



**THE FEDERAL
REDISTRIBUTION
NEW SOUTH WALES**

Comment on suggestion 79

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7 pages



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FEDERAL MEMBER FOR WARRINGAH

10 November 2023

Redistribution Committee for New South Wales
Australian Electoral Commission
Locked Bag 4007
Canberra ACT 2601

Redistribution Committee

Re: NSW electoral boundaries redistribution - Division of Warringah and surrounding divisions

I note that pursuant to the AEC published timetable, suggestions for redistributions in NSW went public on 30th October 2023. I refer to my submission dated 26th October 2023 – Suggestion 42.

A number of suggestions made proposals in respect to and impacting the Division of Warringah.

Please find below my comments in reply to suggestions relating to the Division of Warringah. In making these comments, I am mindful of Section 66(3)(b) of the Commonwealth Electoral Act that requires the Redistribution Committee give due consideration to the following elements in relation to each proposed Electoral Division.

Section 66(3)(b) “subject to paragraph (a), shall give due consideration, in relation to each proposed Electoral Division, to:

- (i) community of interests within the proposed Electoral Division, including economic, social and regional interests;
- (ii) means of communication and travel within the proposed Electoral Division;
- (iv) the physical features and area of the proposed Electoral Division; and
- (v) the boundaries of existing Divisions in the State;

and subject thereto the redistribution quota for the State shall be the basis for the proposed redistribution, and the Redistribution Committee may adopt a margin of allowance, to be used whenever necessary, but in no case shall the redistribution quota be departed from to a greater extent than one tenth more or one tenth less.”

1. General comments in reply

- a) The Committee faces a complex exercise to reduce the 47 divisions of New South Wales to 46. This submission does not address the whole of New South Wales and extensive redistribution that will occur. It is limited to the Division of Warringah and consequential impacts on surrounding Divisions. As boundary changes on one Division have flow on impacts on neighbouring Divisions, my Suggestion 42 and these additional comments in reply seek to minimise impact on neighbouring Divisions whilst prioritising consideration of the elements in Section 66(3)(b) of the Commonwealth Electoral Act set out above. This submission in reply further supports the proposals for boundary redistribution contained in Suggestion 42.
- b) Most suggestions addressing or impacting the Division of Warringah recognise that the Division of Warringah reflects a clearly distinct community with a western boundary extending into the Division of North Sydney. These suggestions also recognise that Warringah is a settled area, bound by coastline, with little room for population growth. It is broadly accepted that a mostly westward boundary shift will be necessary to meet the population criteria for the Division of Warringah.

2. Considerations of Communities of Interest, Socio-economic similarity, and Transport Corridors

a) Southern area of Warringah Division

- i. Approximately 30 per cent of the voters of the Warringah Division are in the suburbs South of the Spit Bridge, the main transport thoroughfare for the area, linking the Northern peninsula and beaches to the areas of Mosman, South Cremorne and Neutral Bay.
- ii. From Spit Bridge, Military Road is the main transport thoroughfare in the Lower North Shore connecting Neutral Bay, Cremorne, and Mosman. Along and adjacent to it are major supermarkets in Neutral Bay, the areas only picture theatre, the Cremorne Orpheum, the areas only public library, the Mosman Library, the shopping village of Mosman Junction and service stations, cafes, restaurants, and professional offices. These facilities are used by the population of the Lower North Shore for shopping, recreation, and social activities. They are shared by that area, not confined to Local Government Area (LGA) boundaries.
- iii. The Lower North Shore's only public high school, Mosman High School, has a catchment area that stretches from Mosman to Kirribilli. It is linked to five primary schools in the area, Middle Harbour Primary, Mosman Primary and Beauty Point in Mosman, Neutral Bay Primary and Cammeray Primary to form the Harbourside Schools Network. The non-government schools of the area, Redlands in Cremorne, Queenwood, Mosman Preparatory and Blessed Sacrament Primary School in Mosman all take much of their enrolments from students residing in the Lower North Shore.
- iv. The Harbour Trust areas of Chowder Bay, Georges Heights, Middle Head in Mosman and former Sub Base Platypus in Neutral Bay along the shores of Sydney

Harbour are all used extensively for recreation and exercise by citizens across the Lower North Shore.

