

**Submission ID:** CO-0051  
**Date Received:** 30/4/26, 4:06 pm  
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**Organisation Name:** Liberal National Party of Queensland  
**Submission Topic:** Electorate Boundaries and Names  
**Electoral District:** All  
**Related Submissions:** O-719, O-724

**Submission:**

See below

**Submission Attachments**

LNP Comments on Objections 300426.pdf

Judge Gregory Koppenol  
Chairperson  
Queensland Redistribution Commission  
GPO Box 1393  
Brisbane QLD 4001

Dear Chairperson,

Thank you for the opportunity to make a further submission in response to the objections lodged following publication of the proposed electoral boundaries. This submission is made on behalf of the Liberal National Party pursuant to section 49 of the Electoral Act 1992.

The LNP has reviewed the objections published by the Commission. This submission responds to those bearing upon the boundaries and names addressed in the LNP's original objection (O-0719), and to the further submission of the Australian Labor Party (O-0724) where it proposes changes the LNP does not support.

The LNP's overarching position remains that the Commission's draft boundaries are sound in their general architecture and represent a considered balancing of the statutory criteria. Where discrete deficiencies have been identified, the LNP proposes targeted corrections capable of implementation within the Commission's existing framework. The LNP opposes proposals that would require cascading changes across multiple electorates and substantial elector displacement without demonstrated necessity.

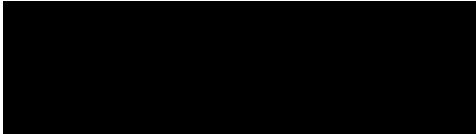
The Commission is respectfully invited to distinguish between objections that refine the draft and proposals that seek to replace it. The objection phase exists to test and improve the Commission's work - not to advance extensive alternative models that could more appropriately have been ventilated at the primary submission stage. Where late-stage redesigns are advanced, they should be held to a commensurately higher standard of justification.

The LNP is confident that the Commission's process has been thorough and independent.

Our submission is focused on assisting the Commission's process by identifying where modest refinement would strengthen the draft, and where the draft should be defended against proposals that would weaken it.

Please do not hesitate to contact me should the Commission require any further information.

Yours sincerely



Ben Riley  
State Director

## Introduction

This further submission is made in the public interest in response to objections lodged following publication of the proposed redistribution.

The draft boundaries appear, in their general architecture, to represent a careful balancing of the statutory criteria under the Electoral Act 1992. Where refinement is warranted, it should be targeted, proportionate, evidence-based and directed to demonstrated defects in the draft.

The Commission is respectfully invited to distinguish between:

- a. genuine objections identifying discrete anomalies capable of confined correction; and
- b. proposals advanced at the objection stage which would substantially recast the draft boundaries across multiple electorates

The latter category should attract careful scrutiny.

The Commission's objection process serves an important but defined function: to test the draft boundaries and identify confined defects.

Where a submission advances a substantially new redistribution model affecting multiple districts, and which was not put forward in comparable detail at the initial submission stage, the Commission is respectfully invited to consider whether that proposal is properly characterised as a comment on the draft or as a late alternative model.

In the latter case, it should be approached with caution unless clearly demonstrated to be necessary to achieve a superior statewide outcome.

Where a participant seeks broad secondary redesign after publication of the draft, the Commission should require clear evidence that such proposals are necessary, superior overall, and justify the resulting elector displacement and consequential changes.

The relevant statutory considerations include:

- enrolment equality and permissible tolerance;
- communities of interest;
- means of communication and travel;
- physical features and natural boundaries;
- local government boundaries where relevant; and
- minimisation of unnecessary change with durable long-term outcomes

No single criterion is determinative. Local preference, standing alone, cannot compel adoption where the proposed remedy causes greater disruption elsewhere.

It is respectfully submitted that the Commission may give greater weight to objections that identify a specific problem in the draft, propose a confined remedy, minimise elector displacement, avoid consequential changes elsewhere, and are supported by concrete evidence.

By contrast, proposals requiring widespread secondary redistribution and reconfiguration across multiple districts should be required to meet a higher persuasive threshold.

## **Aspley**

A number of objections concern the treatment of Geebung at the Aspley/Nudgee boundary. The LNP acknowledges the community sentiment and has reviewed the submissions, including those from the Geebung Kindergarten and Preschool (O-0575) and the Geebung RSL (O-0717).

