



**THE FEDERAL  
REDISTRIBUTION  
NEW SOUTH WALES**

# Objection 36

Cheston Mak

27 pages

# **Objection to AEC's proposed redistribution boundaries (2024 NSW federal redistribution)**

Author of the objection: Cheston Mak  
Date: 16th June 2024

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## Content background

AEC has released a proposed redistribution (“**AEC’s proposal**”) of the federal boundaries for NSW on 14 June 2024. In the proposal, the division of North Sydney is to be abolished and absorbed by adjacent divisions.

## Author background

I am an elector (male, age group 25-35), currently based in the division of Melbourne, but has lived in Sydney for 9 years and has good local knowledge of Northwest Sydney, Northern Suburbs and North Shore areas.

I have been following all federal (NSW and Vic) and NSW state redistributions since 2018. I have recently provided a suggestion for the ongoing Victorian federal redistribution (suggestion S20) in 2023.

## Issues with AEC’s proposal

To cater for the abolition of North Sydney, it is inevitable that the boundaries of adjacent divisions have to be significantly changed. However, I believe AEC’s proposal has too many drastic changes which will force many electors to be transferred to different divisions. There is definitely potential to optimise and reduce these changes, while satisfying the numerical requirements for 2023 and projected 2028 enrolment quota.

Bennelong has traditionally included the Epping town centre for decades (Epping East and North Epping since 1977, Epping West since 1993). The statement in the report that the proposed Division of Bennelong will align with historical extents (Lane Cove, Riverview etc.) is correct. However, minimising changes to the existing boundaries should be a higher priority. It is noted there are no name mismatches (name is not named after a location), which means there is no sufficient justification to amend Bennelong significantly to match its historical extent as closely as possible.

AEC’s proposal will also split Blacktown into two divisions (Greenway and McMahon) along the railway line. For a major Western Sydney suburb like Blacktown, it is not ideal to have electors to be in different divisions.

The southernmost extent of Berowra is proposed to be even more south than what it is currently. Currently, the southernmost extent is North Rocks Road, bordering Parramatta. Under AEC’s proposal, the southernmost extent is proposed to be Terry’s Creek and the Eastwood SA2 boundary. This makes the already massive Outer Metropolitan seat even larger (in size) than it is, stretching from Wisemans Ferry to Eastwood, and this is not an ideal shape for an electorate.

# My proposal

## Boundary changes

My proposed alternative (“**my proposal**”) seeks to reduce or minimise AEC’s proposed changes. My proposal is in the table below, with maps in **Appendix A**. The specific SA1 areas in my proposal are detailed in **Appendix B**.

Division	AEC’s proposed boundary changes that I object	My proposed alternative solution	Impact to proposed changes or existing boundaries
Bennelong	Would have lost partial of Epping (West), and entire Epping (East)-North Epping to Berowra	Retain all areas that would have been lost to Berowra  Areas of Epping (West) that are to be ceded to Parramatta (i.e. west of Midson Road), to continue as proposed	Minimal to no changes to existing boundaries
	Would have gained entire Chatswood West and entire Greenwich from abolished North Sydney.  Proposed boundary would have been Fullers Road.	Chatswood West (north of Mowbray Road) to be given to Bradfield instead.  New boundary at Mowbray Road.	N.A.
	Would have gained entire Greenwich from abolished North Sydney.  Would have also gained portion of St Leonards east of railway line, from abolished North Sydney.  This means division will cross the railway line for only a small area. The St Leonards precinct also split into three divisions.	Part of Greenwich (east of Sarner Road and south of River Road) to be given to Warringah instead.  Portion of St Leonards (east of railway line) to be given to Bradfield instead.  New eastern boundary at Sarner Road and River Road	N.A.
Berowra	Would have lost West Pennant Hills to Mitchell respectively	Retain West Pennant Hills that would have been lost. Furthermore, gain the	Minimal to no changes to existing boundaries

Division	AEC's proposed boundary changes that I object	My proposed alternative solution	Impact to proposed changes or existing boundaries
		<p>remaining area of West Pennant Hills SA2 area from Mitchell so the entire SA2 is within Berowra.</p> <p>Boundary to be the West Pennant Hills SA2 boundary and the M2</p>	
	<p>Would have gained partial of Epping (west), Epping (east)-North Epping from Bennelong</p>	<p>No gain, localities to remain part of Bennelong, i.e. no changes to southern boundary along the M2</p>	<p>Minimal to no changes to existing boundaries</p>
Bradfield	Proposed boundary at Fullers Road and Pacific Highway	<p>Gain Chatswood West (north of Mowbray Road) that would have been given to Bennelong. New boundary at Mowbray Road.</p> <p>It also means almost all of Willoughby LGA will lie within Bradfield. A small exception will be near the Mowbray Road/Epping Road intersection where the LGA boundary does not follow Mowbray Road.</p>	N.A.
		<p>Gain portion of St Leonards (east of railway line) that would have been given to Bennelong.</p> <p>A counter-argument that this change does not line up with LGA boundaries is invalid as the original proposed boundary for Bradfield already does not follow that.</p> <p>Instead, it follows the St</p>	N.A.

