



**THE FEDERAL
REDISTRIBUTION
NEW SOUTH WALES**

Comment on suggestion 85

Rob Mills

29 pages

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

Submitted via [website](#)

Dear Committee,

Thank you for the opportunity to comment on suggestions made to you for the redistribution of NSW federal electorate divisions.

This commentary is submitted on behalf of the campaign to elect Ms Nicolette Boele for the current federal seat of Bradfield. Ms Boele campaigned for the seat in 2022. She announced her intention to recontest the seat after receiving the support of a local community group, Voices of Bradfield, shortly after the May 2022 election, and has been campaigning since.

This commentary has been prepared with the assistance and comments of many of the volunteers on Ms Boele's past and current campaign, and I wish to especially thank Mr Nick O'Brien and Mr Rod Sharples. Any errors herein, however, are mine.

Please note that we make no recommendations on changing or retaining the names of electoral divisions.

Regards



Rob Mills for the campaign of Nicolette Boele
Community Independent candidate for the Division of Bradfield

Nicolette
BOELE

Contents

| | |
|---|----|
| INTRODUCTION | 3 |
| COMMENTARY ON SUGGESTIONS..... | 5 |
| Mackellar..... | 6 |
| Warringah | 9 |
| North Sydney and Bradfield..... | 12 |
| Appendix 1: SA2's and current Commonwealth Electoral Divisions | 16 |
| Appendix 2: Mackellar | 17 |
| Appendix 3: Warringah and North Sydney..... | 22 |
| Appendix 4: North Sydney and Bradfield..... | 23 |
| Appendix 4: NSW State Government Boundaries..... | 25 |
| Planning Department Boundaries..... | 25 |
| NSW Local Health Districts | 26 |
| Department of Education, current secondary high school catchments (co-ed only)..... | 27 |
| Department of Education, future public school catchments (co-ed only)..... | 28 |
| North shore bus routes..... | 29 |

INTRODUCTION

The criteria by which the Redistribution Committee will assess the redistribution in NSW are set out in s.66(3) of the Commonwealth Electoral Act 1918¹:

(3) In making the proposed redistribution, the Redistribution Committee:

(a) shall, as far as practicable, endeavour to ensure that, if the State were redistributed in accordance with the proposed redistribution, the number of electors enrolled in each Electoral Division in the State would not, at the projection time determined under section 63A, be less than 96.5% or more than 103.5% of the average divisional enrolment of that State at that time; and

(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) [sic] 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.

(3A) When applying subsection (3), the Redistribution Committee must treat the matter in subparagraph (3)(b)(v) as subordinate to the matters in subparagraphs (3)(b)(i), (ii) and (iv).

Consistently with the approaches taken by legislation and the parties, we have looked at transport corridors and geographical boundaries.² Where we differ slightly with the suggestions made by the suggestions listed below is on the utility of using local government area (LGAs) boundaries as strong indicators of communities of interest, at least in so far as urban or metropolitan Sydney is concerned (different considerations may apply in regional and rural NSW). Notwithstanding that LGAs have been argued in historical submissions to be indicators of communities of interest to previous Redistribution Committees, they are not expressly considered in the relevant legislation, which is open to other suggestions to define communities of interest, suggestions on which are included below.

Our suggestion that LGA boundaries not be given as much weight as other indicators of communities of interest is based on two arguments. First, anecdotal evidence suggests that most residents of Sydney have little to no idea who their representatives are at an LGA level, nor the ward in which they reside; to the extent that they are aware of their LGA, it is often as a provider of services or regulation,

¹ *Commonwealth Electoral Act 1918* (*Commonwealth Electoral Act 1918*).

² Liberal Party of Australia, NSW Division, *Suggestion 47* (No 47, Australian Electoral Commission, Undated) 83, 10 <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0047-liberal-party-of-australia.pdf>> (*Suggestion 47*); NSW Labor, *Suggestion 48* (No 48, Australian Electoral Commission, Undated) 33, 2–4 <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0048-NSW-labor.pdf>> (*Suggestion 48*); NSW Nationals, *Suggestion 50* (No 50, Australian Electoral Commission, Undated) 80, Methodology <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0050-NSW-nationals.pdf>> (*Suggestion 50*).

not as a well-spring of community. Secondly, the history of changes to LGA boundaries in NSW suggests that they are driven more by the policy priorities of the State government in power, than the need to service or represent a well-defined community.

Consistent, also, with the approach adopted by many of the party submissions, this comment looks at the north shore of Sydney as a whole and discusses Mackellar, Warringah, Bradfield, North Sydney, Berowra and Bennelong.³ Clearly, however, the implications of what is suggested herein will have repercussions further west of these electorates that the Redistribution Committee will consider.

Finally, this commentary is limited to the following submissions:

Suggestion 22 – Kylea Tink MP⁴

Suggestion 42 - Zali Steggall OAM MP⁵

Suggestion 46 – The Greens NSW⁶

Suggestion 47 – The Liberal Party of Australia, NSW Division⁷

Suggestion 48 – NSW Labor⁸

Suggestion 50 – The NSW National Party⁹

Suggestion 51 – Dr Sophie Scamps MP¹⁰

The approach adopted here is to begin with Mackellar and then move south and west. Alternatives to suggestions made by the major parties are made on a parsimony principle, i.e., in an attempt to incorporate as much of the major parties' suggestions as possible while maintaining current community boundaries. The suggestions made by the incumbent independent members are referred to, but as they are generally confined to only the one electorate, they are not explored in detail.

The following abbreviations are used:

- CED = Commonwealth Electoral Division
- LGA = Local government area
- SA1 or 2 = Statistical area 1 or 2 as defined by the Australian Bureau of Statistics (ABS)

³ NSW Labor (n 2) 1; The Greens NSW, *Suggestion 46* (No 46, Australian Electoral Commission, Undated) 13, 1 <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0046-the-greens-NSW.pdf>> (*Suggestion 46*); NSW Nationals (n 2) 23.

⁴ Kylie Tink MP, *Suggestion 22* (No 22, Australian Electoral Commission, 24 Oct 23) 6, 22 <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0022-kylea-tink-MP.pdf>> (*Suggestion 22*).

⁵ Zali Steggall OAM MP, *Suggestion 42* (No 42, Australian Electoral Commission, 26 Oct 23) 8 <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0042-zali-steggall-OAM-MP.pdf>> (*Suggestion 42*).

⁶ The Greens NSW (n 3).

⁷ Liberal Party of Australia, NSW Division (n 2).

⁸ NSW Labor (n 2).

⁹ NSW Nationals (n 2).

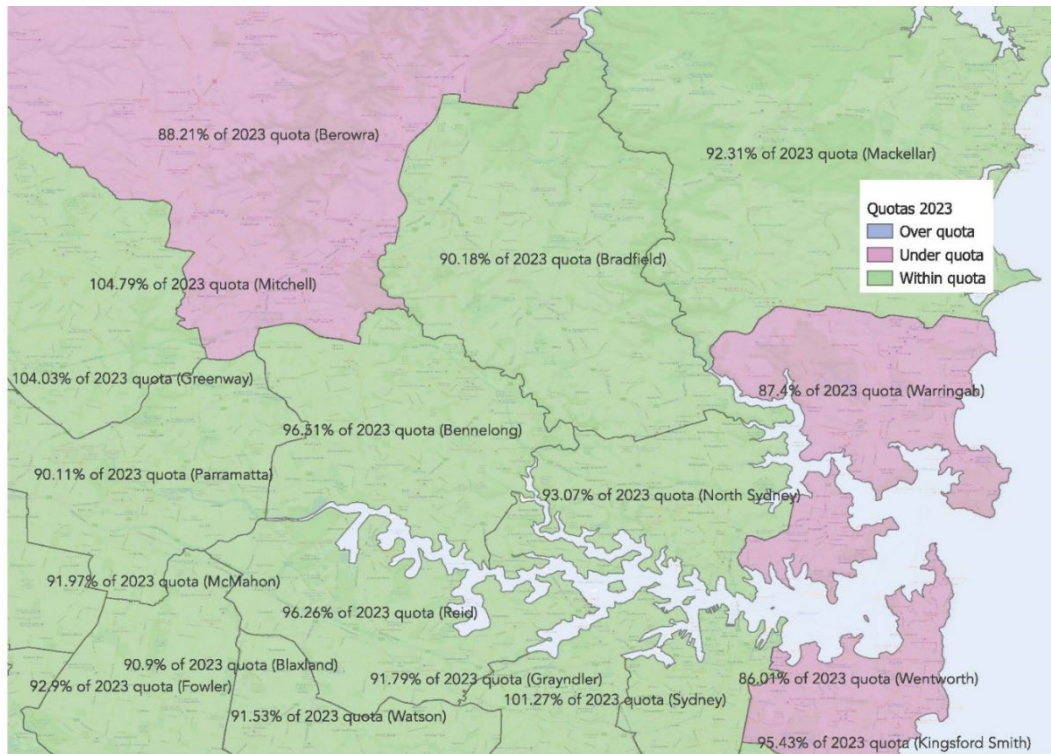
¹⁰ Dr Sophie Scamps MP, *Suggestion 51* (No 51, Australian Electoral Commission, 27 Oct 23) 3 <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/files/suggestions/nsw24-s0051-dr-sophie-scamps-MP.pdf>> (*Suggestion 51*).

