



# Objection 1

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# Victorian Labor's

Objections to  
redistribution  
committee's  
proposal for  
Victoria.

Victorian  
**Labor**

16 April 2021

Redistribution Secretariat for Victoria  
Australian Electoral Commission  
Sent via: public submissions tool

Dear members of the Redistribution Committee,

Thank you for the opportunity to provide objections to proposed division boundaries and names in Victoria.

Please find attached the objections of the Australian Labor Party (Victorian Branch) to the Redistribution Committee's proposals.

Victorian Labor appreciates the work of the committee in preparing the draft boundaries and also appreciates the opportunity to comment on the committee's proposals.

Yours in solidarity



CHRIS FORD  
ACTING VICTORIAN BRANCH STATE SECRETARY  
AND CAMPAIGN DIRECTOR

## AUSTRALIAN LABOR PARTY OBJECTIONS TO REDISTRIBUTION COMMITTEE'S PROPOSAL FOR VICTORIA

The effects of the ALP's objections are summarised as follows:

- 1. Higgins/Macnamara:** Restore Punt Road and Dandenong Road as electoral boundaries between these two Divisions. Instead of transferring 46,954 electors between these seats, instead only the suburb of Windsor, containing 4,731 electors are sent from Macnamara to Higgins. That results in all of Stonnington Council being placed in Higgins and all of Port Phillip Council being retained in Macnamara. Our objection also unites the suburb of Prahran in Higgins and the suburb of St Kilda East entirely in Macnamara.
- 2. Menzies/Deakin:** Retain the existing southern boundary of Menzies, which is also a municipal, State and Federal boundary. With a major expansion of the Eastern Freeway, now being built, which will expand from eight lanes to up to 18 lanes in the very part of the Whitehorse Council area that is proposed to be sent to Menzies, these part suburbs are instead transferred to Deakin. In turn, Menzies is compensated by retaining Warranwood and regaining Croydon suburbs as has usually been the arrangement for Menzies since its establishment in 1990.
- 3. Tucker/Wannon:** Fine tunes the Redistribution Committee's proposal. Anglesea is retained in Tucker and instead several small localities right next door to the town of Winchelsea are transferred to Wannon. Overall, the two way exchange involves fewer than 4,000 electors at both the quota and future quota dates.
- 4. Hotham/Bruce:** Unites the entire suburb of Noble Park North in Bruce and unites the suburb of Mulgrave in Hotham. The exchange both ways involves fewer than 5,000 electors and also avoids having any of Monash Council within Bruce.
- 5. Bruce/Holt/Isaacs:** Lyndhurst is returned to Holt, thereby retaining the Western Port Highway, which is also a Council boundary, as the boundary between Holt and Isaacs. That enables Holt to lose to Bruce the tiny section of the suburb of Berwick, (1,317 electors), which in any event is isolated from the remainder of the seat by Berwick Springs. The change also results in a two way split of the suburb of Berwick between La Trobe and Bruce, instead of the three way split of the suburb, as proposed. Finally, Isaacs is able to retain its existing Pakenham Line boundary with Bruce.
- 6. Kooyong/Chisholm:** Unites the entire suburb of Surrey Hills into Kooyong. The transfer of around 3,000 electors from Chisholm doesn't require any other movement of electors.
- 7. Maribyrnong/Fraser:** Transfers 1,605 electors from Fraser to Maribyrnong. Although it splits the suburb of Maribyrnong, the objection actually improves the community of interest of both Divisions.

### DIVISION NAMES

Labor supports the proposal of the Redistribution Committee to rename a Division in honour of Margaret Tucker, which was a common cause of so many suggestions and comments on suggestions, including our own. Should the proposal be adopted, then Tucker would become the first Division in Australian history solely named after an indigenous woman.

However, we disagree with the proposal that Corangamite, an indigenous Federation name, be the Division to be renamed.

We note that the Division of Kooyong, also an original Federation name, has not contained the suburb of Kooyong since the creation of Higgins in 1949. To the best of our knowledge, in the 70 plus years, since the suburb was removed and despite the fact that the suburb actually adjoins the seat of Kooyong, no one has proposed that the Division name of Kooyong either be retired or follow the suburb name.

Similarly, Maribyrnong, a Division which has existed since 1906, has often not contained the suburb of Maribyrnong, including before 2010 and under the current proposal. Yet over the years, successive Commissioners have seen fit to retain the name.

At the last redistribution, the Redistribution Committee proposed that Corangamite be renamed 'Cox'. But after consideration of objections and, we think, the eloquent case made by Mr Nyunggai Warren Mundine at the public hearings held in Melbourne, the Augmented Commission concluded (par 96 of its Report:

*Some objections noted that the name 'Corangamite' now has a strong connection to the area covered by the electoral division itself, rather than simply the lake or the local government area. The augmented Electoral Commission therefore concluded it would be appropriate to retain the name of the electoral division, noting that the meaning of Corangamite, as 'bitter' and relating to the saltiness of Lake Corangamite, is equally appropriate to a coastally focused electoral division. Doing so will also allow for the retention of a Federation name and an Aboriginal name."*

Given the debate that occurred in 2018 and the final determination made, it was rather surprising to see again that the name of Corangamite is again proposed to be retired.

Lake Corangamite is becoming further and further away from the seat of Corangamite, similar to what happened in the case of another Federation Division, Werriwa, and the aboriginal word for Lake George.

We think that equally, Corangamite should be retained and that Tucker be adopted as a divisional name. We had proposed in our comments on suggestions that Hotham be renamed Tucker. We ask that during this phase that further consideration be given to that suggestion. If the Commission is reluctant to retire the name of Hotham, (established in 1969) then we request that Gellibrand, created in 1949 be renamed Tucker.

### **OBJECTION 1: HIGGINS AND MACNAMARA**

This portion of our submission will cover our objection to the proposed divisions of Higgins and Macnamara.

This submission objects on several grounds to the proposed redistribution of these divisions.

In making this submission we note that analysis by various psephologists (Antony Green; Poll Bludger; Tallyroom<sup>1</sup>) shows that the proposed changes will only negligibly change the overall Two-Party Preferred (2PP) vote in both Higgins and Macnamara and have no

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<sup>1</sup> <https://www.tallyroom.com.au/41273> ; <https://antonygreen.com.au/2021-federal-redistribution-victorian-draft-boundaries/> ; <https://www.pollbludger.net/2021/03/19/draft-federal-redistributions-victoria-and-wa/>

significant impact on the primary votes of the major parties. Indeed, the proposed changes are projected to marginally benefit the Labor Party in both seats.

We acknowledge that because the enrolment in Macnamara is projected to be over the quota designated in Section 66(3)(a) of the Act by some 248 electors, that a redistribution is necessary under the Electoral Act to bring it within the permissible range of the numbers of electors. The Committee has in response proposed a redistribution of the boundaries that will move some 46,964 electors – that is, 27,393 in Caulfield East, Caulfield, Caulfield North, parts of St Kilda East and Elsternwick moved from Macnamara into Higgins, and 19,571 electors in South Yarra and Prahran moved from Higgins into Macnamara. The Committee’s reasoning for its proposal as stated is:<sup>2</sup>

*“334. Seven suggestions to the redistribution and four comments on suggestions advocate a swap of territory between the proposed Divisions of Higgins and Macnamara on community of interest grounds adopting Hotham Street and Williams Road as the eastern boundary.<sup>86</sup>*

*335. The Redistribution Committee proposes the Division of Macnamara gains further territory in the Stonnington City Council from the Division of Higgins, gaining all territory west of Williams Road (South Yarra and part of Prahran). **In making this change the Redistribution Committee is able to accommodate these suggestions and comments on suggestions, seeing value in this alteration acknowledging the community of interest surrounding public housing and in the strong eastern boundary of Williams Road and Hotham Street providing a strong north south transport link.**” (emphasis added)*

As a starting point, we would like to stress that effecting our objections and our proposed boundary changes would only affect the electorates of Macnamara and Higgins. It involves absolutely no impact on the broader state-wide distribution of electorates: no other electorate need be affected.

Our submission argues that the necessary net transfer of electors can be better achieved with regards to the Section 66 factors by returning Windsor to Higgins. This proposal will not involve the transfer of some 46,964 electors – it will only affect some 5,000 electors. This more minimalistic transfer of electors would cause less confusion and disruption to electors. It will better reflect communities of interest within the two electorates, and the physical features, natural boundaries and means of communication and travel within the two electorates – including the boundaries of Local Government Areas.

