest solution to reduce Maitland and increase Upper Hunter.	High degree of conformity
Manly		Reasonable solution
Maroubra		Reasonable solution
Miranda	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion
Monaro	Failure to address electors shortfalls in westerly Districts.	Failure to address electors shortfalls in westerly Districts.
Mount Druitt	To address the EDRC proposals I have combined the discussion of Penrith, Londonderry, Mount Druitt and Blacktown.	See my discussion
Murray	Failure to address electors shortfalls in westerly Districts.	Failure to address electors shortfalls in westerly Districts.
Myall Lakes	Addition of electors is probably not necessary in view of underlying enrolment.	Fair degree of conformity
Newcastle		Fair degree of conformity
Newtown		Fair degree of conformity

North Shore		Fair degree of conformity
Northern Tablelands		I believe the further transfer of electors from Ballina to Lismore would enable a better series of boundaries for Northern Tablelands and in turn Barwon.
Oatley	To do the EDRC proposal justice, I have created a discussion about East Hills, Oatley and Kogarah.	Fair degree of conformity
Orange		Fair degree of conformity
Oxley	I had sought a greater degree of voter equality between Coffs Harbour, Oxley and Port Macquarie. This should be addressed by the EDRC	Fair degree of conformity
Parramatta	EDRC has accepted my logic of using the motorway as a boundary for Drummoyne, Strathfield, Auburn and Parramatta. I have sought this result for some years.	Fair degree of conformity
Penrith	To address the EDRC proposals I have combined the discussion of Penrith, Londonderry, Mount Druitt and Blacktown.	See my discussion
Pittwater		Fair degree of conformity
Port Macquarie	I had sought a greater degree of voter equality between Coffs Harbour, Oxley and Port Macquarie. This should be addressed by the EDRC	Fair degree of conformity
Port Stephens		Fair degree of conformity
Prospect		Fair degree of conformity
Riverstone		Fair degree of conformity
Rockdale		Fair degree of conformity
Ryde		Reasonable solution
Shellharbour	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion
South Coast	Failure to address electors shortfalls in westerly Districts.	Failure to address electors shortfalls in westerly Districts.
St Ives (Davidson)		Reasonable solution
Strathfield		Reasonable solution
Summer Hill		Reasonable solution
Swansea		Reasonable solution
Sydney		Reasonable solution
Tamworth		Tamworth is placed too much above quota.
Terrigal		Complete Agreement
The Entrance		Fair degree of conformity
Tweed		Complete Agreement

Upper Hunter	The elector shortfalls in Barwon and high enrolment of both Upper Hunter and Tamworth are of concern.	Fair degree of conformity
Vaucluse		Reasonable solution
Wagga Wagga	Failure to address electors shortfalls in westerly Districts.	Failure to address electors shortfalls in westerly Districts.
Wahroonga (Ku-ring-gai)		Reasonable solution
Wakehurst		Reasonable solution
Wallsend		Reasonable solution
Willoughby		Reasonable solution
Winston Hills (Seven Hills)		Reasonable solution
Wollondilly	Failure to address electors shortfalls in westerly Districts.	Failure to address electors shortfalls in westerly Districts. Consider the transfer of electors from Wollondilly to Campbelltown a mistake which exacerbates excesses nearer Sydney whilst exacerbating shortfalls in westerly Districts.
Wollongong	To do the EDRC proposal justice, I have created a discussion about Cronulla, Heathcote, Holsworthy, Miranda, Keira, Shellharbour and Wollongong.	See my discussion
Wyong		Reasonable solution