



# Comment on objections 84

Australian Labor Party (Victorian Branch)

12 pages

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**To:** [FedRedistribution - VIC](#)  
**Cc:** [Samuel Rae](#); [Kosmos Samaras](#); [Stephen Donnelly](#)  
**Subject:** Australian Labor Party (Victorian Branch) - Comments on Objections  
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**Attachments:** [Victorian Labor's Comments 160518.pdf](#)

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Dear Redistribution Secretariat for Victoria

Please accept the attached submission from the Australian Labor Party (Victorian Branch).

Grateful if you could please acknowledge receipt of this e-mail.

Regards,  
Justin



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**Victorian  
Labor's**  
Comments  
on objections.

Victorian  
**Labor**

15 May 2018

Redistribution Secretariat for Victoria,  
Australian Electoral Commission  
GPO Box 768  
Melbourne VIC 3001

Dear Augmented Redistribution Committee

The Australian Labor Party (Victorian Branch) (the ALP) welcomes the opportunity to again contribute to the redistribution process in Victoria.

We thank the Committee for the significant work that it has undertaken to date, and look forward to the next steps in the process.

Please find enclosed our comments on objections.

Should any matter in this document require clarification please do not hesitate to get in touch.

Regards



Samuel Rae  
**State Secretary**  
Australian Labor Party (Victorian Branch)

## RURAL & REGIONAL VICTORIA

The approach of the Redistribution Committee for Victoria to local government areas (“LGA’s”) in rural and regional Victoria is a significant departure from the principles that it has adopted for Divisional boundaries, both in other States and previously in Victoria.

Paragraph 54 of the 2010 proposals for Victoria states:

*“The Committee was mindful of the need to consider community of interests in proposing new boundaries, accepting that there could be more than one community of interest within a division. Local government and regional boundaries were used extensively in rural and regional areas as indicators of community of interests. The Committee adopted this approach based on the prominent role that local government plays in providing a significant range of services to, and in representing the interests of, their communities in rural and regional Victoria. Geographical features such as the Great Dividing Range and state borders also impacted on the configuration of the boundaries.”*

That is pretty clear cut. However, in paragraph 134 of the current proposals for Victoria, the Committee states among other matters that it:

*“Accept[s] that splitting local government areas or localities may be appropriate where doing so provides for a strong physical boundary and/or a clearer community of interest, or where doing so meets the numerical requirements of the Electoral Act.”*

Clearly, the new stance concerning LGA boundaries in the country is reflected by the proposal.

The ALP reiterates its support of the principle that wherever possible, but especially in rural and regional areas, that LGA’s be united subject to the numerical requirements. We respectfully request that the Augmented Electoral Commission maintain this traditional approach.

As the Commission knows, more than 200 of the 413 objections refer to the boundaries of the proposed Divisions of Wannon and Cox.

Before considering objections, let’s examine the differences in LGA’s between the present and proposed boundaries of these Divisions.

Wannon currently is made up of eight wholly contained LGA’s. Four are coastal, Glenelg; Moyne; Warrnambool and Corangamite and in elector numbers are 64% of the Division. Three of the remaining LGA’s, Ararat; Pyrenees and Southern Grampians adjoin coastal LGA’s. The exception is Central Goldfields.

The Committee’s proposed Division of Wannon removes Central Goldfields to Mallee. Whilst Wannon wholly retains six of its existing LGA’s, the four coastal plus Ararat and Southern Grampians, it ends up containing partial numbers from four LGA’s, parts of Northern Grampians; Pyrenees; Colac-Otway and Golden Plains. In our view, that is too many splits.

It is noted that every objection recommends that both Colac Otway and Golden Plains Shires be united in a single Division.

It is also observed that, were the ALP objection for Wannon upheld, the Commission could also agree to that part of the National Party objection concerning the split of Pyrenees Shire by returning from the proposed Mallee to Wannon the 1,948 current and 1,947 projected electors from the SA2 of Avoca.