<b>Division</b>	<b>AEC's proposed boundary changes that I object</b>	<b>My proposed alternative solution</b>	<b>Impact to proposed changes or existing boundaries</b>
		Leonards - Naremburn SA2 boundary.	
Warringah	Proposed western boundary along Lane Cove/North Sydney LGA boundary	Gain part of Greenwich (east of Sarner Road and south of River Road)  New western boundary at Sarner Road and River Road	N.A.
Mitchell	Would have gained West Pennant Hills from Berowra	No gain; rather, the small area of West Pennant Hills SA2 area within Mitchell is to be ceded to Berowra. This will mean the entire SA2 area is within the same division  Boundary to be along the West Pennant Hills SA2 boundary	Minimal to no changes to existing boundaries
	Would have lost the entire Rouse Hill Town Centre to Greenway	Retain Rouse Hill Town Centre.  Boundary to be along full length of Commercial Road between Windsor Road and Withers Road	Proposed changes reduced
Greenway	Would have lost all areas of Blacktown and Seven Hills south of railway line to McMahon  Proposed boundary along railway line	Retain some portions of Blacktown and Seven Hills south of the railway line. This also means the entire Blacktown (East) - Kings Park SA2 area is within Greenway.  Boundary to be Seven Hills Road South, Bungarribee Road and Balmoral Street (i.e. Blacktown (East) - Kings Park SA2 boundary)	Proposed changes reduced

Division	AEC's proposed boundary changes that I object	My proposed alternative solution	Impact to proposed changes or existing boundaries
	Would have gained some parts of Rouse Hill, including the entirety of Rouse Hill Town Centre from Mitchell	Cut back some of the gain, and Rouse Hill Town Centre to remain within Mitchell  Boundary to be along full length of Commercial Road between Windsor Road and Withers Road	Proposed changes reduced
McMahon	Would have gained all areas of Blacktown and Seven Hills south of railway line from Greenway	Cut back some of the gain. No part of Blacktown (East) - Kings Park SA2 area to be within McMahon  Boundary to be Seven Hills Road South and Bungaribee Road (i.e. Blacktown (East) - Kings Park SA2 boundary)	Proposed changes reduced

## Enrolment Data

The 2023 and projected 2028 enrolment data of my proposed alternative are shown below, compared to the proposal by AEC. It is noted that the 2023 redistribution quota and the 2028 projected enrolment quota are 121,011 and 129,621 respectively.

The detailed calculations for each division are in **Appendix B**.

**Table: 2023 enrolment data**

Division	AEC's 2023 enrolment numbers	AEC's % variation from the redistribution quota	My proposal's 2023 enrolment numbers	My proposal's % variation from the redistribution quota
Bennelong	123,253	1.85%	128,569	6.25%
Bradfield	125,471	3.69%	131,642	8.79%
Berowra	128,756	6.40%	123,349	1.93%



Division	AEC's 2023 enrolment numbers	AEC's % variation from the redistribution quota	My proposal's 2023 enrolment numbers	My proposal's % variation from the redistribution quota
Warringah	128,292	6.02%	131,327	8.52%
Greenway	109,188	-9.77%	110,879	-8.37%
Mitchell	119,353	-1.37%	111,697	-7.70%
McMahon	117,643	-2.78%	114,493	-5.39%
<b>Total of the 7 divisions</b>	<b>851,956</b>	<b>-</b>	<b>851,956</b>	<b>-</b>

**Table: 2028 projected enrolment data**

Division	AEC's projected 2028 enrolment numbers	AEC's % variation from the projected enrolment quota	My proposal's 2028 projected enrolment numbers	My proposal's % variation from the projected enrolment quota
Bennelong	127,105	-1.94%	132,688	2.37%
Bradfield	125,668	-3.05%	132,013	1.85%
Berowra	131,996	1.83%	125,922	-2.85%
Warringah	127,110	-1.94%	130,256	0.49%
Greenway	130,982	1.05%	131,857	1.73%
Mitchell	133,386	2.90%	126,882	-2.11%
McMahon	132,460	2.19%	129,089	-0.41%
<b>Total of the 7 divisions</b>	<b>908,707</b>	<b>-</b>	<b>908,707</b>	<b>-</b>

While noting that the percentage variation of the 2023 enrolment numbers is higher in my proposal, the projected percentage variation of the 2028 enrolment numbers are lower, meaning the enrolment numbers are projected to be more or less balanced in 2028. All percentage values are within the 10% (2023) and 3.5% (projected 2028) acceptable variances.

## Electors transferred to a different division

Under my proposal, these areas will no longer have electors transferred to a different division (compared to AEC's proposal):

Area	Current division of area to be retained in	Number of electors no longer transferred to a different division (2023 enrolment)
Epping (West) SA2 east of Midson Road	Bennelong	6,062
All of Epping (East) - North Epping SA2	Bennelong	8,460
West Pennant Hills SA2 within existing Berowra	Berowra	7,297
Blacktown (East) - Kings Park SA2 south of the railway line	Greenway	1,848
Some areas of Seven Hills - Prospect SA2 south of the railway line (SA1 areas of 1162601, 1162603, 1162604, 1162621)	Greenway	1,302
Rouse Hill Town Centre (SA1 areas of 1162520, 1162521, 1162522, 1162533, 1162542)	Mitchell	1,459
<b>Total</b>	-	<b>26,428</b>

Only one additional area will have electors transferred to a different division (compared to AEC's proposal):

Area	Current division of area	Division the area would be in under my proposal	Number of additional electors to be transferred to a different division (2023 enrolment)
West Pennant Hills SA2 within existing Mitchell	Mitchell	Berowra	1,818
<b>Total</b>	-	-	<b>1,818</b>

This means compared to AEC’s proposal, there is a net reduction of 24,610 electors that have to be transferred to a different division, or 2.89% of the seven divisions combined. This shows that my proposal is an improvement to AEC’s proposal in minimising the impact to existing electors.

Applying the above values to Table K of the AEC report gives the following updated values:

**Updated Table K: Summary of movement of electors between proposed electoral divisions - My proposal**

	<b>Number (entire state)</b>	<b>Percentage of state</b>
Electors transferred to another electoral division	688,241	12.36% (as opposed to AEC’s 12.81%)
Electors remaining in their existing electoral division	4,878,248	87.64% (as opposed to AEC’s 87.19%)
<b>Total</b>	<b>5,566,489</b>	<b>100.00%</b>

## Other issues AEC should consider

AEC should strongly consider these issues in case my alternative proposal is not accepted:

- If it is decided that Bennelong will not include North Epping and Epping, then it is preferred that these two suburbs be ceded to Parramatta instead of Berowra since Epping is in the Parramatta LGA, like majority of the federal division of Parramatta.
  - This also means Berowra will still not cross the M2 motorway.
- North Epping should be in the same division as Epping town centre, as the only physical access into North Epping is via Epping. It is illogical for both suburbs to be in different divisions.