Our submission takes the following structure:

1. **Communities of interest:** The community of interest consideration militates against the proposed alteration. The argument that public housing tenants across Melbourne’s inner south-east form a community of interest can be doubted. The proposed alteration splits a community of interest of significant size in the Jewish community, divides the community of interest in Stonnington Council across multiple electorates, artificially divides Glen Eira residents from Port Phillip and wrongly collects them with Stonnington residents in Higgins despite Glen Eira and Port Phillip

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<sup>2</sup> Proposed redistribution and reasons for proposal – paras 334–335.

communities socialising, communicating and using means of travel together in notably different ways to that of Stonnington;

2. **Means of communication and travel and physical features:** The means of communication and travel used by electors across Melbourne's inner south-east are not in fact reflected in the proposed divisions of Macnamara and Higgins. Williams Road and Hotham Street do not provide a notably strong north south transport link, and especially not when compared to Punt Rd/Hoddle Highway. By contrast, Dandenong Road/Princes Highway and Punt Road/Hoddle Highway are far stronger transport links in Melbourne and present a far stronger and more natural northern boundary. This boundary more accurately reflects the different ways in which Macnamara and Higgins electors actually gather and socialise.
3. **The boundaries of existing Divisions:** The boundaries of existing State Divisions – for example, in Caulfield and Prahran – will now be unnecessarily divided across multiple Federal Electorates.
4. **Considerations that are not relevant:** Considerations motivated by improving the aesthetic of the proposed boundaries are not relevant nor convincing.
5. **Alternative proposals:** A more appropriate and proportionate response to Macnamara having surplus electors of 248 above quota, having regard to the statutory factors, is to return Windsor into Higgins.

## **Part I – Communities of interest**

### **(i) Formed and cohesive political identity**

We think it is worth stating firstly that there is a clear community and identity around voting in the Division of Macnamara and Melbourne Ports as it was known prior to 2016. Aside from the most recent redistribution, which transferred the suburb of Windsor from Higgins to Macnamara, all of the suburbs currently in Macnamara have been in the same electorate since at least 1990 – although we note the 2010 redistribution transferred the southern part of the suburbs of Elsternwick and Glen Huntly and all of Gardenvale and Caulfield South to Goldstein.

Residents of Caulfield North, Caulfield, St Kilda East, Ripponlea, Balaclava and the northern part of Elsternwick have voted in this district together with the suburbs of Elwood, St Kilda, Albert Park, South Melbourne and Port Melbourne for over three decades – they are knowledgeable about this fact and organise themselves politically in organisations that span across these suburbs. They know who their current and previous Members are and were and their identity as 'locals' is linked to the seat they live in. This can be seen in the candidate forums organised by the community during the election in Glen Eira and St Kilda, both of which had attendance well into the hundreds. It can also be seen in the community advocacy groups that formed around the 2019 election with active membership across all parts of Macnamara to campaign in Macnamara for action on climate change, including the Australian Conservation Foundation and the Jewish Climate Network. This community identifies strongly with Melbourne Ports/Macnamara.

## **(ii) The Jewish community**

A community of interest of substantial size is the Jewish community which has been predominantly located in Melbourne Ports and Macnamara. It has been for several decades centred around greater Caulfield, St Kilda East, Elsternwick, Balaclava, St Kilda and Ripponlea and the Local Government Areas of Port Phillip and Glen Eira. Many Jewish families now living in Caulfield grew up in St Kilda, East St Kilda and Elwood, or first settled there when they came to Australia, and retain strong ties to these areas. If the proposed alteration proceeds, the Jewish community – a community with important political and social interests – will be divided across two electorates and its political representation will suffer as a consequence.

Just **0.4%** of Australians identify their religion as Jewish but in Caulfield and Caulfield North it is over 40%; in St Kilda East it is 24.8% and in Balaclava, Elsternwick and Ripponlea it is between 11-18%. In St Kilda and Elwood it is also above 2% which is still significantly above the state-wide average.

This area contains nearly all Jewish synagogues; community organisations and centres; not-for-profits; health and aged care services; and even its own volunteer security and paramedic organisations. It is home to many Jewish schools and kosher restaurants and shops.

The area is also home to the full diversity of the Jewish community's religious sects, such as the Orthodox Lubavitch/Chabad community and the ultra-Orthodox Adass community. These communities live predominantly across both sides of Hotham Street in St Kilda East, Elsternwick, Ripponlea and Balaclava. They have their own synagogues and schools, their own kosher butcher and religious authorities (even separate to the mainstream Jewish community), and both their institutions and their community members are spread across these suburbs.

In the heart of all of these communities are shopping strips on Carlisle Street, Balaclava; Glenhuntly Road, Elsternwick (and Caulfield/Glenhuntly); and Hawthorn Road, Caulfield. These shopping strips contain many kosher butchers, bakeries and supermarkets. They also contain regular shops and supermarkets that sell an extensive range of kosher products. But they are a melting pot of multicultural Melbourne – they also contain many typical inner-city Melbourne cafes, coffee shops, restaurants and bars. In some ways they demonstrate the cultural and social links that connect this electorate – non-Jewish people (and Jewish alike) may come from across St Kilda, Elwood or St Kilda East to Carlisle Street or Glenhuntly Road for brunch, drinks, or to do their shopping; and Jewish people may come from Caulfield, Elsternwick or St Kilda East for the kosher shops and restaurants and the Jewish or Israeli-style institutions as well. Indeed, it is because of the role of Balaclava in connecting the communities in Macnamara that some proposed Balaclava to be an alternative name to the 2018 AEC Redistribution for the successor Division to Melbourne Ports – it would be counter-intuitive for Balaclava to become an artificial border between Divisions.

The Jewish community provides strong evidence that the communities south of Dandenong Road/Princes Highway are integrated socially east-west along the shopping strips of Elsternwick and Balaclava. The only kosher butchers that serve the Jewish community south of Dandenong Road/Princes Highway are in Ripponlea on Glen Eira Rd and Inkerman St in St

Kilda. Every kosher restaurant and bakery in Melbourne is South of Dandenong Road, and where north of Glen Huntly Road, they are largely concentrated on Balaclava Rd, including for example the iconic institutions of Glicks. The Jewish community, and indeed the community of Glen Eira, is not a community that ordinarily travels north of Dandenong Road to shop and dine – it is located largely in Caulfield/Elsternwick/St Kilda and faces west, not north. It travels west well beyond Hotham St/Williams Rd to St Kilda and Balaclava to shop and dine and gather and visit its community organisations.

Further evidence to this point is found in the '*eruv*.' An eruv is a ritual wire enclosure that permits Jews to engage in many activities that are otherwise prohibited on the Sabbath (which occurs every week from Friday to Saturday). For example, without an eruv, religious and orthodox members of the Jewish community are by Jewish law prohibited from carrying and transporting objects on the Sabbath, including strollers to convey children. The Melbourne eruv is therefore an integral part of Jewish life in Melbourne. And importantly, the Melbourne eruv follows the contours of where this community is in fact located, and where it in fact travels. The eruv's eastern boundary tracks north-south along St Kilda Rd, and its northern boundary tracks east-west along Dandenong Road/Princes Highway, and the enclosed area leads further south capturing parts of Brighton and Bentleigh. There has never been any notable move for its expansion across Dandenong Road/Princes Highway. It is strong evidence that the Jewish community, which is the most significant community of interest in this area, orients from Dandenong Road/Princes Highway southwards (not northwards), and spreads well across Hotham St/Williams Rd. The map of the *eruv* is viewable in the appendix.

More evidence to the community's cross-pollination across Hotham St/Williams Rd is in the plans to establish the Elsternwick Jewish Cultural Precinct. The Precinct is a project of Glen Eira Council and the Commonwealth Government with a substantial multi-million dollar that intends, by establishing the Precinct, to create an active and thriving meeting space for the local community by upgrading and redeveloping Selwyn St, Elsternwick; expanding the Jewish Holocaust Centre; relocating the Jewish Museum; and upgrading the Kadimah Jewish Cultural Centre and National Library. This project is being organised in partnership with the local Elsternwick Traders' Association and other Jewish organisations and is one of the most significant developments in the community in recent years. The Precinct's location in Elsternwick makes abundantly clear that the community across the areas south of Dandenong Road gather in Elsternwick, and that in future the programme of governments – local and national – is to enhance their engagement locally in Elsternwick and nearby areas.

It is beyond doubt that the Jewish community has made the areas spanning St Kilda to Caulfield North its home and has fundamentally shaped the local character of that area.

The proposed division would divide this community and families into two electorates on either side of Hotham Street. And it would wrongly place this community into Higgins, which being located predominantly north of Dandenong Road/Princes Highway (a strong natural boundary) and away from the heart of the community's organisations and institutions, is an area with which this community has only a very limited affiliation with regards to social and cultural interests, shopping, dining, communication and travel.

In particular, for the religious communities, who often are more insular and less engaged with the secular and political world, this would make their representation far more difficult.

They would find it harder to get representation and support if half of them had to go to one local MP and the other half to another.

### **(iii) The City of Stonnington**

The proposed alteration will further divide the community of interest in Stonnington across Higgins and Macnamara, and will split the community of interest in Port Phillip across Higgins and Macnamara and artificially divide Port Phillip from Glen Eira. This is despite the communities of interest in Glen Eira and Port Phillip sharing a set of social interests and an identity that are far more similar than those shared by Stonnington and Glen Eira or Stonnington and Port Phillip, when considering their school catchment zones; its trader associations; how they study, shop, gather and travel; and the natural physical boundaries in Punt Rd/Hoddle Highway and Dandenong/Princes Highway.