The ALP proposes retaining western Geebung in Aspley. The LNP notes that the institutions cited by the ALP and the community - the RSL, train station, kindergarten, schools and shops - serve residents on both sides of any plausible boundary in this densely urban area. The ALP's proposal does not materially alter day-to-day community experience; it moves the line without achieving administrative improvement.

The LNP's proposal is more purposeful: align the Aspley/Nudgee boundary with the Deagon Ward boundary and transfer the Ellison Road / Murphy Road pocket into Nudgee. This delivers state-to-local-government boundary alignment - a concrete and durable administrative benefit.

Neither proposal keeps Geebung wholly intact. The Commission should prefer the option that achieves a practical structural improvement over the option that does not.

## **Logan Corridor**

The Commission should note at the outset that the ALP's proposals for Beenleigh, Woodridge and Marsden do not operate independently. They form part of a single integrated redesign of the entire Logan corridor and its interface with the Gold Coast, involving cascading changes across at least seven electorates.

The ALP proposes to move Bethania from Woodridge into Beenleigh; to remove Gold Coast localities from Beenleigh into Oxenford; to rebalance Oxenford by transferring Studio Village and southern Oxenford into Gaven; to return Guanaba from Gaven to Oxenford; to transfer Merrimac and parts of Carrara from Gaven into Mudgeeraba; to move Emerald Lakes from Gaven into Southport; and to reprofile both Woodridge and Marsden around new spines.

These changes are further connected to the ALP's proposal to transfer South Ripley into Ipswich West, which requires parts of Logan (Glenlogan, parts of Jimboomba) to shift into Greenbank and Moggill to absorb portions of Pine Mountain, Muirlea and Blacksoil.

While individual moves within the package are presented with community-of-interest justifications, the cumulative effect should not be obscured. Taken together, the package touches Beenleigh, Woodridge, Marsden, Oxenford, Gaven, Mudgeeraba, Southport, Logan, Greenbank, Ipswich West and Moggill - at minimum eleven electorates - and displaces thousands of electors from their current or proposed boundaries.

A proposal of that scale is not a refinement of the draft. It is a secondary redistribution advanced at the objection stage. The scale of elector displacement is itself a relevant consideration.

Targeted refinements affecting a limited number of electors can be implemented within the Commission's draft architecture. Proposals requiring extensive movement across multiple districts should demonstrate commensurately greater public benefit. No such necessity is established here.

To the extent discrete concerns arise from the draft, they are capable of confined treatment without reopening the broader corridor. The Commission's draft reflects a considered balancing of the statutory criteria across the Logan–Gold Coast region.

The LNP submits that the preferable course is to preserve that work and adopt only the targeted refinements identified in the LNP's original objection - the transfer of Cedar Vale and Woodhill into Logan - which improve community-of-interest alignment without disturbing the Commission's configuration elsewhere.

## **Beenleigh**

The ALP proposes to restore Beenleigh as an electorate sitting entirely within the Logan local government area. This would require transferring Bethania from Woodridge into Beenleigh and removing the Gold Coast localities of Yatala, Luscombe, Ormeau Hills and the balance of Ormeau. The LNP opposes this.

The ALP's case rests on the assertion that the Logan River isolates Bethania from the balance of Woodridge. It does not. Bethania station sits on the Gold Coast heavy rail line, providing direct, frequent services to Loganlea, Woodridge and the broader corridor. School catchments confirm the connection - Loganlea State High School draws enrolments from both sides of the river.

Furthermore, the Queensland Government's Logan to Gold Coast Faster Rail project will deliver a new pedestrian bridge over the Logan River directly linking Bethania to the balance of the Woodridge electorate. Bethania and Woodridge are connected now by heavy rail and school catchments; they will be further connected by active transport infrastructure that is already in planning. The Commission is required under section 46(1)(e) to have regard to demographic trends and the trajectory of communities — not merely their present configuration. State planning policy does not treat the Logan River as a barrier at this location. The Commission should not either. The ALP has not demonstrated otherwise.

The Commission's inclusion of the northern Gold Coast localities within Beenleigh reflects the tight social, community and economic ties between Beenleigh and the northern Gold Coast corridor. These ties are substantiated by public transport links that do not merely pass through the electorate but originate from Beenleigh and travel deliberately into the suburban and manufacturing centres of the northern Gold Coast, including the 729 and 728 bus services. Beenleigh functions as the civic and commercial anchor for these communities. The Commission recognised this in its draft and was right to do so.