## LIBERAL PARTY & OTHER OBJECTIONS TO WANNON/COX/MALLEE/BALLARAT/BENDIGO/NICHOLLS

The Liberal Party and several others have objected to the proposed boundaries of Cox, both at its eastern and western ends.

At the eastern end of Cox, although it wasn't made in the original ALP suggestions, the Committee has made the sensible decision to combine Ocean Grove, Barwon Heads and Queenscliff, which is currently in Corangamite with the suburbs of Portarlington, Leopold, Drysdale and St Leonards, thereby uniting all of the Bellarine Peninsula into the same Division. You find this arrangement reflected in the boundaries of the State electoral district of Bellarine.

However, the Liberal party objection states:

*“Until such a time that the Electoral Commission is able to combine all of the urban areas of Geelong within one division, the Liberal Party submits that the Commission should avoid leaving remnants of urban Geelong in a different division to those of the remaining areas of urban Geelong. Until that time the Commission should ensure that the communities of urban Geelong are sufficiently represented in the divisions of Corio and Cox/Corangamite so that they have ample and equal weight in their representation in the Australian Parliament”.*

That is an argument to never unite the Bellarine Peninsula. It is also impossible to place all of urban Geelong in the same Division. What the Committee's proposal achieves is combine as much of urban Geelong in Corio, which is entirely made up of parts of the Greater Geelong Council, as well as uniting the Bellarine Peninsula in the adjoining Division.

The result is that the proposed Division of Cox is two thirds in electoral numbers made up of Greater Geelong Council plus Queenscliff.

Turning to the western end of Cox, the Liberal Party and others advocate that all of Golden Plains Shire be sent to Ballarat so as to allow for all of Colac-Otway Shire to be included in Cox. To facilitate such an arrangement, the Liberal Party proceeds to rearrange the electoral boundaries of all Divisions in Western and Northern Victoria.

Golden Plains, particularly at its western end does have a relationship with Ballarat. But Golden Plains Shire also adjoins Greater Geelong Council. On the other hand, Colac-Otway Shire is separated from Geelong by the Surf Coast Shire. At the State level, Colac-Otway is in the same electoral district as Corangamite and part of Moyne Shires. In our view it is not defensible to deny a relationship between Colac-Otway and places to its west given it is next door to the 12 Apostles on the Great Ocean Road which finishes at Allansford near Warrnambool, the largest city along the road.

To allow for the inclusion of Golden Plains into Ballarat, the Liberal Party then recommends that Ballarat sheds Hepburn Shire and part Moorabool Shire to Bendigo which then loses its share of Macedon Ranges Shire to Nicholls.

The ALP acknowledges that the catchment area of both Ballarat and Bendigo is greater than the electoral numbers which can be included in both Divisions. Given the numerical requirement, the Committee's proposal is the most practical. It satisfies communities of interests for both Divisions.

- The Midlands Highway is the connecting route between City of Ballarat and Hepburn Shire. It runs right through the spine of both. This transport route sees residents across Hepburn Shire including Daylesford accessing Ballarat as the main services centre for health care, education, work and shopping.
- Hepburn Shire sees itself as part of the Central Highlands and it is a member of the Central Highlands Mayors



and CEOs Forum which includes City of Ballarat, Moorabool Shire.

- All of the Hepburn Shire Football clubs play in the Central Highland Football League which is centred in Ballarat
- The Liberal Party proposal to remove parts of Bacchus Marsh from Ballarat results in the split of Moorabool Shire, an outcome which should be avoided wherever possible.

At Wannon's north-western end, the Liberal Party advocates that Horsham and West Wimmera be added. As the Committee will know, this is not the first time that such an action has been considered. The Liberal Party proposal was adopted by the 2010 proposal by the Redistribution Committee. But the Augmented Commission reversed that proposal.

