



**THE FEDERAL
REDISTRIBUTION
NEW SOUTH WALES**

Comment on suggestion 98

Peter Mitchell

33 pages

Friday 10 November 2023

Re: NSW Federal Redistribution 2023 – Invitation for Comments

Dear AEC,

Thank you for the opportunity to make comments on the suggestions for the redistribution of electoral divisions in NSW.

My suggestions are informed by my experience as an expert urbanist. I have workshopped with various communities throughout Sydney to explore how their centres and suburbs should be designed and planned. I have found that communities' aspirations for their urban places are far clearer when their electoral boundaries are consistent with their common interests. Designing and planning for our future is far less complicated a task when electorates are drawn around major centres where communities come together (like the existing divisions Sydney and Parramatta for example) and far more challenging when centres are divided (like existing divisions through the centres of Chatswood and Blacktown).

I hope that the AEC finds the reasoning for these suggestions for Sydney divisions to be compelling, and that many of these divisional boundaries are adopted.

Yours sincerely,

Peter Mitchell

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These three consolidated comments chapters address the divisions for Sydney's three most important city centres. All three have a most significant community of interest that must be considered when drawing divisions that are founded upon these cities.

5. Comments on suggestions

This is limited to divisions in the Sydney region, as this is the scope of my own suggestions (S29). I haven't had time to view all others' suggestions, but have commented on all overtly politically authored comments as well as several private citizens' comments.

6. Conclusion

1. General comments

Several suggestions abolish a division in the northern Sydney region. My analysis leads me to conclude that this idea has no sound basis for these reasons:

- Many who suggest an abolition in northern Sydney cite an elector-based assessment of the region being over its quota. However, these assessments are flawed in that they assume no changes to the overall edges of this entire region, even when these changes would be relatively easy to make in the northwestern Sydney area.
- The division of Parramatta is readily able to accommodate some north-south movement depending on the balance of enrolments north and south of the Parramatta River.
- The Old Windsor Road boundary between Mitchell and Greenway is no longer appropriate to use as a division boundary, because of the many significant new centres that have been developed along this corridor along with metro and rapid bus services. These new centres will increasingly serve communities on both sides of the road, so it is now time for at least one division to be drawn to span the road and unite all these new centres. The common interest in this area of new outer-urban development is clear. There are no significant differences between Kellyville in the east and Kellyville Ridge in the west. Furthermore, Rouse Hill in the east and now Tallawong in the west are significant centres at the terminus to the metro – these are the most major centres this area around which a division can be founded.
- Potential north-south shifts in both Parramatta and Mitchell enable the northern Sydney region to be distributed based on common communities of interest – mostly using the major topographical barriers in this region as boundaries. My suggestions (S29) demonstrate that these boundary changes enable this region to successfully achieve 6 divisions (Mackellar, Warringah, North Sydney, Bradfield, and Berowra or “Marramarra”). The balance can be accommodated in Parramatta and Mitchell.
- There has been some media speculation about which NSW division should be abolished, and several suggestions suggest abolishing North Sydney. This may be due to a combination of flawed reasoning about the northern Sydney region enrolment, the current significant under-enrolment in the ‘corner’ electorate of Warringah needing to be addressed, and politically-based speculation in an only recently hotly contested division. This media speculation appears to have encouraged several suggestions to include abolishing North Sydney. However, the AEC must pursue the best electoral outcome overall rather than simply adopting a more common suggestion.
- Any suggestions for an abolition (including my own suggestion for abolishing Banks, due its the current divide at Salt Pan Creek) should ideally ensure that they justify that proposed abolition by demonstrating that a better outcome can be achieved in the area of the abolition as well as in surrounding divisions. I will let others judge my own suggestions on that basis. However, in my analysis of others’ suggestions, I have not seen a single suggestion that abolishes North Sydney and yet achieves better outcomes for divisions throughout the northern Sydney region. Most fail to recognise that the North Sydney CBD is a major centre that shouldn’t be divided via poor quality boundaries like the LGA boundaries, while many of these proposals also push poor outcomes onto other divisions to the east and west.
- While my analysis of others’ suggestions confirms my own view that an abolition in the northern Sydney region is unjustified and that a better outcome can be achieved without it, I do want to recognise an opportunity for more significant changes in the Berowra – Macquarie area that can enable a significant improvement whereby the Hawkesbury area can be split from the Blue Mountains and a division can be drawn centred upon Windsor and Richmond. These changes may or may not involve an abolition, or the renaming of some divisions (especially Berowra given that it may no longer be relevant), depending on how these changes are made.

2. Consolidated comments for North Sydney

These comments below are intended to address all submissions that reference the existing division of North Sydney.

Drawing divisions in the northern Sydney area is challenging for all, because there are many very distinct geographical features that often clash with the numeric requirements of the redistribution.

North Sydney division in particular has a variety of suggested alignments, and some suggest abolishing it. While my own submission (S29) contains what I propose to be the ideal boundaries for this seat while meeting all the requirements of the redistribution, I would like to make an argument that that no matter which specific boundaries the AEC chooses to draw (or what name is preferred), that this division is drawn to meet these two vital community of interest criteria:

Principles for forming a division in North Sydney

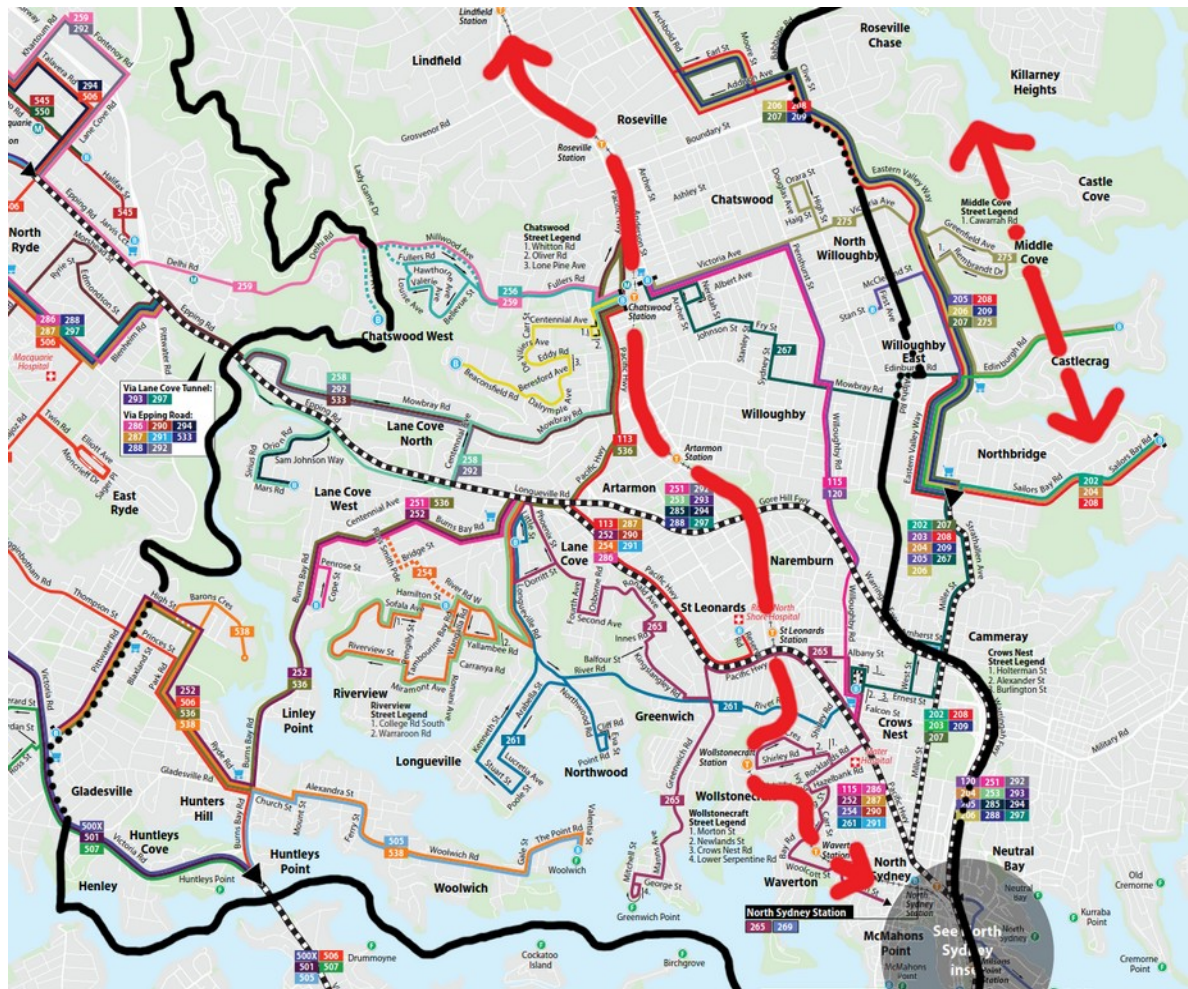
1. **North Sydney is a very significant place in the Sydney and NSW contexts, and is deserving of being the anchor for a single division formed around the lower north shore area, and should not be abolished.**
2. **North Sydney CBD, Crows Nest, St Leonards, and Chatswood are all current and / or future major city centres that are interconnected and located in close proximity, and should all be contained within the one division.**

Suggested strategies for forming a division in North Sydney

Please consider these arguments as justification for retaining the North Sydney division and appropriately redistributing this area in consistency with its common interests:

1. **North Sydney should be drawn third.** Mackellar and Warringah need to be drawn first and second in the northern Sydney area, due to their geographic extremities in Barrenjoey Head and North Head respectively. Mackellar should be drawn first because Mackellar's western boundary along Cowan Creek – Middle Harbour is very strong, while Warringah already spans Middle Harbour at the major city artery and high frequency bus route of the Spit Bridge. (Mackellar's western boundary is, A. a creek valley that is a major topographic barrier, B. it is a large land use gap with two national parks in the space between, C. it is an LGA boundary, D. there is a 5km gap between Terry Hills and St Ives, and E. it is an existing division boundary. For these reasons, Mackellar's western boundary should remain in place.)
2. **Warringah's western boundary can expand into areas with common interests, and a north-south boundary in the Willoughby area is a viable solution.** As a result of #1, Mackellar must expand southwards slightly. Warringah is in turn required to expand westwards, but it must respect North Sydney's role as a major city centre. Warringah's westward expansion should take in areas that have common interests with existing parts of Warringah. These common interests can generally be defined as coastal communities with undulating topography, bus connectivity primarily in a north-south direction, and limited to no connectivity to the rail network. This can be achieved by drawing a north-south running boundary between the Sydney Harbour Bridge and the Roseville Bridge. The Warringah Expressway is an obvious barrier between east and west, and there are several possible paths for this boundary to continue to the north in the Willoughby area. My suggestion is to use Warrane Road – Alpha Road – Flat Rock Drive. Viable alternative boundaries are High Street – Alpha Road – Flat Rock Drive, or Penshurst Street – Willoughby Road, however these alternatives have the drawback that they cut through small local centres. From a broad division-scale coherence point of view, all of these options would make for extremely coherent divisions east and west of the boundary. From a connectivity point of view, the regional bus map below shows that there is extremely low transport demand and provision in an east-west direction between Chatswood and the 'crag and coves' suburbs of Roseville Chase, Castle Cove, Middle

Cove, Castlecrag, and Northbridge. These 'crag and cove' suburbs, as well as Cammeray and Neutral Bay are communities that have far more in common with Warringah's rail-free connectivity than they do with the rail-oriented north shore line communities.