- v. Accordingly, these areas all share essential community of interest and will benefit from being in a single federal electoral division.

b) Northern area of Warringah

- i. Long Reef Headland, immediately north of Dee Why serves as a prominent landmark and boundary between the southern end of the peninsula on which Warringah is based and the northern end on which Mackellar is situated.
- ii. Warringah is not, as it is often assumed because it includes the suburb of Mosman, a North Shore seat. It is a seat with approximately 70 per cent of its voters north of the Spit Bridge on the peninsula in beach side suburbs and the Forest area. The Division of Warringah is predominantly characterized by a coastal and beaches lifestyle.
- iii. Although a continuous strip of beaches line the coast, there is a notable difference in character between the more high-density southern and the lower density northern end of the peninsula. The density of population in the southern end of the peninsula has developed an active and storied sporting history. It has long supported six surf clubs and is associated in rugby league with the Manly Warringah Sea Eagles and in rugby union with the Manly Marlins.
- iv. The suburbs of Dee Why, Curl Curl, Killarney Heights, Forestville, and Frenchs Forest, currently within the Division of Warringah, are strongly linked to the Warringah Mall shopping district and broader Manly Brookvale area as their commercial and social hubs.
- v. Further, the areas of South Dee Why, North Curl Curl include a number of secondary schools whose catchment areas are predominantly in the Division of Warringah and linked to the Manly beaches area, in particular, St Lukes Grammar school and Manly Selective Campus.
- vi. Manly Selective Campus forms part of the Northern Beaches Secondary College, a collaboration of individual school campuses, which also includes Freshwater Senior Campus, Mackellar Girls Campus, and Balgowlah Boys Campus all of which are in the Division of Warringah. Only Cromer campus is outside the Division of Warringah.
- vii. There is a strong community of interest in the southern peninsula that is better served by being united in a single federal electoral division.

3. Suggestion 47 – Liberal Party Submission

- a) Suggestion 47 submits for the Division of Warringah to be abolished but this appears to be a name substitution for a division that would cede much of its Northern area, with Frenchs Forest, Forestville and Killarney Heights (the Forest suburbs) and the south of Dee Why to the Division of Mackellar and compensate for these excisions by adding the whole of the North Sydney LGA into what is essentially a substantially re-drawn Warringah Division under the name North Sydney. The Liberal party proposal does not

identify how their proposal satisfies the primary considerations pursuant to the Australian Electoral Act of prioritising community of interest.

- b) Their suggestion substantially changes the character of the current division of Warringah, which is focussed around its two centres of activity and interest, North of Spit bridge with the beaches areas of Manly/Freshwater and Curl Curl and Forest areas, and South of Spit bridge, with the Lower North Shore area centred around Mosman, Cremorne and Neutral Bay.
- c) Suggestions to slice off substantial parts of the Division's northern suburbs of Dee Why, Curl Curl and Freshwater or the Forest suburbs cuts across the community of interests that binds those areas to the beaches, Manly and the coast, as set out above. This is reflected in school catchment areas, sporting clubs, areas of recreation and key commercial centres of Brookvale and Manly.
- d) Suggestion 47 alone recommends the abolition of the name of the Division of Warringah, one of the few Divisions with an indigenous name and the adoption of the name North Sydney. The community of Warringah recently voted 59% in support of constitutional recognition in the Referendum and strongly values and respects its First Nations' division name, culture and heritage. The name of Warringah should be preserved.
- e) Suggestion 47 reveals that the voter roll of its proposed 'new' seat is mainly from the existing Division of Warringah, with 71.8% living in the current Division of Warringah and only 28.2% in the current Division of North Sydney. On closer reading the seat abolished under its proposal is, in fact, the Division of North Sydney.
- f) Suggestion 47 by the Liberal Party is clearly politically motivated having lost the Division of Warringah at the 2019 Federal election to independent representation and failed to regain it at the 2022 election, and then having incurred the further loss of the North Sydney Division to an independent at the 2022 election.
- g) Suggestion 47 shows a disregard for the interests and priorities of residents of the Warringah and North Sydney Divisions and the character of these Divisions. It fails to take into account any of the necessary factors of community of interest, in particular that of economic, social and transport considerations. Accordingly, Suggestion 47 by the Liberal Party in respect to the Division of Warringah should not be given any weight.