- SEIFA = Socio-Economic Indices for Areas produced by the ABS
- IEO = Index of Education and Occupation, one of four SEIFA

COMMENTARY ON SUGGESTIONS

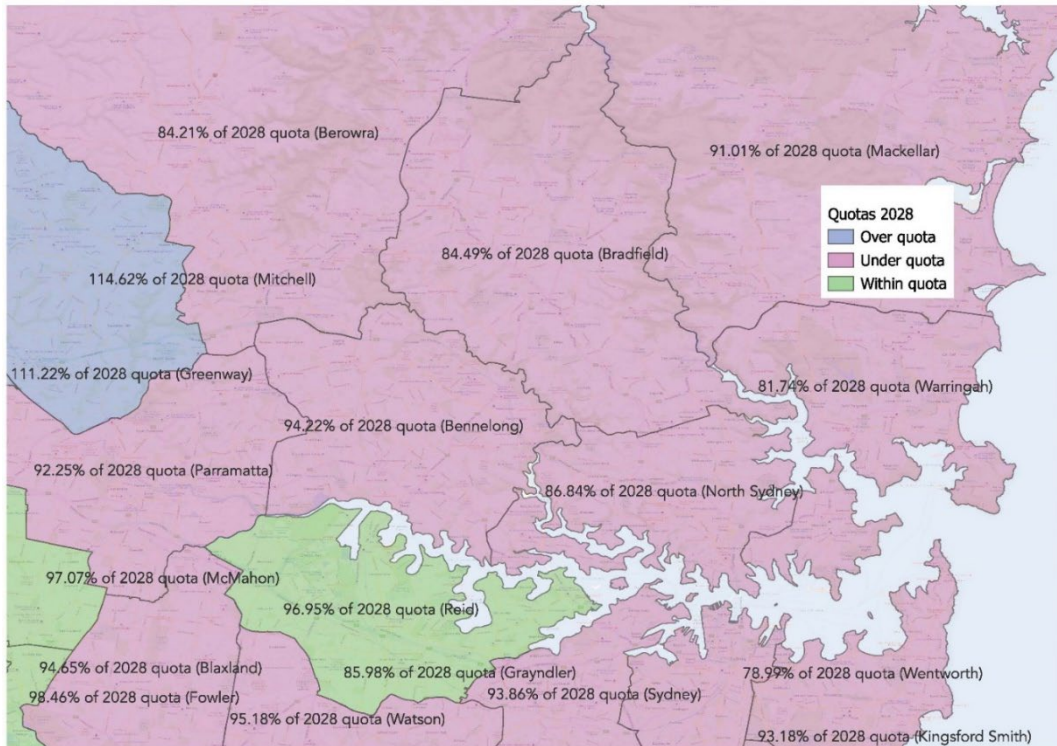
As relevant submissions acknowledge, the north shore of Sydney is currently under the 2023 quota in some divisions, and under 2028 quotas based on forecast growth in many more. Figure 1 2023 Quotas and Figure 2 2028 Quotas map out which divisions are under quota in each respective year.¹¹

Figure 1 2023 Quotas



¹¹ All enrolment figures, including percentage of quotas, are based on AEC data supplied for the purposes of the NSW federal redistribution

Figure 2 2028 Quotas



Clearly an adjustment – whether a border movement, a merger, or an abolition – will have an impact on the quotas of neighboring and close divisions. It makes sense, then, when treating the north shore as a unit, to begin with the hard boundaries which cannot be adjusted. Mackellar’s eastern boundaries cannot be moved, and it is unlikely that the AEC will break from previous practice and allow its northern boundary to cross the Hawkesbury.¹² The retention of the Hawkesbury as a “hard border” is also consistent with community definitions adopted by the NSW state government for planning, health districts and high school catchments.¹³

Since that is the case, Mackellar’s boundaries can only move west and/or south to bring it within quotas.

Mackellar

Our understanding of Suggestion 47 is represented below:

¹² NSW Labor (n 2) 9. "The Hawkesbury River north of the Sydney CBD hasn't been crossed since 1967. It is a natural physical boundary separating the communities of Sydney from the Central Coast."; NSW Nationals (n 2) 22f; Liberal Party of Australia, NSW Division (n 2) 10f.

¹³ See Appendix 4: NSW State Government Boundaries

Figure 3 Suggestion 47: Mackellar detail

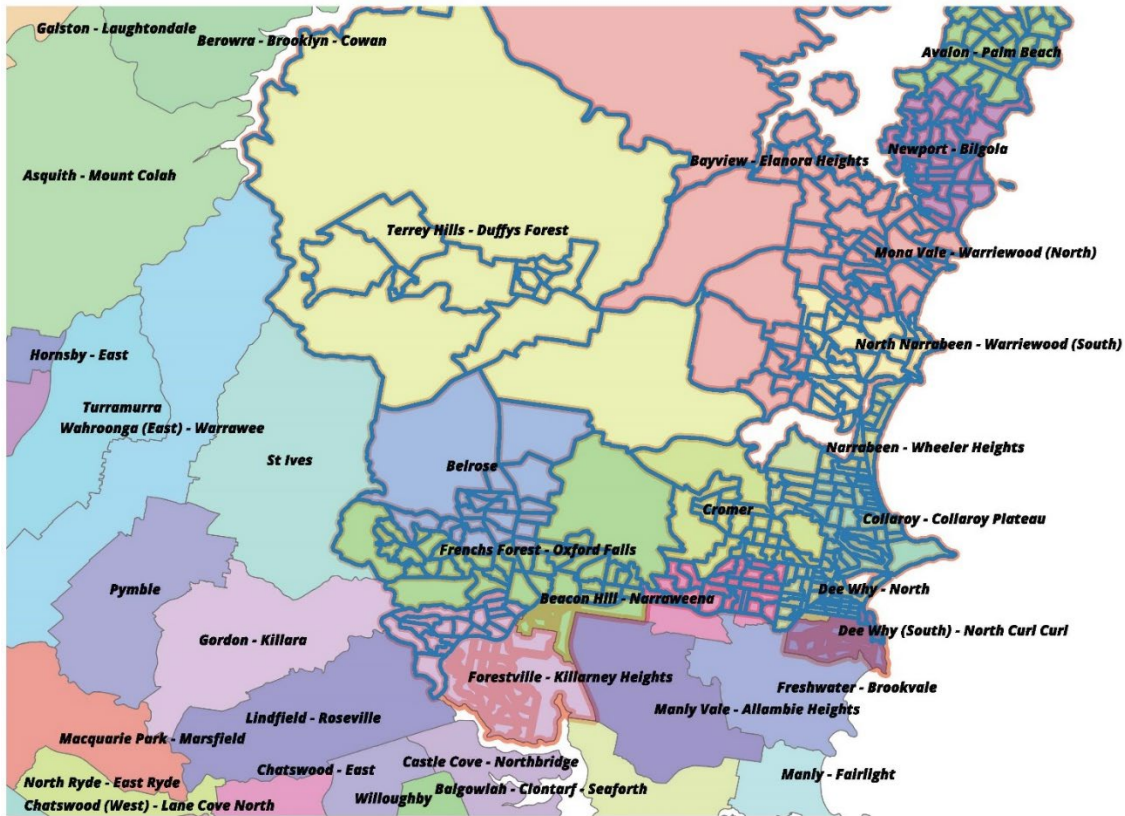


Figure 3 shows the current SA1 borders in thick blue outline, and the Liberal party’s proposed additions in thick red (Suggestion 47). Essentially, the proposal is that Mackellar absorb the SA2’s of Forestville-Killarney Heights and Dee Why (South) – North Curl Curl. An enrolment table is set out at Table 1: Suggestion 47 on Mackellar on page 17 to demonstrate the effect on quotas.

The National Party (Suggestion 50) suggests that North Sydney be abolished and describe the impact on Mackellar here:

With the need for the Divisions of Mackellar and Bradfield to address their shortfalls by gaining addition projected enrolment from the south – and the need for the Division of Warringah to gain projected enrolment from the west – the Division of Sydney (sic) will automatically lose over 36,000 projected electors before beginning to attempt to address its own enrolment shortfall.

Therefore, the NSW Nationals suggest the Division of Bennelong should be retained and the Division of North Sydney should be abolished.¹⁴

This suggestion does not provide specific recommendations at the SA1 or SA2 level, but the map provided implies that the suggestion is consistent with that of the Liberal party.¹⁵

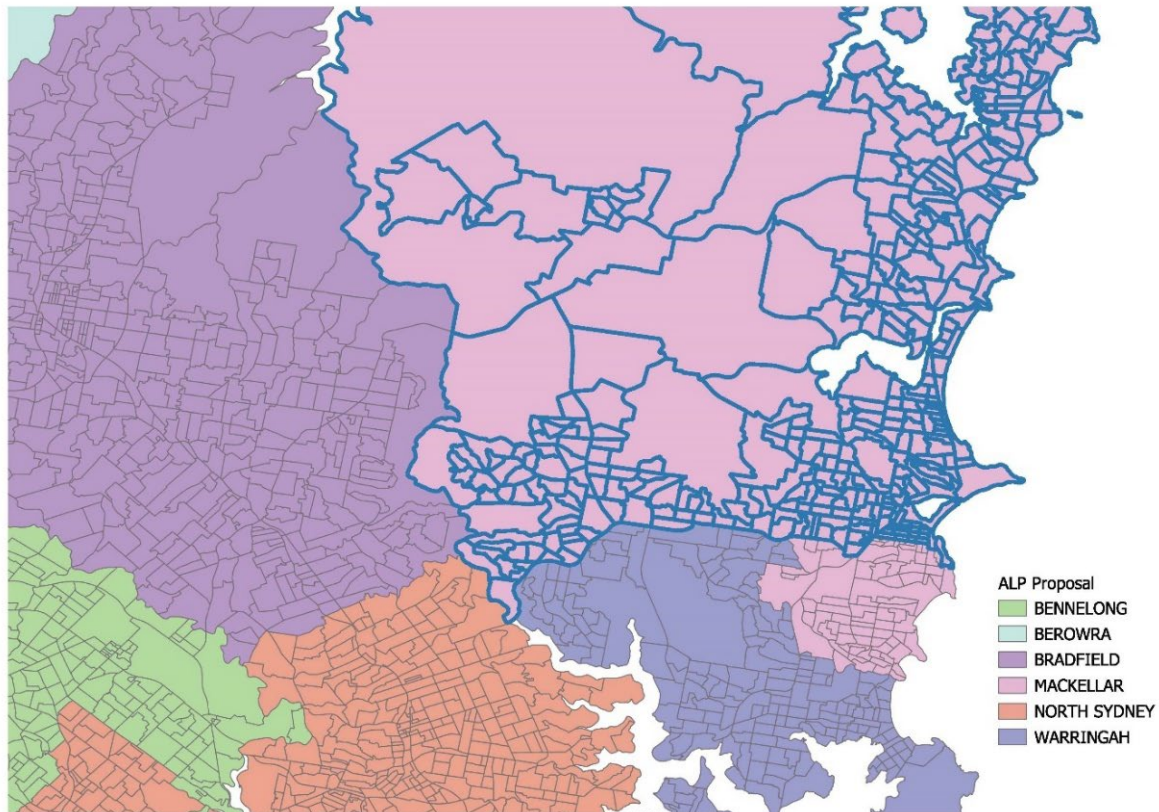
The ALP proposal (Suggestion 48) (Figure 4 and Table 2: Suggestion 48 on Mackellar on page 18) pushes Mackellar south along its coastal boundary only, giving Mackellar not only the balance of SA2 Dee Why (South)-North Curl Curl, but also Freshwater–Brookvale. However, it does not meet quota for

¹⁴ NSW Nationals (n 2) 23.

