



**THE FEDERAL
REDISTRIBUTION
NEW SOUTH WALES**

Comment on Objections 212

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6 pages

Chairman
New South Wales Redistribution Committee
Australian Electoral Commission

25 July 2024

**Subject: Comment on Objections to the AEC draft redistribution plans
- In particular relating to abolition of the federal seat of North Sydney**

Dear Committee members

My name is Margaret Stoneman, a resident of Kirribilli in the electorate of North Sydney.

Having looked at multiple Objections to the proposed redistribution and analysed the AEC's own more recent data in depth, I draw attention in this submission commenting on the Objections to a number of statistical facts. My main issues in summary relate to three areas:

- Actual AEC data show that since the AEC base date, the Division of North Sydney has grown by 1.05% - a rate of 1.8% pa. This is twice as fast as the 0.84% pa average annual growth in the 55 months prior to that date (a period equivalent to the AEC's projection period). This proves the AEC's projected decline of 0.06% is based on a fallacy.
- Some serious anomalies in the AEC projections for the redistributed electorate of Warringah into which approx. a third of North Sydney is to be shoe horned.
- A suggested redistribution that reduces the number of electorates in the Northern Sydney metropolitan region. With modest adjustments in the boundaries of four contiguous electorates and the merging of the balance of Bradfield with Berowra.

1 Electoral Roll projections and base data

Objections 602, 686, 729, 302, 323, 324 and many others raise the issue of the large gap between the AEC's projected growth for the Division of North Sydney and the reality of what is so obvious for those who actually live in the division. Objection 602 by Penny Scardifeld, a long serving former Councillor and Deputy Mayor of North Sydney LGA draws specific attention to the AEC's own published electoral roll data.

The AEC's projected decline of 0.06% in enrolment over the period from 9/8/23 to 10/4/28 has already been overtaken by reality in the AEC's latest gazetted data as at 31 May 2024. In the ~seven months since the AEC's base date the North Sydney electorate has already grown by 1.05%. This is more than twice the average rate of growth over the preceding 4 years and 7 months (a period equivalent to the AEC's projection period).

Disenfranchisement: All of the Divisions in the Table feature in the AEC's proposed abolition of North Sydney and redistribution of its constituents in three randomly determined parts. Parts that are most notable for the arbitrary division of what is currently a cohesive division with a shared Community of interest. Constituents are randomly disposed into neighbouring electorates with very different community interests and lifestyle values. These parts therefore become mere appendages at the periphery under the AECs and various other proposed redrawing of boundaries.

AEC published electoral roll data yields the following facts for the electoral divisions in the Northern Sydney region:

Current electoral division	Electoral roll 31/5/24 (latest data)	Growth since 2016 redistribution	Growth last 4yrs+7mths	AEC projected growth 9/8/23 to 10/4/28	Growth since AEC base 9/8/23	Growth since last election
Bennelong	117,674	12.13%	7.39%	4.57%	0.76%	2.30%
North Sydney	113,808	7.84%	3.85%	-0.06%	1.05%	1.88%
Mackellar	113,290	5.83%	2.27%	5.61%	1.42%	1.80%
Bradfield	109,825	4.54%	2.39%	0.36%	0.64%	1.15%
Berowra	107,500	2.53%	1.13%	2.26%	0.71%	1.22%
Warringah	107,346	5.75%	2.55%	0.19%	1.50%	1.89%
NSW total	5,628,867	11.90%	6.13%	7.12%	1.12%	2.86%

To summarise a few facts, all of which are based on actual gazetted AEC data, relating to the period subsequent to the previous Federal electoral redistribution for NSW in 2016:

- There are 17 electoral divisions that fall further below the AEC's designated redistribution Quota; 12 of these are metropolitan divisions.
- North Sydney grew 7.84% between the previous redistribution and the AEC's base date of 9/8/23. This is significantly faster than any of these electorates apart from Cook (8.00%) and Grayndler (7.86%) that grew only marginally faster. Arguments that
- The slowest growing divisions by quite a margin were Berowra (2.53%), Wentworth (2.78%) and Bradfield (4.54%). Berowra and Bradfield have grown much more slowly than the other electorates in the northern Sydney region. since the last election

The only apparent rationale for abolishing North Sydney is because Warringah, Bradfield, Mackellar and Berowra need the numbers, having staved off intensified development and associated population growth in their own low density suburban electorates. This is unjust and unreasonable at many levels.

