



Comment on objections 41

Australian Greens
Victoria

22 pages

Australian Greens Victoria comments

Australian Greens Victoria (AGV) would like to thank the Redistribution Committee for the opportunity to comment on objections to the proposed boundaries for the Victorian federal redistribution.

AGV congratulates the Committee on their work in developing the proposed boundaries, acknowledging the challenge in balancing the maintenance of communities of interest with the necessity of ensuring all electorates meet the elector tolerances for both the starting and projection date. While the Committee decided not to adopt many of the recommendations from AGV, we agree that the committee has that balance right in your proposed boundaries.

However we would like to take the opportunity to comment on the objection made by Victorian Labor, which directly takes issue with the original AGV suggestion on multiple occasions. Therefore our comments will be restricted to addressing the arguments, littered with half and mis-truths, that Victorian Labor have put forward in their objection to proposed change to the boundaries of Macnamara and Higgins, and defending the integrity of our original submission.

Summary

AGV supports the proposed boundaries for the Divisions of Macnamara and Higgins as put forward by the Redistribution Committee. The following points summarise our detailed response to Labor's objections, provided below.

Jewish community

AGV agrees that greater Melbourne has an important Jewish community, which is one of our city's strengths. Under current boundaries, Higgins, Goldstein, Macnamara and Hotham all contain significant Jewish populations. However, Labor's submission that the Jewish households, businesses and institutions outside the current boundaries of Macnamara are insignificant simply doesn't stand up to scrutiny.

In fact, if the Redistribution Committee aimed to form an electorate with the highest possible Jewish population, the Committee's proposed boundaries would serve this goal much better than Labor's proposal. The following table shows the size of the Jewish population contained within each of Macnamara and Higgins under the current boundaries and under the Committee's proposed boundaries¹:

Electorate	Existing 2019 Boundaries	Proposed 2021-22 Boundaries
Macnamara	16,064	3,730
Higgins	5,837	18,083

¹ Number of respondents identifying their religion as Judaism at the 2016 Australian Census, based on aggregating SA1's within the divisions of Macnamara and Higgins

Clearly it is not possible to encapsulate the entire Jewish community within a single electorate. However, the proposed boundaries serve to unite the Jewish community within Higgins better than the current boundaries have served to do so within Macnamara. We submit that Labor's objections on this basis are nonsensical and should be dismissed. Hyperbole cannot substitute for accurate data.

Additionally, the AGV is not aware whether there is any precedent for taking religion into account in determining what counts as a 'community of interest' for the purposes of the Act. If the Committee were to find that religion is an eligible basis for defining a community of interest, then we presume that the Committee would agree that it must be done in a non-discriminatory manner. Given the substantial Muslim, Buddhist, Hindu and other religious minority communities with geographic concentrations in different parts of the Melbourne Metropolitan region who are currently spread across different divisions, such a decision would require a number of substantial changes to the proposed boundaries from the Committee's draft, which we've attempted to begin to identify below.

Local government and suburb boundaries

The many communities across the Cities of Stonnington, Glen Eira and Port Phillip share much in common. In fact, in this part of greater Melbourne, areas linked across municipal boundaries often share *more* in common than areas within those boundaries.

Labor's submission on the basis of municipal boundaries is self contradicting. They object to the proposed separation of South Yarra and parts of Prahran from Toorak, Kooyong and Malvern because this further splits the City of Stonnington across two electorates (which it is already split across). But they ignore the proposed unification of the City of Glen Eira suburbs like Caulfield and Carnegie within Higgins (which serves to reduce the number of electorates that the City of Glen Eira is split across from four to three), and they seek its reversal. Similarly, they object to the split of the 'L' shaped suburb of Prahran, but they ignore the unification of the suburb of South Yarra within Macnamara, and again seek its reversal.

We submit that the parts of South Yarra and Prahran that the Redistribution Committee proposes to move into Macnamara share a much stronger community of interest with St Kilda than they do with the remainder of Stonnington (with their apartment buildings, fashionable shops, cafes and nightlife). Similarly, there is considerably more overall shared character and interests between the areas of Elsternwick, Caulfield, Caulfield North and Caulfield East with the other suburban areas of the proposed division of Higgins than with the inner-urban suburbs in the proposed division of Macnamara - which are uniquely defined in character by their geographic position, wedged between the CBD and the bay. Labor's objections on the basis of municipal and suburb boundaries should be dismissed.