North West Sydney Bus Network Map effective 12 December 2022, Busways, accessed from TfNSW Transport Info website on 5 November 2023. Red arrows added to highlight the north-south connectivity of the north shore train line (left) and Eastern Valley Way bus services (right). Black dot-dash lines added to show my proposed boundaries of North Sydney as in submission 29. Please note:

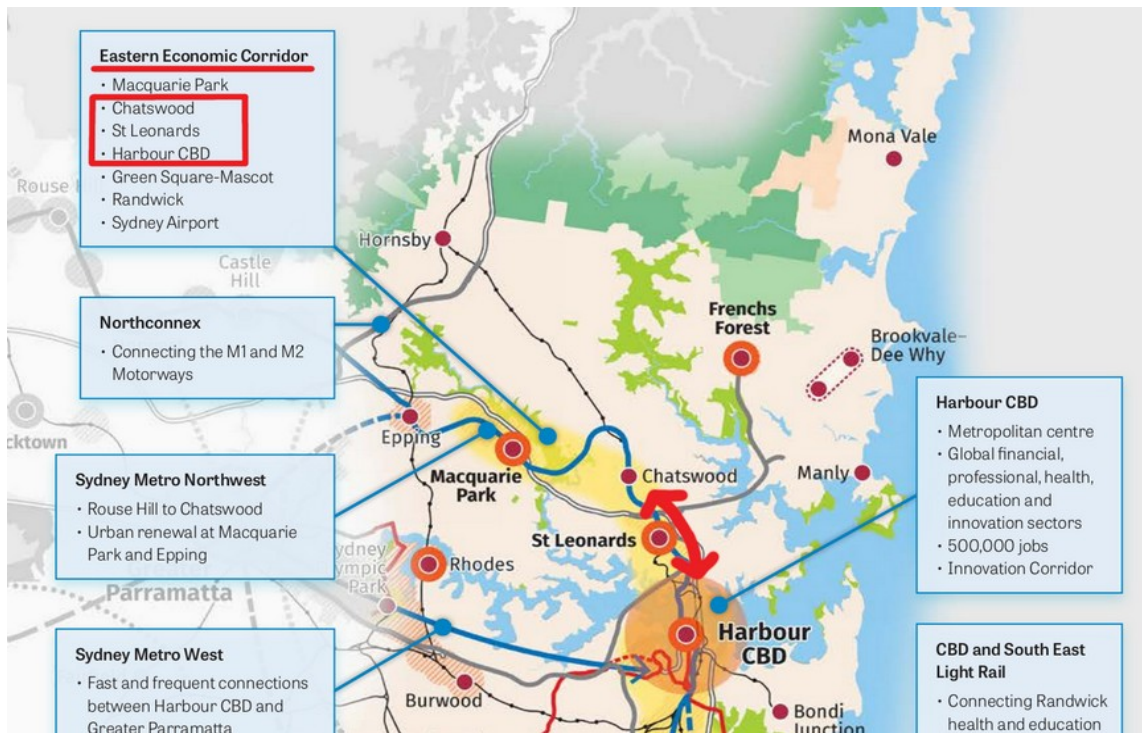
- i. *There are 10 bus services that travel north-south along the Eastern Valley Way corridor; 202, 203, 204, 205, 206, 207, 208, 209, 267, 275. This is very similar transport servicing to the Warringah area, for example the major bus corridors of Military Road and Sydney Road.*
- ii. *There are only 2 bus services that travel east-west across the proposed Warringah – North Sydney boundary and connect with centres to the west. 267 is a Chatswood – Crows Nest shuttle, and its 2 services per hour during weekday peaks is typical of a local bus service. 275 is a shuttle between Castlecrag and Chatswood, with only 4 daily services on a weekday, it could fairly be described as extremely infrequent.*
- iii. *There is a third bus services that does cross the proposed Warringah – North Sydney boundary. This is the 205, a peak hour only service, and the only reason it crosses this proposed boundary is that its route begins and terminates at the Willoughby Bus Depot at Stan Street.*
- iv. *The Willoughby Road – Victoria Avenue bus services 115 and 120 follow the alignment of the old northern Sydney tramway north to Chatswood Station. This confirms that the majority of the*

central and western areas of the Willoughby LGA are orientated around the rail line, while the eastern fringes of Willoughby are not.

3. **North Sydney CBD does not have a common interest with Warringah, and these places cannot viably be connected in one division.** North Sydney CBD is a high-rise scale, high density, major city centre that is, from a common interest point of view, incompatible with all areas inside the Northern Beaches LGA, which are entirely all low-to medium scale and density areas. North Sydney is also located directly on the rail network, while the Northern Beaches and Mosman areas have better bus connections to Wynyard Station than they do to North Sydney Station. Therefore, Warringah cannot expand into North Sydney CBD as these urban environments are too physically and connectively dissimilar for any common community of interest argument to be sustained. While some suggestions do extend Warringah westwards to the North Sydney LGA boundary for basic redistributive convenience, the AEC must recognise that there are better options available to draw two communities of interest – one in the rail-based areas to the northwest of the Sydney Harbour Bridge and one in the road-based areas to the northeast of the bridge.
4. **The city centres of North Sydney, Crows Nest, and St Leonards have close common interests with one another and should remain within the same division.** North Sydney's common interest lies to its northwest. North Sydney CBD, Crows Nest, and St Leonards are all major city centres directly connected with one another and located only 2km apart in total. Chatswood is another major city centre located a further 3km up the train line. All these major city centres should be contained within one division due to their substantial common interests as economic engine rooms in the NSW economy. For example, this is an extremely important area for health care services and workers, formed around the Royal North Shore Hospital, the North Shore Private Hospital, the Mater Hospital, and a many other smaller health care providers. In the current *Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018*, these city centres are all located within the "Eastern Economic Corridor".

"The Eastern Economic Corridor from Macquarie Park to Sydney Airport is the State's greatest economic asset – contributing two-thirds of NSW's economic growth in the 2015-16 financial year. It will build on its credentials and leverage its strong financial, professional, health, education and innovation sectors."

Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018, p20.



Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018, p21. Red lines and arrow added to highlight the Eastern Economic Corridor through the lower north shore of Sydney. Please note:

- i. The "Harbour CBD" includes the North Sydney CBD (p90).
- ii. The wide light-yellow semicircular band describes the "Eastern Economic Corridor".
- iii. The thin grey line between the north shore and Frenchs Forest describes the Beaches Link Tunnel, which has since been cancelled. "On 8 September 2023, the NSW Government confirmed the decision to cancel the Beaches Link project." ([Western Harbour Tunnel and Warringah Freeway Upgrade, Transport for NSW, 8 September 2023](#)).

5. **The importance of the North Sydney, Crows Nest, and St Leonards city centres is growing with rapid and high-priority urban development, which is a common interest consideration between existing and new communities in these areas.** The St-Leonards – Crows Nest – Victoria Cross areas are already experiencing rapid high intensity urban development in combination with the Sydney Metro Northwest. The Crows Nest area in particular has been recently identified by the NSW Government as a "priority development zone" for rapid rezoning, primarily as a response to the ongoing housing crisis ([Sydney poised for priority zones to solve housing crisis, Sydney Morning Herald, 31 October 2023](#)). This means that this relatively small area will experience particularly rapid growth in population and therefore in voting enrolments too. These existing and future communities in the chain of city centres will all share common interests in their high-density, highly-connected, inner-city urban environment, and therefore they must not be split apart in this redistribution.
6. **The common interests of the North Sydney, Crows Nest, and St Leonards city centres are more important than LGA boundaries.** There are several suggestions suggest extending Warringah westwards, such as those that include the entire North Sydney LGA in Warringah, and suggestions that adopt some or all of the existing LGA boundaries between North Sydney, Willoughby, and Lane Cove. These LGA boundaries are extremely divisive to the St Leonards and Crows Nest city centres, and therefore should not be used for the drawing of federal divisions. To use the health services example, there are public and private hospitals scattered on all sides of these LGA boundaries, these health care providers (and most importantly their health care workers who live in the local area) would be divided if these boundaries were

adopted. If the AEC was to use these boundaries in this redistribution, this would be to repeat the mistake of dividing the Chatswood city centre down the middle along Victoria Avenue.

7. **Chatswood should be included in a division alongside North Sydney, Crows Nest, and St Leonards city centres.** Chatswood is a major city centre that shares the same high-density, high-connectivity, inner-city common interests as the centres to its immediate south. It is also in a pivotal location in the transport network, as it is a major interchange between heavy rail, metro rail, and bus services. This makes it highly strategically important in the "Eastern Economic Corridor". Due to these common interests, Chatswood must be included in the same division as the North Sydney, Crows Nest, and St Leonards city centres.