## Conclusion

- My alternative proposal will alter AEC’s proposed changes for 7 divisions in northern Sydney.
- Bennelong’s proposed loss of Epping and North Epping will be significantly reduced, retaining much of these suburbs while absorbing a smaller extent of the abolished North Sydney. This also means Warringah and Bradfield will absorb more of North Sydney.
- West Pennant Hills will continue to be unified under one division, but under Berowra as opposed to AEC’s proposed Mitchell.
- Minor boundary changes to Mitchell, Greenway and McMahon to balance enrolment numbers.

**Appendix A:**  
**Maps of my proposal (by division)**



May 2024  
**MAP OF PROPOSED  
 COMMONWEALTH ELECTORAL DIVISION OF  
 BENNELONG**



0 2 km

Names and boundaries proposed by the Redistribution Committee —

Names and boundaries of existing Divisions —

Names and boundaries of Local Government Areas (as of August 2023) —

**Existing boundary along M2 and around North Epping to remain**

**Area to remain with Bennelong**

**Existing boundary along Lane Cove River to remain**

**Boundary to follow Mowbray Road**

**Areas of North Sydney to be gained by Bradfield instead**

**Area to be ceded to Parramatta as proposed, with boundary with expanded Parramatta to be along Midson Road**

**Small section of North Sydney within Willoughby LGA south of Mowbray Road to be ceded to Bennelong as proposed**

**Boundary to follow Sarner Road, River Road and boundary of 1168507 (SA1)**

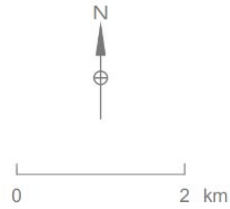
**Area of North Sydney to be gained by Warringah instead**

**SOURCES**  
 This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.

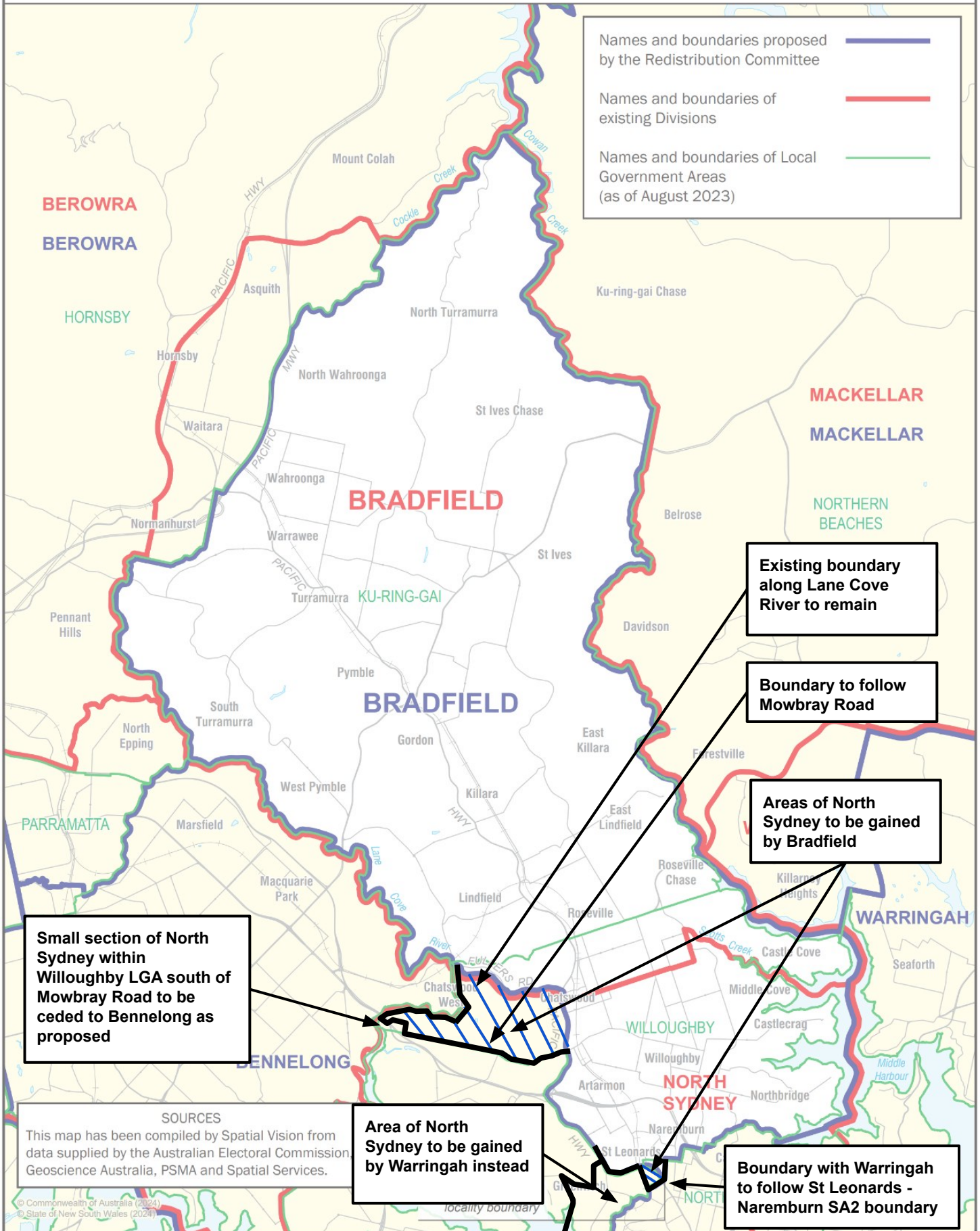




May 2024  
**MAP OF PROPOSED  
 COMMONWEALTH ELECTORAL DIVISION OF  
 BRADFIELD**



Names and boundaries proposed by the Redistribution Committee	
Names and boundaries of existing Divisions	
Names and boundaries of Local Government Areas (as of August 2023)	