¹⁵ Ibid 29.

2028.

Figure 4: Suggestion 48: Mackellar detail



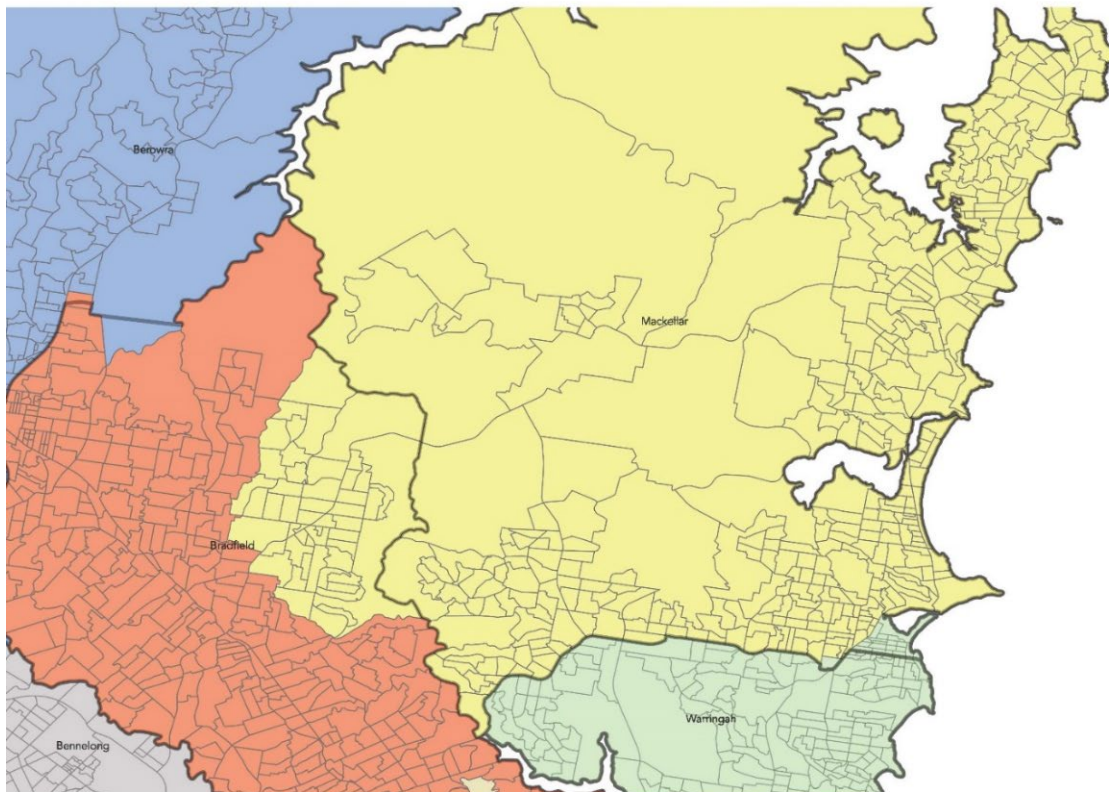
The Greens (Suggestion 46) suggest that the following SA2's be transferred from Bradfield to Mackellar: Forestville, St Ives and Pymble. Note that the 2 SA1's in Forestville within Bradfield currently have no 2023 or 2028 enrolments against them. Suggestion 46 might meet quotas, but it ignores the community characteristics of both Bradfield, which essentially is built around the Pacific Highway and the north shore train line, and Mackellar. A glance at SA2's and CEDs (see Appendix 1: SA2's and current Commonwealth Electoral Divisions at page 16) shows that accepting Suggestion 46 would result in a very odd shape for Mackellar, protruding in a not easily explainable way into parts of the north shore very dissimilar to the current Mackellar and breaking the north-south flow of traffic so important to the definition of a Bradfield community.

Neither Suggestion 51 (Scamps) nor Suggestion 22 (Tink) make specific suggestions regarding Mackellar's boundaries. Suggestion 42 (Steggall) suggests that Warringah absorb Dee Why, but makes no specific suggestion on other changes to Mackellar that would address its quota challenges. In an attempt to address resizing Mackellar, one option might be to include the SA2 of St Ives (currently Bradfield) into Mackellar, as per Suggestion 46, but rejecting that suggestion's further assertion that Pymble be included. Note that Suggestion 42 does **not** canvass this possible solution. In support of this addition to Mackellar is a recognition that the majority of Mona Vale Road and Forest Way are already in Mackellar, and absorbing St Ives simply extends the boundaries around those axes. However, the natural barriers of parkland, the distinctive community of St Ives, and recognition – as per Suggestion 51 – that much of Mackellar's community feeling is derived from its beachside nature (which St Ives does not share) suggest that St Ives is not a natural fit into Mackellar.

The inclusion of St Ives into Mackellar does not in itself solve Mackellar (See Table 4: Mackellar after Warringah's suggestion and St Ives SA2 added on page 20). However, if the decision to assign Dee Why North entirely to Warringah is reversed (while Warringah keeps Dee Why South in its entirety),

then Mackellar comes into the quotas (See page 21, Table 5: Warringah's suggestion (excl Dee Why North) and St Ives SA2 added)

Figure 5: Member for Warringah proposal + St Ives addition



Warringah

All of the resulting effects on quotas for Mackellar of the suggestions discussed above are set out at

Appendix 2: Mackellar from page 17 below. They demonstrate that the Liberal Party proposal (Suggestion 47) and an (amended) Warringah proposal (Suggestion 42) that includes St Ives would satisfy the quota requirements. The Greens' submission (Suggestion 46) is not considered for the reasons outlined above. Suggestion 48, as is discussed above, is not within quota for 2028.

Turning to the decision criteria set out in s.66(3), it is not immediately clear that it is possible to differentiate between the two suggestions that satisfy the quota criteria. Both the Liberal Party suggestion and the amended Warringah suggestion involve some change of borders around Dee Why, as the former adds the Forestville-Killarney Heights SA2 (from current Warringah) and the latter adds the St Ives SA2 (from current Bradfield) and gives all of Dee Why North to Mackellar. Neither of the inland SA2s are especially similar to existing Mackellar (both are inland and not coastal) and each is accessible via main arteries already partly in Mackellar, the A38/Warringah Road complex, and the A3/Mona Vale Road/Forest Way complex. Perhaps the distinction between the two possible solutions lies on the location of Garigal National Park, which, were it not for the A3, would separate St Ives from Mackellar. On balance, it seems the addition of the Forestville-Killarney Heights SA2 to Mackellar and its subtraction from Warringah more closely meets s.66(3) criteria. However, each of the scenarios is arguable.

In either case, Warringah needs to move south, as most of the suggestions acknowledge. Suggestion 47 does this by confining its changes to the eastern side of the electorate only, effectively making the electorate hug the Pacific coast and then move west up the Parramatta River. In doing so the Liberal Party suggests abolishing Warringah and renaming it North Sydney, as under their proposal Warringah's march west continues into and over the North Sydney CBD. See Figure 6.

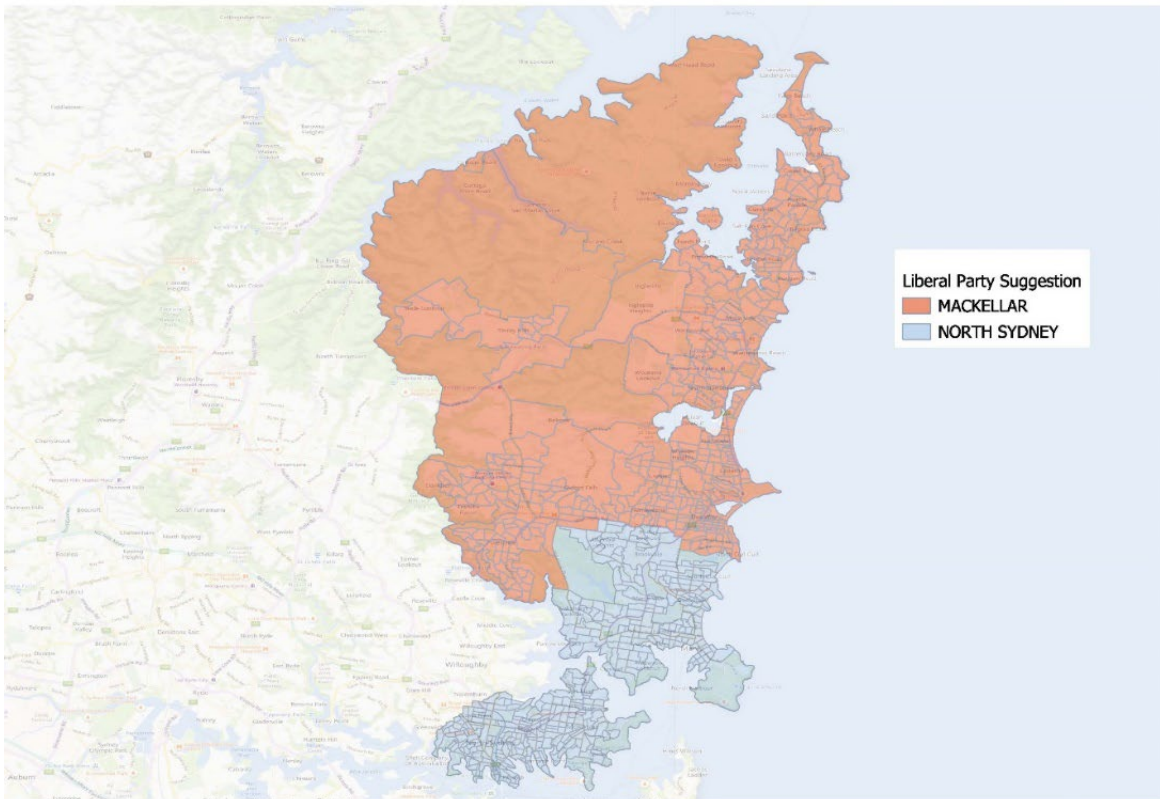
It is not *prima facie* clear why Warringah's move south should be confined to the eastern seaboard, especially when there are two major roads with similar traffic volumes (approx. 50,000 each per day¹⁶ in the A8 (over the Spit Bridge) and the A38 (over the Roseville Bridge), with a similar volume of bus routes over each. It is also worth recalling that for at least one redistribution cycle, Warringah (then with former PM Tony Abbott as the local member) included East Lindfield and Roseville, i.e., areas to the west of the proposal in Suggestion 47.