The Augmented Electoral Commission stated:

*“59. Opposition to the Redistribution Committee’s proposal to transfer the LGAs of West Wimmera and Horsham from the Division of Mallee to the Division of Wannon centred on community of interest and demographic concerns, arguing that the dry areas of these LGAs have more affinity with the areas north in the Division of Mallee. The recent completion of the Wimmera-Mallee Pipeline was cited as a primary indicator of a shared community of interest.*

*60. The Commission concluded there was merit in returning Horsham and West Wimmera LGAs to the Division of Mallee, and that this was numerically feasible given the decision to retain the Division of Murray. To meet the numerical requirements of the Electoral Act, the Commission then proposed to transfer Northern Grampians LGA, including Stawell, from the Division of Wannon to the Division of Mallee.*

*61. The objections against the transfer of Horsham and West Wimmera LGAs from Mallee to Wannon were, therefore, upheld.”*

Assuming that the Augmented Electoral Commission agrees with its predecessors determination made last time concerning Horsham and West Wimmera, then no further commentary is needed concerning the rest of the Liberal Party proposal except to note that its placement of Echuca from Nicholls into Mallee is of a non-contiguous area. The SA2 of Lockington-Gunblower separates Echuca from Mallee.

## **THE NATIONAL PARTY OBJECTION**

The National Party has objected to the proposed boundary between Wannon and Mallee. They would prefer that Goldfields Shire be retained in Wannon as well as all of Pyrenees Shire, which has been split at the Avoca end between Mallee and Wannon. The National Party also wishes to retain Stawell in Mallee which would keep all of Northern Grampians Shire within Mallee.

However, the National Party solution results in the splitting of both the Shires of Glenelg and Southern Grampians Shires. That can not, in our view, be described as making a compelling case for a new arrangement of the boundaries between Wannon and Mallee.

However, if the ALP objection for Wannon succeeds, then that part of the National Party objection concerning the proposed split of Pyrenees Shire could also be upheld.

The National Party has also objected to the boundary between Indi and Nicholls. They object to the separation of the eastern side of Strathbogie Shire into Indi. We also note the point made by Mark Mulcair in his objection when he asks what is the point of uniting one Shire (Moira) at the expense of splitting another.

In the circumstances, it might be best to leave the current split between Indi and Nicholls as is in order to keep all of Strathbogie together in Nicholls.

# **METROPOLITAN MELBOURNE: WEST OF THE YARRA**

## **POINT COOK**

A number of objections have been made concerning the split of Point Cook. About three quarters of the suburb has been placed in the Division of Gellibrand with the remainder kept in the Division of Lalor. That part of the suburb proposed to remain in Lalor is 6,542 current and 7,709 projected electors.

The ALP would have preferred that Lalor's surplus be moved into Gorton as such a movement would have linked both Wyndham and Melton Councils which are outer Melbourne interface Councils. But the Committee decided instead to transfer Lalor's surplus into Gellibrand. We respect that decision as it has enabled Brimbank Council to form the core of the new Division of Fraser.

Nevertheless, we respectfully contend that our arguments concerning the interface councils being united will continue to apply during the next redistribution period.

The ALP hasn't objected to the boundary between Lalor and Gellibrand. However, we note that the unification of all of Point Cook within Gellibrand is possible provided that all of the SA2 of Laverton is placed in Lalor.

## **FLEMINGTON: Australian Greens; Adam Bandt MP & others**

The Australian Greens have proposed that Melbourne retain Flemington and Travancore as those suburbs have a close relationship with Kensington. Then Wills regains that part of Yarra Council currently within its boundaries but proposed by the Committee to be placed in Melbourne. In order to keep Maribyrnong within quota, the Australian Greens split the suburb of Braybrook by removing a parcel of electors from Fraser.

Braybrook is currently entirely in Maribyrnong but the Committee has proposed that it be in the Division of Fraser. The ALP has objected to this transfer and has suggested an arrangement whereby Braybrook can be retained in Maribyrnong.

In summary, the Australian Greens seek to undo the proposed Divisional boundary, which is also the Council boundary of the western end of Melbourne City Council, between Melbourne and Maribyrnong at the price of both splitting the suburb of Braybrook and of removing the proposed Council boundary between Melbourne and Wills. In our view, that argument can rely less on the community of interest argument that the Committee's proposal.

Also, it should be noted that the Australian Greens objection would result in each of Batman, Wills and Melbourne being placed at the highest end of the allowable deviation from the projected quota. That is significant when you consider the population growth that is occurring in Melbourne.