The points above are all what I consider to be essential considerations for the AEC. In my own submission (S29), I also argue for Hunters Hill to be included for common interest reasons as well as to retain this existing boundary without further disrupting this area. I therefore propose that North Sydney is expanded northwards to Ryde Road to meet its numeric requirements. This would mean that the boundary between the lower and upper north shore divisions is drawn between the local centres of Gordon and Pymble. However, while I stand by the assertions in my submission, providing that the essential considerations above are observed by the AEC, I recognise that there may be other valid boundaries to define North Sydney's western and northern extents.

3. Consolidated comments for Sydney

These comments below are intended to address all submissions that reference the existing division of Sydney.

Drawing divisions in the eastern Sydney area is challenging for all, because of the numeric need for two divisions to be drawn east and southeast of the Sydney city centre.

North Sydney division in particular has a variety of suggested alignments, and some suggest abolishing it. While my own submission (S29) contains what I propose to be the ideal boundaries for this seat while meeting all the requirements of the redistribution, I would like to make an argument that that no matter which specific boundaries the AEC chooses to draw (or what name is preferred), that this division is drawn to meet these two vital community of interest criteria:

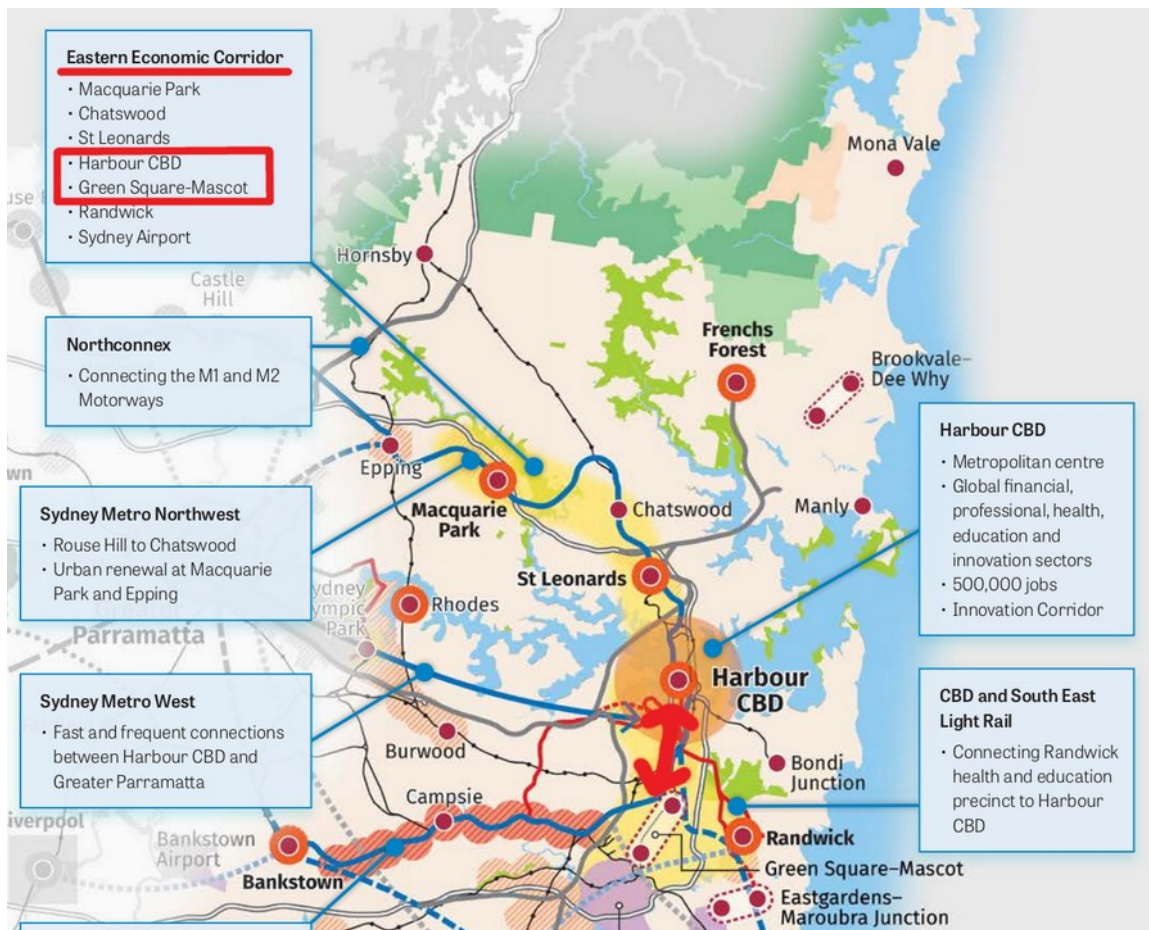
Principles for forming a division in Sydney

1. **Sydney is a city of global significance, a state capital, and is the primary feature in the NSW economy. It is deserving of being the anchor for a single division formed around and centred upon the city, and should not be abolished.**
2. **Sydney CBD, Central, Redfern, and Green Square are all interconnected major centres located in close proximity, and should all be contained within the one division.**

Suggested strategies for forming a division in Sydney

Please consider these arguments as justification for retaining the Sydney division and appropriately redistributing this area in consistency with its common interests:

1. **Sydney should be drawn third.** Wentworth and Kingsford Smith need to be drawn first and second in the eastern Sydney area, due to their geographic extremities in South Head and Cape Banks respectively. Wentworth should be drawn first because its western boundary along South Dowling Street is a major distinctive division between the city centre and the eastern suburbs.
2. **Sydney city's role as a global city, state capital, and economic centre is a distinct common interest that is vital to retain for Sydney's ongoing success into the future.** Keeping the CBD and the inner-city areas (including the Sydney LGA wherever possible) within one division enables this community to remain focused on its distinct high-density physical features and its city-based economic performance. In the current *Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018*, the "Eastern Economic Corridor" extends southwards from Circular Quay, as explained in the strategy map below. These Sydney City areas should remain wholly contained within a single division.



Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018, p21. Red lines and arrow added to highlight the Eastern Economic Corridor from the Harbour CBD to the south.

- 3. The Sydney division's foundational integrity takes precedence over neighbouring divisions.** While the numeric requirements of the redistribution lead to many suggestions pushing the division of Sydney westward, Sydney's importance takes precedence, and a westward expansion of Kingsford Smith should be explored instead, as explained in my submission (S29). While this suggestion may be unusual and potentially controversial, it is made for sound reasons. Furthermore, it enables not only the division of Sydney to retain its foundational integrity, it also maintains the integrity of many divisions west of Sydney. While it is acknowledged that extending Kingsford Smith west of the airport would be a new change, there is a strong precedent for this in the existing division of Cook that spans the Georges River.
- 4. If Sydney is kept in place, then it needs only small and positive adjustments to meet the requirements of this redistribution.** Kings Cross is a distinctly inner-city centre, and can be wholly included within the Sydney division by expanding the boundary westward to Boundary Street and Rushcutters Bay. The Sydney division's western and southern boundaries are very well-drawn, and are very consistent with the City of Sydney LGA, can therefore be retained unchanged.

4. Consolidated comments for Parramatta

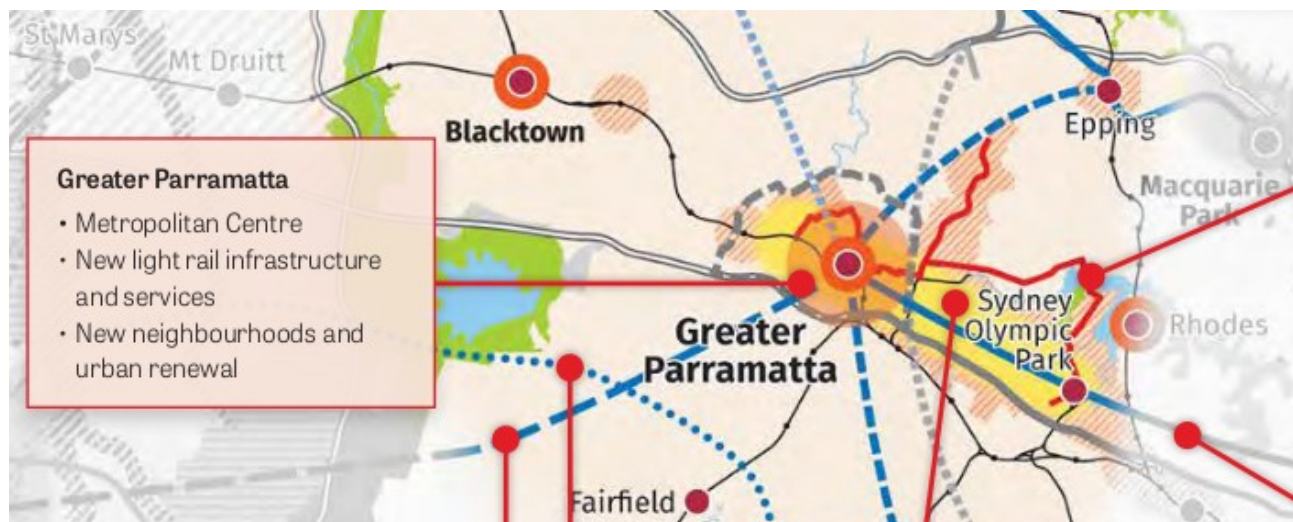
These comments below are intended to address all submissions that reference the existing division of Parramatta.

Parramatta's position as a city that spans the Parramatta River leads to this division being pushed and pulled in various directions by various suggestions. The relative viability of each suggestion should be considered in the context of whether that enables the Parramatta division's foundational integrity to remain focused upon this vital city centre.

Principles for forming a division in Parramatta

1. **Parramatta is a major city centre in the Sydney context, and is deserving of being the anchor for a single division formed around and centred upon the city, and should not be abolished.**
2. **Parramatta and Westmead are currently interconnected major centres located in close proximity, and should both be wholly contained within the one division.**

Parramatta is Sydney's "River City", a geographic centre, and a significant intersection of connections from all directions. The current *Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018*, shows Greater Parramatta to be the most major feature in this central city region.