Unfounded and inequitable proposed abolition: As many other objectors have pointed out, the AEC has not articulated in its report the basis on which it jumps from identifying 14 metropolitan electorates suggested for abolition on the basis of demographics to singling out North Sydney for abolition. This proposal is based on flawed and inaccurate data, demonstrated by the AEC's own data.

Accepting at face value, the AEC's determination that the electorate to be abolished must be a metropolitan one, there appears no equitable reason for deciding that should be North Sydney. On the contrary, as the data above prove, there are many other candidates for more justifiable consideration based on their much slower real world growth performance.

Some objectors, such as the current Member for Warringah, Ms Zali Steggall in **Objection 671**, argue that inner metropolitan Divisions like Warringah, are established and therefore unlikely to see strong population growth. This is very obviously disproven by the case for North Sydney. Perversely, it seems that its strong growth among metropolitan electorates makes it a target for abolition in order to boost the flagging numbers in much slower growing areas like Bradfield, Warringah, Mackellar and Berowra. This is iniquitous.

In essence, those electorates where Nimbyism has averted the intensification of development that leads to population growth, are seeking to be subsidized by the dismemberment of an electorate that has embraced change. An electorate in which the concentration of development is already in the process of experiencing a further acceleration in such development.

Housing and associated projected population growth; Take just one number from Objection 671, the claim that 12,300 new homes are to be constructed by 2029 in LGAs from which Warringah draws its constituents. She rather ingenuously fails to point out that that figure is comprised of:

- 5,900 for the whole of the Northern Beaches LGA, which includes practically all of the electorate of Mackellar, approx. 40% is in Warringah so 2,360 houses at best,
- A mere 500 for Mosman LGA (entirely within Warringah), and
- 5,900 for North Sydney LGA, a small fraction of which falls within Warringah and that an area in which development was previously intensified and not slated by the NSW for further intensification. So really maybe 300 on a generous calculation.

Realistically, a figure of 3,160 would be closer to the truth, about a quarter of that claimed. The electorate of Mackellar contributes a little more to the housing goal with 3,540 prospective homes. While, for Bradfield a projected goal of 7,600 would equate to the NSW government's goal for Ku-ring-gai LGA.

These modest housing targets, and associated population growth projections, pale into insignificance when compared with the Division of North Sydney. Where the NSW government goals point to:

- 5,900 new homes in North Sydney LGA alone, and estimated 5,600 of which fall within the Division.
- 3,400 in Lane Cove LGA, all in North Sydney division,
- 400 in Hunters Hill LGA, all in the Division, and
- 3,400 in Willoughby LGA, approx. half of which (1,700) fall within the division
- A total of 11,100 in the North Sydney electorate by 2029, or 350% to 330% of that slated for Warringah or Mackellar.

This alone crystallises the injustice of the AEC choosing to recommend abolishing the Division North Sydney.

2 Similarity between the AECs proposed redistribution and Suggestion 47.

Objection 578 following up on **Suggestion 47** by the Liberal Party of Australia, NSW Division AEC raised red flags with me when on reading the "Objection" I looked more closely at Suggestion 47.

The fact that the Liberal Party could find nothing it would like to have modified in the AEC's proposed redistribution report, contrasted with that of the Labor Party, the Greens and even the National Party. It also sits oddly with the very detailed and closely argued submissions and Objections of, for example, the sitting Members for North Sydney and Warringah.

My concern only increased on looking further into the actual data published by the AEC, and into the data and projections I analysed prior to submitting in my own **Objection 720**. My research has remained focused on the Northern Sydney region within which my electorate is based.

The following table sets out a comparison of the AEC proposal for this area and that submitted in Suggestion 47. The significant difference being that, in accord with the AEC I retain the existing Electoral Division names, to do otherwise would risk misleading other readers. A risk that I believe is borne out in some of the objections submitted. The sleight of hand in Suggestion 47 appears to have duped even the analytical Election guru, Anthony Green, at first reading.

In Table F in the AEC’s report on the NSW proposed redistribution, tabulating both Suggestions and Comments on those suggestions, I observe that the Liberal Party does not appear under either “Division of North Sydney should be abolished” or Division of North Sydney should not be abolished”. This despite the fact it provides details in S47 of how it should be redistributed between three electorates, one of which is renamed. This is at best confusing. Nor does it appear in the various permutation of Warringah’s boundaries. Yet the Nationals appear in the listings relating to both these Divisions.

What does become clear nonetheless, for those constituents arguing to retain the Division of North Sydney, in looking at S47 in detail is that the Liberal Party, NSW Division is in reality proposing the effective abolition of North Sydney. This fact is to an extent disguised by suggesting renaming a proposed modified Division based on virtually the entirety of Warringah with a segment of North Sydney added but now calling it North Sydney. The AEC is not proposing such a name change, yet its redistribution is uncannily similar to that proposed in S47, as the table below shows.