Suggestion 47 urges that a reconfigured North Sydney-Warringah move west to cover the current North Sydney LGA, asserting that "an approach based around LGAs complies best with statutory requirements"¹⁷. For reasons outline earlier, we do not accept that the alignment between LGAs and communities of interest is as strong as some of the suggestions contend, and therefore that simply aligning the western boundary of North Sydney – Warringah with the North Sydney LGA is an insufficient definition of a community of interest.

¹⁶ Transport for NSW, 'NSW Traffic Volume Viewer' <<https://maps.transport.nsw.gov.au/egeomaps/traffic-volumes/#/?z=13&lat=-33.77821567710731&lon=151.19773186132812>>.

¹⁷ Liberal Party of Australia, NSW Division (n 2) 20.

Figure 6: Suggestion 47 reconfiguration of Warringah and North Sydney (with Mackellar)

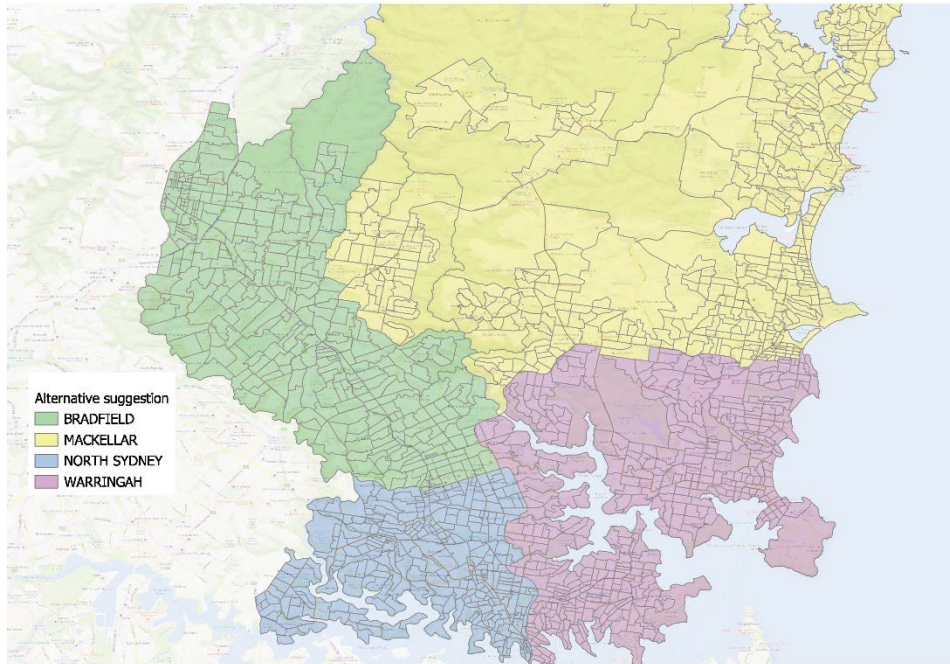


The SA2's that would realign under Suggestion 47 are Crows Nest-Waverton, North Sydney-Lavender Bay, Neutral Bay-Kirribilli, and Cremorne – Cammeray. The resulting effect on quotas is set out at Table 6: Suggestion 47 on North Sydney-Warringah, page 22. Suggestion 47 appears to be within quota for 2028, but not for 2023.

An alternative reconfiguration that recognizes that both the A8 and the A38 are major arteries for north-south travel within Warringah would be to include the Castle Cove-Northbridge SA2 – currently split between Bradfield and North Sydney – into Warringah. This is illustrated at Figure 7: An alternative solution to Warringah-North Sydney on page 12, and its resulting quota calculations are set out at Table 7, page 22. As well as encompassing both the A8 and the A38, this alternative suggestion allows Warringah to entirely embrace the water-oriented communities along Middle Harbour, from the Spit Bridge west to the Roseville Bridge.

Note that the illustration at Figure 7 also includes the mooted move of SA2 St Ives into Mackellar, thereby keeping Mackellar in quotas as suggested above. Further, this configuration requires the transfer of 3 SA1s from Bradfield to Warringah (12103140844 to 12103140846), as they are located on the eastern side of the A38 and are equally if not more accessible to the Castle Cove community than the Roseville community.

Figure 7: An alternative solution to Warringah-North Sydney



North Sydney and Bradfield

If these suggested configurations for Mackellar and Warringah are acceptable, it remains to reconfigure current North Sydney, Bradfield and Berowra. Suggestion 48 (ALP) is similar to Suggestion 47, and removes the urban centre of North Sydney from the current North Sydney, and pushes North Sydney into current Bennelong and Bradfield¹⁸.

There are three major urban centres along the north shore train line (and Pacific Highway) that are currently distributed between Bradfield and North Sydney, viz., Hornsby, Chatswood and North Sydney. Chatswood is a destination in itself, but is also a hub for access west through Macquarie University, to Epping to Tallawong.¹⁹ Each of these three conurbations has a distinct community, and should ideally not be split between CEDs. Suggestion 22 resolves this by pushing North Sydney into Bradfield so that the balance of the two Chatswood SA2s currently in Bradfield are then in North Sydney. In this scenario, North Sydney would include the entirety of both centres, Chatswood and North Sydney. By contrast, in both the alternative suggestions (Suggestions 47 and 48) the North Sydney SA2 is transferred to Warringah, while Suggestion 47 distributes the northern SA2s of North Sydney to Bradfield and Suggestion 48 distributes the southern SA2s of Bradfield to North Sydney.

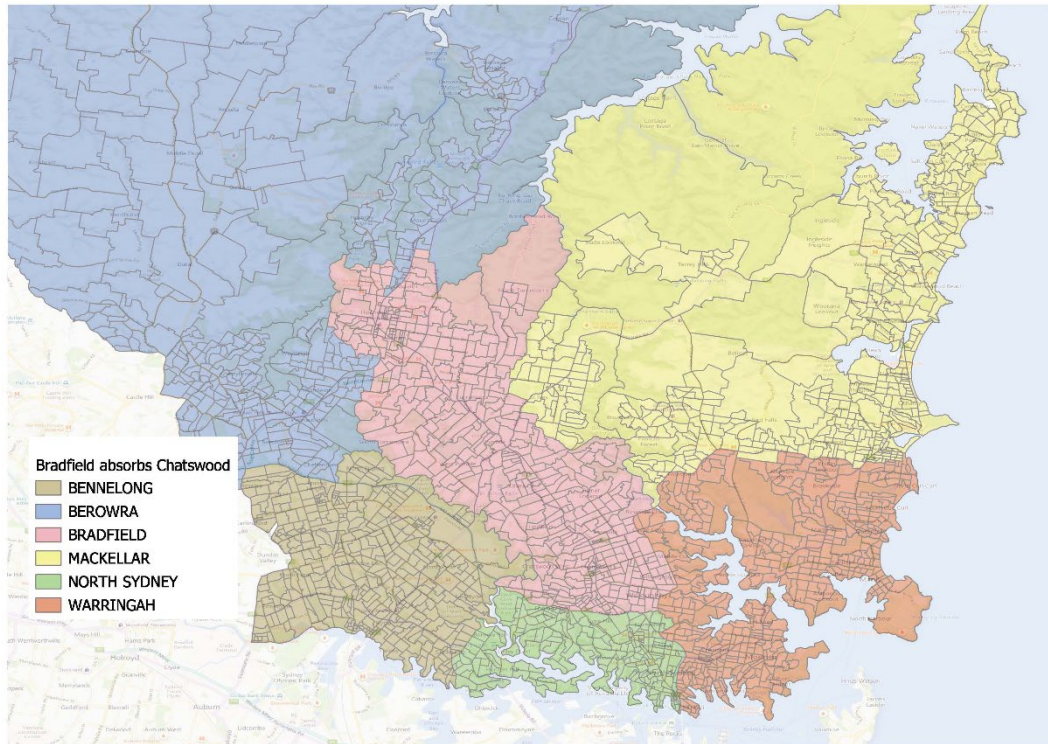
A compromise solution might be to instead ensure that the entirety of Chatswood is in Bradfield, while North Sydney remains in the current North Sydney. It makes sense to have Chatswood within one CED, rather than split between two as it currently is. It was our campaign's experience in the 2022 election that many residents of Chatswood were confused about which CED they were to vote in, and this was likely due to the somewhat arbitrary division between Bradfield and North Sydney west-east along Victoria Avenue. It is also worth noting that including the whole of Chatswood into Bradfield ensures that two north shore synagogues remain in Bradfield (the North Shore Synagogue and North Shore

¹⁸ NSW Labor (n 2) 23,25.