Greater Sydney Region Plan, A Metropolis of Three Cities, NSW Government 2018, p19.

Current plans include a "Greater Parramatta and Olympic Peninsula Economic Corridor". However, physical connections between Parramatta and Olympic Park are currently poor, with the major industrial areas of Cameilia and Silverwater in between, and a circuitous heavy rail connection. Connections will be substantially improved with the construction of the Sydney Metro West and Parramatta Light Rail Stage 2 projects in future years. Due to the extended time scales for these major infrastructure projects and the ever-present risks of delays, is suggested that the AEC maintains Parramatta's eastern boundary around the industrial areas in this redistribution, and that in a future redistribution, the boundary should be extended to Homebush Bay.

5. Comments on suggestions

S01 – Andrew Kalokerinos

**Warringah –
Wentworth**

- The suggestion to merge Warringah and Wentworth isn't justified as there is no direct means of travel between these areas.

S04 – Christiane Barber

Barton – Grayndler

- This suggestion demonstrates that public transport rail lines are usually very poor quality boundaries, as evidenced by the current boundary that divides the community of Marrickville.
- My own suggestions (S29) demonstrate that the community of Marrickville can be successfully reunited within the division of Grayndler by moving the boundary to the Cooks River as this suggestion calls for.

S05 – Colin James Hesse

Barton – Grayndler

- See S04 above.

Barton – Cook

- It is highly constructive to suggest that Cook should remain south of the Georges River. My own suggestions (S29) demonstrate how this can be successfully achieved.

S06 – Fulin Yan

Sydney – Cowper

- The suggestion to move Lord Howe Island into Cowper to align it with its state division of Port Macquarie and to align communities of interests in a more geographically consistent way is highly constructive and fully supported.

S07 – Michael Hedger

**Northern Sydney
region**

- The suggestion to abolish Berowra is reasonable, as this area can easily be redistributed either side of the clear boundary of Berowra Creek. An obvious advantage would be to split the disparate halves of Macquarie to ensure that an outer northeast Sydney division can be centred upon Windsor. However, my suggestions (S29) demonstrate that it isn't necessary to abolish Berowra, and that a superior approach involves adjusting the boundary of Old Windsor Road, which is no longer an appropriate boundary due to the new centres being developed along this corridor.

S08 – Andrew Solomon

Macquarie

- The suggestion to remove Windsor and Richmond and to expand Macquarie to the west (and to include the entire Greater Blue Mountains World Heritage area) is highly constructive and fully supported.
- My own suggestions (S29) demonstrate how this change could be achieved in the divisions within the Sydney basin.
- As an update to my own suggestions (S29) for the AEC's consideration, I would support the suggested division focused on Blue Mountains, Lithgow, and Oberon to maintain the "Macquarie" name. The eight-drawn northern Sydney division focused on the Hawkesbury region that I had previously named "Macquarie" in S29 could instead adopt a different name, and I leave this open to the AEC and others to suggest what that name might be.

S12 – Duncan Anderson

Northern Sydney region

- The suggestions are based on the total enrolment in the northern Sydney region, which makes the unfounded assumption that the northern Sydney region's collective edge boundaries should remain fixed. This is not the case – Parramatta can shift north or south as long as it remains focused upon the city centre, and Mitchell can (and now should) cross the Old Windsor Road boundary, which is no longer relevant due to the new centres being developed along this corridor. Therefore the redistribution in northern Sydney can be successfully achieved without an abolition, and my own suggestions (S29) demonstrate how this can be done.
- The suggestion to move Hunters Hill LGA into Bennelong is not unreasonable, however this is not an appropriate place to begin drawing boundaries, as it only solves small issues while creating bigger issues elsewhere. In my analysis, I tested whether Hunters Hill should move to Bennelong, and found that it was possible, but that the totality of communities of interest in the northern Sydney region was better supported by maintaining the North Sydney – Bennelong boundary in its existing location. This is also less disruptive to this community and to communities elsewhere in the region.
- It is appropriate for North Sydney to expand northwards, especially to include all of Chatswood.
- It is not appropriate for North Sydney to expand west. The LGA boundary cuts through the centre of Cremorne, so it is less suitable as a division boundary than the Warringah Expressway.
- A westward expansion of North Sydney would force both Warringah and Mackellar to cross the Cowan Creek – Middle Harbour boundary, which would decrease the common interests in both communities. Warringah's Mosman should remain linked with Neutral Bay, and Mackellar's Terry Hills should remain disconnected from St Ives. Ultimately, these suggestions cause more problems throughout the northern Sydney region than they solve.

S13 – Martin Gordon

Northern Sydney region

- The general suggestion to retain these divisions in a westward shift is realistic, and is demonstrated as achievable in my suggestions (S29).
- The split of the Hawkesbury area from Macquarie is constructive.
- The shift of Parramatta southwards to address numeric interests is very reasonable, providing this can be achieved while maintaining this division's focus on the city centre.

S14 – Jeff Waddell

Enrolment projections query

- While I don't doubt the AEC's independence, this suggestion's query of potential projection errors may possibly be explained by poor quality forecasting work. Either explanation is concerning though. So, in the interests of ensuring that the projected enrolment figures are as realistic and evidence-based as possible, I call on the AEC to publish their evidence behind the projected enrolment figures for analysis. If there are any significant issues identified with these figures, then the redistribution program should be paused so that the figures can be revised.
- If there is to be any change to the projected enrolment figures, then new information based on current NSW Government policies for priority rezonings should be included. (*Sydney poised for priority zones to solve housing crisis, Sydney Morning Herald, 31 October 2023*)

Overall Comments

- The suggestion to abolish North Sydney leads to several drastic and unjustified changes, including Parramatta moving too far north, Reid crossing north over the Parramatta River, and Blaxland losing its focus on the major centre of Bankstown.
- The suggestion to expand Kingsford Smith to the west is excellent, and produces significant positive improvements in Sydney and Grayndler. Beyond this to the west and south, though, the flaws introduced from the North Sydney abolition disrupt each division in turn.

Northern Sydney

Mackellar

- A small southern expansion of Mackellar is highly reasonable.
- The proposed southern boundary is excellent, given the clarity of the Curl Curl Lagoon divide between suburbs. A minor point would be to swap Beacon Hill Road for Warringah Road, as the latter is also a clearer option.

Warringah

- Please see the *Consolidated Comments for North Sydney* section above.
- A westwards expansion of Warringah is necessary, but including the North Sydney CBD in this area is too broad for a common community of interest to be formed between the city centre and the Northern Beaches LGA. This proposed boundary also divides the major centres of Crows Nest and St Leonards. The Warringah Expressway is a far clearer western boundary.

North Sydney

- The suggested abolition of North Sydney is unwarranted - please see the *Consolidated Comments for North Sydney* section above.

Bradfield

- A boundary to Bennelong along the Pacific Highway is unwarranted,

and is too close to the major centre of Chatswood, cutting this centre off from its school and surrounding community. The lower north shore is a distinct area centred upon the ridgeline and rail line, so this area shouldn't be divided.

Berowra

- This suggestion maintains Berowra's split into two separate halves by Berowra Creek, which is unfortunate, and doesn't support the proposal to abolish North Sydney.

Bennelong

- The suggestion to span the Lane Cove River creates a poorly connected division with less clear communities of interest than the current well-drawn division, so this would be a regressive change. It also undermines the proposal to abolish North Sydney.
- While Victoria Road is a busy traffic thoroughfare, it is also a corridor where several local centres are formed. This dual role makes it unsuitable as a boundary. The proposal to move the Bennelong – Reid boundary north to Victoria Road would divide existing centres in Gladesville and West Ryde.

Mitchell

- This suggestion maintains the boundary of Old Windsor Road, which is no longer appropriate given the new centres being developed along this corridor. As a result, it makes unjustified disruptions to divisions further east when a more constructive approach would retain North Sydney and use the redistribution requirements to find clearer boundaries between the different communities of interest in the northern Sydney region.

Southern Sydney

Wentworth

- It is constructive to fix the arbitrary boundaries to Sydney, but this approach should also be continued with all of Kings Cross to move to Sydney, given the Boundary Street – Rushcutters Bay area provides a clearer boundary than the current alignment, and maintains Sydney division's foundation on the city centre.
- The suggested southern boundary is relatively reasonable, although it does divide some local centres on Anzac Parade. It is constructive that it avoids dividing the centres of Randwick and Coogee.

Sydney

- Please see the *Consolidated Comments for Sydney* section above.
- A small boundary adjustment is warranted, and this suggestion is very constructive in including the centre of Newtown more wholly within this division.

Kingsford Smith

- Please see the *Consolidated Comments for Sydney* section above.
- The westward expansion of this division is extremely constructive. I showed in my own suggestions (S29) that this enables significant improvement in divisions throughout inner western Sydney. The westward expansion could include the entirety of the areas of Cook that are north of the Georges River, as this is a clearer southern extent for Kingsford Smith.

Grayndler

- Keeping this division extremely closely aligned with the Inner West LGA is extremely constructive, including the Cook River southern boundary that fixes the existing divide through the centre of Marrickville.

Reid

- The drastic suggestion that Reid should cross the Parramatta River undermines the suggestion that North Sydney be abolished.

