



**THE FEDERAL
REDISTRIBUTION
NEW SOUTH WALES**

Objection 237

Ben Wilson

7 pages

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NSW, 2065

3/7/2024

To:

The NSW Redistribution Committee
Australian Electoral Commission

Objection to the redistribution of electoral boundaries abolishing the Federal Division of North Sydney

Dear Committee,

I am writing in objection to the recommendation of the Redistribution Committee which has the effect of abolishing the Federal Division of North Sydney.

The Committee's recommendation to abolish North Sydney is flawed and the redistribution proposal should be revisited in a manner than addresses key failings in the proposed redistribution.

I submit the current redistribution proposal is based on unreliable and inaccurate demographic projections for the localities of St Leonards, Crows Nest, and North Sydney, to arrive at a misconceived solution which fails the community of interest test and which will undermine effective representation for our community which is, arguably, the most critical impact of this flawed proposal.

1) Flawed demographic projections

The recommended boundary changes that abolish North Sydney are predicated on inaccurate projections for population growth within the existing North Sydney boundaries.

The population of North Sydney on its current boundaries is growing not falling.

Multiple state and local planning policies are designed to ensure this growth will accelerate significantly over the next ten years.

The use of historic demographic data which does not take into account current planning policies, developments under construction and actual population movements sets the scene for a perverse outcome.

As proposed, the boundaries of Warringah, Bennelong and Bradfield are to be redrawn to trifurcate the existing North Sydney electorate and converge at a point near the Pacific Highway in Crows Nest / St Leonards.

Crows Nest is identified by the NSW Department of Planning as a strategic and priority population growth node underpinned by the new metro stations at Crows Nest and Victoria Cross (North Sydney) and associated over station high density residential development, as well as high density residential infill development at St Leonards South.

The NSW Department of Planning website says this:

“The 2036 Plan leverages the existing public transport infrastructure and the future Crows Nest Metro Station to support the growing St Leonards and Crows Nest community with the provision of new infrastructure, open spaces, upgraded cycle lanes and planning for health and education.

*The plan will **deliver 6,680 new homes**, planning capacity for an extra 119,979 sqm employment floor space and 16,500 new jobs in health, education, professional services and the knowledge sector.*

This is for Crows Nest / St Leonards alone.

These planning projections are completely at odds with the dataset used by the AEC which predicts that by 2028 there will be a decline in electors in 30 out of 35 SA1s in Crows Nest / Waverton and a decline in electors in 14 out of 29 SA1s in St Leonards / Naremburn. One only needs to walk the streets of the community to know that this projection bears no connection to reality.

Actual examples of incorrect demographic projections:

I provide here three examples of many inaccuracies in the enrolment projections with photographic examples of actual residential developments.

All information sourced from AEC data spreadsheet Actual and projected enrolments
Example 1:

SA1 12101168714: Willoughby

Actual enrolments 9/8/23: 334

Projected enrolments: 10/4/28: 318

Growth: - 4.79%

Actual development on site: 442 residences. Projection = less than 1 elector per residence.
Construction completed development now on sale.



Example 2

SA1 12101168501: Greenwich / Riverview (Canberra Avenue St Leonards South: 2,000 new dwellings)