The ALP's insistence that Gold Coast seats must sit entirely within the city boundary is a political preference, not a statutory requirement. Having considered the Commission's proposal, the LNP believes it represents a more elegant solution than our original proposal. The Logan to Gold Coast faster rail project creates genuine functional links between the northern Gold Coast and southern Logan, better reflecting emerging communities of interest than a boundary drawn purely along LGA lines. We prefer the Commission's proposal on its merits.

The ALP's Beenleigh proposal is not directed at correcting a discrete deficiency. It is the entry point for a major redraft of the entire Logan corridor. The Commission should assess it accordingly.

The LNP's position on Beenleigh is straightforward: the Commission's draft configuration achieves an acceptable enrolment balance without the upheaval the ALP proposes. The LNP's original submission identifies a single targeted improvement - the transfer of Cedar Vale and Woodhill into Logan, reflecting their stronger functional relationship with Logan LGA communities.

That correction can be made within the Commission's existing architecture. The ALP's proposal cannot.

## **Logan**

The ALP proposes to extend Logan's western boundary further south along the Mount Lindesay Highway to include Glenlogan and parts of Jimboomba, in order to rebalance enrolments after South Ripley is removed from Greenbank and transferred to Ipswich West.

This is not a community-of-interest argument for Logan. It is an arithmetic consequence of a decision made elsewhere. The Commission should be cautious about altering the composition of Logan - a seat that bears the name of the region it serves - in order to solve an enrolment problem created by the ALP's South Ripley transfer.

The residents of Glenlogan and Jimboomba are not proposed for inclusion in Logan because they share a demonstrated community of interest with existing Logan communities. They are proposed for inclusion because the ALP's broader model requires the numbers to work.

The LNP's original submission proposes the transfer of Cedar Vale and Woodhill into Logan. Those communities are bounded by the Logan River to the west and the Logan City LGA boundary to the south, and share a functional relationship with the seat that bears their region's name. That is a community-of-interest argument.

The Commission should prefer it to the ALP's approach, which treats Logan as a receptacle for displaced electors from other electorates' redesigns

## **Marsden / Waterford**

Both the LNP and the ALP identify deficiencies in the Commission's draft treatment of the existing Waterford electorate. That convergence is notable. However, the two parties propose materially different remedies, and the Commission should be attentive to the difference.

The ALP proposes a broad reprofile of Marsden around Scrubby Creek, the M1, the Logan River and the Crestmead edge, retaining Waterford West, Loganlea, Meadowbrook, Tanah Merah, Loganholme and Logan Reserve together. The ALP's own analysis shows that only 18 per cent of existing Waterford electors would be retained in proposed Marsden under the Commission's draft, and presents its model as a significant continuity improvement.

The LNP does not dispute that the draft creates disruption in this area. However, the ALP's remedy is inseparable from its broader Logan corridor redesign. The reprofile of Marsden requires corresponding changes to Woodridge, which requires changes to Logan, which

requires changes to Greenbank, and so on. The Commission cannot adopt the ALP's Marsden in isolation because it does not balance in isolation.

The LNP's proposal is self-contained. Transferring the Park Ridge area, including the portion east of Mount Lindesay Highway and south of Green Road, into Logan allows Waterford and Waterford West south of Kingston Road to be returned to their natural electorate.

The seat retains the established name Waterford, preserving voter recognition and continuity consistent with section 46(1)(d). This achieves meaningful continuity improvement without the cascading disruption the ALP's model demands.

## **Woodridge**

The ALP proposes to reprofile Woodridge using a transport spine of Kingston Road, Wembley Road and Browns Plains Road, retaining Woodridge, Logan Central, Berrinba, Heritage Park and part of Browns Plains, and uniting larger parts of Regents Park and Kingston. The ALP contends this retains 67 per cent of existing Woodridge electors compared to 37 per cent under the Commission's draft.

The continuity figures the ALP presents are selectively framed. Any model can be made to appear superior to the draft by choosing which electors to count and which metric to forego.

The relevant question is not whether the ALP's model retains a higher proportion of existing electors in one seat, but whether it delivers a better overall outcome across the region when all consequential changes are accounted for.

The ALP's proposed Woodridge boundaries cannot be adopted without also adopting the ALP's Marsden proposal, which cannot be adopted without the ALP's Logan, Beenleigh, Greenbank and Ipswich West changes. The Commission is not being asked to improve Woodridge. It is being asked to accept an eleven-electorate redesign on the basis that one seat's continuity percentage improves.