The school catchment zones reinforce the distinct identity of Stonnington compared against Port Phillip and Glen Eira and the strong natural boundaries between these communities presented by Punt Rd and Dandenong Rd/Princes Highway compared against the weaker natural boundary in Hotham St. The suburbs of Toorak and Kooyong, and most of Malvern and Armadale, are captured in the catchment of Auburn High, which is not only North of Princes Highway but is North of the Yarra River entirely. The catchment of Prahran High School (which extends only from years seven to nine) extends only slightly south of Dandenong Road/Princes Highway, and hugs Princes Highway on Queens Rd along Albert Park. Revealingly, from year ten onwards, students in South Yarra and Prahran attend Richmond High School, and then from year eleven Collingwood High School, both of which are well-north of the Yarra. This is compared against the broad majority of the students in the existing boundaries of Macnamara whose schools are located to the west and south of Princes Highway - Albert Park College, Elwood College, and Glen Eira College.

The well-formed identity in Stonnington as distinct from Glen Eira and Port Phillip is reflected in its highly active trader association, *The Chapel St Precinct Association*, which is independent of any shopping district south or west of the Princes Highway and which represents over 2,200 properties and business along Chapel St from South Yarra through Prahran to Windsor (and nothing beyond Dandenong Road/Princes Highway).

On one hand, residents of Caulfield, St Kilda East and Elsternwick in Macnamara predominantly socialise and shop in areas south of Dandenong Road, and gather in their own parks that are south of Dandenong Road (Caulfield Park, Caulfield Racecourse, Alma Park, Elsternwick Park, the St Kilda Botanical Gardens, and Albert Park for example), which as a key arterial highway forms a strong natural boundary between the Stonnington and Glen Eira LGAs. Moreover, those west of Punt Rd (and especially those west of St Kilda Rd) predominantly socialise west of Punt Rd and connect with those in the State Electorate of Caulfield in areas of St Kilda. By contrast, residents of Prahran, South Yarra, Malvern, Toorak and Armadale in Higgins socialise in different, distinct shopping and dining strips, parks and community centres and are far less likely to shop and gather in areas of St Kilda. The electors in Stonnington proposed to be moved into Higgins, as the Liberal Party submission notes,<sup>3</sup> orient largely along Chapel St from South Yarra and Prahran to Windsor. Other than Chapel St, they shop, dine, travel and socialise on Malvern Road and Commercial Road; on Toorak Road and at the Toorak Village; on Glenferrie Road; and High Street. They gather in

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<sup>3</sup> s90

separate parks that sit north of Dandenong road. These shopping strips have intrinsically more in common with each other than with those south of Dandenong Road/Princes Highway, which orient towards the bay. The most distinct way of identifying them is the fact they all live in the Local Government Area of Stonnington, and their shared economic and social interests would be best represented by the suburbs of South Yarra, Windsor, Prahran, Armadale and Toorak remaining in one electorate.

It's also notable that the proposed redistribution would split the suburb of Prahran into two different electorates – the suburb of Prahran stretches east-west from Punt Road to Orrong Road (its north border being Commercial/Malvern Road and its south border being High Street between Punt and Williams, while its south border is Dandenong Road between Williams and Orrong). Thus moving the boundary to Williams Road splits Prahran residents, who were entirely within Higgins prior to the redistribution, between two electorates of Macnamara and Higgins. Of Prahran's 12,982 residents, roughly half (6,216) would be in Higgins and the rest (6,766) in Macnamara. This further illustrates the unnecessary division that this boundary of Williams Road would create and the fact that Williams Road is not a significant natural boundary.

Furthermore, if we are to examine the SA2 area of Prahran-Windsor (the suburbs of Prahran and Windsor share an SA2 and a common postcode of 3181), which covers the entirety of the areas between Punt Road, Malvern/Commercial Road, Orrong Road and Dandenong Road, this entire SA2 was located within Higgins until the 2019 redistribution, when the Windsor suburb was taken out. This proposed redistribution would split this SA2 further up, putting 6,216 residents of the 19,714 in the SA2 in Higgins and the rest in Macnamara.

Prior to 2016, the entire Local Government Area of Stonnington was located within Higgins while the entirety of the LGA of Port Phillip has been within Melbourne Ports/Macnamara for many decades. The proposed redistribution sends one section of Port Phillip into Higgins while it splits Stonnington further between Higgins and Macnamara. Local Government Areas should also be considered clear communities of interest and commonality – they share common distinguishing features, social interests and facilities and if there is a way to contain entire LGAs within singular electorates (rather than divide them, as Stonnington would be under the proposal) this is surely a desirable outcome.

A key reason for which the Committee in 2018 moved Windsor into Macnamara was that it is “well connected to the south of the proposed electoral division via train and tram routes.” Windsor indeed is in ways connected to St Kilda, but for the reasons discussed, it is not the same for Caulfield, St Kilda East and Elsternwick viz-a-viz Malvern, Armadale and Toorak.

#### **(iv) The public housing argument**

Public housing tenants are some of our community's most vulnerable, and during COVID-19 have been in many ways subject to complex challenges, including financial. Macnamara is proudly home to public housing tenancies.

Only the Australian Greens (Victoria) in its suggestion (S97) and comment (CS33) has argued that a public housing community of interest exists across the inner south-east of Melbourne and would be better served by the proposed alteration. Its submission however requires closer analysis and attention.

Firstly, while public housing tenants across Melbourne certainly may hold many interests in common, including economic interests, it is very difficult to say that they are a *community* of interests. Some commonality in interest is indeed a necessary element of a community of interest, but it does not in itself mean that a community around that interest exists. It is difficult to see how there is a community between the tenants from Port Melbourne down the bay to St Kilda and north to South Yarra. The interests of those in public housing towers are so multifarious that they are incapable of reduction except into vague notions of shared interest – and at that point, there’s the same rationale for connecting Prahran and South Yarra with South Melbourne as there is Collingwood to Richmond, or any other suburb that contains public housing towers.

These public housing tenants share very limited linkages across the tenancies:

1. **Transport:** These towers are not closely connected by any transport links. They use different trams, trains and buses. Those in Park Towers (South Melbourne) and Bangs Street (Prahran) for example can’t even connect via public transport without changing trams at the city. They share no common roads, transport links, shopping centres or supermarkets.
2. **Municipalities:** They are located in different municipalities – some in Port Phillip, others in Stonnington, and a small number across Glen Eira.
3. **Services:** They access different government and non-government welfare agencies. They rely on different Services Australia and Medicare offices – those in Port Phillip are serviced by the South Melbourne office, while those in Stonnington are serviced by the Prahran office.
4. **Demographics and needs:** They have different demographics. Some towers exist only for over 50s, while others cater more to families. Some house more locals, while others house more immigrants and those speaking languages other than English. It arguably is very difficult to identify a uniform or consistent set of interests between the residents of these towers. Moreover, in respect of support from a Federal Electorate Office, the needs of public housing tenancies are particularly diverse and individualistic.

Many of the linkages that do exist – for example, they are the recipients of services by Star Health, or by the Victorian Government – are through services unilaterally provided to the tenants only because those services are provided to all tenants that live in Victoria. There is no evidence (and none presented by the Australian Greens (Victoria)) of public housing tenants in the inner south east running campaigns to advance their joint interest or organising themselves as a community of interest. For example, we cannot identify any joint activities of the kind organised by the different public housing towers that exist in Port Phillip or Glen Eira – let alone activities between those towers and the ones contained in Stonnington.

At most, there is a community of interest of public housing tenants west of Queens Road/Princes Highway (those by the bay) and a separate community of interest in public housing tenants in Windsor, Prahran and South Yarra, which has a more inner-city character.

The better view is that each public housing tenancy – that is, each high rise – represents an independent community of interest. Many such tenancies have organising committees that

arrange events and other gatherings and do so for their own residences, rather than for a community of public housing tenants spanning the inner south-east.

Secondly, even assuming that such a community of interest does exist – to which we retain our objection – it is difficult to see how its interests may be better served by the proposed alteration. To this end it is important to note that the Victorian Government has embarked on a program of building 9,300 additional public housing dwellings and 2,700 additional affordable housing dwellings with urgency, with all builds to be commenced by 2024. This will entail a substantial expansion of public housing in Higgins, because the Government has identified Boroondara LGA as a ‘priority local government area’ for such investment, and Boroondara LGA is partly contained in Higgins. Of the six ‘fast start’ projects already announced, one is in Higgins - in Ashburton, in Boroondara. Markham Avenue in Ashburton will be a site for the development of 178 dwellings across five buildings, to be completed by the latest in 2023. Assuming that there is a community of interest surrounding public housing, the Government has already funded a programme the consequence of which will be that the community of interest expands in Higgins. There is therefore no reason to take public housing out of Higgins’ western suburbs as Higgins’ eastern suburbs have been identified as a priority for future investment in public housing. It may even help public housing tenants in Windsor, South Yarra and Prahran to continue to be connected to Higgins, rather than be wholly concentrated in one electorate of Macnamara, so as to have an expanded influence across multiple electorates. Put more generally, there is a massive demand for public housing across Victoria and the Committee’s intention to cluster public housing in single federal electorates is inconsistent with the State Government’s intention of developing public housing across the State.