- Cook**
 - Keeping Cook south of the Georges River is a most constructive approach, however the western boundary is clearer if it follows the Woronora River. The suggestion to use the rail line as a boundary shouldn't be adopted because this divides several centres, including the major centre of Sutherland.
- Hughes**
 - It is constructive for Hughes to collect more of the inland areas south of the Georges River. The western boundary shouldn't be adopted because this splits several centres – the M5 Motorway is a clearer boundary.
- Barton**
 - It is constructive to shift this division in this direction, but the existing boundary of Liverpool Road is better than the suggestion to use the rail line, because this divides several centres, including the major centre of Burwood.
- Watson**
 - This is a reasonably drawn division.
- Blaxland**
 - Parramatta's move so far north creates space in this area for what appears to be a whole division. However, there is no single significant urban centre for this division to be focused upon, especially considering the use of rail lines for boundaries that divides urban centres. This further undermines the suggested abolition of North Sydney. It would be better to keep North Sydney, shift Parramatta southwards slightly while retaining its foundation on the city centre – these changes would enable Blaxland to remain founded upon the major centre of Bankstown.
- Fowler**
 - These suggested boundaries cut too close to the major centre of Liverpool. It would be more constructive to ensure Fowler is well-founded upon Liverpool.
- Greenway**
 - This small change doesn't resolve the flaws in the boundaries of Old Windsor Road and the rail line, which divides several important and rapidly growing centres.
- Chifley**
 - This division also uses the rail line for boundaries which divides several several urban centres.
- Macquarie**
 - Including more of northern Lindsay in a division with Windsor and Richmond is a constructive approach, however Macquarie should be divided into is separate Hawkesbury and Blue Mountains parts.
- Lindsay**
 - A southward expansion is appropriate.
- Parramatta**
 - The suggestions in the northern Sydney region push Parramatta too far north, reducing its clear foundation on the city centre. This undermines the suggestion to abolish North Sydney.
- McMahon**
 - These suggestions fail to resolve McMahon's current lack of clarity without a major centre and with several major geographical and motorway barriers within it.
 - The selection of the rail line for the eastern boundary divides several several urban centres.
- Werriwa**
 - Without a map, these changes are unclear.
- Macarthur**
 - This is a reasonable proposal, however the flaws in divisions elsewhere throughout Sydney are likely to require different kinds of changes in this area.

S16 – Darren McSweeney

Northern Sydney

Mackellar

- It is appropriate to keep the western boundary in place.
- The southern boundary is worsened by this suggestion, reducing the clarity of Warringah Road by diverting from it, while maintaining the divide through the major centre of Dee Why.

Warringah

- The western boundary is drawn through the centre of the North Sydney, Crows Nest, and St Leonards major centres, which is unfortunate.
- Abolishing North Sydney is a flawed suggestion – please see the *Consolidated Comments for North Sydney* section above.

Bradfield

- The north-western boundary is an unfortunate split through these upper north shore communities, including a divide through the centre of Pymble. It would be better to find a more direct boundary across the north shore ridgeline that passes between centres. This poor outcome undermines the suggestion to abolish North Sydney.

Bennelong

- This is a reasonable suggestion as it maintains this division's existing communities of interest while finding appropriate new boundaries.

Berowra

- This suggestion maintains and exacerbates the existing split in this division along Berowra Creek. This poor outcome undermines the suggestion to abolish North Sydney.

Mitchell

- While this is a well-drawn division for the southern areas of the Hills District, it maintains a boundary on Old Windsor Road that is no longer relevant now that new urban centres are being developed along it. This boundary divides these communities where they should instead be united.

Parramatta

- Parramatta's huge move north undermines its foundation on this major city centre, and cuts of its immediate neighbour in Granville, which is unfortunate. This poor outcome undermines the suggestion to abolish North Sydney.
- Please see the *Consolidated Comments for Parramatta* section above.

Macquarie

- It is unfortunate that this suggestion does not address the existing split in Macquarie between the Blue Mountains and Hawkesbury areas.

Southern Sydney

Wentworth

- Wentworth's western expansion undermines Sydney's foundation on this state capital.
- Please see the *Consolidated Comments for Sydney* section above.

Kingsford Smith

- Due to the drastic move in Wentworth, this division makes a minimal incursion into Sydney, and doesn't appear to divide any new urban centres, which is constructive.

Sydney

- This suggestion pushes Sydney too far off its city centre.
- Please see the *Consolidated Comments for Sydney* section above.

Cook

- It is highly appropriate to return Cook to the Sutherland area, and the Woronora River is an excellent western boundary.

Grayndler

- The communities of interest get dissolved in this area by the

unfortunate span of the Cooks River.

- | | |
|----------------|--|
| Reid | <ul style="list-style-type: none">• While this suggested division is mostly quite reasonable, splitting Newington from Sydney Olympic Park is a very awkward, and should certainly be avoided. |
| Barton | <ul style="list-style-type: none">• This is a reasonable suggestion, however the Wollie Creek boundary isn't ideal because the urban centres along this corridor are accessed from both sides. The M5 Motorway's emergence from underground further west makes it appropriate boundary from that point on. |
| Watson | <ul style="list-style-type: none">• The southern boundary divides through the major centre of Bankstown, which is an awful outcome, and undermines the suggestion to abolish Blaxland. |
| Banks | <ul style="list-style-type: none">• This division maintains its split either side of Salt Pan Creek. It should have been abolished instead of Blaxland. |
| Hughes | <ul style="list-style-type: none">• This is a reasonably well-defined division, however it is unfortunate to divide Liverpool from its neighbouring centres in Fairfield to the north. It is also unfortunate that this division's communities are bisected by motorways. |
| McMahon | <ul style="list-style-type: none">• The large northwards shift and the great east-west span of this division are poor outcomes, and this undermines the suggestion to abolish North Sydney. |
| Fowler | <ul style="list-style-type: none">• The western two-thirds of this division is well-defined. The common interest between this area and the eastern third is not clear. |
| Werriwa | <ul style="list-style-type: none">• This is a very well-drawn division that anticipates the significant development of the aerotropolis. |

S22 – Kylea Tink

North Sydney

- This suggestion draws a reasonably well-defined division for the lower north shore area. It also retains the major centres of North Sydney, Crows Nest, and St Leonards wholly within and central to this division, and it adds Chatswood. A minor problem for the eastern boundary is that it divides the centre of Cremorne.
- However, this suggestion is unrealistic given that it creates problems elsewhere in the northern Sydney region, including a disruptive northern expansion of Warringah with an inferior boundary to the current divide on Warringah Road, a very poor quality western expansion of Mackellar that dissolves these communities of interest, and massive disruption in the upper north shore area of Bradfield.
- It is necessary for North Sydney to contract its eastern boundary and extend further northwards. My suggestions (S29) demonstrate that this can be achieved while maintaining the lower north shores' distinct common interests.
- Please see the *Consolidated Comments for North Sydney* section above.

S42 – Zali Steggall OAM MP

Warringah

- Both options retain the strong boundary of Warringah Road. This is appropriate, especially since this major road does not sever any local centres.
- Both options suggest a minor northwards expansion, however the clarity of this proposal is poor. While this would have the advantage of unifying Dee Why (which as a major centre must be united in either of these divisions), this proposal severs Dee Why from its immediate 'hinterland' in Narraweena and from its industrial centre in Cromer. These boundaries are inferior to a minor southwards contraction of this boundary to the Curl Curl Lagoon, which is a much clearer boundary. This alternative would successfully unify Dee Why and Cromer in Mackellar, and retain Brookvale and Manly in Warringah.
- Option A is extremely constructive in identifying the clear boundary of the Warringah Expressway. This option should be extended north to make up for the shortfall for removing Dee Why from Warringah.
- Option B has several significant flaws. It divides North Sydney city centre from the major centres of Crows Nest and St Leonards, even though these major places with significant common interests are only 2km apart in total. It also severs the local centres of Wollstoncraft and Waverton. While a boundary in this location will always be flawed, this suggestion would be slightly improved by extending west to Berrys Creek.
- Please see the *Consolidated Comments for North Sydney* section above.

S44 – Allegra Spender MP

Wentworth

- The suggestion to expand west into Sydney is most unfortunate because it undermines that divisions' important foundation on the city centre.
- The suggestion to expand south into Clovelly is constructive, and a further southward expansion can include Kensington, Randwick, and Coogee.
- Please see the *Consolidated Comments for Sydney* section above.

S46 – The Greens NSW

Overall comments

- This suggestion's statement that "*the required changes that are needed to make the redistribution work are evidence that the Federal parliament should be expanded*" is correct and fully supported.
- The suggestion that Bradfield should be abolished is not justified by the outcomes achieved in the suggested redistribution of this area, as this proposal breaks more than it fixes. If an abolition is desired in the north, then Berowra would be a better candidate because then Bradfield could be centred upon Hornsby, Mitchell could move into the southern parts of Berowra, and the northern parts of Berowra could be unified in a new outer western Sydney division centred upon Windsor. This option would fix the current divide in Macquarie. An equally viable alternative is that there is no abolition in northern Sydney, and that the redistribution requirements are achieved by a boundary adjustment at the Old Windsor Road.

Northern Sydney

Mackellar

- It is highly appropriate that this suggestion starts drawing northern Sydney with Mackellar.
- Expanding Mackellar westwards is far worse than expanding south, for community of interest reasons. Mackellar's existing western boundary is a topographic barrier, a land use gap with two national parks, an LGA boundary, and is the large space between the suburbs of Terry Hills and St Ives that effectively face away from one another due to their different interests – Terry Hills being most closely connected with Mona Vale and St Ives with Pymble. Mackellar's western boundary should therefore be retained. The clearest southern expansion of Mackellar's boundary would be move from Dee Why to Curl Curl Lagoon.

Warringah

- Expanding Warringah north would include all of Dee Why within the same division, which is an important improvement on the current boundary, but the new boundary at the edge of Cromer would be very unclear, and this does not support the proposal for a northwards expansion. A southwards movement of this boundary to Curl Curl Lagoon would be far clearer.
- Expanding Warringah west is a constructive approach, but the new boundary should be the Warringah Expressway, because North Sydney CBD is a high density city centre that is incompatible with the Northern Beaches LGA areas.

North Sydney / "Cammeraygal"

- Moving North Sydney off the North Sydney CBD is unwarranted.
- Keeping North Sydney's western boundary in place is a constructive

suggestion, as there does not appear to be significantly strong reasons to move this boundary.

- Expanding North Sydney northwards to include all of Chatswood is constructive. The expansion could also include all of Gordon.

Berowra

- This division would be clearly based on the major centre of Hornsby, which is a constructive approach for this area. My analysis suggests that Berowra Creek should be the new western boundary of this division, and this is supported by other suggestions that adopt this approach. This would require the Old Northern Road communities to be redistributed, which I dealt with in my submission (S29), but need not go into this further here as this suggestion stops at this point.

Bennelong

- The northwards expansion to Cherrybrook is queried as it appears that a division of this size might exceed the requirements of the redistribution.
- Bennelong is already very well drawn in its current location, and the M2 Motorway is already a very clear northern boundary, so any minor adjustments would be more constructively made in a westward direction.