4. Suggestion 48 - Labor Party Submission

- a) Suggestion 48 by the Labor Party proposes the ceding of the Northern area of the Division of Warringah, the suburbs of Dee Why, Curl Curl and Freshwater, to the Division of Mackellar with again little reference or explanation to the impact on economic, social and regional interests of these areas which are much stronger economic and social links to the Division of Warringah and the southern beaches region (as set out in more detail above) than the Northern end of the Peninsula and the Division of Mackellar.
- b) This would constitute a considerable alteration to the character of the Division of Warringah with a substantial loss of beaches areas and suburbs and adjoining economic

centres. Slicing off substantial parts of the seat's northern suburbs of Dee Why, Curl Curl and Freshwater or the "Forest" suburbs cuts across the community of interests that bind those areas to the beaches and the economic centres of Brookvale and Manly.

- c) Suggestion 48 then proposes that the Division of Warringah expand into the Crows Nest area and whilst reflecting a combination of the Option A and B westward expansion proposals in my Suggestion 42, Suggestion 48 by the Labor Party goes significantly further west and risks:
 - i. Unbalancing the Division of Warringah and altering its character from one inclusive of the beaches to a North Shore dominated Division; and
 - ii. Impacting the Division of North Sydney more substantially than necessary by excising significant economic and social centres and substantially changing the character of the Division of North Sydney.
- d) Suggestion 42 in respect of a western boundary adjustment for the Division of Warringah provides two options for the Committee; one based on a clear physical boundary, the Warringah Freeway, thus connecting all of the Lower North Shore areas to the east of that road, from Kirribilli, Cammeray, Neutral Bay, North Cremorne and Mosman into a single Federal seat. The other option follows the boundary of the State seat of North Shore. Either of these suggestions better align with communities of interest and for closer co-operation between State and Federal representatives and focus on community of interest.
- e) Moving the Warringah Division's boundary all the way to Crows Nest represents a significant shift in the economic and social centre and communities of the Division and much greater impact on the Division of North Sydney than necessary.
- f) Further, the Lower North Shore of Sydney has a distinct identity quite separate to the Crows Nest area.
- g) The areas of Neutral Bay and Cremorne are more closely bound with the economic and social centre of Mosman than the greater North Sydney area. There are strong connections in transport, commerce, education and recreation shared by the areas of Neutral Bay, Cammeray, Cremorne and Mosman.
- h) This suggestion fails to prioritise consideration of the community of interest and should also not be given any weight.

5. Suggestion 22 - Submission by the Member for North Sydney - (Eastern adjustment of Western boundary of Division of Warringah)

- a) In contrast to the majority of suggestions that a westward movement of boundaries is desirable for the Division of Warringah, Suggestion 22 has sought in part to remedy a voter shortfall in the Division of North Sydney by suggesting a movement of that division's boundary Eastward, excising the areas of Cremorne and Neutral Bay out of the Division of Warringah and moving them into the Division of North Sydney whilst failing to propose how the consequential voter shortfall in the Division of Warringah would be remedied.