Public housing

Labor objects to the unification of public housing towers across Prahran, South Yarra and South Melbourne within the division of Macnamara, dismissing their status as a community of interest

on the basis of a claim that they only share economic interests. This seems to ignore the definition of 'community of interest' in the act, which clearly includes shared economic interests.

However, as we detail below, the communities living in these large public housing towers share much beyond economic interests. They are in the same public housing region (Inner Metro South) and share many local services, including the Victorian Housing Department's office in South Melbourne (especially when arranging transfers) and important emergency support and crisis services centered in St Kilda. They have shared interests in the effective provision of key Commonwealth services relating to immigration and citizenship, income support and employment services, Medicare and the NDIS. There is movement of tenants between the estates: people seeking transfers tend to request to stay in the area because of the services that they use and the community connections that they have established. And the Tenants Associations of the different estates have often worked with each other on shared interests and have raised issues for one another.

Labor also refers to State government plans to build new public housing as something that will cause the dispersal of public housing tenants as a community of interest. We submit that this ignores the fact that much of the planned housing build will be social and affordable housing rather than public housing that is owned and managed by the government, like the high density housing estates under consideration here.

It is impossible to understand the demography and patterns of wealth and disadvantage within the inner suburbs of Melbourne without reference to the geographical stratification that arises from high density public housing, and we think the Commission was right to acknowledge the public housing towers of the inner south as a key community of interest. Labor's objection on this basis should be dismissed.

Means of communication, transport and physical features

Labor argues that Punt Rd and Dandenong Rd, with their categorisation as M2 routes should be preferred as boundaries over Hotham St / Williams Rd as an M3 route. They further argue that communities in this area travel east-west and not north-south to shop and socialise.

We submit that the first of these points is irrelevant and the second is simply incorrect. While much commuter through-traffic uses the major M2 routes, there is significant local use of key north-south routes. Chapel St, Williams St/Hotham Rd, Orrong Rd, Kooyong Rd and Glenferrie Rd/Hawthorn St are all significant north-south transit routes heavily used by locals.

The suggestion that residents of South Yarra and Prahran would be more likely to shop in Malvern than St Kilda, or that most residents of St Kilda would sooner socialise in Caulfield than on Chapel St, defies all logic and experience. Again, we submit that Labor's objections on this basis should be dismissed and that the Redistribution Committee's proposed use of Hotham St / Williams Rd as a clear, straight and strong boundary between Macnamara and Higgins should be implemented.

Detailed rebuttal

For the remainder of our submission, Victorian Labor comments from their objection are in italics below, with our response following on from each.

Introduction

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

While the Committee is well aware that political partisanship has no role in the consideration or determination of new boundaries, Labor begins their submission at the outset by attempting to mislead the Committee. Many of the same psephologists have in fact noted that proposed changes will substantially change the overall primary vote in Macnamara and present risks to Labor in losing the seat (Tally Room, Antony Green).

While AGV has attempted to debunk Labor's mistruths below, reading their submission in this context will help the Committee understand the motivated reasoning they have applied throughout.

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.

While communities tend to cohere at the political level by associating around federal electorates and federal members, this association does not constitute a community of interest, and these formations play a very limited role in constituting community identity.

Additionally, while some electors may prefer to be in a “Labor seat” or “Liberal seat” or “Green seat” because they believe they can more strongly influence or identify with a particular party’s policy position rather than another’s, this can not be a basis on which to draw boundaries.

If the Redistribution Committee were to adopt the argument that existing members of a federal electorate cohere into a community of interest on the basis of those boundaries, then no boundary change would ever be justified, even when there are underlying changes to the electorate in terms of social, economic or regional interests.

(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.