Southern Sydney

Wentworth

- While the arbitrary boundary through Kings Cross should be fixed in this redistribution, a westward expansion of Wentworth into Sydney would disturb the Sydney division's vital foundations on the city centre. Wentworth should expand southwards instead.

Kingsford Smith

- Please see the *Consolidated Comments for Sydney* section above.

Sydney

- Please see the *Consolidated Comments for Sydney* section above.

Grayndler

- This suggestion demonstrates that major changes to the division of Sydney also involves major changes throughout the inner west, which is unfortunate. It is far more important that Sydney remains centred upon the CBD with only minor changes, and that Kingsford Smith makes the necessary westward expansion instead. This also reduces disruption in Sydney's west.

Grayndler

- The use of the railway line for the southern boundary is unfortunate, because this divides a series of urban centres, including the major centre of Canterbury.

Barton, Banks, Reid, and Watson

- The suggestion to abolish Watson appears relatively arbitrary, and without any clear explanation for how this would improve the clarity of communities of interest in Sydney's west. Banks is a much clearer candidate for abolition due to it being split by Salt Pan Creek, and my submission (S29) demonstrates how this can be successfully achieved.

S47 – Liberal Party of Australia, NSW Division

Overall comments

- This submission is applauded for the clarity of their overview maps, which helpfully contain both existing and proposed division boundaries.
- While this submission has named Warringah for abolition, Antony Green correctly notes in his blog (30 October 2023) that it actually proposes to abolish North Sydney, and instead renames Warringah as North Sydney.
 - Abolishing North Sydney is a flawed suggestion – please see the *Consolidated Comments for North Sydney* section above.
 - The suggestion states “it is time to make the decision to abolish a division in this (‘outer west and north of the harbour’) area” (p20), citing “very low or no population growth” as the reason. This is misleading, because Sydney’s north is growing rapidly. Crows Nest and either Kellyville or Bella Vista have been assigned as “priority development zones” for rapid rezoning, primarily as a response to the ongoing housing crisis (SMH, 3/11/23). (In fairness, this official planning change by the current government would not have been public knowledge when all the redistribution submissions were drafted and submitted, but it is publicly known now, so must be considered by the AEC.) Also, Sydney’s northwest regions on both sides of Old Windsor Road include extensive areas of ongoing low density development. For these reasons, the suggestion that there should be an abolition in the northern Sydney region cannot be substantiated.
- My own submission (S29) demonstrates that it is unnecessary to abolish North Sydney, and that there are other ways to redistribute the northern Sydney region without an abolition.
- Blaxland should not be abolished, because it is essential for the city centre of Bankstown to be the major feature in a division in this area. The suggested boundaries for Watson are an improvement on the existing division of Blaxland by removing peripheral areas to the north, but there are better options to draw a division more comprehensively around Bankstown centre. I suggest Banks to be abolished instead, because it is easily split by Salt Pan Creek.
- It is helpful to create a new division in northwest Sydney, because this enables the existing division of Macquarie to be redrawn without both the Hawkesbury and Blue Mountains areas.
- It is helpful to merge the Blue Mountains with the areas to the west, although I have no position on the name or boundaries of this division as this is outside the scope of my own submission.

Northern Sydney

Mackellar

- Extending Mackellar south is the appropriate plan, but this submission’s proposed boundaries are problematic:
 - Headland Road Dee Why is a better boundary than Pacific Parade, but it severs the existing interconnected suburbs of Dee Why – North Curl Curl. A far better boundary is the Curl Curl Lagoon (as suggested in my submission S29), because this is a wide boundary between suburbs. This is especially important because Dee Why is a major centre in the Northern Beaches context, so the boundary shouldn’t sever areas that have

walkable access to this centre.

- The existing Warringah Road boundary is extremely appropriate, because this road is a wide, high speed corridor without any local centres spanning it (centres like Forestville and Forestway are located adjacent to the road rather than across it). There is therefore very little connectivity between suburbs located on either side of Warringah Road. There is therefore limited value in this suggestion that unifies the suburbs of Forestville and Frenchs Forest. Given the better boundary at Curl Curl Lagoon that enables Mackellar to be successfully resolved, the AEC should instead prioritise maintaining the other existing electoral boundaries of Warringah Road in place, as per the AEC's factors of considerations.

Warringah / "North Sydney"

- Abolishing North Sydney is a flawed suggestion – please see the *Consolidated Comments for North Sydney* section above.
- The suggestion argues for the merger of these two divisions based on the "North Sydney LGA [being] divided between divisions". This is a flawed proposal, because unifying this LGA should not be achieved at the expense of dividing the major city centres of North Sydney, Crows Nest, and St Leonards from one another.

Bradfield

- The major flaw with this proposal is that St Leonards is severed from both North Sydney and Greenwich, the latter of which includes a number of health services south of the Pacific Road that are co-located with the major hospitals to the north. These LGA boundaries are poor quality quality boundaries for divisions.

Bennelong

- This is a poorly-drawn division due to its lack of common interests, because splitting Ryde from Epping is worse than combining Ryde with Lane Cove. While in the past Bennelong has been positioned further east, its westward moves over several redistributions have resulted in the current Bennelong being very clearly drawn between the Lane Cove and Parramatta Rivers. Moving back eastwards would be a regressive change. While Bennelong may, in some suggestions, include Hunters Hill LGA (if this is justified overall), it shouldn't extend any further east than the Lane Cove River.
- The western LGA boundary is unfortunate, because it splits Eastwood from Epping. The existing M2 boundary is superior.
- The poor outcomes in this suggested version of Bennelong undermine the suggested abolition of North Sydney – if this abolition was justified, it would achieve better-drawn divisions around it.

Berowra

- Berowra is much better drawn in its existing format than in this suggestion.
- While the Old Northern Road is an LGA boundary, it should not be used as a divisional boundary, as this splits the ridgetop settlements of Dural and Glenorie in half.
- Even though this division is clearly focused on the Hornsby LGA, it combines two separate communities in its eastern and western halves, divided by the significant expanse of Berowra Creek. This suggestion is akin to the existing division of Macquarie being split between Blue Mountains and Hawkesbury areas.
- Epping's role as a major centre at the intersection of rail and metro lines orientates its interests with Sydney, North Sydney, Chatswood,

Strathfield, and Parramatta. Cutting Epping off from its southern inner-city neighbours and combining it with its outer-suburban and peri-urban areas makes this suggestion for Berowra far too broad in terms of its communities' common interests.

- The poor outcomes in this suggested version of Berowra undermine the suggested abolition of North Sydney – if this abolition was justified, it would achieve better-drawn divisions around it.

Mitchell

- This is a very strangely-drawn division, due to its span across the broad Darling Mills Creek. It's another division of two separate halves.
- Old Windsor Road is no longer an appropriate divisional boundary due to the development of new centres linked by metro and rapid bus services. Maintaining this boundary means that these centres remain divided, which is unfortunate.
- The poor outcomes in this suggested version of Mitchell undermine the suggested abolition of North Sydney – if this abolition was justified, it would achieve better-drawn divisions around it.

Reibey

- It is a positive approach to create a distinct division in the Hawkesbury area, however this division would be better drawn by extending along the existing rail line into Riverstone and Schofields rather than into metro areas that are disconnected with Windsor. The southern extent of this division is too broad, as the inclusion of the rapidly growing metro centre of Rouse Hill is too dissimilar to the satellite towns of Windsor and Richmond and the peri-urban and rural areas of the Hawkesbury.
- It is unfortunate to cut Rouse Hill off from its immediate metro centre neighbour in Tallawong.

Greenway

- Dividing through the major centre of Blacktown is a most unfortunate approach. Blacktown should be wholly contained and centrally located within its division.
- Richmond Road is an excellent boundary only for the section west of the Western Sydney Parklands Reserve. East of this reserve, the importance of Blacktown centre should be observed.

Southern Sydney

Wentworth

- In my submission (S29), I argue for Wentworth to contract westward slightly to Boundary Street, as this boundary into Rushcutters Bay is the clearest available in the area, so I suggest that this is a superior option to this suggestion that expands Wentworth eastwards...
- However, if the AEC should choose to expand Wentworth eastwards, then these proposed Sydney – Wentworth boundaries are the next best alternative. While it is most unfortunate to draw a boundary along Oxford Street, it is a positive feature to trace around the Taylor Square so that this local centre can stay wholly within one division.
- The provision of light rail on Alison Road means that splitting these light rail centres with a division boundary is most unfortunate. The AEC should look for better options for a southern boundary so that Coogee (and Randwick and other centres in this area) can stay wholly within one division.

Kingsford Smith

- Please see the *Consolidated Comments for Sydney* section above.
- The very high density environments of Green Square and Zetland

have very little in common with Sydney's coastal settlements in the southeast, and therefore shouldn't be included in Kingsford Smith. Furthermore, this expansion significantly undermines the vital seat of Sydney.

Sydney

- Please see the *Consolidated Comments for Sydney* section above.
- This suggestion raises “*the foundational basis of any Division of Sydney*” as a matter of importance, and I strongly agree, even to the point of commenting that this submission doesn't value this foundational basis highly enough because it preferences Kingford Smith's western airport boundary more highly than Sydney's boundary.

Cook

- Maintaining the split in central Sutherland is unfortunate, as this maintains the divisional severance between the interconnected centres of Sutherland and Cronulla.
- Maintaining the the span across the Georges River is unfortunate, as this maintains separate communities of interest. While this is unavoidable sometimes, it would be better for Kingsford Smith to span the airport than for Cook to span the Georges River, because the former option keeps the division on Sydney in place.

Grayndler

- The use of the railway line for the southern boundary is unfortunate, because this divides a series of urban centres, including the major centre of Canterbury.

Reid

- This division extends too far south, awkwardly combining dissimilar interests between northern and southern areas.
- The span across large urban discontinuities such as Rookwood Cemetery and the Enfield Freight Yards is unfortunate, as this makes this division relatively disconnected for an otherwise inner-city area.
- The use of the railway line for the southern boundary is unfortunate, because this divides a series of urban centres.
- The poor outcomes in this suggested version of Reid undermine the westward push of Wentworth when Kingsford Smith could push west instead.