In the two year period between the striking of the quota and the projected date, the Division of Melbourne, as proposed is expected to grow by 5.9%, nearly twice the State average of 3.2%. It should be possible at the next redistribution, due in two years to place Kensington together with Flemington. That way the remainder of the Division of Melbourne will be able to be kept together next time.

A completely different objection to the Australian Greens but which covers similar territory is objection 358 by Andrew Gunter. His objection seeks to place Kensington and Flemington together but in Maribyrnong instead of in Melbourne. For the reasons we have already outlined Mr Gunter's objection can more easily be accommodated at the next Victorian redistribution without the need to make wholesale changes as he advocates this time. The ALP also disagrees with Mr Gunter's idea of replacing an indigenous name, Maribyrnong with that of a 19th century explorer.



## **CRAIGIEBURN**

Without wishing to reiterate our objection which recommends that Craigieburn be united in McEwen instead of Calwell, we note that there have been several objections in relation to Craigieburn. Of particular note is objection 251 from the Craigieburn Residents Association. That objection, alongside the objection number 132 by Councillor Tom Joseph of Whittlesea Council as well as others articulates reasons why Craigieburn should be in McEwen so as to give that Division a clear focal point.

## **METROPOLITAN MELBOURNE: EAST OF THE YARRA**

The ALP agrees with the objection lodged by Knox Council which seeks to retain the existing boundary between Aston and Bruce. The change involves no electors but would maintain the southern Knox Council boundary as the divisional boundary between Bruce and Aston.

We also commend objections 16, 31, 46 and 48 which oppose the inclusion of Eltham and surrounding areas into Menzies.

## **LIBERAL PARTY & OTHERS OBJECTIONS TO DUNKLEY/FLINDERS/HOLT/ISAACS/BRUCE/LA TROBE**

In respect to the proposed Divisions of Flinders and Dunkley, let's look at what is proposed.

The Redistribution Committee proposal is to unite all of Frankston Council in the one Division, Dunkley, and also proposes Flinders as entirely made up of parts of Mornington Peninsula Shire. Currently, Flinders comprises parts of the Mornington Peninsula as well as Casey Council. Frankston Council is presently divided between Dunkley and Isaacs.

It should be noted that the Mornington Peninsula Shire contains too many electors to fit into a Division: 120,429 current and 123,244 projected. Frankston Council has too few electors, 95,178 current and 97,039 projected, to comprise a Division. But each combined comprise two Divisions.

The members of the Augmented Redistribution Committee have done a better job than either the suggestions of the ALP or the Liberal Party with their proposals for Dunkley and Flinders.

The Liberal Party and others submit that the Committee has made a mistake. They insist that a better arrangement of the communities of interests in the Divisions in the south east of Melbourne that they object to would result in the following changes:

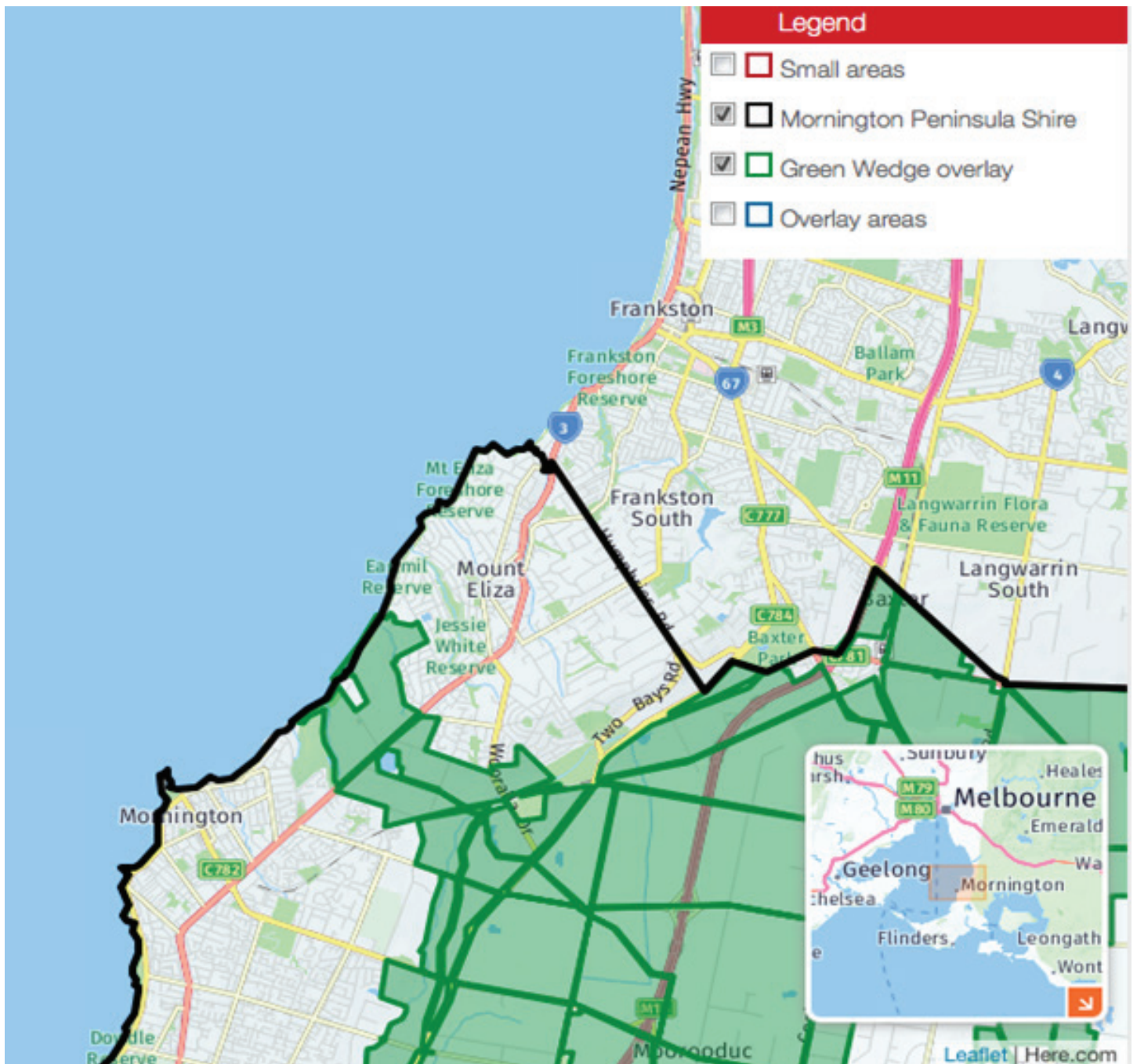
- Frankston Council, instead of being united in Dunkley should be divided four ways between the Divisions of Flinders, Holt, Dunkley and Isaacs.
- Dunkley, instead of being a Mornington Peninsula/Frankston LGA Division should also contain, via the inclusion of Carrum-Paterson Lakes, parts of Kingston Council.
- Flinders, instead of being a Mornington Peninsula Division should take in parts of Casey Council as well as via Langwarrin parts of Frankston Council. NB Flinders lost its last remaining segment of Frankston Council in the 2002 redistribution.
- Holt, instead of being as both now and proposed entirely comprised of parts of Casey Council should gain more than 20,000 electors from Frankston Council.

Just by stating the effects as outlined above of the Liberal Party objection should be sufficient for the Augmented Commission to reject the Liberal Party objection.

The Liberal Party is also incorrect when it states “The Liberal Party suggests that the Augmented Electoral Commission retain the proposed transfer of electors [to Dunkley] from the existing Division of Isaacs electors from Isaacs in the part of Carrum ,Paterson Lakes.....”

None of these electors which are in Kingston LGA are proposed to be transferred anywhere by the Redistribution Committee.

In examining whether the Committee’s proposed boundary between Dunkley and Flinders are clear, we establish that the Mornington suburb boundary as illustrated by the below map is also a green wedge separating the suburb from Mount Eliza. Such a clear and wide suburb boundary is virtually a unique thing in the Melbourne metropolitan area.