Actual enrolments 9/8/23: 262

Projected enrolments 10/4/28: 256

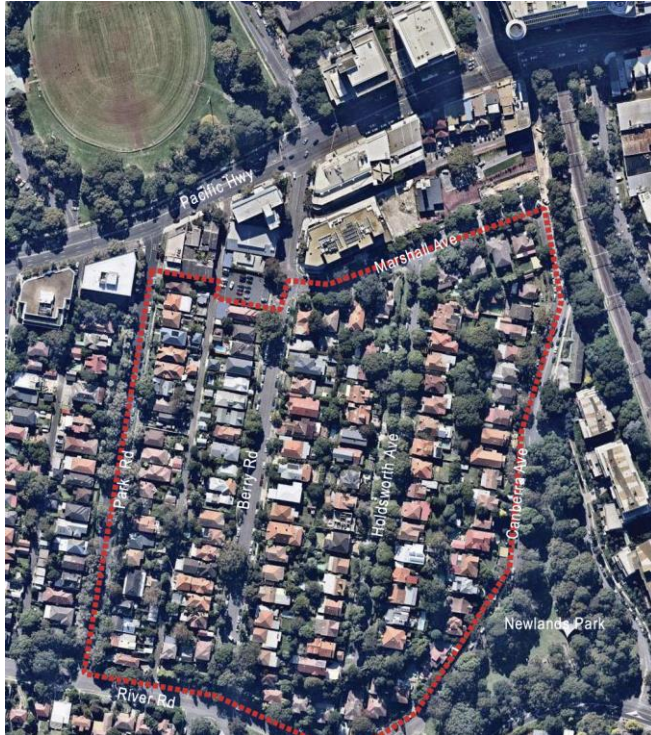
Growth: - 2.29%

Actual development

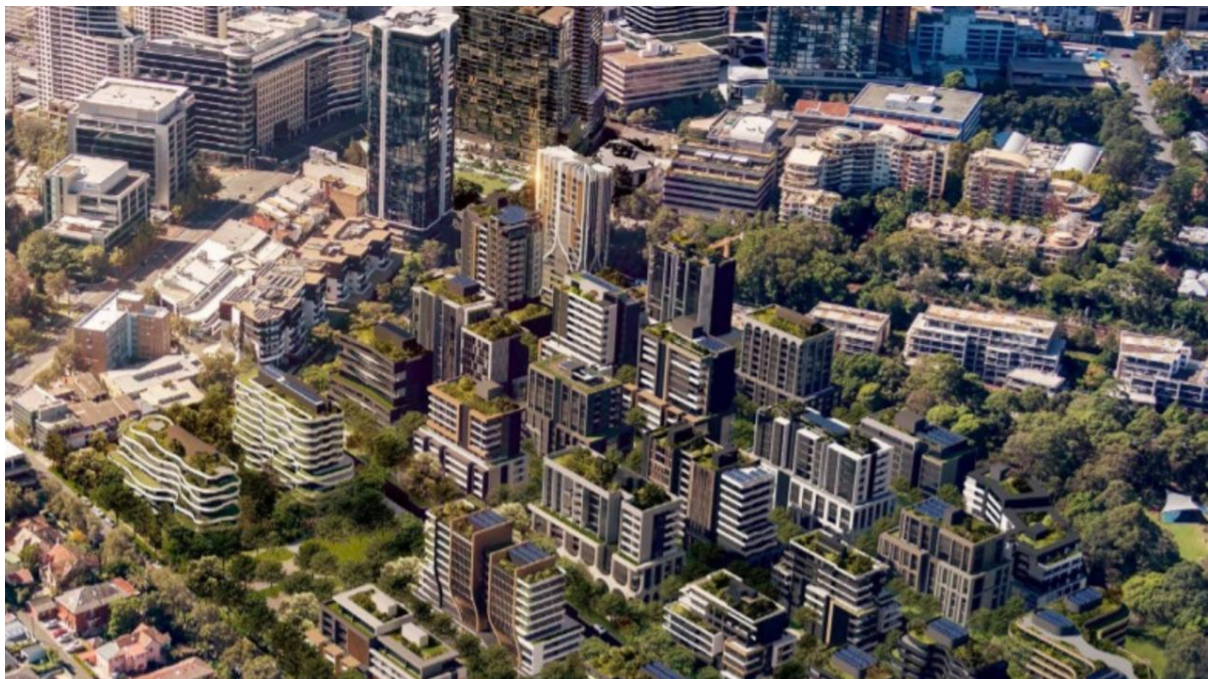


The image below shows the precinct development currently under construction in **SA1 12101168501** and **SA1 12101168520**.

Before:



The combined actual elector numbers for this precinct at 9/8/2023 (Above) was 605
The projected elector number for 10/4/28 (below) is estimated at 626. An increase of 21 electors. This is patently and self-evidently inaccurate and an incorrect basis to determine boundaries.



Similarly, the projected negative movements in elector numbers relied on to support the redistribution are not supported by actual residential densities as medium density and infill developments continue at pace across the electorate.

The proposed redistribution places the intersection of three electorates in the heart of this Crows Nest / St Leonards growth node ensuring only that a further redistribution will be likely be required in four years time. The practical effect of this will mean that electors living in the highest density zone on the entire lower North Shore within 100 meters of each other could be living in one of three different electorates, each represented by different MPs.

2) The Community of Interest test

The proposed boundary redistribution fails the community of interest test.

The boundaries as proposed sever the highly connected and integrated communities of Lane Cove, Greenwich, Crows Nest, North Sydney, Waverton, Wollstonecraft dispersing them in three directions grafting them to electorates where there is no community of interest at all.

In the case of the new boundaries of Bennelong, there is no community of interest between my community of Greenwich and Denistone or North Epping at the far western extremity of the Division of Bennelong.