¹⁹ Transport NSW, 'Sydney Rail Network Map', *transportnsw.info* (5 January 2023) <<https://transportnsw.info/document/4746/sydney-rail-network-map-5-jan.pdf>>.

Temple Emmanuel), potentially three if St Ives is not moved to Mackellar (Kehillat Masada Synagogue). However, merely moving the 2 Chatswood SA2s into Bradfield would not put Bradfield within quotas, as is evident from Table 8: Bradfield including Chatswood on page 23. This could be done by bringing Artarmon and Willoughby into Bradfield in the south, and adding Hornsby-West into Bradfield in the north, so that Bradfield takes in the entirety of the Hornsby centre, on the same principle that it takes Chatswood. It is important to note that if the St Ives SA1 is retained in Bradfield, the absorption of Hornsby-West does not need to be the whole SA2.

Figure 8: Bradfield includes Chatswood

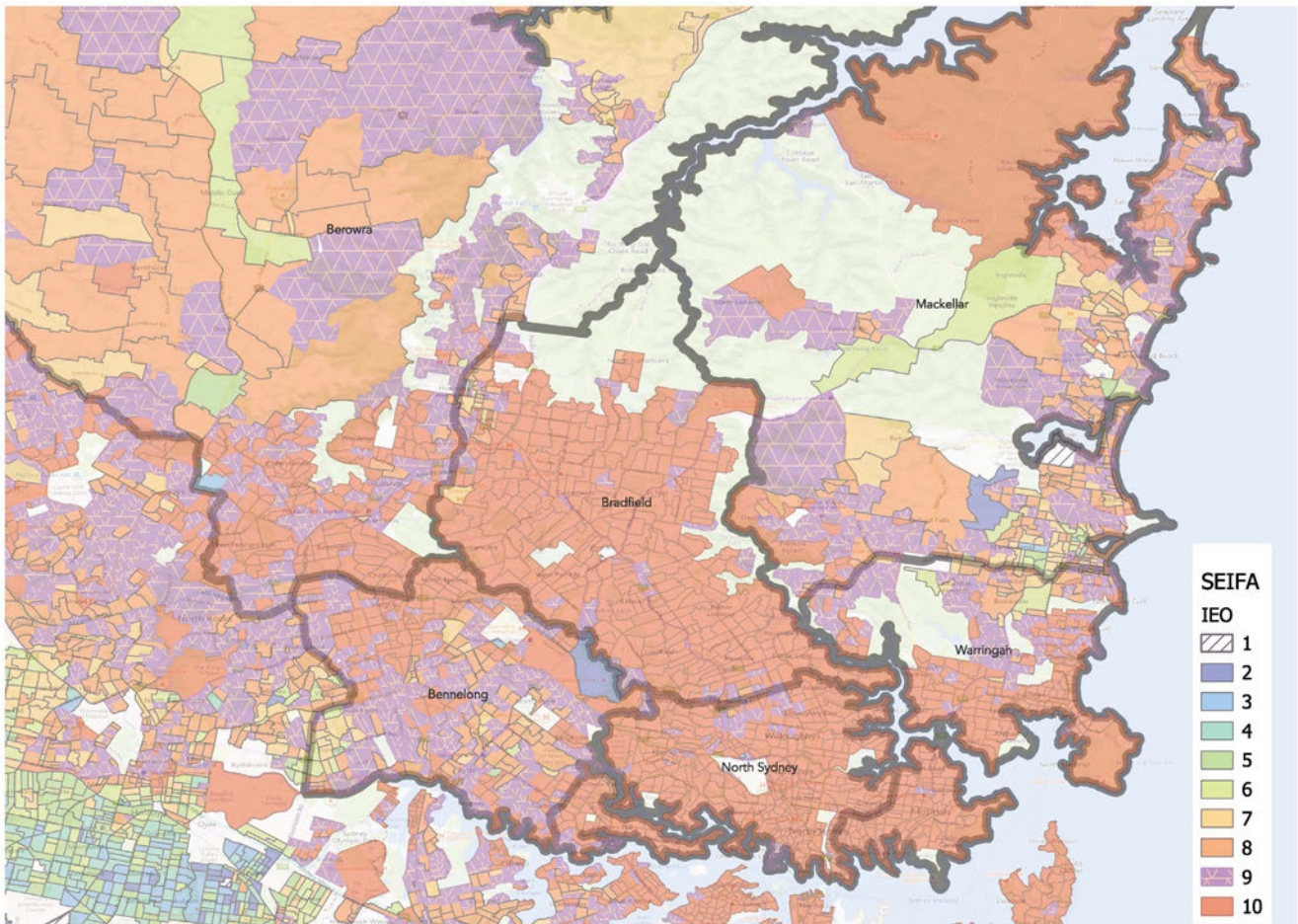


An alternative to this approach would see North Sydney move into Bradfield and this has been proposed in Suggestion 48 and Suggestion 22. Suggestion 48 sees the northern boundary of North Sydney moved to Lindfield, while Suggestion 22 urges a border change only up to Boundary Road, just north of Chatswood.²⁰ Suggestion 22's border changes will not be sufficient to bring North Sydney into quota if the changes on that CED's eastern borders suggested above are accepted. An alternative would be to push North Sydney west into Berrong, and have Berrong move north into Berowra, which is significantly under quota. If the Socio-Economic Indices for Areas (SEIFA) produced by the ABS are indicative to some extent of communities sharing characteristics, then a placement of the Berrong border as far north as Cherrybrook would be consistent with Berrong current SEIFA profiles.²¹ Figure 9 illustrates this using the Index of Education and Occupation (IEO) by deciles against SA1s and current CEDs.

²⁰ NSW Labor (n 2) 23; Tink MP (n 4).

²¹ Australian Bureau of Statistics, 'Socio-Economic Indexes for Areas (SEIFA)' <<https://www.abs.gov.au/websitedbs/censushome.nsf/home/seifa>>.

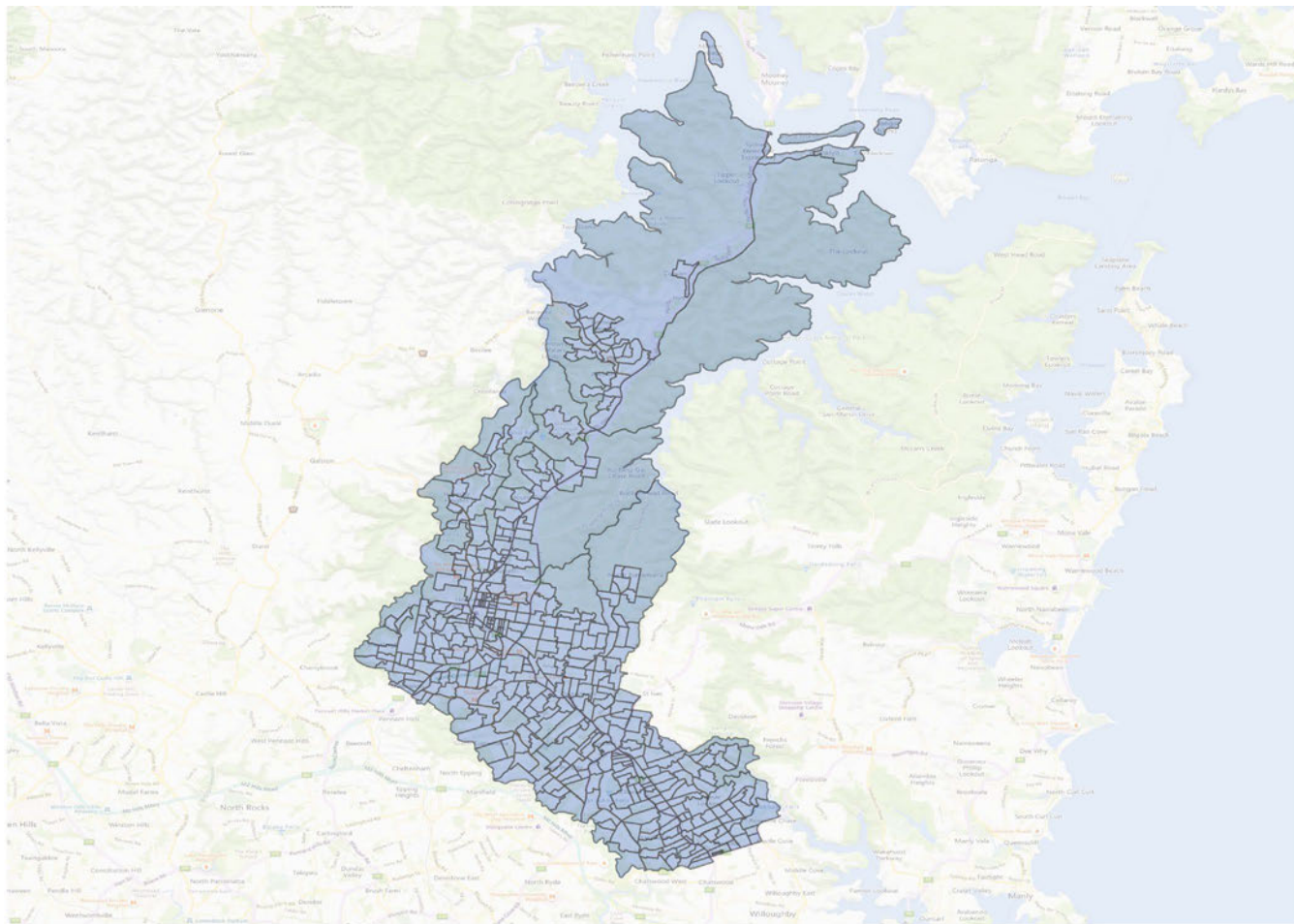
Figure 9: Socio-Economic Indices for Areas: Index of Education and Occupation (Deciles)