The best that can be said for the Liberal Party objection in Melbourne’s south east is that it adds credence to the ALP objection advocating that Bruce cede to both Hotham and Isaacs those parts of the Greater Dandenong Council that are south of the Pakenham Line.

It is noted that the Liberal Party's changes involving Dunkley return a significant portion of Greater Dandenong Council from Bruce to Isaacs.

In contrast, it is instructive to return to the ALP's alternative suggestion.

In providing comments on objections in relation to the Bruce / Hotham / Isaacs interface it is useful to first restate briefly: *the key reasons for our concerns* regarding the Commission's proposals; and *Labor's alternative* which gives effect to the broad strategic intent of the Commission while better meeting the criteria of the *Commonwealth Electoral Act* regarding physical features and community of interests and significantly reducing unnecessary change for electors. To summarise:

**1. The Pakenham Railway line** is a strong, readily identifiable physical feature which has formed the southern boundary of the Bruce electorate for decades. In 1994 when the Commission proposed moving Bruce south of the Railway line the Liberal Party's strong objection was upheld by the Commission, and as recently as 2010 the Redistribution Committee acknowledged this as a "*solid boundary*" and this continues to be the case.

From a local perspective, you cannot overstate the profound impact that the railway line has had for decades in shaping the patterns of community life in Dandenong / Noble Park, including economic habits of shopping and work, and community participation whether in schools, sporting groups or religious observance. "*Are you south or north of the line?*" is a standard question which people ask to make sense of how they relate to other locals.

Residents in the area south of the Railway line in Noble Park and Keysborough have a long history in the Division of Isaacs. The relationship of these residents to the south is strong and well established, given the longstanding impact of the Pakenham Railway line on the community's behaviour, including patterns of school attendance, sporting participation, shopping (at Parkmore Shopping Centre as well as the Douglas Street shops) and worship. Abandoning the Railway line as a boundary also splits the community of interests in Dandenong / Dandenong South including the Australian-Albanian community, and there is no clear logic for the adoption of Kirkham Road as the Bruce / Isaacs boundary as this is not a strong natural boundary and disregards the clear community of interests.

In our view, it is completely unnecessary to abandon the railway line as a longstanding boundary for most of the Bruce electorate and does not accord with the statutory criteria. It is acknowledged that there is a need to cross the railway line for mathematical reasons and to give effect to the broad logic of the Commission's proposal to reorient the Bruce electorate to be east-west. Springvale is by far the most natural place to cross the railway line given the communities of interest and physical features (including the shopping centre which crosses the railway line in Springvale), hence Labor's proposal maintains the railway line as a border for most of the Bruce electorate while uniting Springvale.

**2. Police Road (the Commission's proposed Bruce / Hotham boundary) does not define an actual community of interest** and is merely an administrative boundary. In contrast, Labor's submission carefully explains and empirically illustrates the strong and established links between residents, community facilities and businesses in Mulgrave and the areas north of Princes Hwy (Dandenong North and Noble Park North) and proposes the main roads of Springvale Road and Waverley Road as more logical boundaries, noting these are also largely suburb boundaries.

Retaining the suburbs of Mulgrave and Wheelers Hill in Bruce acknowledges these strong links, and also respects the history of the Bruce electorate whereby Mulgrave and Wheelers Hill are the only suburbs that have been entirely in Bruce since its creation in 1955. It is accepted that over time it may be necessary for

the Bruce electorate to move further out due to growth at the edges of Melbourne, however in our view it is not necessary to make this change at this time when the existing communities of interest, current boundaries, and history, can be respected while accommodating the Commission's strategic logic.