Finally, the nature of the set of interests that it is suggested public housing tenants share must be closely examined. It appears that only the Australian Greens (Victoria) have made submissions in relation to public housing tenants in these areas. It argues that public housing tenants are a community of interests for the following reason:

*“The COVID-19 health emergency has clarified not only expectations of government policy to provide support in times of crisis, but expectations of members of parliament as local members and hubs of support for their community. **In particular, the challenges of the Melbourne public housing “lockdown” and the assistance these communities needed to navigate both the legal changes and the insufficient services they were provided, demonstrates that these public housing communities share a strong community of interest and that the committee should attempt where possible to unite them within electorates.**” (emphasis added)*

The interests of public housing tenants arising out of the ‘public housing “lockdown”’ and in relation to the assistance required to navigate the legal changes and claimed insufficiency in services provided, if they exist at all, must necessarily relate to the government instrumentality that instituted the lockdown and the relevant legal changes and is responsible for administering the relevant services. That government instrumentality is the Government of Victoria through the Department of Housing (and other Departments relating to the COVID-19 response). The role of the Commonwealth Government, and of Members of Commonwealth Parliament, here is limited at best – if it has any role, its role only arises indirectly by way of funding arrangements with the States. This can only ground an argument that public housing tenants, to be united as a community in pursuit of the

interests as suggested, ought to be united for the purposes of influencing the policymaking of State Governments. That is, what been presented by the Australian Greens (Victoria) is an argument for the unification of a community of interests surrounding public housing tenants in state electorates – but not in federal electorates, like that of Macnamara.

## **Part II – Means of communication, transport and physical features**

We now touch on the means of communication and travel in the area and those links to the communities of interest.

It can be seriously doubted that there is a “strong eastern boundary of Williams Road and Hotham Street providing a strong north south transport link,” especially when compared to that of Punt Rd/Hoddle Highway and Dandenong Road/Princes Highway, which are the two key pieces of road infrastructure (and thus natural boundaries) in this area and in Melbourne. The boundaries of Punt Road/Hoddle Highway and Dandenong Road/Princes Highway are far more distinct and significant boundaries than Williams Road/Hotham Street.

While the boundaries between Glen Eira and Port Phillip are not that distinct – they share some suburbs and postcodes, for example, and are not always bordered by large main roads; Stonnington’s borders from Glen Eira, Port Phillip and Melbourne are two of Melbourne’s most significant main road/highways – Punt Road and Dandenong Road/Princes Highway.

Punt Road/Hoddle Highway is one of if not the most significant and well-known north-south roads in Melbourne – with four to six and even at some parts eight lanes in both directions. Punt Rd has some of Melbourne’s busiest bus routes and vehicle flows, and is a strong boundary between the major parks of Fawkner Park, the Royal Botanic Gardens, and the Alfred Hospital in the western parts of South Yarra and the more residential and shopping-oriented eastern districts of South Yarra. It connects the Eastern Freeway of Fitzroy all the way south through Richmond to St Kilda.

Dandenong Road/Princes Highway is an enormously significant road in Victoria and Australia. It’s an eight to ten lane east-west road that is entirely separated with dividers, a divided tram lane for much of it; and very little ability to turn right or do a U-turn across it without queuing up at intersections. There’s a reason it is a major boundary between Stonnington and Glen Eira LGAs: it is a real, natural and traditional boundary between these communities. Dandenong Road is a part of Princes Highway which connects over 1898 kilometres Sydney to Adelaide through Melbourne.

There is strong evidence to both of these points. The hierarchy of major local and arterial roads is set by the Movement and Place Framework,<sup>4</sup> which prioritises particular movements along and across routes with regard to network connectivity, the road environment and places as destinations. Regarding north-south links, Punt Road, St Kilda Rd/Brighton Rd/Nepean Hwy, Warrigal Road, Kerferd Road and Bay/Crockford Street are M2 routes which provide for significant movement of people and goods, mainly via general traffic but also public transport. They are high capacity routes that prioritise through

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<sup>4</sup> See generally <https://transport.vic.gov.au/about/planning/movement-and-place-in-victoria>

movement of traffic over intersecting route movements. Regarding east-west transport links, based on the Movement and Place Framework, Dandenong Road, North Road, South Road and Williamstown Road are M2 routes, providing for significant movement of people and goods mainly via general traffic.

By contrast, Williams Road and Hotham Street only connects Alexandra Avenue traffic from South Yarra through to Elsternwick. There is no particularly distinct cultural or social difference between people who live on either side of it. It in many places is effectively a two-lane road, with parking available on all sides. It offers no real natural boundary. It offers nominal traffic and transport flows once compared to Punt Road/Hoddle Highway or Dandenong Road/Princes Highway.

Williams Road/Hotham Street is an M3 route that provides only for moderate movement of people and freight. St Kilda Road, Orrong Road (Dandenong Rd to Toorak Rd), Hawthorn Road, Grange Road, Glenferrie Road, Tooronga Road and Burke Road are also M3 routes, providing comparable movement via general traffic and/or public transport.

Moreover, the Stonnington suburbs currently in Higgins share a number of their own tram routes that have very limited to no connectivity south of Dandenong Road or west of Punt Rd. Many of these routes go east-west along Toorak Road, Malvern Road, High Street and Wattletree Road (via Dandenong Road). All of these roads and tram routes connect across Stonnington from South Yarra, Prahran and Windsor, all providing routes to Chapel Street and then through Malvern, Toorak and Armadale and across to Malvern East, Glen Iris and in some further east.

Similarly, tram routes down Carlisle Street and Glenhuntly Road connect St Kilda, St Kilda East, Elwood, Balaclava and greater Caulfield. This demonstrates the close connectivity that all of these suburbs have south of Dandenong Road, and is an important contrast to the close connectivity the suburbs north of Dandenong Road have to each other.

The characteristics shared by suburbs east and west of St Kilda Road also identify other communities of interest with common social, retail and hospitality ties as well as transport links. Elsternwick and Elwood, for example, don't just have similar names, they share Glenhuntly Road as their main shopping strip, road and public transport routes; the 67 tram runs through both; and Elsternwick and Ripponlea Railway Stations both service Elwood for train stations. The Elsternwick and Ripponlea train stations also service many of the residents on the western (and eastern) side of Caulfield, for whom travelling via Caulfield East station is inconvenient. Elsternwick and Ripponlea also share a common postcode - 3185, while Elwood is 3184 - and all three share many cultural similarities, institutions and common demographics. They share neighbourhood Facebook groups, local restaurants offer 'local discounts' and delivery zones that cover all three equally. They are also quite connected with Balaclava, St Kilda and St Kilda East. It is undeniable that Elsternwick shares far more in common with Elwood, Ripponlea, St Kilda and St Kilda East than it does with Toorak, Malvern East, Glen Iris or Ashburton.

It also seems strange and undesirable to divide St Kilda East into separate electorates and to separate most of St Kilda East from St Kilda. St Kilda East is, like Balaclava, a diverse suburb that in many ways neatly links between these different areas and communities. It has clear travel and communal links and commonalities to St Kilda, Elwood, Elsternwick and Caulfield.

Moreover, it was noted earlier that the suburb of Prahran and the postcode of 3181 (Prahran-Windsor) stretch on both sides of Williams Road – similarly, the suburb of 3183 (St Kilda East-Balaclava) stretches across both sides of Hotham Street; as does the suburb of 3185 (Elsternwick-Ripponlea). This further undermines the argument that Williams Road-Hotham Street is a natural boundary or divider between communities – on the contrary, clear communities of common suburbs and postcodes exist on either side of it.

Finally, it seems especially undesirable to divide the Port Phillip and Glen Eira LGAs. They are linked by well-used public transport networks and road infrastructure. All the main traffic links in this area (Dandenong Rd, Balaclava Rd, Glen Eira Rd and Glenhuntly Rd) run east-west. The proposed new boundaries create an artificial border across these lines of communication (and these communities).

### **Part III – Boundaries of existing divisions**

It is also important to examine the representation at a State level.

The State District of Malvern (covering areas of Malvern, Malvern East, Armadale, Toorak, Glen Iris, Armadale and Kooyong), which is entirely within Higgins (irrespective of the proposed alteration to the boundaries), remains one of the safest Liberal seats in Victoria.

By contrast, the State Seat of Caulfield (predominantly in Caulfield and Caulfield South & East, as well as Ormond, Elsternwick, Balaclava and parts of St Kilda and St Kilda East) is the second most marginal state electorate in Victoria. Labor and the Liberals are separated by just over 200 votes on a 2PP basis. The community of Caulfield is home to a set of political interests and perspectives that is far more diverse than Malvern - its political diversity would be subsumed if moved into Higgins. This strongly suggests that the political representation of the constituents of Caulfield would be better served by remaining in Macnamara than by being moved into Higgins.