The LNP submits that the Commission's draft Woodridge configuration, while imperfect, represents a workable balance that does not require the cascading disruption the ALP proposes. Where discrete improvements are available - such as the Waterford restoration the LNP proposes - they should be pursued on their own merits rather than as components of a larger package.

## **Rockhampton / Keppel**

The ALP submits that the existing boundaries of Rockhampton and Keppel should remain unchanged, citing section 46(1)(d) continuity and the fact that both seats are currently within quota.

The LNP does not support this position. The Commission's proposed changes are modest, well-reasoned and address a demonstrable enrolment trajectory problem. Rockhampton is currently below the state average and projected to decline further. Keppel is above average and growing.

The transfer of further portions of Frenchville and Koongal from Keppel to Rockhampton corrects that imbalance using areas the Commission itself found to be well connected to central Rockhampton. The transfer of Pink Lily from Mirani unites the Rockhampton airport within a single district - a sensible administrative improvement that the LNP supported in its original submission (S-110).

The ALP's continuity argument, while relevant, does not override the Commission's obligation to produce durable boundaries. Leaving Rockhampton to decline further below quota while Keppel grows above it is not continuity - it is deferral of a correction that will only become more disruptive at the next redistribution.

The LNP submits that the Commission's draft configuration for Rockhampton and Keppel should be retained.

## **Ipswich West**

The ALP proposes transferring South Ripley from Greenbank into Ipswich West. On the ALP's own figures, this would produce an electorate projected at 24.59 per cent above quota by 2032 - nearly two and a half times the statutory tolerance. Community of interest is a relevant consideration. It is not the only one, and the Commission is required to weigh it against projected enrolment sustainability under section 46(1)(e).

The Commission's draft already considered this balance. The QRC transferred Karalee, Chuwar and Barellan Point to Moggill - a change the LNP supported - while gaining the balance of the Ipswich local government area from Scenic Rim. The result is an Ipswich West that remains wholly within the Ipswich local government area and is projected to grow toward the state average without exceeding the enrolment ceiling.

The ALP's proposal also has consequences beyond Ipswich West. It requires Pine Mountain, Muirlea and Blacksoil to be transferred into Moggill, and parts of Jimboomba and Glenlogan into Logan, to rebalance the seats disturbed by South Ripley's movement. This is precisely the kind of cascading late-stage redesign that the objection phase is not designed to accommodate.

The Commission weighed South Ripley's placement, made a considered judgement, and produced a configuration that balances community of interest against medium-term enrolment durability. The ALP has not demonstrated that the draft is deficient - only that it prefers a different outcome.

The LNP submits that the Commission's draft configuration for Ipswich West should be retained. The Commission's judgement on South Ripley was sound and should not be reopened to facilitate the ALP's broader structural redesign of the Logan-Ipswich-Moggill corridor.

## **Burdekin / Mundingburra**

The LNP reiterates its original submission that Lavarack Barracks should be wholly contained within the seat of Mundingburra. Townsville's defence community constitutes a distinct community of interest under section 46(1)(a) and it is contrary to that principle for the barracks precinct to be entirely excluded from the three Townsville-based seats.

The LNP notes that the ALP (O-0724) also supports the transfer of metropolitan Townsville areas from Burdekin into Mundingburra. Both major parties identify the same functional problem. This bipartisan convergence should give the Commission confidence that a correction is appropriate.

Unlike broader redesign proposals elsewhere, this is a self-contained and practical correction with minimal collateral consequence. The Lavarack Barracks precinct is a single defence community with common facilities, workforce patterns and local identity.

## **Gaven**

The LNP reiterates its original submission that the Glades Golf Course, associated housing estates and the Breakwater area should be transferred into Gaven. These areas are bounded by Mudgeeraba Creek, access the Pacific Motorway westward toward Gaven, and have community ties to All Saints Anglican School.

The ALP proposes a much broader reconfiguration of Gaven involving multiple compensating transfers across the Gold Coast. The LNP opposes this broader package. No evidence has been provided to argue for these cascading changes, which would affect multiple communities of interest and arguably demand further consultation outside of the statutory process.

The LNP's Glades/Breakwater proposal is a simpler, less disruptive correction that can be assessed on its own merits without requiring compensating changes across multiple Gold Coast electorates.