Barton

- The use of railway lines for the northern and southern boundaries is unfortunate because this divides a series of urban centres.

Parramatta

- Please see the *Consolidated Comments for Parramatta* section above.
- It is positive that this division maintains the connection between Parramatta and Westmead.
- The extension south into Aurburn, Merrylands, and Guildford is appropriate, as these areas connect well with Parramatta city centre.
- The pipeline southern boundary is excellent, as this rarely divides urban centres. However, it would be more ideal if the pipeline was used for the whole southern boundary rather than extending into Yennora. This is especially relevant since there is no need for Parramatta to contract so much in the north due to Mitchell's incursion.

Watson

- This division uses good boundaries, however it is unfortunate that the major centre of Bankstown is not more centrally located within it, due to Reid's incursion from the north. The Rookwood Cemetery would be a better boundary between these divisions.

- Banks**
- The existing division of Banks is problematic due to the Salt Pan Creek divide through the centre. It is unfortunate that this suggestion retains this approach. It would be better to abolish Banks and to redistribute this area, as I have suggested in my own submission (S29).
- Hughes**
- Extending this division north slightly is a mistaken approach, because Chipping Norton and Moorebank are better paired with Liverpool city centre, and the M5 Motorway is a better boundary between north and south. This suggestion that retains Hughes largely as-is is therefore inferior to others' suggestions that redistribute the areas south of the Georges River in more comprehensively positive ways.
- McMahon**
- With Blacktown suggested to be split, this division does not contain a clear primary centre wholly within its area, which is unfortunate. How will these communities develop an appreciation for the distinctiveness of their area when the urban features of this area are so indistinct?
 - The southern boundary suggested is very clearly defined.
 - The western boundary is very poorly drawn considering that it lies adjacent to the M7 Motorway, which would provide much clearer definition. It is also most unfortunate to cut directly through the centre of Rooty Hill, especially when this could be so easily avoided.
- Fowler**
- Like McMahon, this is a very nebulous division, with only Fairfield as the most major centre, but in a particularly peripheral position in this area. Rather than distributing Fowler and Werriwa in a north / south orientation, it would be better to split them east / west, so that the eastern division is focused on the major centre of Liverpool, while the western division can be focused on the communities linked by the Liverpool to Parramatta T-Way.
- Werriwa**
- This is a very awkwardly drawn division, with major motorways dividing communities throughout this area, rather than these barriers being used more appropriately as major dividing boundaries between separate divisions.
 - Liverpool should take a much higher importance than in this peripheral location.
 - It's unfortunate to draw a boundary through the centre of Macquarie Fields.
- Chifley**
- Aside from the flawed eastern boundary (see McMahon above), the northern, western, and southern boundaries of this division are clearly defined, and the centres of Mt Druitt and St Marys are distinct.
- Lindsay**
- This is a constructive suggestion, although the westward incursion into the Blue Mountains is most unfortunate.
- Bird Walton**
- A new division in this location is a positive suggestion, due to the clear orientation around the aerotropolis.
 - The Camden Valley Way is a distinct boundary, and it doesn't pass through any urban centres.
- Macarthur**
- Aside from the problematic northern boundary (see Werriwa above), this is a constructive suggestion.

S48 – Australian Labor Party

Overall comments

- The suggestion for the AEC to define regions of the state (4.5, p6) in the future is positive, and is provisionally supported. A further way this suggestion can be improved is for the AEC to specify consideration for what I describe in my submission as ‘major and minor boundaries’ (S29, p3). This approach would enable the AEC to transparently show which boundaries are considered major and unlikely to be spanned unless there is compelling reason to do so, and which areas form a link between regions that can be redistributed to suit the balance of electoral populations between regions. For example, the Illawarra Escarpment is a major boundary, while the line between southwestern Sydney suburbs and the Southern Highlands areas is commonly considered a minor boundary. This kind of boundary clarification would be especially important between Sydney’s regions and between rural regions so that the NSW community can appreciate where boundary adjustments between regions are more or less appropriate.
- On the suggestion stating that the problem of redistributions creating cascading impacts on divisions is “*amplified if the Redistribution Committee is inclined to aim as close to quota as possible, and not merely to be just within the permissible tolerance,*” (4.7 p7) it should be noted that the AEC does not appear to be required to aim as close to a quota as possible within each seat. This is highly appropriate, as it enables the AEC, as an independent institution, to use its discretion to achieve better and less disruptive outcomes overall if some divisions are able to sit higher or lower within the acceptable range than others for strategic reasons. Some communities of interest may be marginally bigger or smaller than others, and the AEC should remain able to accommodate these differences within reasonable tolerances, rather than splitting communities of interest for purely quantitative reasons. This discretion is wholeheartedly supported for the AEC, as they can be trusted to make these decisions in the public interest.
- It is a reasonable suggestion to abolish Hughes due to the many geographic discontinuities that imply alternative ways to distribute this area. However, Banks is likely to be a better candidate for abolition due to it currently being split into halves by Salt Pan Creek.

Northern Sydney

Mackellar

- This submission identifies Mackellar’s worst section of boundary – Pacific Parade through Dee Why – for adjustment. However, the extension cuts through the centre of Freshwater, which is most unfortunate. A much better boundary is the Curl Curl Lagoon, which provides a much clearer distinction between suburbs rather than through suburbs and centres.
- Retaining the existing boundary of Warringah Road is highly appropriate.

Warringah

- Please see the *Consolidated Comments for Sydney* section above.
- This suggestion makes Warringah’s communities of interest too broad, as the major city centre of North Sydney is incompatible with the Northern Beaches LGA.

North Sydney

- Please see the *Consolidated Comments for Sydney* section above.
- It is positive that this division extends north to include all of Chatswood, and excellent that the boundary is drawn between and not through urban centres. However, the boundary could extend even further north to include Gordon, creating a clearer definition between lower and upper north shore divisions, and enabling better boundaries to be drawn in each division.
- The westward expansion into Ryde is unnecessary, and it splits the centre of Ryde, which is currently expanding to the west of Lane Cove Road adjacent to Top Ryde. Meanwhile, both Ryde and the growing centre of North Ryde would be better paired with Macquarie Park as they are in the existing division of Bennelong.

Bradfield

- Extending Bradfield northwest to Berowra Creek is an excellent suggestion, and the quality of this outcome of a Hornsby-based division proves that other suggestions that abolish North Sydney are unjustified.
- A swap of Gordon and Killara to North Sydney could readily be accommodated by gaining western Pennant Hills and Thornleigh from Berowra. This would avoid the current boundary through these urban centres.

Bennelong

- While the eastern boundary is unfortunate and the westward movement here unjustified (see North Sydney), this suggestion is otherwise fairly reasonable. A small improvement would be to include all of North Rocks within this division.

Berowra

- While this division is located somewhat in a 'corner' location, a better solution needs to be found. This division unfortunately splits the centre of Cherrybrook, includes the metro terminus of Rouse Hill and Tallawong without any of their southern neighbours, and splits the northern riverside towns of Wilberforce and North Richmond from Windsor and Richmond.
- There are positive suggestions to begin to straddle Old Windsor Road, and to connect Windsor with Riverstone. Schofields should be considered for inclusion instead of Rouse Hill due to its better connections with Windsor.

Mitchell

- The majority of this division remains unchanged, which is both good in itself, and is further evidence that other submissions that abolish North Sydney are unjustified.
- A minor comment is that the northern boundary is unfortunate for the suburbs of North Kellyville and Rouse Hill. Second Ponds Creek would be a better boundary between suburbs.

Greenway

- This contraction of the existing division doesn't fix the main problem that the major centre of Blacktown remains divided. A north / south rather than an east / west split with Chifley could create more clearly defined divisions between Blacktown in the South and Schofields and other expanding centres in the north.
- Maintaining the use of the rail corridor as the western boundary maintains the existing divisions through these urban centres, which is unfortunate.

Southern Sydney

Wentworth

- The slight eastwards contraction to Boundary Street and Rushcutters

Bay is constructive, as it recognises the close link between Kings Cross and Sydney City.

- The adoption of Anzac Parade as a boundary is unfortunate, because the light rail turns this corridor from a divider into an attractor. The new centres along it shouldn't be split up, and western Kensington and Kingsford shouldn't be disconnected from UNSW and the major hospitals.
 - Randwick Barracks helps form a distinct southern boundary.
- Kingsford Smith**
- Please see the *Consolidated Comments for Sydney* section above.
 - The very high density environments of Green Square and Zetland have very little in common with Sydney's coastal settlements in the southeast, and therefore shouldn't be included in Kingsford Smith. Furthermore, this expansion significantly undermines the vital seat of Sydney.
- Sydney**
- Please see the *Consolidated Comments for Sydney* section above.
 - This suggestion pushes the division of Sydney too far from its city foundations, as the inclusion of Balmain at the expense of Green Square is a regressive change due to a weaker common interest in the new arrangement. This proves the need for Kingsford Smith to expand to the west instead, as this keeps Sydney's foundations intact.
 - The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
- Cook**
- Returning Cook to a Sutherland seat is an extremely constructive solution.
- Grayndler**
- Apart from its awkward boundaries (see Sydney above), this division has a reasonable community of interest, given its centres in Canterbury and Sydenham, and its rail and light rail connections.
 - The southern boundary to Wollli Creek has the appearance of being reasonable, however the rail line centres along this creek can be accessed from both sides, so it is a suboptimal boundary given that these communities could remain united.
- Barton**
- Apart from the limitations with the northern boundary (see Grayndler above), this division is a reasonable suggestion.
- Reid**
- No changes is an appropriate response for this division.
- Watson**
- The suggested westward expansion into Bankstown puts this major centre at the periphery of this division, which is inappropriate for a place of such importance.
- Banks**
- While the areas south of the Georges River are difficult to redistribute, this suggestion retains the existing problem with Banks being split by Salt Pan Creek, and exacerbates this with the extension south into Menai. It would be better for Banks to be abolished and for these halves to be redistributed, however this would require more significant changes throughout eastern and central Sydney. These poor outcomes do not support the suggestion to shift the division of Sydney west when there is an alternative to shift Kingsford Smith west.
- Hughes**
- See Banks above.