Existing boundary along Lane Cove River to remain

Boundary to follow Mowbray Road

Areas of North Sydney to be gained by Bradfield

Small section of North Sydney within Willoughby LGA south of Mowbray Road to be ceded to Bennelong as proposed

Area of North Sydney to be gained by Warringah instead

Boundary with Warringah to follow St Leonards - Naremburn SA2 boundary

**SOURCES**  
 This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.

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 © State of New South Wales (2024)





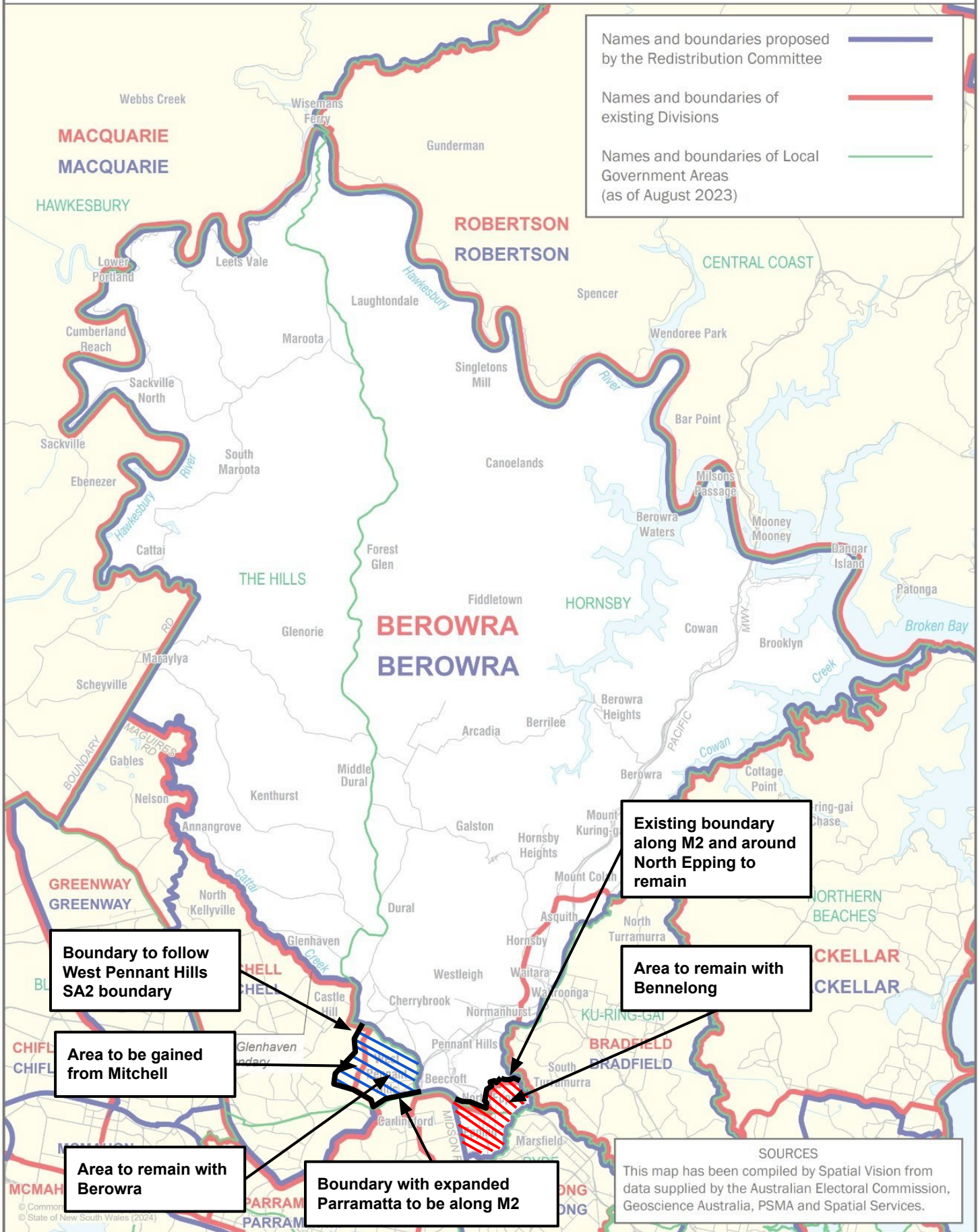
# May 2024 MAP OF PROPOSED COMMONWEALTH ELECTORAL DIVISION OF BEROWRA



0 5 km



Names and boundaries proposed by the Redistribution Committee	
Names and boundaries of existing Divisions	
Names and boundaries of Local Government Areas (as of August 2023)	