Zionism Victoria says the Jewish community of interest is defined by ‘shared religious, national and cultural identities’. Labor’s submission also references religion. We presume the Committee will take legal advice and form a view about whether this is in accordance with the matters the Commission is able to take into account, given the silence in the Act on matters of religion in the independent determination of electoral boundaries and the apparent lack of precedent on this point.

However, assuming such an interpretation of ‘community of interest’ is permissible, historical links of communities to specific places are a weak foundation for identifying communities of interest. Many ethnic and religious communities, particularly those with histories of migration going back to the 19th and early 20th centuries, have historical links to inner city suburbs that have radically transformed since that period.

When the option is presented between preserving a community interest based on actually existing members of a given community versus areas with historical linkages to a given community, it would be strange to prioritise the latter over the former. And as we show below, the new proposed Division of Higgins provides a stronger representation of the Jewish community than the existing Division of Macnamara.

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.

While these numbers are true, the Labor submission ignores the large Jewish community who already live within the existing Division of Higgins. These include the suburbs of Toorak (9%),

Ormond (9%), Carnegie (6%), Malvern (6%) and Armadale (6%). In fact, by combining the large Jewish communities of Caulfield, Caulfield North, Elsternwick and St Kilda East with these suburbs, the Redistribution Committee's proposed Division of Higgins will have a larger Jewish population than the existing Division of Macnamara, providing stronger protections for any community of interest than existing boundaries:²

Electorate	Existing 2019 Boundaries	Proposed 2021-22 Boundaries
Macnamara	16,064	3,730
Higgins	5,837	18,083

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

² Number of respondents identifying their religion as Judaism at the 2016 Australian Census, based on aggregating SA1's within the divisions of Macnamara and Higgins

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.

Under current boundaries, Higgins, Goldstein, Macnamara and Hotham all contain large Jewish populations. Thus there is no way to provide a single electorate for the entirety of the Jewish community of the inner south, as such an electorate would be well over the maximum quota of electors.

But Labor is being misleading when they imply that the existing division of Macnamara contains 'nearly all Jewish synagogues, community organisations and centres, not for-profits, health and aged care services and Jewish schools and kosher restaurants and shops'. In fact there is a wealth of Jewish institutions within the existing Division of Higgins.

These include:

- a number of synagogues such as Chabad South Yarra, Chabad Carnegie, Chabad Malvern (which includes a mikvah) and Kedem.
- King David School, a progressive Jewish day school for K-12 students and Progressive Judaism Australia, the roof body and advocate for Progressive Jewish organisations in Victoria.
- A kosher precinct on Glenferrie Rd in Malvern, including Continental Kosher Butchers, Glick's Malvern and kosher sections within both Coles and Woolworths
- A number of Jewish advocacy organisations, charities and community hubs including LaunchPad Malvern, Stand Up, Jewish Climate Network, Australian Friends of Tel Aviv University and many others
- Jewish Care Carnegie, one of Victoria's largest Jewish residential aged care facilities, and Regis Armadale, which has dedicated services for Jewish aged care residents

Additionally Higgins borders directly the important Jewish precinct in Hawthorn/Hawthorn East which includes Bialik College, a cross-communal Jewish Zionist K-12 school and the Ark Centre, a modern Orthodox synagogue and community centre.

To argue that the 'Jewish community ... is not a community that ordinarily travels north of Dandenong Road to shop and dine – it is located largely in Caulfield/Elsternwick/St Kilda' is simply incorrect.

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.

The eruv already contains substantial sections of the Division of Higgins, including the parts of the suburbs of Ormond, Carnegie and Murrumbeena that lie east of Grange Rd and north of North Rd. The new Division of Higgins would in fact include a larger portion of the eruv than the existing Division of Macnamara.

Additionally, according to the Council of Orthodox Synagogues of Victoria, 'serious investigative work and halachic enquiries are currently being undertaken by Melbourne Eruv Pty Ltd with a view to extending the Eruv boundaries to encompass Malvern Chabad, Cabrini Hospital in Malvern and the Avenue Hospital in Prahran', all locations north of Dandenong Rd and currently within the Division of Higgins.

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.