- b) This Eastward boundary movement should be rejected as the Division of Warringah has firm coastal boundaries to the East and as such, Westward movement of boundaries is preferable.
- c) The Division of North Sydney has boundaries with the Divisions of Warringah, Bennelong and Bradfield. Of these, the boundaries with Bennelong and Bradfield are more extensive than with Warringah. These boundaries provide significantly more opportunity to expand the Division of North Sydney westwards and northwards as recognised and suggested by the Suggestions 48 and 46.
- d) Suggestion 22 suggests alignment of boundaries with the North Sydney LGA alone but fails to take into account the connections in transport, commerce, education and recreation that are shared by the areas of Neutral Bay, Cremorne and Mosman.
- e) The suggestion that a suitable boundary for a Federal Division is a LGA boundary ignores the fact that the level of Government most proximate to the Federal level in terms of day-to-day issues and co-ordination is the State level and that as a result, State boundaries should have at least equal if not more prominence than LGA boundaries in any considerations of federal boundary redistributions.
- f) Accordingly, Options A and B of Suggestion 42 for the movement of the western boundary of the Division of Warringah should be preferred in respect to the consideration of community of interest.

6. Suggestion 51 - Submission by the Member for Mackellar (Northern boundary adjustment to Division of Warringah)

- a) Suggestion 51 proposes that the Southern boundary of the Division of Mackellar expand southward within the LGA of the Northern Beaches Council, at the expense of the Division of Warringah, the only other Federal Division in the Northern Beaches LGA. This would result in a greater voter shortfall in the Division of Warringah and result in a greater westward movement of Warringah's boundaries, significantly altering the character of the Division of Warringah and further impacting the Division of North Sydney.
- b) A southern realignment of the Mackellar boundaries would likely involve including either the areas of South Dee Why, Curl Curl or the areas of Killarney Heights and Forestville into the Division of Mackellar. As set out above, excising these areas, in particular those of Dee Why and Curl Curl, would separate these areas from their natural economic and social connection with the southern end of the peninsula. These areas are far closer and share community of interests in character, transport, business and education, recreation and proximity to the Brookvale and Manly area of the Division of Warringah.
- c) In contrast, the economic and social centres of the Division of Mackellar are further to the north with Warriewood and Mona Vale.
- d) Further, if the areas of Southern Dee Why, Northern Curl Curl are moved into the Division of Mackellar, this would separate a number of secondary schools whose catchment areas are predominantly in Warringah.

- e) Suggestion 51 focuses on the beaches character of the Division of Mackellar and whilst noting its bushland expanses to the west, does not acknowledge the significant community connection westward via the areas of Duffy's Forest, Ingleside, and Terrey Hills. There is a clear land connection to the westward inland area with Mona Vale Road, a significant transport artery for private and public bus services, running directly from Mona Vale into the heart of St Ives.
- f) Similarly, the areas of Belrose, Davidson and Frenches Forest share a main transport link through to East Lindfield and Roseville and have similar character, density and amenity to East Killara and East Lindfield.
- g) It's acknowledged that the Division of Mackellar also needs to grow to meet electoral enrolment requirements. This can be better achieved with a westward movement of boundaries rather than southward along the beaches into Warringah.
- h) Suggestion 42 proposes a minor and measured movement of Warringah's Northern boundary to add the remaining northern part of the suburb of Dee Why, being all areas South of the Dee Why Lagoon, a clear physical boundary, to the Division of Warringah. This would unite the distinct area known as Dee Why into one division and is consistent with the State seat of Manly boundary.
- i) The consequential voter shortfall in the Division of Mackellar can be remedied by including the area of St Ives from the Division of Bradfield into Mackellar. The Division of Mackellar would then be well within both applicable voter thresholds with an August 2023 voter roll of 122,174 and a projected April 2028 roll of 128,013.
- j) This resolves the quota problem affecting the Division of Mackellar simply and elegantly, causes minimal boundary movement and preserves the character of both the Divisions of Warringah and Mackellar. This proposal further flows through to the Division of North Sydney, minimising the number of voters needing to be acquired by the Division of Warringah from that Division and thereby assists to preserve the character and community of interests of the Division of North Sydney.

I thank the Committee for the opportunity to comment on submissions affecting the Division of Warringah and wish them all the best in their deliberations.

Yours sincerely,



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Member for Warringah