It is also worth noting that the State Seat of Caulfield combines greater Caulfield, Elsternwick, Balaclava, Ripponlea and parts of St Kilda East and St Kilda. This is another demonstration that it is not unusual at all to link these suburbs in a common electorate.

Finally, if our submission to move the suburb of Prahran back into Higgins is accepted, the boundaries of the State seat of Caulfield could be entirely contained in two federal electorates (Macnamara and Goldstein) rather than three under the proposal (Macnamara, Goldstein and Higgins).

### **Part IV – Considerations that are not relevant**

A number of submissions suggest that the proposed alteration would be desirable for the reason that it would produce a more compact or square-like electorate, which is premised on the supposition that the aesthetic and shape of the existing boundaries of Macnamara is a problem that the AEC ought to address.<sup>5</sup>

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<sup>5</sup> S24; S70. CS40; CS48

Firstly, the aesthetic of the boundaries is not a consideration that appears in Section 66 of the Act.

Secondly, the present shape of the boundaries are in no way distinctively peculiar. As the boundaries are set by having regard to the complex factors in Section 66, the borders of electorates very often do not take on an intuitive or simple shape. And nor should they – as the prioritisation of that object would undermine the rest of the criteria set out in the Act.

## **Part V – Proposal and final comments**

### **(i) Proposal**

In our view, the proposal that best accords with the statutory factors is to return the suburb of Windsor into Higgins. This will:

1. Reflect that Dandenong Road/Princes Highway and Punt Road/Hoddle Highway are the major arterial roads in this part of Melbourne that effectively delineate communities on either side, on the basis of travel, communication, and communities of social, economic and other interests;
2. Recognise that the community of Glen Eira that is south of Dandenong Road/Princes Highway and presently in Macnamara travels and socialises across the proposed Hotham Street boundary in far greater numbers than north of Dandenong Road/Princes Highway, which is a naturally strong physical boundary that creates a division between these residents and those of Higgins;
3. Limit the harm that inheres in dividing across multiple electorates the community of interest in the Jewish community, which is one of Australia’s smallest minority communities considered nationally but biggest groups when considered locally, and one that has peculiar and unique needs in respect of its political representation;
4. Reunite the community of interest in the Stonnington LGA into one federal electorate – Higgins; avoid dividing Port Phillip and Glen Eira LGAs across two electorates when they have strong ties regarding means of travel, communities of social interest and communication; and not place Glen Eira LGA into Stonnington when Glen Eira has limited ties to the latter.

Moreover, this proposal will recognise that there are serious doubts about the status of public housing tenants across Melbourne’s inner south as a community of interest, and as to whether public housing tenants would indeed be better served by a single federal Electorate Office and Member if combined into the one electorate. It will also recognise that there are sufficiently serious doubts as to the benefits of the proposal that such a significant response which moves 46,964 electors may not be proportionate or desirable, especially considering the proposal’s detrimental consequences.

Our proposal and the resultant elector transfers are outlined before.

### **MACNAMARA AND HIGGINS (Transfers based on the Commissioners Proposals)**

1.

<b>DIVISION</b>	<b>15/7/20</b>	<b>26/1/25</b>
<b>MACNAMARA (As Proposed)</b>	<b>106 788(-2.1)</b>	<b>113 631(-3.0)</b>

Less its share of SA2 Prahran-Windsor		
<b>To Higgins</b>	<b>-9 787</b>	<b>-10 114</b>
Less SA2 South Yarra East (Proposed to be transferred from Higgins)		
<b>To Higgins</b>	<b>-13 702</b>	<b>-14 634</b>
Plus SA2 Caulfield North (Proposed to be transferred to Higgins)		
<b>Ex Higgins</b>	<b>+14 572</b>	<b>+15 243</b>
Plus its share of SA2 Caulfield South (Proposed to be transferred to Higgins)		
<b>Ex Higgins</b>	<b>+3 871</b>	<b>+3 903</b>
Plus its share of SA2 Elsternwick (Proposed to be transferred to Higgins)		
<b>Ex Higgins</b>	<b>+3 802</b>	<b>+4 112</b>
Plus part SA2 Ormond-Glen Huntley (That part proposed to be transferred to Higgins)		
<b>Ex Higgins</b>	<b>+620</b>	<b>+658</b>
Plus part SA2 St Kilda East (That part proposed to be transferred to Higgins)		
<b>Ex Higgins</b>	<b>+3 344</b>	<b>+3 477</b>
<b>TOTALS</b>	<b>109 388(0.3)</b>	<b>116 276(-0.7)</b>

<b>HIGGINS</b>	<b>(As Proposed)</b>	<b>111 179(2.0)</b>	<b>116 976(-0.1)</b>
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Less SA2 Caulfield North (Proposed to be transferred to Higgins)		
<b>To Macnamara</b>	<b>-14 572</b>	<b>-15 243</b>
Less its share of SA2 Caulfield South (Proposed to be transferred to Higgins)		
<b>To Macnamara</b>	<b>-3 871</b>	<b>-3 903</b>
Less its share of SA2 Elsternwick (Proposed to be transferred to Higgins)		
<b>To Macnamara</b>	<b>-3 802</b>	<b>-4 112</b>
Less part SA2 Ormond-Glen Huntley (That part proposed to be transferred to Higgins)		
<b>To Macnamara</b>	<b>-620</b>	<b>-658</b>
Less part SA2 St Kilda East (That part proposed to be transferred to Higgins)		
<b>To Macnamara</b>	<b>-3 344</b>	<b>-3 477</b>
Plus its share of SA2 Prahran-Windsor		
<b>Ex Macnamara</b>	<b>+9 787</b>	<b>+10 114</b>

Plus SA2 South Yarra East (Proposed to be transferred from Higgins)

Ex Macnamara	+13 702	+14 634
<b>TOTALS</b>	<b>108 579(-0.4)</b>	<b>114 331(-2.4)</b>

## **OBJECTION 2: MENZIES AND DEAKIN**

**Effect of the ALP Objection:** The existing southern boundary of Menzies, in place since its formation in 1984 is retained. The northern parts of Whitehorse Council, north of Whitehorse Road, proposed to be sent to Menzies are instead placed in Deakin. Menzies, in turn, retains Warranwood and parts of the Croydon suburbs from Deakin.

### **Reasons for the ALP Objection:**

1. Since its formation in 1984, Menzies has always been a Manningham Council based Division. However, since the 1990's Menzies has been required to contain more electors than those just supplied by Manningham. From that time, Menzies has always contained parts of Maroondah Council.
2. Except since the last Redistribution, when significant parts of Nillumbik Shire were added to Menzies, but now returned to northern seats, except for the suburb of North Warrandyte, Menzies has contained parts of Croydon suburbs.
3. The ALP objection seeks to apply the traditional arrangement of Menzies making up its numbers by moving into parts of Maroondah Council.
4. We acknowledge that the proposal of the Redistribution Committee does entirely unite Maroondah Council within Deakin. However, no matter how desirable that outcome, on community of interests grounds, it is overwhelmed by the poor outcome also on community of interest grounds of including parts of Whitehorse Council in Menzies.
5. The southern boundary of Menzies is a Council, State and Federal boundary. That boundary also contains significant parklands, including Boronia Grove Reserve and Koonung Creek Reserve.
6. Moreover, the southern boundary of Menzies also contains, running through its parklands, the widest and busiest section of the Eastern Freeway. Please see for photographic evidence of just how prominent the Eastern Freeway already is:  
[https://northeastlink.vic.gov.au/data/assets/pdf\\_file/0019/418033/EarlyDesignSchematicsAndArtistImpressions-Sept-2018.pdf](https://northeastlink.vic.gov.au/data/assets/pdf_file/0019/418033/EarlyDesignSchematicsAndArtistImpressions-Sept-2018.pdf)
7. Work has commenced on building the North East Link, the biggest road transport project in Victoria's history. As part of that project, East Link and the Eastern Freeway are to be significantly expanded. The current Eastern Freeway, currently at least eight lanes wide is expected to double in width. See: <https://northeastlink.vic.gov.au/design/design/eastern-freeway-upgrades>
8. There are very strong reasons that previous Commissioners have never considered moving Menzies south into Whitehorse Councils. The overwhelming arguments against and reflected by boundary arrangements at the three levels of Government become even more supercharged once the widening of the Eastern Freeway is completed.
9. Almost a minor point when compared to the issues raised above is the fact that the ALP retains the current arrangement of Whitehorse Council being split between the Divisions of

Kooyong, whereas the Committee’s proposal divides the Council four ways by including Menzies in the mix.

10. In addition to the arguments above, the communities that we proposed to send from the proposed Menzies to the proposed Deakin orient themselves east-west along both the Maroondah Highway/Whitehorse Rd, and along the Belgrave/Lilydale railway line. In this context, it makes more sense for these areas to be removed from Chisholm and sent to Deakin, rather than to the Doncaster/Manningham based seat of Menzies.