Selwyn St, Gordon St and all of Elsternwick north of Glen Huntly Rd would be entirely contained within the new Division of Higgins under the existing boundaries proposal. Thus there would be no splitting of the Elsternwick Jewish Cultural Precinct due to the changes proposed by the Committee.

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.

As we have noted above, the Jewish community is already spread across a number of electorates in the inner south (and indeed across all electorates in Victoria). The arbitrary distinction that Labor has drawn throughout their submission between the substantial Jewish community within the City of Stonnington and the Jewish community within the City of Glen Eira (many of whom are already within the Division of Higgins) is bizarre, and does not reflect the actual contours of the Victorian Jewish community.

Other communities with religious aspects

Should it be that it is permissible under the legislation to define a community of interest at least in part with respect to religion, then this would obviously require a non-discriminatory approach between communities. Other communities of interest with a religious aspect would need to be taken into account in all current and future redistributions.

For example, the Muslim community exists in relatively high concentration in particular areas in greater Melbourne, but these communities are currently divided across proposed electorates. The table below highlights the population density of Muslim Australians across a number of adjacent suburbs in the outer-north, but the Committee is effectively proposing to split this community in the middle across the seats of Calwell and Wills.

10 most Muslim suburbs in outer-north Melbourne	Percent Muslim	Proposed 2021-22 Division
Dallas	49%	Calwell
Meadow Heights	41%	Calwell
Broadmeadows	36%	Calwell
Campbellfield	35%	Calwell
Fawkner	32%	Wills
Coolaroo	29%	Calwell
Roxburgh Park	28%	Calwell
Hadfield	21%	Wills
Glenroy	19%	Wills
Jacana	17%	Calwell

Likewise, there are many similar religious minority communities throughout greater Melbourne who may identify as a contiguous ‘community of interest’ but who are split across proposed Divisions.

These include the Buddhist community of the outer south-east, which the Redistribution Committee is proposing to divide between Hotham, Isaacs and Chisholm; and the Hindu

community of the outer west, which the Redistribution Committee is proposing to divide between Lalor, Gellibrand and Fraser.

10 most Buddhist suburbs in outer-SE Melbourne	Percent Buddhist	Proposed 2021-22 Division
Springvale South	33%	Hotham
Springvale	23%	Hotham
Keysborough	19%	Hotham/Isaacs
Noble Park	16%	Hotham
Notting Hill	11%	Chisholm
Glen Waverley	10%	Chisholm
Waterways	10%	Isaacs
Clayton South	9%	Hotham
Noble Park North	9%	Hotham/Bruce
Lynbrook	9%	Holt

10 most Hindu suburbs in outer-west Melbourne	Percent Hindu	Proposed 2021-22 Division
Williams Landing	16%	Lalor
Tarneit	15%	Lalor
Truganina	14%	Gellibrand
Albion	10%	Fraser
Point Cook	10%	Gellibrand
Laverton	9%	Gellibrand
Carnegie	9%	Fraser
Wyndham Vale	7%	Lalor
Burnside Heights	6%	Gorton
Plumpton	5%	Hawke

It also goes without saying that many other minority religious groups exist across Victoria and Australia, which the Committee may also be required to take into account.

If the Committee was to commit itself to such a position, then we submit that fairness would require the Committee to consider a large number of further changes to boundaries across the Melbourne metropolitan area. As one example, the suggestion by the Victorian Liberals to align their new Division of Hawke (which could be repurposed as either the existing Division of Cooper or Wills) on an east-west axis across the the inner-north would allow Calwell to push down and take in the suburbs of Glenroy, Hadfield and Fawkner, uniting the Muslim community of interest of the outer-northern suburbs. We note of course that further adjustments would then be needed to surrounding seats to keep all electorates within elector quotas.

(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.

Again we see Victorian Labor making an extremely arbitrary distinction between the City of Stonnington and City of Glen Eira. While we will address the specific arguments below, the communities of the Cities of Stonnington, Glen Eira and Port Phillip all share much in common, and the attempt to draw clear lines between them does not reflect the lived reality of these communities.

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 existing school catchments within the City of Stonnington and City of Glen Eira completely refute the argument presented by Victorian Labor.