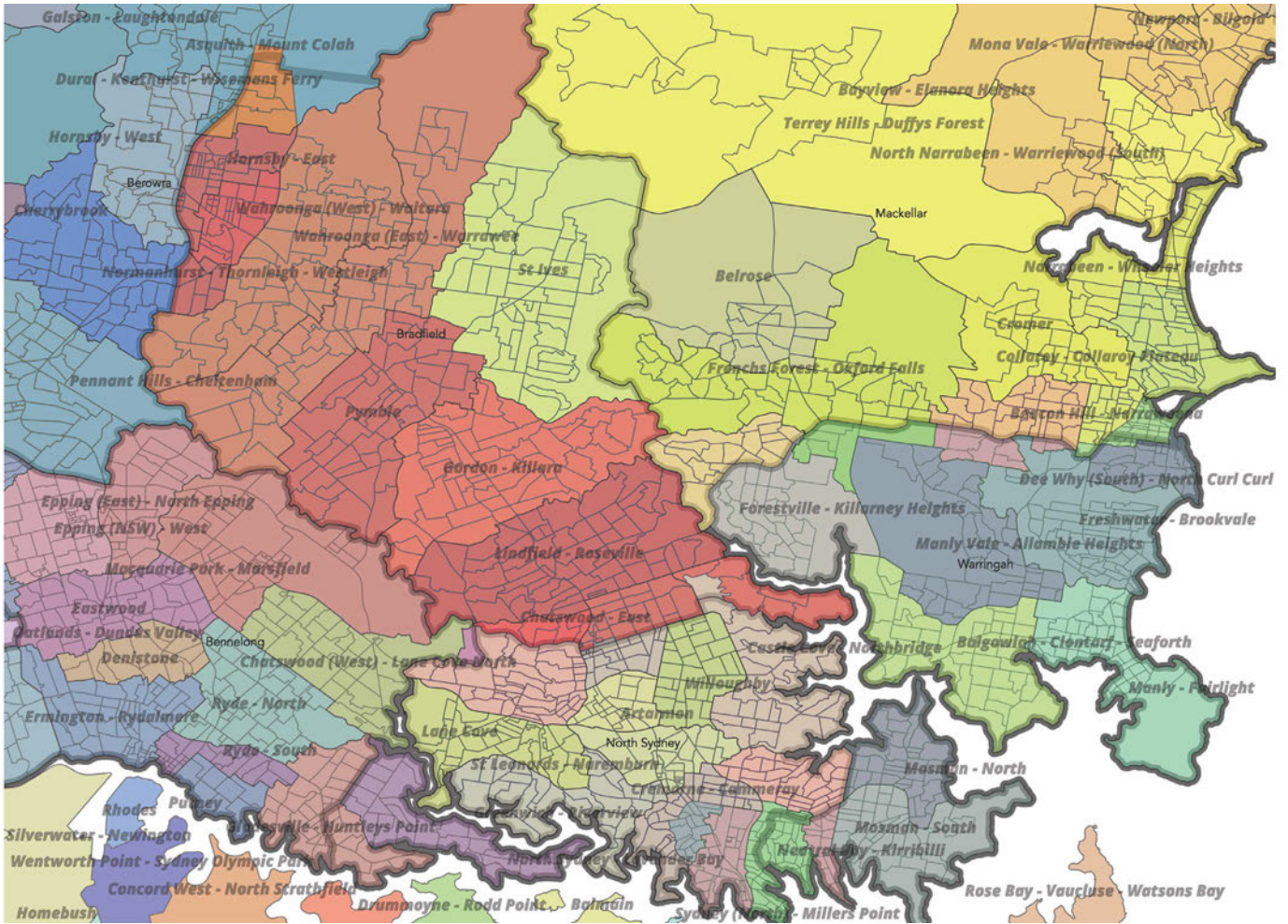
If, contrary to the solution suggested here that Bradfield absorb Chatswood, North Sydney moves north into Bradfield, then an alternative configuration on Bradfield could involve it moving west to take the eastern SA2s of Berowra. Such a redrawing would place Bradfield’s western border down the natural barrier of the Berowra Valley. See Figure 10.

This configuration makes sense because it recognizes the importance of the north shore train line to the communities of Bradfield, which has a significant commuter population of both schoolchildren and the employed, frequently and consistently travelling north-south either to/from Chatswood, or through Chatswood to the Sydney CBD and/or Macquarie University. In support of this contention, one can look to the planned catchment areas for north shore public high schools, supplied by the NSW Department of Education (see Appendix 4: NSW State Government Boundaries below). In that case, Bradfield would be redrawn as in Figure 10, which maintains the St Ives SA2 in Mackellar, and is therefore consistent with the proposals above for Mackellar and Warringah.

Figure 10: Bradfield western and northern borders



Appendix 1: SA2's and current Commonwealth Electoral Divisions



Appendix 2: Mackellar

The tables below set out the data derived from the descriptive narratives provided by each party and by the incumbents in Mackellar, Warringah and North Sydney. Where the narrative or maps provided by suggestors conflict with data tables they provide, we have preferred the latter over the former.

The tables list the original (i.e., pre-redistribution current) Commonwealth Electoral Division (CED) and the SA2s moved reassigned to the new boundaries

The quotas are 121,011 +/- 10% for 2023 and 129,621 +/- 3.5%.²²

Key:

| | | |
|-------------------|-----------------|-----------------|
| | Enrolments 2028 | Enrolments 2023 |
| Per cent of quota | 107.51 | 109.65 |
| | Outside quota | Inside quota |

Table 1: Suggestion 47 on Mackellar

| Original CED | Enrolments 2028 | Enrolments 2023 |
|-----------------------------------|-----------------|-----------------|
| MACKELLAR | | |
| Avalon - Palm Beach | 10,270 | 10,063 |
| Bayview - Elanora Heights | 8,692 | 8,619 |
| Beacon Hill - Narraweena | 8,170 | 7,226 |
| Belrose | 6,523 | 6,230 |
| Collaroy - Collaroy Plateau | 11,591 | 10,074 |
| Cromer | 6,482 | 5,717 |
| Dee Why - North | 10,498 | 9,419 |
| Dee Why (South) - North Curl Curl | 144 | 141 |
| Forestville - Killarney Heights | 3,942 | 3,813 |
| Frenchs Forest - Oxford Falls | 10,354 | 10,427 |
| Mona Vale - Warriewood (North) | 10,943 | 10,765 |
| Narrabeen - Wheeler Heights | 8,972 | 8,181 |

²² 'Redistribution Quota – New South Wales Federal Redistribution', *Australian Electoral Commission* <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/enrolment-quota.htm>>; 'Enrolment Projections - New South Wales Federal Redistribution', *Australian Electoral Commission* <<https://www.aec.gov.au/Electorates/Redistributions/2023/nsw/enrolment-projections.htm>>.

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--------------------------------------|-----------------|-----------------|
| Newport - Bilgola | 10,704 | 10,528 |
| North Narrabeen - Warriewood (South) | 7,908 | 7,700 |
| Terrey Hills - Duffys Forest | 2,775 | 2,796 |
| MACKELLAR Total | 117,968 | 111,699 |
| WARRINGAH | | |
| Dee Why - North | 1,702 | 1,459 |
| Dee Why (South) - North Curl Curl | 6,552 | 6,071 |
| Forestville - Killarney Heights | 5,355 | 5,323 |
| WARRINGAH Total | 13,609 | 12,853 |
| Grand Total | 131,577 | 124,552 |
| Percent of quota | 101.51 | 102.93 |

Table 2: Suggestion 48 on Mackellar

| Original CED | Enrolments 2028 | Enrolments 2023 |
|-----------------------------------|-----------------|-----------------|
| MACKELLAR | | |
| Avalon - Palm Beach | 10,270 | 10,063 |
| Bayview - Elanora Heights | 8,692 | 8,619 |
| Beacon Hill - Narrabeena | 8,170 | 7,226 |
| Belrose | 6,523 | 6,230 |
| Collaroy - Collaroy Plateau | 11,591 | 10,074 |
| Cromer | 6,482 | 5,717 |
| Dee Why - North | 10,498 | 9,419 |
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| Forestville - Killarney Heights | 3,942 | 3,813 |
| Frenchs Forest - Oxford Falls | 10,354 | 10,427 |
| Mona Vale - Warriewood (North) | 10,943 | 10,765 |
| Narrabeen - Wheeler Heights | 8,972 | 8,181 |

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--------------------------------------|-----------------|-----------------|
| Newport - Bilgola | 10,704 | 10,528 |
| North Narrabeen - Warriewood (South) | 7,908 | 7,700 |
| Terrey Hills - Duffys Forest | 2,775 | 2,796 |
| MACKELLAR Total | 117,968 | 111,699 |
| WARRINGAH | | |
| Dee Why (South) - North Curl Curl | 6,552 | 6,071 |
| Freshwater - Brookvale | 14,831 | 14,922 |
| WARRINGAH Total | 21,383 | 20,993 |
| Grand Total | 139,351 | 132,692 |
| Per cent of quota | 107.51 | 109.65 |

Table 3: Mackellar after Warringah's suggestion

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--------------------------------------|-----------------|-----------------|
| MACKELLAR | | |
| Avalon - Palm Beach | 10,270 | 10,063 |
| Bayview - Elanora Heights | 8,692 | 8,619 |
| Beacon Hill - Narrabeena | 8,170 | 7,226 |
| Belrose | 6,523 | 6,230 |
| Collaroy - Collaroy Plateau | 11,591 | 10,074 |
| Cromer | 6,482 | 5,717 |
| Forestville - Killarney Heights | 3,942 | 3,813 |
| Frenchs Forest - Oxford Falls | 10,354 | 10,427 |
| Mona Vale - Warriewood (North) | 10,943 | 10,765 |
| Narrabeen - Wheeler Heights | 8,972 | 8,181 |
| Newport - Bilgola | 10,704 | 10,528 |
| North Narrabeen - Warriewood (South) | 7,908 | 7,700 |
| Terrey Hills - Duffys Forest | 2,775 | 2,796 |