**MENZIES AND DEAKIN (Transfers based on the Commissioners Proposals)**

<b>DIVISION</b>	<b>15/7/20</b>	<b>26/1/25</b>
<b>MENZIES (As Proposed)</b>	<b>112 514(3.2)</b>	<b>118 193(0.9)</b>
Less part SA2 Mitcham (All proposed to be transferred from Deakin)		
<b>To Deakin</b>	<b>-4 822</b>	<b>-5 048</b>
Less part SA2 Nunawading (All proposed to be transferred from Deakin)		
<b>To Deakin</b>	<b>-2 143</b>	<b>-2 277</b>
Less part SA2 Nunawading (All proposed to be transferred from Chisholm)		
<b>To Deakin</b>	<b>-2 491</b>	<b>-2 615</b>
Less part SA2 Blackburn (All proposed to be transferred from Chisholm)		
<b>To Deakin</b>	<b>-8 641</b>	<b>-9 462</b>
Less part SA2 Box Hill (All proposed to be transferred from Chisholm)		
<b>To Deakin</b>	<b>-1 550</b>	<b>-1 717</b>
Less part Box Hill North (All proposed to be transferred from Chisholm)		
<b>To Deakin</b>	<b>-7 141</b>	<b>-7 589</b>
Plus SA2 Croydon Hills-Warranwood		
<b>Ex Deakin</b>	<b>+13 319</b>	<b>+13 643</b>
Plus part SA2 Croydon West (All except south of Mount Dandenong Road: 2145122;25)		
SA1’s 2145101-21; 23-24; 26		
<b>Ex Deakin</b>	<b>+9 308</b>	<b>+9 823</b>
Plus part SA2 Croydon East (All north of Mount Dandenong Road)		
SA1’s 2145002-3; 5-9; 12-13; 15; 17; 19; 23-24; 26; 31-33; 35		
<b>Ex Deakin</b>	<b>+5 671</b>	<b>+5 958</b>
<b>TOTALS</b>	<b>114 024(4.6)</b>	<b>118 909(1.5)</b>

<b>DEAKIN</b>	<b>(As Proposed)</b>	<b>115 004(5.5)</b>	<b>119 311(1.9)</b>
<b>Less SA2 Croydon Hills-Warranwood</b>			
<b>To Menzies</b>		<b>-13 319</b>	<b>-13 643</b>
<b>Less part SA2 Croydon West (All except south of Mount Dandenong Road: 2145122;25)</b>			
<b>SA1's 2145101-21; 23-24; 26</b>			
<b>To Menzies</b>		<b>-9 308</b>	<b>-9 823</b>
<b>Less part SA2 Croydon East (All north of Mount Dandenong Road)</b>			
<b>SA1's 2145002-3; 5-9; 12-13; 15; 17; 19; 23-24; 26; 31-33; 35</b>			
<b>To Menzies</b>		<b>-5 671</b>	<b>-5 958</b>
<b>Plus part SA2 Mitcham (All proposed to be transferred from Deakin)</b>			
<b>Ex Menzies</b>		<b>+4 822</b>	<b>+5 048</b>
<b>Plus part SA2 Nunawading (All proposed to be transferred from Deakin)</b>			
<b>Ex Menzies</b>		<b>+2 143</b>	<b>+2 277</b>
<b>Plus part SA2 Nunawading (All proposed to be transferred from Chisholm)</b>			
<b>Ex Menzies</b>		<b>+2 491</b>	<b>+2 615</b>
<b>Plus part SA2 Blackburn (All proposed to be transferred from Chisholm)</b>			
<b>Ex Menzies</b>		<b>+8 641</b>	<b>+9 462</b>
<b>Plus part SA2 Box Hill (All proposed to be transferred from Chisholm)</b>			
<b>Ex Menzies</b>		<b>+1 550</b>	<b>+1 717</b>
<b>Plus part Box Hill North (All proposed to be transferred from Chisholm)</b>			
<b>Ex Menzies</b>		<b>+7 141</b>	<b>+7 589</b>
<b>TOTALS</b>		<b>113 494(4.1)</b>	<b>118 595(1.2)</b>

### **OBJECTION 3: TUCKER AND WANNON**

**Effect of the ALP Objection:** The coastal suburb of Anglesea is retained in Tucker with more rural hamlets and localities transferred to Wannon.

#### **Reasons for the ALP's Objection:**

1. Anglesea is much more closely aligned in community interest with Tucker than the area being proposed to be removed, this takes the form of:
  - o Closely linked economic interests, with especially similar economic production and output to the Bellarine Peninsula. This is reflected across the community from

commonality of industry, particularly focussed on tourism, to labour force participation rates.

- The areas within the proposed boundary also parallel the median age and education Anglesea much more closely than the area being proposed for removal in this submission.
2. The inverse of this is also true – The community interests of the areas proposed for removal share vastly stronger commonality with the electorate of Wannon than Anglesea.
  3. The remaining areas within the proposed boundary for Tucker, including Bannockburn, retain strong transport and communication linkages to Torquay and Geelong while the same cannot be said of the areas proposed for removal.
  4. Bannockburn and Anglesea all enjoy strong hub and spoke transport lines with Geelong. The key distinction is that Anglesea also shares these lines with other significant population centres in Tucker, particularly Torquay and Armstrong Creek, where the proposed area for removal does not.
  5. The transfers of electors under this objection are relatively small- less than 4,000 but are an improvement in what the proposal attempts to achieve for both Divisions.

**(Transfers based on the Commissioners Proposals)**

**TUCKER AND WANNON**

<b>DIVISION</b>	<b>15/7/20</b>	<b>26/1/25</b>
<b>TUCKER (As Proposed)</b>	<b>101 000(-7.4)</b>	<b>119 685(2.2)</b>
Less part SA2 Winchelsea (Localities of Buckley; Gherang; Madewarre; Moriac; Paraparap and Wurdiboluc SA1's 2103602; 9-10; 12; 14		
<b>To Wannon</b>	<b>-1 474</b>	<b>-1 524</b>
Plus part SA2 Lorne-Anglesea (Suburb of Anglesea only) SA1's 2104904-6; 9-10 And part SA1 2104907 (containing the suburb of Anglesea. Estimated 60/70)		
<b>Ex Wannon</b>	<b>+2 386</b>	<b>+2 453</b>
<b>TOTALS</b>	<b>101 912(-6.5)</b>	<b>120 614(3.0)</b>

**WANNON (As Proposed)**

Less part SA2 Lorne-Anglesea (Suburb of Anglesea only) SA1's 2104904-6; 9-10 And part SA1 2104907 (containing the suburb of Anglesea. Estimated 60/70)		
<b>To Tucker</b>	<b>-2 386</b>	<b>-2 453</b>

Plus part SA2 Winchelsea (Localities of Buckley; Gherang; Madewarre; Moriac; Paraparap and Wurdiboluc

SA1's 2103602; 9-10; 12; 14

<b>Ex Tucker</b>	<b>+1 474</b>	<b>+1 524</b>
<b>TOTALS</b>	<b>112 311(3.0)</b>	<b>113 122(-3.4)</b>

#### **OBJECTION 4: HOTHAM AND BRUCE**

**Effect of the ALP Objection:** Unites the entire suburbs of Mulgrave and Noble Park North within, respectively, the Divisions of Hotham and Bruce.

#### **Reasons for the ALP Objection:**

1. While acceding to the broad logic of the Committee's proposal for the Division of Bruce, it is strongly submitted that:
  - Police Road (a main road and the municipal boundary) be retained as the northern boundary with Hotham, and therefore
  - Noble Park North be fully retained within the Division of Bruce.
2. This reduces unnecessary change for electors, better reflects the community of interest, and avoids illogically and unnecessarily splitting suburbs, localities and municipalities across Divisions.
3. Police Road is the municipal boundary between the Cities of Monash and Greater Dandenong. The Committee's proposed northern boundary illogically and inexplicably crosses this municipal boundary to include a small slice of the suburb of Mulgrave and City of Monash in the Division of Bruce. The flow-on consequence of this is that the locality of Noble Park North is then split between the Divisions of Hotham and Bruce, unnecessarily moving electors.
4. The local government boundary here is a clear and sensible boundary. Its adoption avoids part of the City of Monash from falling within the Division of Bruce and avoids confusion for electors in Mulgrave or Noble Park North. Indeed, in 2018 the Commission adopted "*Police Road and the local government area boundary for the majority of the northern boundary of the proposed Division of Bruce*" (para 182 of the previous Redistribution Committee's proposal which was adopted in the final maps) and there is no logical need at this time for such a confusing change that would run counter to the principles in the Act.