When it comes to secondary schools, the Glen Eira College catchment stretches both north and south of Dandenong Rd, taking in most of the City of Stonnington suburbs of Malvern and Malvern East in addition to the City of Glen Eira suburbs of Caulfield, Caulfield North, Caulfield South, Glen Huntly and Carnegie (which is also currently within the Division of Higgins).

As the Labor submission notes, the Prahran High School catchment also crosses Dandenong Rd, taking in large parts of St Kilda and St Kilda East. Prahran High School is in the process of applying for registration to teach Years 10-12 from 2022, which will mean that students from both north and south of Dandenong Rd will be within the catchment zone of Prahran High until the end of Year 12.

As for primary schools, no less than seven primary school catchments cross Dandenong Rd between the City of Stonnington and City of Glen Eira. These include Windsor Primary School, Armadale Primary School, Caulfield Junior College, Malvern Primary School, Lloyd Street Primary School, Carnegie Primary School and Murrumbeena Primary School. Note too that many of these schools are physically located within the existing Division of Higgins despite catchments within the City of Glen Eira; therefore the new proposed boundaries for the Division of Higgins would serve to unite these school catchments within the same electorate.

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).

AGV agrees that there is a specific community of interest within Chapel St, which is why we support the Redistribution Committee's proposal to unite all of Chapel St from South Yarra to Balaclava within the same division.

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, 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 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

While Victorian Labor have argued the truism that people tend to shop and socialise close to where they live, there are much stronger similarities between the commercial, nightlife and entertainment precincts of South Yarra, Prahran, Windsor and St Kilda than between Chapel St

and the more suburban commercial precincts along Toorak Rd and High St (east of Williams Rd) and Glenferrie Rd.

Many residents who live in these areas live in similar dwellings (apartments) with similar tenancy arrangements (larger share of renters), and while attracted to the lifestyle benefits of living close to key hubs of Melbourne nightlife, often also share similar concerns relating to community amenity and public safety.

There are also established public transport links between these communities, with both the #78 tram route and Sandringham rail line providing direct transport connectivity.

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.

AGV believes that the rather arbitrary lines of suburbs should not be treated as sacrosanct by the Committee, and it is evident that the character of Prahran east of Williams Rd is markedly different than that west of Williams Rd, particularly with the number of apartments and medium/high density dwellings growing rapidly, and the specific commercial, nightlife and entertainment precinct along Chapel St and surrounds.

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.

Victorian Labor fails to mention that while the City of Stonnington is already divided between two electorates, the City of Glen Eira is currently divided into four almost equal sized quarters by Higgins, Macnamara, Goldstein and Hotham.

By moving those parts of the City of Glen Eira currently within Macnamara into Higgins, the northern half of the City of Glen Eira would now be entirely contained within the Division of Higgins, uniting that community of interest and limiting the number of divisions that the City of Glen Eira is spread over to three.

(iv) The public housing argument

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.*

As Victorian Labor rightly points out, public housing tenants across Melbourne share many interests in common, including economic interests. But Labor then go on to deny that this represents a community of interest, which appears to contradict the *Electoral Act 1918* which explicitly identifies a shared economic interest as part of a community of interest in section 66(3)(a):

'In making the proposed redistribution, the Redistribution Committee shall give due consideration, in relation to each proposed Electoral Division, to communit[ies] of interest within the proposed Electoral Division, including **economic**, social and regional interests.'

It is also impossible to understand the demography and patterns of wealth and disadvantage within the inner suburbs of Melbourne without reference to the geographical stratification that arises from high density public housing.

Labor is also correct to point out that this commonality is shared not only between Prahran, South Yarra and South Melbourne, but Collingwood and Richmond. Given this distinct social and economic community of interest of inner-Melbourne's high rise public housing, it would of course be ideal if all of these areas could be packed into one electorate. However as with the Jewish community of interest discussed above, this would be well over the maximum quota of electors.

As AGV proposed in our original submission to the Committee, it is possible to contain nearly all of Melbourne's high rise public housing within two electorates, Melbourne in the north and Macnamara in the south. In the case of the south, this has been achieved with the Committee's proposed boundaries for the Division of Macnamara.