- 3. The proposal to use Heatherton Road and Springvale Road as electorate boundaries for Bruce / Hotham / Isaacs unnecessarily divides the strongly linked community of interests in Springvale South, Springvale and Noble Park** (west of Corrigan Road, the existing boundary), splitting these communities across three electorates. Labor's alternative explains these issues in detail, and the alternative proposal brings together in the Hotham Division the nationally significant and tight-knit Indo-Chinese communities which are the dominant population group across the suburbs of Springvale South, Springvale, Clarinda, Westall, Clayton and Clayton South, including the two major shopping and business centres of Clayton and Springvale. These centres are well connected by rail services and bus routes, hence uniting them in one electorate also takes account of the statutory criteria of the means of travel.
- 4. The proposal would result in enormous and unnecessary changes in this redistribution and also, almost certainly, the next.** The boundaries of existing electorates is a statutory criteria to be considered, albeit subordinate to the others. Labor's alternative proposal fully achieves the Commission's numerical requirements and strategic intent and better meets the most important statutory criteria in relation to community of interests and physical features.

Labor's proposal also achieves criteria (iv) by significantly reducing the extent of change for electors (the number of electors retained in current electorates under Labor's proposal is 61.3% for Bruce as opposed to AEC 34.5%; 69.5% for Hotham as opposed to AEC 42.8%; and 83.6% for Isaacs as opposed to AEC 68.3%). As also explained in The ALP's submission, this has an additional benefit when considering the changes that could be reasonably expected in the next redistribution, whereby this avoids the likely need to move electors back from Bruce to Hotham and Isaacs. In our view, the Commission could take a long-term approach instead of pursuing radical changes which are likely to be substantially reversed next time when considering projected growth patterns.

- 5. The Commission's proposal unfairly isolates residents in Keysborough, South of Cheltenham Road and Dandenong South, South of Kirkham Road by dividing them from their points of interest in the Southern part of the Greater Dandenong Local Government Area.**

By drawing the boundary of Isaacs and Bruce at Cheltenham and Kirkham Roads, the Commission splits these communities from the community infrastructure of these suburbs, which are overwhelmingly North of Cheltenham Road and South of the Cranbourne-Pakenham train line. These communities would be far better served if the existing Bruce/Isaacs boundary was maintained. Maintaining the existing boundary of the Cranbourne-Pakenham train line would allow:

- Keysborough South to remain in the same electorate as this community's key transport hubs, centres of interest and places of education, such as Parkmore Shopping Centre, the Douglas Street Shops, Keysborough Secondary College and the Noble Park, Yarraman and Dandenong Train Stations.
- Dandenong South to remain one community. Splitting this community in two along Kirkham Road, a one-lane each way suburban street, splits a close-knit community and isolates those residents South of Kirkham Road from, not only the Dandenong Train Station and Parkmore Shopping Centre, but from the Albanian Mosque and Dandenong South Primary School, which are both proposed to be removed from Isaacs in the Commission's proposal.

Labor proposes that the existing Bruce/Isaacs/Hotham boundary be restored so that the seat of Isaacs can continue to cover substantial communities in both the Cities of Kingston and Greater Dandenong. The existing boundaries allow these communities to live, shop, learn and worship within the same Division, while the proposed changes fails each of these tests for residents of Keysborough and Dandenong South. We strongly suggest that the best way to maintain these communities of interest is to restore the Bruce/Isaacs boundary to the Cranbourne/Pakenham train line.

It is not appropriate that the boundaries of the Divisions of Bruce, Holt and Isaacs be treated as a mere afterthought. As the Liberal Party has done in its submission, as the substantive argument relates to the Divisions of Dunkley and Flinders, with the consequential changes to other Divisions simply passed off as necessary *“in order to meet the required number of electors.”*

## **SUMMARY**

The Divisions of Bruce, Hotham and Isaacs warrant serious consideration in their own right and should not be treated as an accidental by-product of changes to the Division of Dunkley.

The strategic logic of the Commission to re-orient the Division of Bruce in a more East – West direction is sound however the execution is flawed from a local perspective and the intent can be more simply and elegantly achieved.

The ALP’s alternative proposal better accords with the statutory criteria by strengthening community of interests, respecting (existing) strong natural boundaries, significantly reducing change for electors. It also has the added benefit of taking account of adjustments that could be reasonably expected in the next redistribution by avoiding changes that are likely to be reversed next time.