COMMENTS ON SUGGESTIONS TO THE AEC NSW FEDERAL REDISTRIBUTION COMMITTEE

| | | |
|-------------------|---------|---------|
| MACKELLAR Total | 107,326 | 102,139 |
| Grand Total | 107,326 | 102,139 |
| Per cent of quota | 82.8 | 84.4 |

Table 4: Mackellar after Warringah's suggestion and St Ives SA2 added

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--------------------------------------|--------------------|--------------------|
| BRADFIELD | | |
| St Ives | 14,366 | 14,271 |
| BRADFIELD Total | 14,366 | 14,271 |
| MACKELLAR | | |
| Avalon - Palm Beach | 10,270 | 10,063 |
| Bayview - Elanora Heights | 8,692 | 8,619 |
| Beacon Hill - Narraweena | 8,170 | 7,226 |
| Belrose | 6,523 | 6,230 |
| Collaroy - Collaroy Plateau | 11,591 | 10,074 |
| Cromer | 6,482 | 5,717 |
| Forestville - Killarney Heights | 3,942 | 3,813 |
| Frenchs Forest - Oxford Falls | 10,354 | 10,427 |
| Mona Vale - Warriewood (North) | 10,943 | 10,765 |
| Narrabeen - Wheeler Heights | 8,972 | 8,181 |
| Newport - Bilgola | 10,704 | 10,528 |
| North Narrabeen - Warriewood (South) | 7,908 | 7,700 |
| Terrey Hills - Duffys Forest | 2,775 | 2,796 |
| MACKELLAR Total | 107,326 | 102,139 |
| Grand Total | 121,692 | 116,410 |
| Percent of total quota | 93.88 | 96.2 |

COMMENTS ON SUGGESTIONS TO THE AEC NSW FEDERAL REDISTRIBUTION COMMITTEE

Table 5: Warringah's suggestion (excl Dee Why North) and St Ives SA2 added

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--------------------------------------|--------------------|--------------------|
| BRADFIELD | | |
| St Ives | 14,366 | 14,271 |
| BRADFIELD Total | 14,366 | 14,271 |
| MACKELLAR | | |
| Avalon - Palm Beach | 10,270 | 10,063 |
| Bayview - Elanora Heights | 8,692 | 8,619 |
| Beacon Hill - Narraweena | 8,170 | 7,226 |
| Belrose | 6,523 | 6,230 |
| Collaroy - Collaroy Plateau | 11,591 | 10,074 |
| Cromer | 6,482 | 5,717 |
| Dee Why - North | 10,498 | 9,419 |
| Forestville - Killarney Heights | 3,942 | 3,813 |
| Frenchs Forest - Oxford Falls | 10,354 | 10,427 |
| Mona Vale - Warriewood (North) | 10,943 | 10,765 |
| Narrabeen - Wheeler Heights | 8,972 | 8,181 |
| Newport - Bilgola | 10,704 | 10,528 |
| North Narrabeen - Warriewood (South) | 7,908 | 7,700 |
| Terrey Hills - Duffys Forest | 2,775 | 2,796 |
| MACKELLAR Total | 117,824 | 111,558 |
| WARRINGAH | | |
| Dee Why - North | 1,702 | 1,459 |
| WARRINGAH Total | 1,702 | 1,459 |
| Grand Total | 133,892 | 127,288 |
| Percent of total quota | 103.29 | 105.2 |

Appendix 3: Warringah and North Sydney

Table 6: Suggestion 47 on North Sydney-Warringah

| Original CED | Enrolments 2028 | Enrolments 2023 |
|---------------------------------|--------------------|--------------------|
| NORTH SYDNEY | | |
| Castle Cove - Northbridge | 7,844 | 7,661 |
| Cremorne - Cammeray | 9,264 | 9,194 |
| Crows Nest - Waverton | 12,321 | 12,790 |
| Neutral Bay - Kirribilli | 6,160 | 6,539 |
| North Sydney - Lavender Bay | 8,664 | 8,457 |
| NORTH SYDNEY Total | 44,253 | 44,641 |
| WARRINGAH | | |
| Balgowlah - Clontarf - Seaforth | 14,549 | 14,564 |
| Beacon Hill - Narraweena | 3,294 | 2,894 |
| Cremorne - Cammeray | 4,349 | 4,457 |
| Frenchs Forest - Oxford Falls | 1,669 | 1,614 |
| Freshwater - Brookvale | 14,831 | 14,922 |
| Manly - Fairlight | 15,629 | 15,695 |
| Manly Vale - Allambie Heights | 12,105 | 11,837 |
| Mosman - North | 9,904 | 10,206 |
| Mosman - South | 10,365 | 10,694 |
| Neutral Bay - Kirribilli | 5,654 | 6,021 |
| WARRINGAH Total | 92,349 | 92,904 |
| Grand Total | 136,602 | 137,545 |
| Percent of total quota | 105.39 | 113.66 |

Table 7: A alternative approach to Warringah

| Original CED | Enrolments 2028 | Enrolments 2023 |
|-----------------------------------|--------------------|--------------------|
| BRADFIELD | 2,930 | 2,912 |
| Castle Cove - Northbridge | 1,956 | 1,902 |
| Forestville - Killarney Heights | 0 | 0 |
| Lindfield - Roseville | 974 | 1,010 |
| MACKELLAR | 144 | 141 |
| Dee Why (South) - North Curl Curl | 144 | 141 |
| NORTH SYDNEY | 23,268 | 23,394 |
| Castle Cove - Northbridge | 7,844 | 7,661 |
| Cremorne - Cammeray | 9,264 | 9,194 |
| Neutral Bay - Kirribilli | 6,160 | 6,539 |
| WARRINGAH | 104,256 | 104,298 |
| Balgowlah - Clontarf - Seaforth | 14,549 | 14,564 |
| Beacon Hill - Narraweena | 3,294 | 2,894 |
| Cremorne - Cammeray | 4,349 | 4,457 |
| Dee Why (South) - North Curl Curl | 6,552 | 6,071 |
| Forestville - Killarney Heights | 5,355 | 5,323 |

| | | |
|-------------------------------|----------------|----------------|
| Frenchs Forest - Oxford Falls | 1,669 | 1,614 |
| Freshwater - Brookvale | 14,831 | 14,922 |
| Manly - Fairlight | 15,629 | 15,695 |
| Manly Vale - Allambie Heights | 12,105 | 11,837 |
| Mosman - North | 9,904 | 10,206 |
| Mosman - South | 10,365 | 10,694 |
| Neutral Bay - Kirribilli | 5,654 | 6,021 |
| Grand Total | 130,598 | 130,745 |
| Percent of total quota | 100.75 | 108.04 |

Appendix 4: North Sydney and Bradfield

Table 8: Bradfield including Chatswood

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--|--------------------|--------------------|
| BRADFIELD | 92,227 | 91,943 |
| Asquith - Mount Colah | 1,771 | 1,762 |
| Chatswood - East | 4,927 | 5,369 |
| Chatswood (West) - Lane Cove North | 1,630 | 1,713 |
| Gordon - Killara | 14,843 | 14,614 |
| Hornsby - East | 6,205 | 6,748 |
| Lindfield - Roseville | 15,097 | 15,215 |
| Normanhurst - Thornleigh - Westleigh | 1,919 | 1,898 |
| Pymble | 11,496 | 11,636 |
| Turrumurra | 14,603 | 14,044 |
| Wahroonga (East) - Warrawee | 12,730 | 12,418 |
| Wahroonga (West) - Waitara | 7,006 | 6,526 |
| NORTH SYDNEY | 16,076 | 16,491 |
| Chatswood - East | 4,506 | 4,685 |
| Chatswood (West) - Lane Cove North | 11,570 | 11,806 |
| Grand Total | 108,303 | 108,434 |
| Percent of total quotas | 83.55 | 89.61 |
| Plus | | |
| NORTH SYDNEY | | |
| Artarmon | 5,298 | 5,557 |
| Willoughby | 8,685 | 8,604 |
| BEROWRA | | |
| Hornsby - West | 7,203 | 6,934 |
| Revised Grand Total | 129,489 | 129,529 |
| Percent of total quotas (revised) | 99.90 | 107.04 |

Table 9: Bradfield moves west and north

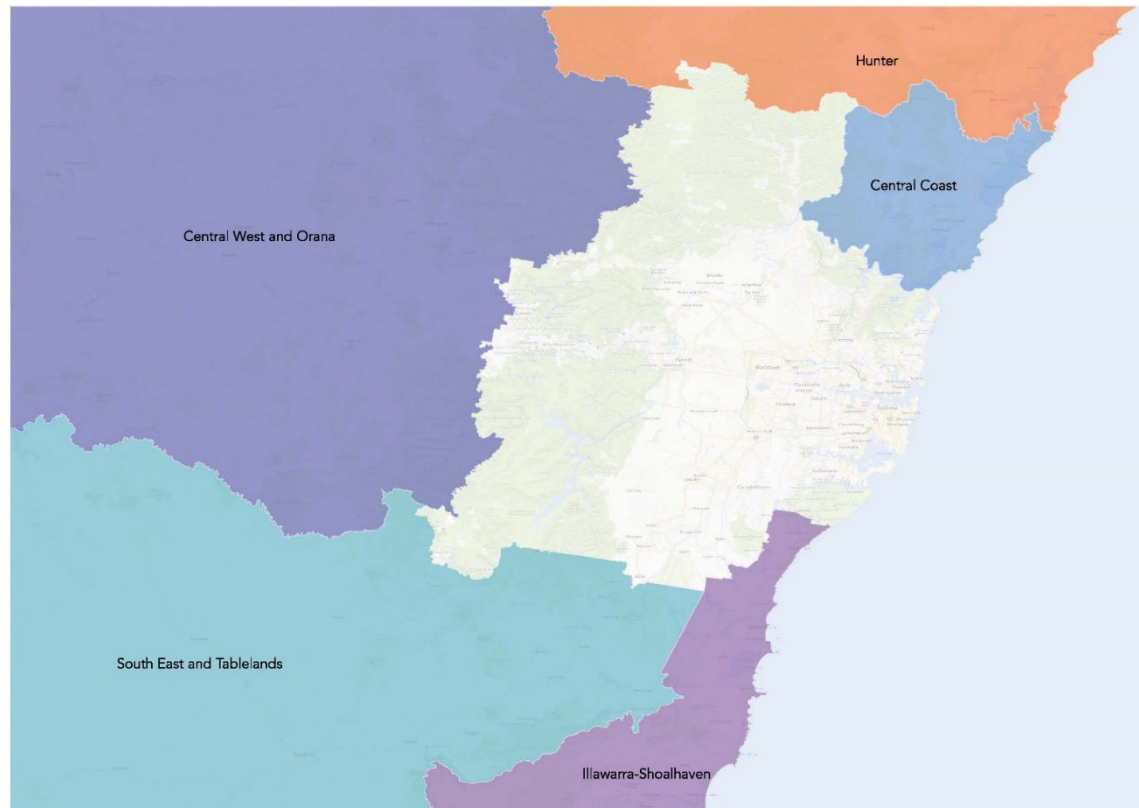
| Original CED | Enrolments 2028 | Enrolments 2023 |
|-----------------------|--------------------|--------------------|
| BEROWRA | 40,485 | 40,057 |
| Asquith - Mount Colah | 13,205 | 13,138 |