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.

All of the public housing within South Yarra, Prahran and Windsor share the same public housing region (Inner Metro South) as Albert Park, Port Melbourne, South Melbourne and St Kilda.

AGV understands that there is movement of tenants between the Prahran and South Melbourne public housing. If people want transfers and want to stay in the area because of the services they use and their community connections, then they may be moved between the South Melbourne and Prahran estates.

The Tenants Associations of the different estates have also worked with each other on shared interests and the South Yarra Tenants Associations have previously raised issues related to the South Melbourne estates because of the personal connections that exist between residents.

We note the tenants of the high rise public housing estates in South Yarra and Prahran use the Victorian Housing Department's office in South Melbourne, particularly in relation to transfer requests. We would also note that there are a number of important emergency support and crisis services centred in St Kilda that are used by residents of Prahran and South Yarra.

Additionally, we reject the argument that the 'character' of the public housing communities changes between South Yarra, Prahran and Windsor and those within the City of Port Phillip. This is a completely arbitrary distinction that Labor has made no effort to evidence.

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.

The current proposal for the Markham estate referenced in the objection is for a mixed public housing and private housing development. Of the 178 dwellings, 111 will be public housing and the rest private affordable housing. This type of mixed social housing development is not only substantially different in type from the high density public housing communities, but also different in scale compared to the current estates in South Yarra, Prahran, St Kilda, South Melbourne and across the inner south that thousands of residents call home.

In relation to the reference to the 9300 new houses the government is building as part of the Big Build - only a tiny proportion of these will be within the divisions of Macnamara and Higgins, and only a small number of this proportion will actually be public housing, that is, owned and managed by the government like the high density public housing estates. The vast majority will be community housing in mixed developments along with private housing.

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.

The point AGV was seeking to make was that the public housing ‘lockdown’ was demonstrative of the collective community of interest of public housing tenants, not that this interest was only limited to the period of the lockdown itself. The role of Members of Commonwealth Parliament in supporting members of public housing communities is by no means ‘limited’ - with the Commonwealth Government responsible for immigration and citizenship, income support and employment services, Medicare, the NDIS and other critical services and contact points where the interest and level of need of inner city public housing residents differs from other inner city cohorts.

Additionally the Commonwealth Government has a large degree of control over the shape of the Australian economy, including the overall level of unemployment, inequality and funding available for both Commonwealth and state and territory services. By uniting a larger proportion of public housing tenants within a single electorate, it empowers public housing tenants to more effectively lobby for their collective economic interests.

Part II – Means of communication, transport and physical features

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, 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 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.

Despite claims to the contrary, Punt Road and Dandenong Road do not serve as concrete boundaries to the natural movement of peoples in the inner south.

Punt Road only consists of two lanes each way for the entirety of the section between the Yarra River and Dandenong Road, the same width as all of Williams Road/Hotham Street between Dandenong Road and Glen Eira Road. A substantial portion of South Yarra exists west of Punt

Road, sharing the same postcode (3141) as the suburb east of Punt Road, and this community travels frequently across Punt Road where it is serviced by the Toorak and Malvern Road shopping precincts and South Yarra train station.

Dandenong Road, while admittedly wider, doesn't serve as a function barrier to movement of the communities of the Cities of Stonnington and Glen Eira. There are no less than eleven separate crossings over Dandenong Road along the boundary between the City of Stonnington and Cities of Port Phillip and Glen Eira, including Punt Road, Upton Road, Chapel Street, Williams Road/Hotham Street, Orrong Road, Kooyong Road, Glenferrie Road/Hawthorn Road, Burke Road/Sir John Monash Drive, Darling Road/Koornang Road, Belgrave Road/Murrumbeena Road and Chadstone Road/Poath Road.

Additionally two tram routes operate along Dandenong Road, the #5 and #64, with commuters from both sides of Dandenong Road using these trams to move between major precincts such as Glenferrie Road, Chapel Street, St Kilda Road and the CBD. And between Glenferrie Road and Koornang Road, Dandenong Road runs close to the Frankston and Pakenham / Cranbourne train lines, with major stations in Malvern, Caulfield and Carnegie all servicing commuters on both sides of Dandenong Road.