**Boundary to follow West Pennant Hills SA2 boundary**

**Area to be gained from Mitchell**

**Area to remain with Berowra**

**Boundary with expanded Parramatta to be along M2**

**Existing boundary along M2 and around North Epping to remain**

**Area to remain with Bennelong**

**SOURCES**  
This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.





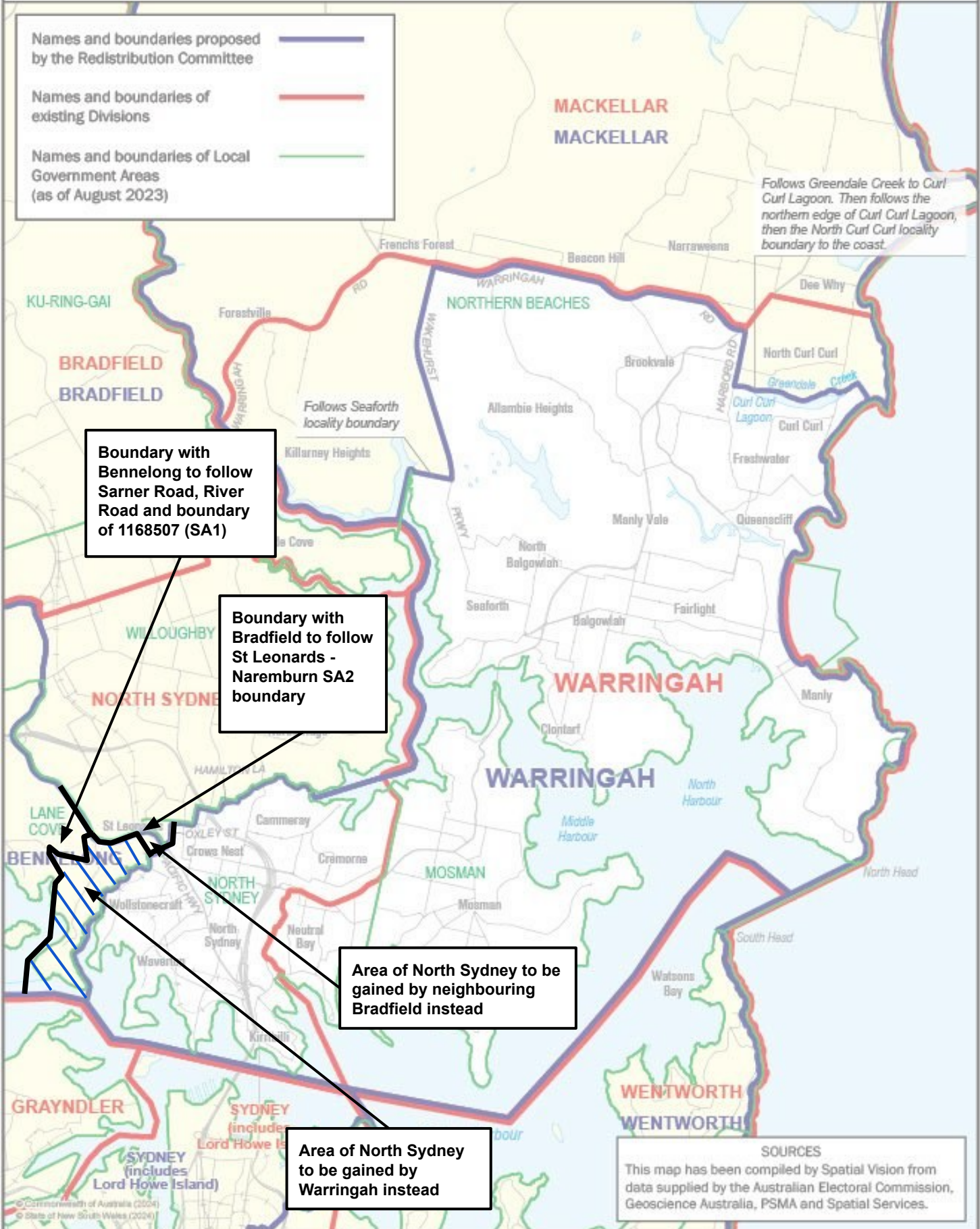
May 2024  
**MAP OF PROPOSED  
 COMMONWEALTH ELECTORAL DIVISION OF  
 WARRINGAH**



0 2 km



Names and boundaries proposed by the Redistribution Committee	
Names and boundaries of existing Divisions	
Names and boundaries of Local Government Areas (as of August 2023)	



*Follows Greendale Creek to Curl Curl Lagoon. Then follows the northern edge of Curl Curl Lagoon, then the North Curl Curl locality boundary to the coast.*

**Boundary with Bennelong to follow Sarner Road, River Road and boundary of 1168507 (SA1)**

**Boundary with Bradfield to follow St Leonards - Naremburn SA2 boundary**

**Area of North Sydney to be gained by neighbouring Bradfield instead**

**Area of North Sydney to be gained by Warringah instead**

**SOURCES**  
 This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.

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# May 2024 MAP OF PROPOSED COMMONWEALTH ELECTORAL DIVISION OF GREENWAY