#### **(Transfers based on the Commissioners Proposals)**

#### **BRUCE AND HOTHAM**

<b>DIVISION</b>	<b>15/7/20</b>	<b>26/1/25</b>
<b>BRUCE (As Proposed)</b>	<b>114 876(5.4)</b>	<b>118 353(1.1)</b>

Less part SA2 Mulgrave (That part proposed to be transferred from Hotham)		
<b>To Hotham</b>	<b>-3 290</b>	<b>-3 337</b>
Plus part SA2 Noble Park North (That part proposed to be transferred from Bruce)		
<b>Ex Hotham</b>	<b>+1 708</b>	<b>+1 713</b>
<b>TOTALS</b>	<b>113 294(3.9)</b>	<b>116 709(-0.3)</b>

<b>HOTHAM</b>	<b>(As Proposed)</b>	<b>111 834(2.6)</b>	<b>117 010(-0.1)</b>
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Less part SA2 Noble Park North (That part proposed to be transferred from Bruce)

<b>To Bruce</b>	<b>-1 708</b>	<b>-1 713</b>
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Plus part SA2 Mulgrave (That part proposed to be transferred from Hotham)

<b>Ex Bruce</b>	<b>+3 290</b>	<b>+3 337</b>
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<b>TOTALS</b>	<b>113 416(4.0)</b>	<b>118 634(1.3)</b>
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## **OBJECTION 5: BRUCE, HOLT AND ISAACS**

**Effect of the ALP Objection:** That part of the suburb of Berwick proposed to be included in Holt instead is placed in Bruce; Holt is then able to retain the suburb of Lyndhurst and Isaacs is able to retain its share of Dandenong South, south of the Pakenham Line.

### **Reasons for the ALP Suggestion:**

1. Lyndhurst is not a new suburb and it is situated in the City of Casey, of which Holt is the primary overlapping electorate. Residents of Lyndhurst commute to the City from Cranbourne, Merinda Park or Lynbrook Stations. The major nearest suburban centre is Cranbourne. There is no part of the existing electorate of Isaacs with which Lyndhurst has a tangible connection. It is separated from both the Kingston and Greater Dandenong parts of Isaacs by kilometres of industry and green wedge land.
2. All of the electors in Berwick-South currently proposed to be in Holt should be transferred to Bruce. Moving this part of Berwick to Bruce unites all of Berwick that is west of Clyde Road in Bruce and keeps that suburb split between just two electorates (Bruce and Latrobe) rather than three. And given that Berwick Springs and Berwick Springs Park would be at the western end of the fragment of Berwick proposed to be in Holt, the residents in that part of Berwick would be somewhat isolated from the rest of Holt.
3. We acknowledge that the Committee's proposal to remove Dandenong South from the electorate of Isaacs and add Lyndhurst coincided with suggestions that Dandenong South has more in common with the balance of the electorate of Bruce. But that's not true. First, while the Dandenong SA2 does not differentiate between Dandenong and Dandenong South, locals do. Dandenong South, which is to say the part of the Dandenong SA2 that is south of the Dandenong Train Line, along with

Keysborough - largely in Isaacs - have the two most significant Albanian-Australian populations south of the Yarra. It would be a shame to split this community.

4. Residents of Dandenong South primarily shop at Parkmore Shopping Centre in Keysborough. The major sporting club – the Dandenong Thunder – play in Dandenong South and primarily draws players from Dandenong South and Keysborough.
5. In simple terms, culturally, geographically and in regard to key transport corridors, Dandenong South has far more in common with the balance of Isaacs than Lyndhurst does. It would be a shame to break the connection between Dandenong South and Keysborough South.
6. Lastly, adding a third local government area of Casey via Lyndhurst into Isaacs does nothing to add to the Isaacs' community of interest. It simply doesn't exist and both the Casey and Greater Dandenong communities would be better served with a reversal of the Lyndhurst/Dandenong South proposal.

**(Transfers based on the Commissioners Proposals)**

**BRUCE, HOLT AND ISAACS**

<b>DIVISION</b>		<b>15/7/20</b>	<b>26/1/25</b>
<b>ISAACS</b>	<b>(As Proposed)</b>	<b>110 010(0.9)</b>	<b>117 864(0.6)</b>
Less part SA2 Lynbrook-Lyndhurst (That part proposed to be transferred from Holt)			
<b>To Holt</b>		<b>-4 229</b>	<b>-4 686</b>
Plus part SA2 Dandenong (That part proposed to be transferred from Isaacs)			
<b>To Bruce</b>		<b>+4 042</b>	<b>+4 235</b>
<b>TOTALS</b>		<b>109 823(0.7)</b>	<b>117 413(0.3)</b>

<b>HOLT</b>	<b>(As proposed)</b>	<b>99 534(-8.7)</b>	<b>117 807(0.6)</b>
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Less part SA2 Berwick South (That part proposed to be transferred from La Trobe)			
<b>To Bruce</b>		<b>-1 317</b>	<b>-1 493</b>
Plus part SA2 Lynbrook-Lyndhurst (That part proposed to be transferred from Holt to Isaacs)			
<b>Ex Isaacs</b>		<b>+4 229</b>	<b>+4 686</b>
<b>TOTALS</b>		<b>102 446(-6.0)</b>	<b>121 000(3.3)</b>

<b>BRUCE</b>	<b>(As Proposed)</b>	<b>114 876(5.4)</b>	<b>118 353(1.1)</b>
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Less part SA2 Dandenong (That part proposed to be transferred from Isaacs)			
<b>To Isaacs</b>		<b>-4 042</b>	<b>-4 235</b>

Plus part SA2 Berwick South (That part proposed to be transferred from La Trobe)

<b>Ex Holt</b>	<b>+1 317</b>	<b>+1 493</b>
<b>TOTALS</b>	<b>112 151(2.9)</b>	<b>115 611(-1.3)</b>

**A Further note on Bruce and La Trobe:** Bruce is the only Division which is subject to two ALP Objections. We ask that the Augmented Commission also note that if both objections were to be upheld, Bruce would still meet the current quota (110,569 (1.4%) and the future quota 113,967 (-2.7%).

In the case of La Trobe, we note that the Redistribution Committee proposal sets this Division at 9.9% below quota and 2.6% above quota at the projected time which are within the numerical requirements of the Act.

From experience and especially when you're projecting future enrolments four years and six months ahead of the quota date, as in this redistribution, you're most at risk of your projected numbers blowing out in high growth areas compared to medium or slow growth areas. That's not due to any flaw in the methodology of calculating future numbers, but rather a reflection of the fact that in fast growing suburbs subsequent decisions of future increases of building blocks are more likely to occur post the date when the calculations are made. That's a known unknown.

Under the Committee's proposal for La Trobe, the Division will contain four relatively fast growing areas being Pakenham; Beaconsfield-Officer; Clyde North and Clyde.

We have been uncomfortable with so many growth areas being contained in La Trobe. We spent some time trying to reduce the number of growth areas within La Trobe whilst, at the same time meeting the numerical requirements and community of interests considerations of the Act.

We were not able to work out a proposal to submit to you, however this issue warrants further consideration.

## **OBJECTION 6: CHISHOLM AND KOOYONG**

**Effect of ALP Objection:** The suburb of Surrey Hills is entirely united within Kooyong without the need for any other changes.

### **Reasons for the ALP Objection:**

1. We could write up 'War and Peace' but the only part of Surrey Hills not in Kooyong is bounded by Elgar Road, already a partial boundary between Kooyong and Chisholm. The southern boundary of the suburb is the northern end of Wattle Park. Wherever possible, suburbs should be united.
2. There are around 3,000 electors involved and the transfer doesn't require other changes.

(Transfers based on the Commissioners Proposals)

**CHISHOLM AND KOOYONG**

<b>DIVISION</b>	<b>15/7/20</b>	<b>26/1/25</b>
<b>CHISHOLM (As Proposed)</b>	<b>113 624(4.2)</b>	<b>118 494(1.2)</b>
<b>Less its share of SA2 Surrey Hills (East)- Mont Albert (Balance of the suburb of Surrey Hills)</b>		
<b>To Kooyong</b>	<b>-2 931</b>	<b>-3 023</b>
<b>TOTALS</b>	<b>110 693(1.5)</b>	<b>115 471(-1.4)</b>

<b>KOOYONG (As Proposed)</b>	<b>111 031(1.8)</b>	<b>116 886(-0.2)</b>
<b>Plus its share of SA2 Surrey Hills (East)- Mont Albert (Balance of the suburb of Surrey Hills)</b>		
<b>Ex Chisholm</b>	<b>+2 931</b>	<b>+3 023</b>
<b>TOTALS</b>	<b>113 962(4.5)</b>	<b>119 909(2.4)</b>

**OBJECTION 7: MARIBYRNONG AND FRASER**

Overall, Victorian Labor agrees with the significant realignment of divisions across the western suburbs, noting the mathematical necessity of such a realignment given the rapid population growth in this part of Melbourne. However, we object to the inclusion of a portion of the suburb of Maribyrnong, north of Raleigh Rd, in the Division of Fraser, and believe that it should be returned to the Division of Maribyrnong.