COMMENTS ON SUGGESTIONS TO THE AEC NSW FEDERAL REDISTRIBUTION COMMITTEE

| Original CED | Enrolments 2028 | Enrolments 2023 |
|--|--------------------|--------------------|
| Berowra - Brooklyn - Cowan | 8,480 | 8,604 |
| Hornsby - West | 7,203 | 6,934 |
| Normanhurst - Thornleigh - Westleigh | 11,597 | 11,381 |
| BRADFIELD | 85,670 | 84,861 |
| Asquith - Mount Colah | 1,771 | 1,762 |
| Gordon - Killara | 14,843 | 14,614 |
| Hornsby - East | 6,205 | 6,748 |
| Lindfield - Roseville | 15,097 | 15,215 |
| Normanhurst - Thornleigh - Westleigh | 1,919 | 1,898 |
| Pymble | 11,496 | 11,636 |
| Turrumurra | 14,603 | 14,044 |
| Wahroonga (East) - Warrawee | 12,730 | 12,418 |
| Wahroonga (West) - Waitara | 7,006 | 6,526 |
| Grand Total | 126,155 | 124,918 |
| Percent of total quotas (revised) | 97.33 | 103.23 |

Appendix 4: NSW State Government Boundaries

Planning Department Boundaries²³



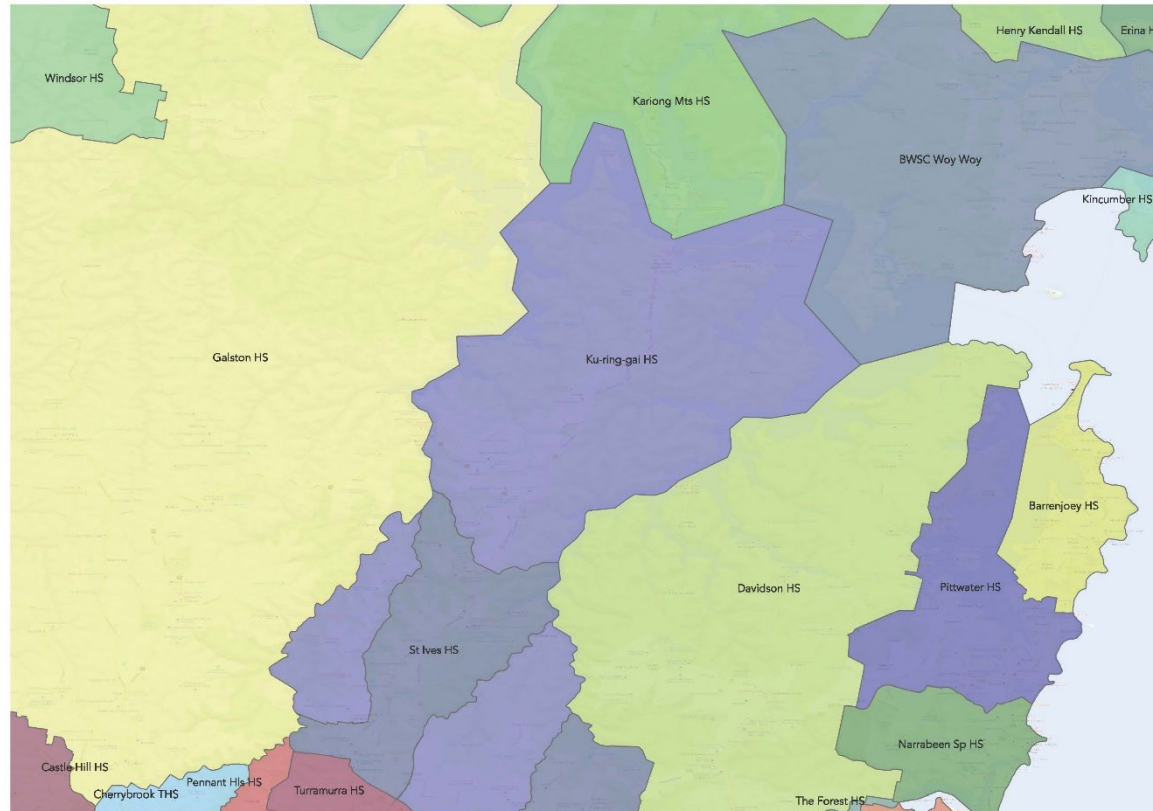
²³ 'Planning District Boundaries - ArcGIS REST Services Directory - Planning Administrative Boundary - NSW Planning Portal'
<https://www.planningportal.nsw.gov.au/opendata/dataset/planning-district-boundaries/resource/50d18111-b3a5-4451-b7a3-32880bc20f6d?inner_span=True>.

NSW Local Health Districts²⁴



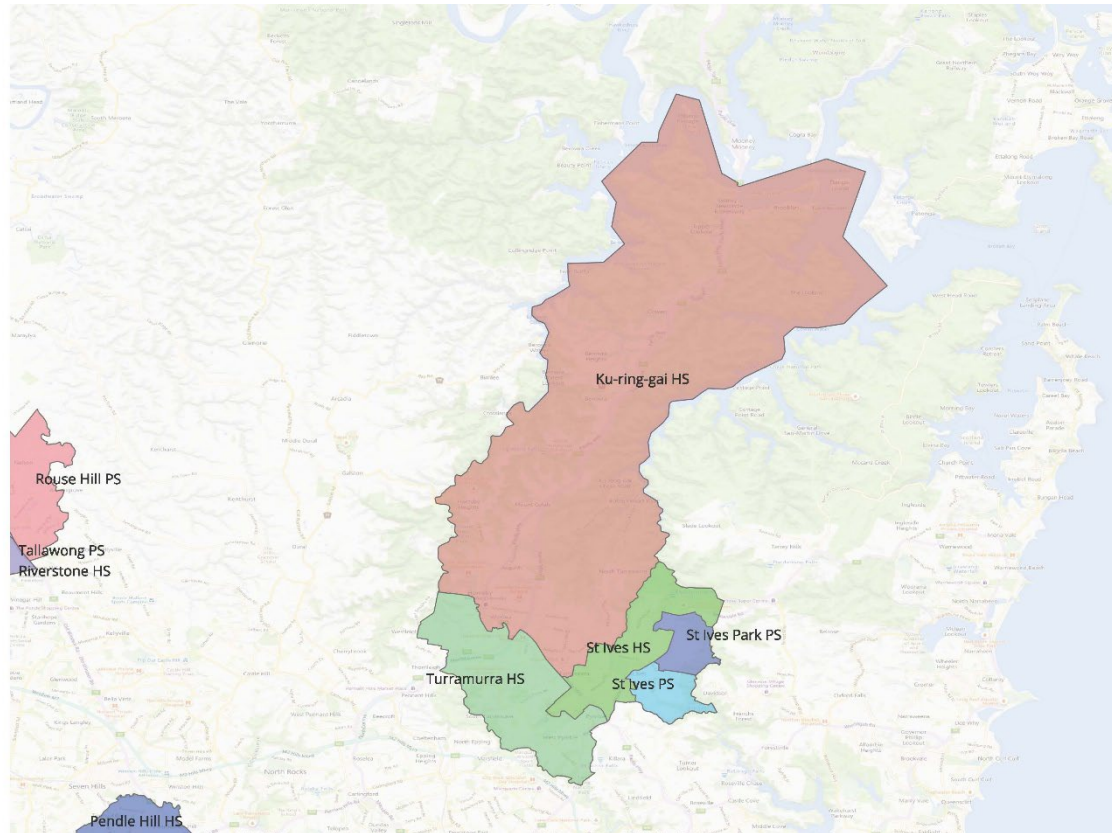
²⁴ Department of Health, 'Local Health Districts NSW' <<https://portal.spatial.nsw.gov.au/portal/home/item.html?id=78df4a3e987b4e7e8b241ee5bfcee358#overview>>.

Department of Education, current secondary high school catchments (co-ed only)²⁵



²⁵ NSW Department of Education, 'School Intake Zones (Catchment Areas) for NSW Government Schools' <<https://data.cese.nsw.gov.au/data/dataset/school-intake-zones-catchment-areas-for-nsw-government-schools>>.

Department of Education, future public school catchments (co-ed only)²⁶



²⁶ NSW Department of Education, 'School Intake Zones (Catchment Areas) for NSW Government Schools' <<https://data.cese.nsw.gov.au/data/dataset/school-intake-zones-catchment-areas-for-nsw-government-schools>>.