0 2 km

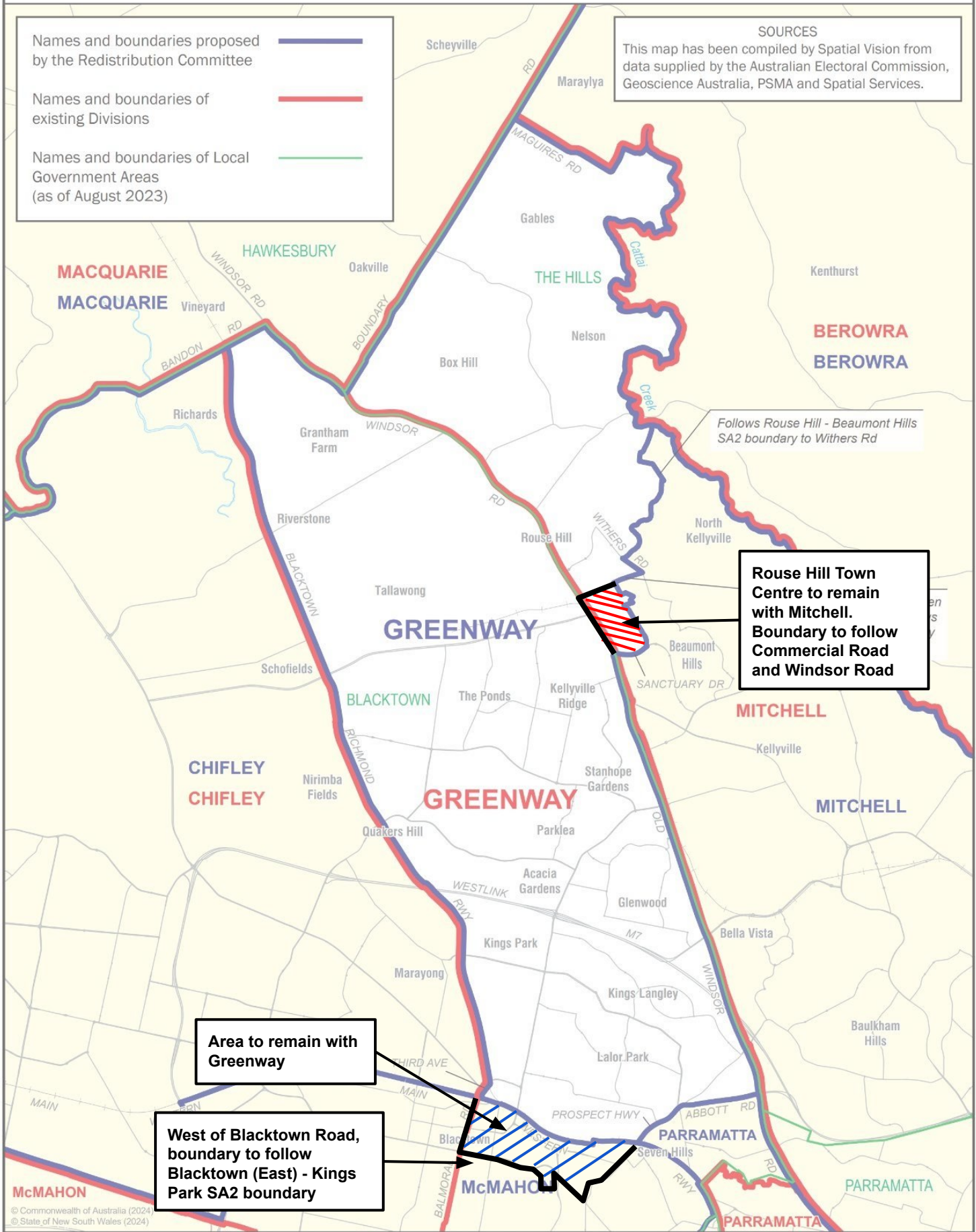


Names and boundaries proposed by the Redistribution Committee —

Names and boundaries of existing Divisions —

Names and boundaries of Local Government Areas (as of August 2023) —

**SOURCES**  
This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.



*Follows Rouse Hill - Beaumont Hills SA2 boundary to Withers Rd*

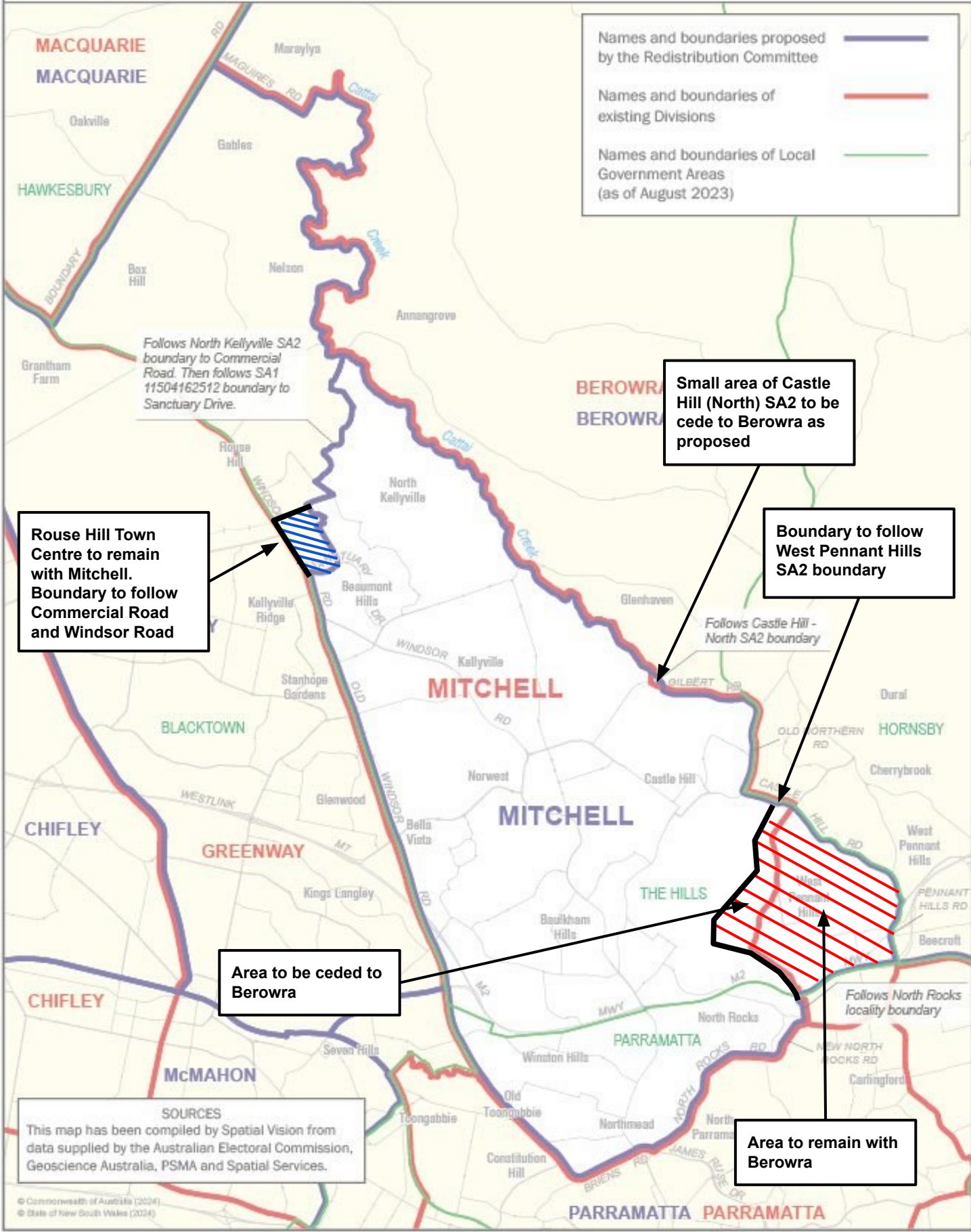
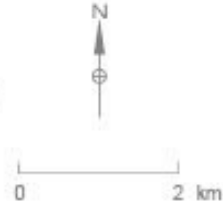
**Rouse Hill Town Centre to remain with Mitchell. Boundary to follow Commercial Road and Windsor Road**