In my case, I shop at Crows Nest and Chatswood, my children go to school in Roseville, my sporting interests and community organisations are anchored in and organised around the communities which radiate from the T1 North Shore rail line. There are no community of interest connections to the west of the Lane Cove River and Victoria Rd.

Similarly, grafting the communities of Wollstonecraft, Crows Nest and Waverton into the Division of Warringah defies any community of interest analysis. It is impossible to suggest a community of interest exists between these communities and Curl Curl on the northern beaches. The community of interest case has not, and cannot be made between any of the suburbs west of the Warringah freeway and the northern beaches and Brookvale end of the Warringah electorate.

There is some community of interest case to be made between Bradfield and North Sydney, given the significance of the T1 North Shore heavy rail line which serves as an economic and transport spine of the two electorates. However, given the points raised regarding the unrealistic demographic projections for Crows Nest / St Leonards / North Sydney it is inherently logical that that this node of population growth should sit wholly within the boundaries of one electorate – not trifurcated between three.

The proposed boundaries do not respect either natural or physical boundaries. Vaulting over both Middle Harbour and the Warringah Freeway to cross Warringah into North Sydney, and

ignoring the opportunity to use the Lane Cove River as a natural boundary between the existing North Sydney and Bennelong.

3) Dilution of effective representation

The communities of North Sydney, Lavender Bay, Waverton, Wollstonecraft, Greenwich, Lave Cove, Crows Nest, St Leonards, Naremburn, and Willoughby are strongly bound by deep and enduring community networks, associations, organisations, educational and economic links. North Sydney enjoys a cohesive and connected community affinity and identity. In the same way there is a common community of interest between Mackellar and Warringah linked by the Northern Beaches.

It is anathema to nurturing and supporting vibrant and cohesive communities to carve up North Sydney's strongly aligned communities and graft them onto three equally disparate electorates each with their own specific and distinct identity and affinities.

Nowhere is this more evident than where the proposed new boundaries of Bennelong, Bradfield and Warringah converge in Crows Nest / St Leonards. This is the highest density and fastest growing area in any of the three electorates and yet it is here at this very epicentre of growth that the Commission proposes to place the intersection of three electorates which have their respective centres of gravity on the northern beaches (Warringah), Ryde (Bennelong) and the Upper North Shore (Bradfield).

The AEC redistribution process is importantly apolitical and independent.

But it should not be blind to the potential real-world outcomes of the boundaries it proposes and the impacts they may have on the effectiveness of representation for a community.

In this case, the boundary redistribution is likely to have a material adverse impact on the effectiveness of the representation of residents in the Crows Nest / St Leonards / Waverton / Naremburn precincts. These are strongly co-related, cohesive localities with a very strong community of interest.

It is entirely foreseeable, even likely, that the proposed boundary redistribution produces an outcome which sees each of Bennelong, Warringah and Bradfield represented by either of the major parties and/or an independent candidate.

One such scenario could be Bradfield (Liberal), Warringah (Independent) and Bennelong (ALP).

The AEC must not concern itself with the identity or affiliation of the elected MP, but must surely consider the interests of the electors to potentially have their single, high community of interest locality (Crows Nest / Waverton / St Leonards / Naremburn) represented by three different MPs none of who's core electorates share a community of interest with those at the absolute epicentre of the boundary change.

The impact of the boundary change has a disproportionate impact on a high proportion of electors who's community is cleaved among three electorates, rather than minimalist changes that impact lesser numbers through minimalist boundary adjustments which are available to the AEC.

I note in passing that the AEC's draft redistribution broadly delivers the submitted proposals of the ALP (to extend Bennelong eastward) and the Liberal Party (to extend Warringah westward) and has absolutely no regard whatsoever for the submissions of the sitting Member for North Sydney. #justsayin'

A proposal that passes the community of interest tests and meets quota requirements

A solution is available to the AEC that meets the elector quota requirements, passes the community of interest test and maintains the Division of North Sydney.

This can be achieved by:

- Preserving North Sydney and adjusting its boundaries of North Sydney northwards to incorporate additional electors in the Chatswood area (community of interest maintained and quota achieved)
- Adjust the boundaries of Mackellar east towards St Ives and westward towards Hornsby with commensurate changes to the boundaries of Bradfield and Bennelong to meet quota similar adjustments can also be made to Warringah.
- The requirement to reduce the number of electorates can be fulfilled through the abolition of a Division which is more consistent with natural boundaries and community of interest considerations and with lower growth forecasts than those which **should be applied** to North Sydney.

Ben Wilson, Greenwich