The three community objections naming Gaven (O-0062, O-0373, O-0514) raise general boundary-coherence concerns in the northern Gold Coast but do not provide the specific evidence that would justify the ALP's larger redesign.

## **Oxenford**

The LNP reiterates its original submission that the Riverstone Crossing community should be included within Oxenford by extending the electorate's southwestern boundary to the Coomera River. This is a natural-boundary correction, not a partisan claim, and is consistent with the ALP's own use of the Coomera River as a boundary feature.

The LNP opposes the ALP's broader Oxenford proposal, which involves transferring the Gold Coast localities of Yatala, Luscombe, Ormeau Hills and the balance of Ormeau into Oxenford as part of its major Logan–Gold Coast redesign. This would fundamentally alter Oxenford's character and is driven by the ALP's desire to remove Gold Coast areas from Beenleigh, not by any community-of-interest evidence specific to Oxenford.

The Commission should adopt the narrow Coomera River / Riverstone Crossing refinement and decline the ALP's wider reconfiguration.

## **Moggill**

The ALP proposes that Moggill gain portions of Pine Mountain, Muirlea and the balance of Blacksoil north of the Warrego Highway and east of Brisbane Valley Highway. The ALP does not argue that these communities have a demonstrated connection to Moggill. Instead, the ALP states openly that the transfer "facilitates the increased enrolment gained by Ipswich West taking in South Ripley."

This is not a community of interest argument for Moggill. It is an arithmetic consequence of the ALP's South Ripley proposal. The Commission should not alter Moggill's boundaries to solve an enrolment problem created by a change the ALP proposes elsewhere.

The Commission's draft configuration for Moggill was carefully considered. The QRC noted that Moggill was at the lower end of the enrolment threshold and projected to fall out of quota by 2032. The inclusion of Karalee, Chuwar and Barellan Point - which the LNP

supported in its original submission (S-110) - was tested against community-of-interest evidence before adoption. The Commission was satisfied that a community of interest exists, and the resulting enrolment is significantly improved.

The ALP does not challenge any of this. It simply proposes to load additional Ipswich-facing localities into Moggill so that its South Ripley transfer works numerically. Pine Mountain, Muirlea and Blacksoil have no argued connection to Kenmore, Chapel Hill, Pullenvale or Bellbowrie. They would be placed in Moggill not because they belong there, but because the ALP's model needs somewhere to put them.

The LNP submits that the Commission's draft configuration for Moggill should be retained.

## **Maryborough / Hervey Bay**

The LNP reiterates its original objection (O-0719) on three confined points.

First, Burrum Heads is effectively isolated from the Burnett electorate. The nearest crossing of the Isis River is at the Bruce Highway, meaning travel from Burrum Heads to communities on the opposite side of the river mouth takes approximately one hour and twenty minutes. Burrum Heads is principally served by the Maryborough and Hervey Bay communities via Hervey Bay–Burrum Heads Road. Its natural home, on any proper application of section 46(1)(b), is the Maryborough electorate.

Second, to offset this adjustment, Tiaro, including the Tiaro State Forest and areas west of the Mary River currently within Maryborough, would more logically sit within Gympie.

Third, the Hervey Bay Hospital precinct should be returned to the Hervey Bay electorate. The LNP notes that this point is supported by substantial community evidence, including from the Deputy Mayor of the Fraser Coast Regional Council (O-0703) and Margaret Shaw OAM (O-0337), both of whom identify the separation of the hospital from the community it primarily serves as a significant concern. Returning the hospital precinct to Hervey Bay is a discrete correction that does not require broader reconfiguration.

These are targeted adjustments that improve community-of-interest alignment and travel coherence within the Fraser Coast region. The consequential adjustments to Gympie and surrounding electorates are modest and do not require the kind of wholesale corridor redesign proposed elsewhere.

## **Callide**

The LNP supports practical refinements where they improve rural representation, reduce travel distances for constituents, and respect local government coherence.

The LNP opposes the ALP's proposal to transfer Fraser Coast rural electors into Callide as part of a wider Sunshine Coast/Wide Bay balancing exercise. This would expand an already geographically vast rural electorate and dilute the representation of existing Callide communities.

Large rural districts should not be treated as balancing mechanisms for metropolitan or coastal pressures. Any Callide adjustment should be justified by demonstrated gains to representation and travel practicality, not by arithmetic convenience alone.