**Area to remain with Greenway**

**West of Blacktown Road, boundary to follow Blacktown (East) - Kings Park SA2 boundary**



May 2024  
**MAP OF PROPOSED  
 COMMONWEALTH ELECTORAL DIVISION OF  
 MITCHELL**



Names and boundaries proposed by the Redistribution Committee	
Names and boundaries of existing Divisions	
Names and boundaries of Local Government Areas (as of August 2023)	

Follows North Kellyville SA2 boundary to Commercial Road. Then follows SA1 11504162512 boundary to Sanctuary Drive.

Rouse Hill Town Centre to remain with Mitchell. Boundary to follow Commercial Road and Windsor Road

Small area of Castle Hill (North) SA2 to be cede to Berowra as proposed

Boundary to follow West Pennant Hills SA2 boundary

Area to be ceded to Berowra

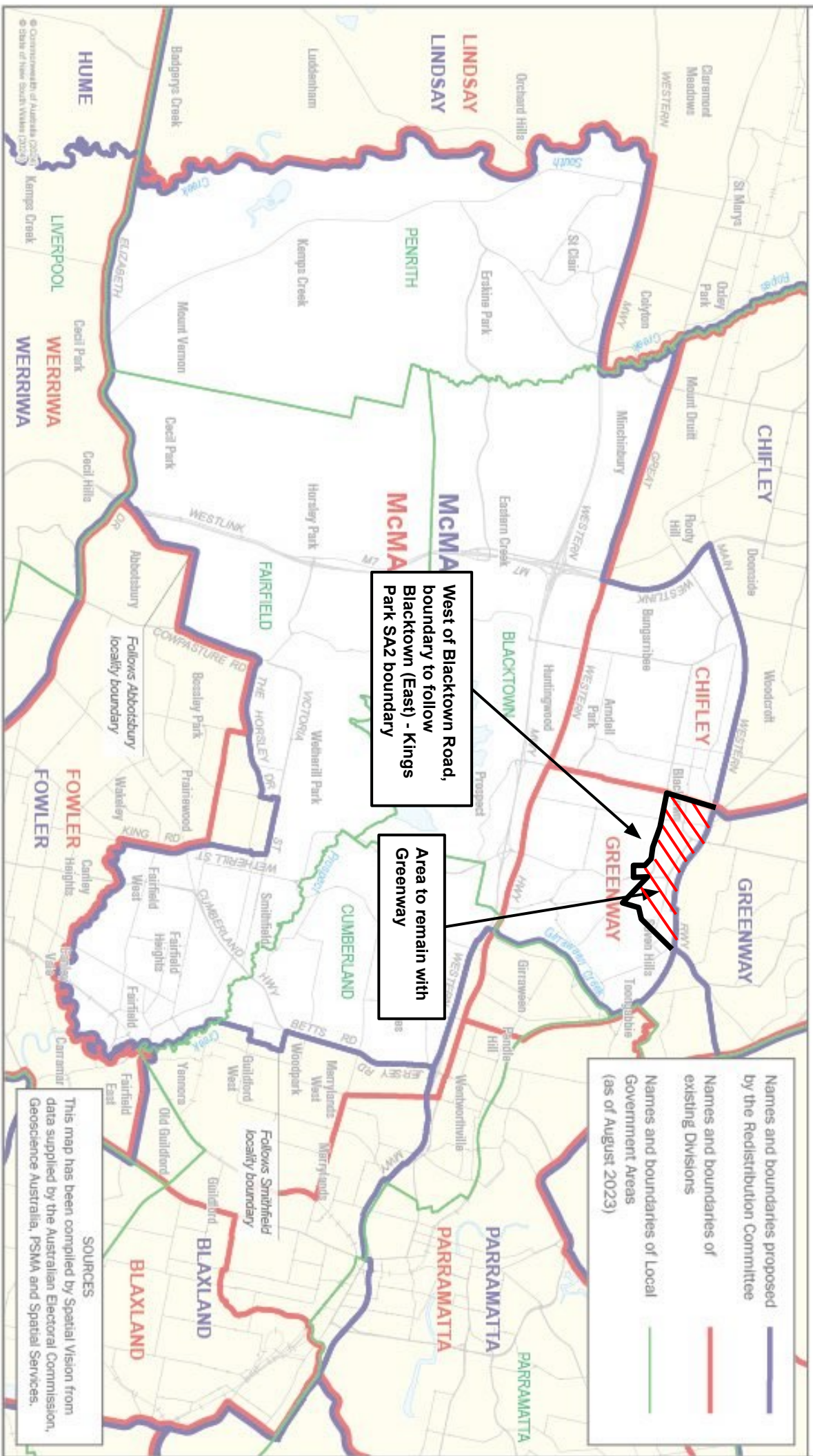
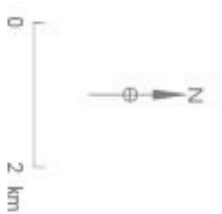
Area to remain with Berowra

**SOURCES**  
 This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.





May 2024  
**MAP OF PROPOSED  
 COMMONWEALTH ELECTORAL DIVISION OF  
 MCGMAHON**



West of Blacktown Road,  
 boundary to follow  
 Blacktown (East) - Kings  
 Park SA2 boundary

Area to remain with  
 Greenway

Names and boundaries proposed by the Redistribution Committee

Names and boundaries of existing Divisions

Names and boundaries of Local Government Areas (as of August 2023)

**SOURCES**  
 This map has been compiled by Spatial Vision from data supplied by the Australian Electoral Commission, Geoscience Australia, PSMA and Spatial Services.