- Parramatta**
- Please see the *Consolidated Comments for Parramatta* section above.
 - It is positive that this division maintains the connection between Parramatta and Westmead.
 - Although the extension southwest adopts a distinctive new southern boundary, the resulting shift away from Parramatta City's foundation is arguably too great.
 - The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
- Blaxland**
- The removal of the major centre of Bankstown worsens the clear common interest for this division. Bankstown is justified in being wholly contained and centrally located within its division.
- Fowler**
- Locating the major centre of Liverpool at the extremity of this division is a regressive change. Liverpool is justified in being wholly contained and centrally located within its division.
- McMahon**
- This suggestion maintains a large east – west span that is unsupported by common interests. The M7 Motorway is a major barrier in the centre of this division.
- Werriwa**
- This is a relatively reasonable suggestion for a division, as it anticipates the planned development along Fifteenth Avenue being central to the future communities in this area.
- Chifley**
- See Greenway above in regards to Blacktown and other rail-based urban centres being divided.
- Lindsay**
- The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
- Macquarie**
- While this suggestion shows interesting intent to include riverside communities with the Blue Mountains, the inconsistent application of this approach in the Windsor and Richmond area is problematic, ultimately failing to adequately resolve the Blue Mountains – Hawkesbury split.
- Macarthur**
- The awkward boundaries suggested for this division shows that the suggested incursion from Fowler hasn't been adequately resolved.

S50 – NSW Nationals

Overall comments

- The suggestion to abolish North Sydney is not justified, given that the northern Sydney division proposals are all of poor quality apart from the very constructive suggestion for Warringah.
- While the suggestion to abolish Grayndler is not unrealistic, it is unnecessary when there are better options to resolve existing problems, for example by abolishing Banks and dividing this area by Salt Pan Creek. Furthermore, the westward movement off Sydney off its foundations is not supported, and given that my submission (S29) has demonstrated that Sydney can be retained in place, this method also enables Grayndler to be retained in place.

Northern Sydney

Mackellar

- Extending Mackellar south is the appropriate plan, but this submission's proposed boundaries are problematic:
 - Please see comments on S47 about the flaws of extending south from Warringah Road.
 - This suggestion retains the existing boundary through the centre of Dee Why, which is most unfortunate.
- A better option is to retain the Warringah Road boundary and move the Dee Why boundary south to the Curl Curl Lagoon.

Warringah

- Please see the *Consolidated Comments for North Sydney* section above.
- The suggestion for Warringah takes a very positive approach in preferring a western boundary along the Warringah Expressway than the North Sydney LGA boundary that some other suggestions adopt. This creates a much clearer common interest throughout the Warringah division as coastal areas with limited rail access. (Other suggestions disrupt this common interest by connecting the vastly different places of parts of the Northern Beaches LGA with the North Sydney CBD.)
- A slightly better western boundary would be better drawn close to the Eastern Valley Way, because the suggested route along Willoughby Road and Penshurst Street divides some local centres.

Bradfield

- The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
- The major centres of Chatswood and Hornsby remain divided, which is most unfortunate.
- The suggestion to span the Lane Cove River is not justified by the selection of Epping Road as a boundary, which although it is a significant wide road, it creates an unnecessary division through an otherwise coherent urban area.
- The poor outcomes in this suggested version of Bradfield undermine the suggested abolition of North Sydney – if this abolition was justified, it would achieve better-drawn divisions around it.

Bennelong

- The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
- Please see comments on S47 about the flaws of east of the Lane Cove River.
- The western boundary through several urban centres – especially a

- major centre like Epping – is unfortunate.
 - The poor outcomes in this suggested version of Bennelong undermine the suggested abolition of North Sydney – if this abolition was justified, it would achieve better-drawn divisions around it.
- Berowra**
- While this division has the advantage of being mostly similar to the existing arrangement, it fails to fix the split through the centre of Hornsby.
 - It introduces a new split through the centre of Castle Hill.
 - It also makes an awkward extension south over the M2 Motorway, which is unfortunate, as these communities are poorly connected with their northern neighbours.
- Mitchell**
- This suggestion maintains the Old Northern Road as a boundary, which is no longer appropriate given the metro rail and rapid bus-oriented centres developing along this corridor. The boundaries through these centres should be removed wherever possible in this redistribution.
- Greenway**
- This suggestion includes the major centre of Blacktown wholly within its division, but an important place such as this should be more centrally located.
 - Retaining the existing boundary along the rail line maintains the divisions through several urban centres.
- Southern Sydney**
- Wentworth**
- A southward expansion of Wentworth is generally appropriate, but these suggested boundaries are sub-optimal:
 - This suggestion fails to resolve the existing awkward boundaries through Kings Cross.
 - The use of Alison Road and Avoca Street as boundaries fails to recognise that the light rail has located centres along these corridors, and that these proposed boundaries divide these centres.
- Kingsford Smith**
- Please see the *Consolidated Comments for Sydney* section above.
 - Please see comments on S47.
- Sydney**
- Please see the *Consolidated Comments for Sydney* section above.
 - Please see comments on S47.
- Cook**
- Please see comments on S47.
- Reid**
- This suggestion is a realistic proposition overall due to clear common interests, however the eastern boundary along the Hawthorne Canal divides a series of light rail centres, which is unfortunate.
- Watson**
- Although it utilises reasonable boundaries, this division has two communities – the northern area around Ashfield and the southern area around Canterbury – rather than one. It therefore fails to support the suggestion for abolishing Grayndler.
- Barton**
- This division has distinct rail line connections between its communities, however:
 - The major centre of Hursville remains divided.
 - The awkward boundaries in the Kogarah area are unfortunate.
- Parramatta**
- Please see the *Consolidated Comments for Parramatta* section above.
 - It is positive that this division maintains the connection between

	<ul style="list-style-type: none"> • Parramatta and Westmead. • However, the vast extension north-east makes the major city centre of Parramatta relatively peripheral to this division, which is unwarranted. This division therefore fails to support the proposal to abolish North Sydney.
New Division Guildford Locality	<ul style="list-style-type: none"> • The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
Blaxland	<ul style="list-style-type: none"> • This division is relatively well-focused on and oriented around the major centre of Bankstown. • It unfortunately draws boundaries through local urban centres in the east and west.
Banks	<ul style="list-style-type: none"> • This suggestion fails to improve upon a division divided by Salt Pan Creek, and also divides the major urban centre of Hurstville.
Hughes	<ul style="list-style-type: none"> • Please see comments on S47.
McMahon	<ul style="list-style-type: none"> • This suggestion fails to improve the definition of this division, and extends this problem by expanding northwest into the Toongabbie area. It is hard to conceive of these disparate areas being brought together.
Fowler	<ul style="list-style-type: none"> • The awkward boundaries suggested for this division are too fragmented to be a realistic consideration for adoption.
Werriwa	<ul style="list-style-type: none"> • Please see comments on S47.
Chifley	<ul style="list-style-type: none"> • This suggestion does improve upon the boundaries in the Blacktown area by not dividing the centre, but it doesn't fix the boundaries in the Riverstone and Schofields areas, where these urban centres remain divided.
Lindsay	<ul style="list-style-type: none"> • Emu Plains is closely connected with Penrith, so although the Nepean River forms a well-defined boundary, this change isn't constructive enough to justify it given that the existing boundary could be retained as-is.
Macquarie	<ul style="list-style-type: none"> • This suggestion maintains the existing problems of a division that spans the disparate Blue Mountains and Hawkesbury areas. The AEC should preference a solution that enables these areas to be split into two clearer communities of interest.
Hume	<ul style="list-style-type: none"> • This suggestion fails to recognise the developing interests around the Western Sydney Airport and Aerotropolis. The interests between these new communities and those in the peri-urban and rural areas of the Picton area are too broad for this to be a realistic consideration for adoption.
Macarthur	<ul style="list-style-type: none"> • Although not unrealistic, this is a sub-optimal approach to resolve this area, because it would be better to separate the existing communities around Campbelltown from the rapidly developing centre of Leppington. It would be more constructive to combine Leppington with its immediate neighbour in Edmundson Park.

S51 – Sophie Scamps MP

Mackellar

- This suggestions arguments for maintaining Mackellar’s distinct existing community of interest and extending south are both realistic and constructive.

S54 – Connor Magee

Northern Sydney region

- Starting the northern Sydney region redistribution in an seat that is suggested to be abolished is an awkward approach, and leads to poor outcomes both in the lower north shore area and beyond.
- The abolition of North Sydney is unjustified – please see the *Consolidated Comments for North Sydney* section above.
- The identification of the strong border between Mackellar and Bradfield is constructive.
- The poorly defined changes in the divisions of Bradfield, Berowra, Bennelong, Mitchell, Parramatta, and also in Greenway show that the suggested abolition of North Sydney is unsubstantiated.

Southern Sydney region

- The Wentworth – Sydney boundary is stronger than the Wentworth – Kingsford Smith boundary so the retention of the latter over the former is unconstructive. The suggestion that Wentworth – Kingsford Smith boundary cannot move south is unjustified.
- The westward move from Wentworth pushes Sydney too far off its state capital city foundations.
- Please see the *Consolidated Comments for Sydney* section above.
- The westward push from Wentworth through Sydney creates significant disruption further west. Much of this is unnecessary given that Kingsford Smith could expand west, and that Sydney can be retained in its current location with only minor adjustments.
- Pushing Cook entirely south of the Georges River is constructive.
- The suggested abolition of Banks is sound.

Conclusion

It is clear that all suggestions have experienced significant challenges involved in redistributing NSW while removing one division. My analysis suggests that none are perfect or ideal, and that the best outcome overall will involve a mix of suggestions to achieve the best outcome for the greatest number of people.

While legislative requirements (and the absence of a legislative change to expand parliament) make this redistribution necessary, the AEC’s “*factors to consider*” show that community of interest considerations (including physical features – such as the urban environment itself) are paramount. Hopefully, every division can find a position where its community is united around the most important places in its area.