Our objection is based on a number of grounds, namely:

1. The east-west transport links between Maribyrnong (suburb) and the surrounding suburbs of Avondale Heights, Aberfeldie and Moonee Ponds, particularly so north of Raleigh Rd.
2. The zoning of the surrounding schools, which include that portion of Maribyrnong north of Raleigh Rd in the zones for schools to the north, all of which remain in the Division of Maribyrnong under the committee's proposal.
3. The utilisation of the defence land in Maribyrnong north of Raleigh Rd is a contemporary community issue, and the future of that site affects the electors proposed to remain in the Division of Maribyrnong more so than electors in the Division of Fraser.
4. The portion of Maribyrnong that we propose to remain in the Division of Maribyrnong has been in that division, to the best of our knowledge, since 1906.

At the core of these arguments is that natural boundaries, which in most cases have significant advantages in terms of defining communities of interest and being easily recognisable, are nevertheless not the best features to draw boundaries upon in every case. In the case of the Maribyrnong River, its flow forms a peninsula that, at first glance, forms a sensible boundary. However, the top of that peninsula is linked to the east and the west to other communities in the Division of Maribyrnong by the only arterial road available to the communities north of Raleigh Rd, and for this reason is also included in the relevant zones for schools. Our arguments are discussed in greater detail below.

### **Traffic arteries and communications**

The main arterial road that links the communities north of Raleigh Road is Raleigh Rd itself, which turns in to Cordite Ave further to the west. It is this road that facilitates the movement of people outside of the SA1s that we propose be shifted back to the Division of Maribyrnong, with the road taking them either to Avondale Heights or Moonee Ponds, both proposed to remain within the Division of Maribyrnong.

In addition, two tram routes run along Raleigh Rd, the 57 and the 82. The 57 connects this portion of the suburb of Maribyrnong to the Melbourne CBD, and runs east to cross the Maribyrnong River into Moonee Ponds, in the Division of Maribyrnong. The 82 runs both east and south, and on its eastward journey connects the communities north of Raleigh Rd with the shopping areas in Moonee Ponds. These connections, together with the arterial road links, demonstrate that this portion of Maribyrnong is fundamentally on an east-west orientation and therefore more aligned with communities that are proposed to remain in the Division of Maribyrnong.

### **School zones**

The zones of the local primary and secondary schools cross the Maribyrnong River and include the communities north of Raleigh Rd, which not only is a community of interest of itself, but is also reflective of the orientation of this community to the west, north and east, rather than further south towards Footscray. The majority of people in this community are in the zone for Aberfeldie Primary School, which dips just south below Raleigh Rd, with the school being north of the Maribyrnong River in Aberfeldie. Those east of Newstead St are in the school zone for Moonee Ponds West Primary school to the east, across the Maribyrnong River. Again, this demonstrates the connection of this community being fundamentally to the suburbs on the other side of the Maribyrnong River in the Division of Maribyrnong.

### **Defence land**

The Defence Site Maribyrnong is, geographically, the largest part of the territory that we propose remain in the Division of Maribyrnong. The Victorian Planning Authority is currently undergoing 'visioning and infrastructure planning' for this site, with the anticipation that this land will be used for residential development in the future. What happens with this land

is of interest to the community, with the people of Avondale Heights having a particularly keen interest in the utilisation of this land. Additionally, should residential development take place in this area, it will be subject to the same transport links that are described above, which link this land more to the west, north and east than to the south.

### **Minimal change and community recognisability**

To the best of our knowledge, this portion of the suburb of Maribyrnong has been within the boundaries of the Division of Maribyrnong since 1906. This is reflective of a significant community of interest with other areas in the division and also means that people in this community easily recognise that they are in the Division of Maribyrnong. We believe that the suburb of Maribyrnong as a whole orients itself more to the communities that are proposed to remain within the Division of Maribyrnong. However, we repeat what we said at the outset of this section that we broadly agree with the proposals of the committee in the western suburbs and it is not possible to place the entirety of the suburb of Maribyrnong within the Division of Maribyrnong. In this context, we are of the view that retaining the communities north of Raleigh Rd in the Division of Maribyrnong represents a suitable compromise, given that the alignment of this portion of the suburb to the west, north and east is significantly greater than the suburb as a whole, and can be easily accommodated with no flow on changes to either Maribyrnong or Fraser.

#### **(Transfers based on the Commissioners Proposals)**

#### **MARIBYRNONG AND FRASER**

<b>DIVISION</b>		<b>15/7/20</b>	<b>26/1/25</b>
<b>MARIBYRNONG</b>	<b>(As Proposed)</b>	<b>109 869(0.8)</b>	<b>116 598(-0.4)</b>
<b>Plus part SA2 Maribyrnong (North of Raleigh Road and Cordite Avenue)</b>			
SA1's 2134913; 17-20			
<b>Ex Fraser</b>		<b>+1 605</b>	<b>+1 752</b>
<b>TOTALS</b>		<b>111 474(2.3)</b>	<b>118 350(1.1)</b>
<b>FRASER</b>	<b>(As Proposed)</b>	<b>110 937(1.8)</b>	<b>116 440(-0.6)</b>
<b>Less part SA2 Maribyrnong (North of Raleigh Road and Cordite Avenue)</b>			
SA1's 2134913; 17-20			
<b>Ex Maribyrnong</b>		<b>-1 605</b>	<b>-1 752</b>
<b>TOTALS</b>		<b>109 332(0.3)</b>	<b>114 688(-2.1)</b>

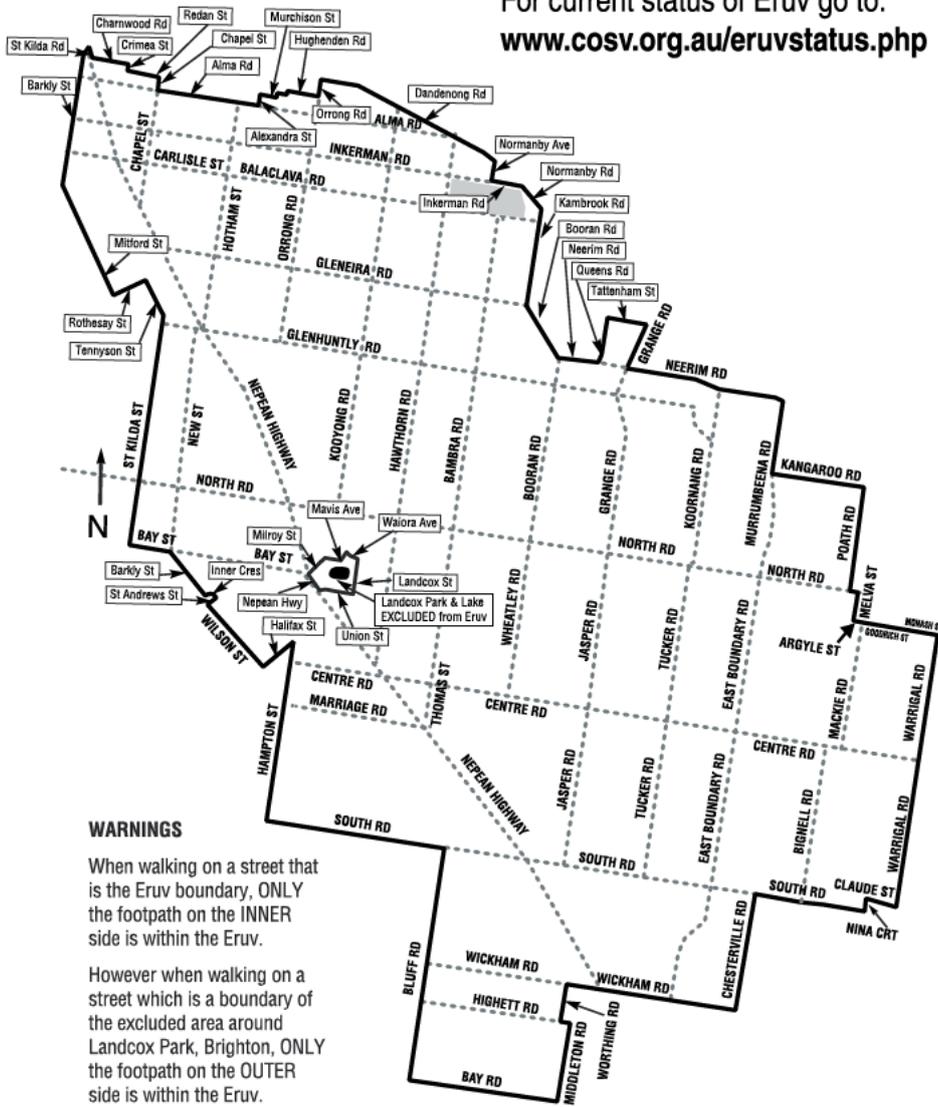
## **APPENDIX A (Macnamara/Higgins objection)**

Please see below a map of the Melbourne Eruv, as described in the body of our objection.

# MELBOURNE ERUV BOUNDARIES

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For current status of Eruv go to:  
[www.cosv.org.au/eruvstatus.php](http://www.cosv.org.au/eruvstatus.php)



## WARNINGS

When walking on a street that is the Eruv boundary, ONLY the footpath on the INNER side is within the Eruv.

However when walking on a street which is a boundary of the excluded area around Landcox Park, Brighton, ONLY the footpath on the OUTER side is within the Eruv.

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