**Appendix B:  
Detailed SA1 enrolment calculations of my  
proposal**

## Bennelong

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>123,253</b>	<b>127,105</b>
<b>Subtract: Chatswood West area - originally North Sydney, cede to Bradfield instead</b>		
1139914	224	201
1139917	337	342
1139919	422	433
1139920	329	328
1139921	315	312
1139922	321	328
1139923	359	356
1139924	213	218
1139925	266	266
1139926	197	201
1139927	262	251
1139928	200	204
1139929	332	340
1139930	273	265
1139931	296	277
1139939	201	180
1139940	218	202
1139945	218	213
1139949	202	185
<b>Subtract: St Leonards area - originally North Sydney, cede to Bradfield instead</b>		
1140128	371	300
1140131	615	943
<b>Subtract: Greenwich area - originally North Sydney, cede to Warringah instead</b>		
1168501	262	256
1168502	391	388
1168503	120	111

1168506	429	434
1168512	314	336
1168514	380	320
1168516	329	345
1168520	343	370
1168526	271	384
1168529	196	202
<b>Add: Epping &amp; North Epping area - retain instead of ceding to Berowra</b>		
Epping (East) - North Epping	8,460	8,892
Epping (NSW) - West <sup>^</sup>	6,062	6,182
<b>My proposal's numbers</b>	<b>128,569</b>	<b>132,688</b>

<sup>^</sup> Only includes SA1 areas that are originally proposed to be transferred from Bennelong to Berowra

## Bradfield

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>125,471</b>	<b>125,668</b>
<b>Add: Chatswood West area - originally Nth Syd, gain instead of going to Bennelong</b>		
1139914	224	201
1139917	337	342
1139919	422	433
1139920	329	328
1139921	315	312
1139922	321	328
1139923	359	356
1139924	213	218
1139925	266	266
1139926	197	201
1139927	262	251
1139928	200	204
1139929	332	340
1139930	273	265
1139931	296	277
1139939	201	180
1139940	218	202
1139945	218	213
1139949	202	185
<b>Add: St Leonards area - originally North Sydney, gain instead of going to Bennelong</b>		
1140128	371	300
1140131	615	943
<b>My proposal's numbers</b>	<b>131,642</b>	<b>132,013</b>

## Berowra

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>128,756</b>	<b>131,996</b>
<b>Subtract: Epping &amp; North Epping area - return to Bennelong</b>		
Epping (East) - North Epping	8,460	8,892
Epping (NSW) - West <sup>^</sup>	6,062	6,182
<b>Add: West Pennant Hills - retain instead of ceding to Mitchell</b>		
West Pennant Hills <sup>^#</sup>	7,297	7,201
<b>Add: West Pennant Hills - further gain from Mitchell</b>		
1129614A	114	116
1129618	221	243
1129619	323	272
1129629	342	350
1129630	232	230
1129631A	255	249
1129632	331	339
<b>My proposal's numbers</b>	<b>123,349</b>	<b>125,922</b>

<sup>^</sup> Only includes SA1 areas that are originally proposed to be transferred from Bennelong to Berowra

<sup>#</sup> Only includes SA1 areas that are originally proposed to be transferred from Berowra to Mitchell



## Warringah

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>128,292</b>	<b>127,110</b>
<b>Add: Greenwich area - originally North Sydney, gain instead of going to Bennelong</b>		
1168501	262	256
1168502	391	388
1168503	120	111
1168506	429	434
1168512	314	336
1168514	380	320
1168516	329	345
1168520	343	370
1168526	271	384
1168529	196	202
<b>My proposal's numbers</b>	<b>131,327</b>	<b>130,256</b>

## Greenway

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>109,188</b>	<b>130,982</b>
<b>Subtract: Rouse Hill Town Centre - return to Mitchell</b>		
1162520	169	278
1162521	357	686
1162522	259	432
1162533	209	272
1162542	465	828
<b>Add Blacktown and Seven Hills - retain instead of ceding to McMahon</b>		
Blacktown (East) – Kings Park ^	1,848	1,986
1162601	220	259
1162603	348	360
1162604	413	440
1162621	321	326
<b>My proposal's numbers</b>	<b>110,879</b>	<b>131,857</b>

^ Only includes SA1 areas that are originally proposed to be transferred from Greenway to McMahon

## Mitchell

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>119,353</b>	<b>133,386</b>
<b>Subtract: West Pennant Hills - return to Berowra</b>		
West Pennant Hills	7,297	7,201
<b>Subtract: West Pennant Hills - further cede to Berowra</b>		
1129614A	114	116
1129618	221	243
1129619	323	272
1129629	342	350
1129630	232	230
1129631A	255	249
1129632	331	339
<b>Add: Rouse Hill Town Centre - retain instead of ceding to Greenway</b>		
1162520	169	278
1162521	357	686
1162522	259	432
1162533	209	272
1162542	465	828
<b>My proposal's numbers</b>	<b>111,697</b>	<b>126,882</b>

## McMahon

SA1 or SA2 areas	2023 enrolment	2028 projected enrolment
<b>AEC's proposed numbers</b>	<b>117,643</b>	<b>132,460</b>
<b>Subtract Blacktown and Seven Hills - return to Greenway</b>		
Blacktown (East) – Kings Park ^	1,848	1,986
1162601	220	259
1162603	348	360
1162604	413	440
1162621	321	326
<b>My proposal's numbers</b>	<b>114,493</b>	<b>129,089</b>

^ Only includes SA1 areas that are originally proposed to be transferred from Greenway to McMahon