Proposed division	Enrolment as at base date		Proposed enrolment 10/4/28		Projected growth	
	AEC	S47	AEC	S47	AEC	S47
Bennelong	123,253	123,678	127,105	127,722	3.13%	3.27%
Berowra	128,758	129,193	131,996	129,142	2.51%	-0.04%
Bradfield	125,471	129,175	125,668	129,332	0.16%	0.12%
Mackellar	126,148	123,357	133,225	130,211	5.61%	5.56%
Warringah	128,292	131,079	127,110	130,124	-0.92%	-0.73%

In looking at the AEC and S47 maps showing the proposed changes, almost every little offset, deviation and turn is replicated between the proposed boundaries. There is no indication that consideration has been given to the comprehensive **Suggestion 22** of Kylea Tink, the member for North Sydney, or **Suggestion 42** Zali Steggall, the Member for Warringah.

The parallels between the redistributed divisions in the Table above is even more surprising, in terms of the proposed electoral roll growth rates for Bennelong, Bradfield and Warringah, into which electorates the dismembered parts of North Sydney are redistributed. The only statistically significant variance is the AEC has 2,791 more existing electors in Bradfield and 27,787 fewer in Warringah and a respective variance of 3,014 on the projected numbers.

Shared numerical anomalies: This is even more surprising in the context where the AEC projects that the number of electors in North Sydney falls by 0.06% in the applicable period, while that for Warringah rises by 0.19%. Yet the revised Warringah is projected to fall by 0.92% (AEC) or 0.73% (Liberal Party), this presents a mathematical conundrum.

To approximate the declines in growth of Warringah projected by both entities, the North Sydney component of the revised electorate would have to decline by around 3%. The redistributed existing elector split is 71.8% Warringah and 28.2% North Sydney, from the southern parts of it. These include North Sydney – Waverton projected by NSW government to grow by 12.92% between 2023 and 2028, and Neutral Bay – Kirribilli projected to rise by 1.48%. Obviously, the falls implied by the AEC and S47 do not bear close inspection.

3 A simple alternative redistribution for the northern Sydney region:

Based on more up to date and accurate data, much of it published by the AEC I would suggest the following changes to the AEC’s proposed redistribution:

- Retain the Division of North Sydney, expanding it to include: the balance of North Sydney LGA currently in Warringah; and taking in the whole of Willoughby LGA. Any further small adjustments needed to be added from Bradfield.
- Realign the south-western boundary of Warringah to align with Mosman LGA western boundary. Expand Warringah northwards into Mackellar, which has an almost indistinguishable commonality on the norther beaches. Retains Killarney Heights in the Division and expand westwards into Bradfield in the area north of Middle harbour to the extent needed to achieve Quota.
- Expand Mackellar westward to incorporate St Ives and the western side of Bradfield to the extent necessary to achieve quota,
- Merge the balance of the Division of Bradfield with Berowra, in effect creating an upper north shore electorate,

An historical aside

A note of specific disagreement with **Objection 686**.

I am supportive of our local member Kylea Tink's **Suggestion 22** and her **Comment 51** but disagree with the alternative she suggests in Comment 51 and her Objection 686. I do not agree with any proposal to extend Warringah to the eastern side of the Warringah expressway. This is an entirely artificial delineation. As in this case, main roads that cut through the heart of community centres are inappropriate as electoral boundaries. To use them in this way is to cleave the strong communities that have evolved and coalesced around the Warringah expressway, the Pacific Highway and the North Shore line. Such use is antithetical to preserving Communities of interest.

In proposing to contract North Sydney's eastern boundary to the Warringah expressway she is cutting our small but very densely populated peninsula in half. This is contrary to the principles around natural geographic features.

The proposal is also and afront to the legacy of Ted Mack's historic contribution to truly representative democracy in Australia as the "father of independents". As a resident of the part of North Sydney Objection 696 proposes be excised, under this redistribution of the most historic part of the foundational North Sydney electorate he would not have been eligible to be vote in the electorate to which he devoted such a landmark decade of representation.

In the light of its own more recent gazette data and more informed projections, rather than superseded ABS extrapolations, I would ask the Committee to reconsider its proposal to abolish the division of North Sydney. It would be an unwarranted and a great mistake to carve it up on an ad hoc basis between neighbouring electorates that share few of its particular characteristic as a rapidly intensifying, inner metropolitan area.

Yours faithfully

Margaret Stoneman