Finally the Committee has previously agreed that Dandenong Road poses no barriers to transportation or communication, as the suburbs of Carnegie, Murrumbeena and Hughesdale, all who sit south of Dandenong Road, are already within the current Division of Higgins. Extending this logic to the area west of Carnegie would mean little difference.

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.

Labor's submission ignores the very strong north-south public transport connectivity that also exists between South Yarra, Prahran, Windsor, St Kilda and Balaclava.

The Sandringham train line runs along this north-south axis and has major stations at South Yarra, Prahran, Windsor, Balaclava and Ripponlea. No station on this train line currently sits within the portion of the City of Glen Eira currently within the Division of Macnamara, with most of the City of Glen Eira better served by both the Frankston and Pakenham/Cranbourne lines that passes through Toorak, Armadale and Malvern, suburbs that the proposed Division of Higgins would unite with these communities.

Labor's submission also ignores the #78 tram route, one of the few commuter corridors in Melbourne that has sufficient demand without going through the CBD to justify a tram service, moving people as it does through all the high traffic communities along the commercial, dining and entertainment precincts along Church and Chapel Street between Richmond and Balaclava.

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.

The wrong test is applied by Labor in this section. Obviously there are genuine links between Caulfield/Elsternwick and St Kilda and Elwood, but as we have also argued, there are equal and stronger links, and importantly shared demography and neighbourhood characteristics, with Toorak, Armadale, Malvern and Carnegie.

As for the links between Caulfield/Elsternwick and Ashburton, Glen Iris and Malvern East (the furthest suburbs under the proposed Division of Higgins), AGV would argue that these links are stronger than the links between Caulfield/Elsternwick and Port Melbourne, South Melbourne or Southbank (the furthest suburbs within the existing Division of Macnamara). These areas have a completely different neighbourhood type, with high density residential and commercial zones and large public housing estates that have almost nothing in common with the communities in Caulfield or Elsternwick.

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 eastwest. The

proposed new boundaries create an artificial border across these lines of communication (and these communities).

While AGV disagrees with the premise that the arbitrary nature of postcode boundaries or suburb names has a meaningful impact on forming communities of interest or determining natural boundaries to transport or communication, if such a test were applied it would be equally relevant that South Yarra (3141) is currently divided between the Division of Higgins and Macnamara. Were Windsor east of Punt Rd be restored to Higgins, as Labor have proposed, Windsor (3181) would also be divided in the same manner.

As to the division of Port Phillip and Glen Eira LGAs, the proposal for the Division of Higgins put forward by the Committee would actually unify far more of the Glen Eira LGA community within the same Commonwealth Division, combining the Glen Eira suburbs of Carnegie, Ormond and Murrumbeena with their fellow Glen Eira suburbs of Caulfield, Caulfield North, Caulfield East and Elsternwick.

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).

The AGV also rejects the premise that the political marginality of an electorate is fair ground for the determination of boundaries by the Redistribution Committee.

However, if such a test is used, there is even less justification for the 'subsumption' of the State Seat of Prahran into the same Division as the State Seat of Malvern. Malvern is indeed one of the safest Liberal seats in the Victorian Parliament, and Prahran unlike Caulfield is not even held by the Liberals, having had a Greens incumbent since 2014. Therefore, under such a test,

AGV would argue there is an even stronger divergence of 'political interests and perspectives' between the western and eastern ends of the City of Stonnington.

It is also worth noting that the State Seat of Prahran combines South Yarra (both west and east of Punt Road), Prahran, Windsor and parts of St Kilda and St Kilda East. This is another demonstration that it is not unusual at all to link these suburbs in a common electorate.

Conclusion

As we've attempted to make clear throughout our comments, AGV supports the proposed boundaries put forward by the Redistribution Committee and believes that Victorian Labor's objection has little if any merit. We hope that the Committee will not be swayed to change these boundaries based on Labor's misleading, often incorrect arguments, and would more than welcome any further opportunity to rebut the case that Labor have made for reversing the Committee's improved boundaries for the inner south of Melbourne.