



Comment on suggestion 47

Charles Richardson LL.B, Ph.D

12 pages

From: [Charles Richardson](#)
To: [FedRedistribution - VIC](#)
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[RE20FC4.pdf](#)

Please find attached a covering letter and comments on the submissions regarding the current redistribution for Victoria.

All the best,
Charles

Charles Richardson, Philosopher

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PHILOSOPHER



29 October 2020

Redistribution Committee for Victoria
% Australian Electoral Commission
Locked Bag 4007
CANBERRA, ACT 2601

Dear Friends,

Thank you for the opportunity to present comments on the suggestions received in relation to the proposed redistribution of federal electoral boundaries for Victoria. My comments are attached for your consideration. Please let me know if you require any further information.

I again wish the Committee well in its deliberations.

Yours sincerely,

Charles Richardson

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COMMENTS ON THE SUGGESTIONS RECEIVED REGARDING THE 2020-21 REDISTRIBUTION OF FEDERAL ELECTORAL BOUNDARIES IN VICTORIA

BY

CHARLES RICHARDSON

I congratulate the Redistribution Committee on its public engagement, as evidenced by the 102 suggestions received. Rather than try to deal separately with each one, in these comments I shall consider what seem to me the most significant issues raised by the suggestions, starting with two general considerations and then proceeding through the state's regions in turn, in the same order as previously used in my own submission (#70). Inevitably, most of my attention will focus on the eleven other suggestions that cover the whole state (numbers 13, 24, 31, 34, 43, 85, 90, 97, 99, 100 and 101), among which there are important differences but also a large measure of agreement. My criticisms of them in various places should not be seen to detract from my great respect for their efforts.

I conclude my comments with a few thoughts on division names.

Numbers

I remain firmly of the view that the Committee should look to the 2025 projected enrolments only for the legal requirement of remaining within the 3.5% projected tolerance, and that, subject to fulfilling that requirement, it should direct itself to maximising the equality across divisions of actual 2020 enrolments. The projected electors have no further claim on our attention beyond the demands of the legislation – they are purely hypothetical. The actual electors, however, are real people who deserve equitable representation in parliament.

In areas of particularly high or low relative projected growth, the legal constraints make substantial equality on the actual enrolments difficult to achieve. My proposed *Scullin*, for example, is 7.0% below average actual enrolment but already 2.8% above the projected average; trying to fit any more electors in it risks bumping up against the 3.5% mark. *Mallee* has a similar problem in the opposite direction (+5.2% actual, -3.0% projected). But these difficulties should not prevent the Committee from trying as far as possible to give Victorian electors an equal say.

It seems to me that most of the comprehensive suggestions suffer from a failure to give sufficient weight to this point. They are routinely proposing divisions that are 8% or even 9% above or below average enrolment, in places where such inequality is unnecessary and could be relatively easily fixed. To demonstrate, I have prepared the following table showing

the degree of variation from average enrolment for each of the comprehensive suggestions:

<u>Suggestion</u>	<u>Mean variation</u>	<u>Variations > 5.0%</u>	<u>Variations > 7.5%</u>
#13 J. Waddell	4.0%	12	4
#24 D. McSweeney	3.6%	10	4
#31 D. Walsh	3.6%	8	5
#34 M. Mulcair	3.6%	12	7
#43 D. Ashley	3.5%	8	5
#70 C. Richardson	2.4%	5	0
#85 C. McLaren	3.5%	9	5
#90 Liberal Party	3.5%	13	4
#97 Greens	3.4%	8	3
#99 H. Hook	3.4%	8	5
#100 ALP	3.6%	10	5
#101 J. Lamond	3.2%	8	3

Several suggestions discuss the impact of Covid-19 and the resulting unreliability of the projected figures, but this does not prevent them from making proposals entirely in terms of those figures and ignoring the actual enrolments – the National Party (#93) and the Greens (#97) are conspicuous offenders in this regard.

Metropolitan vs Regional

In my submission I suggested the use of the boundary of the Greater Melbourne Statistical Area, as defined by the Australian Bureau of Statistics, as a guide to the boundary between metropolitan and regional areas. I apologise for the fact that the figures I cited at that point are wrong: I said (page 2) “the metropolitan area contains enough electors for 26.73 divisions on current enrolment (26.89 projected), leaving 12.27 divisions’ worth (12.11 projected) for non-metropolitan Victoria”; the correct figures are 28.74 and 10.26 actual, 28.89 and 10.11 projected (so of course 28 and 10, not 26 and 12, in the following paragraph). But the substantive point is unchanged, namely that the numbers do not lend themselves to situating every division on one side or the other of the metropolitan boundary, but rather suggest that, as I put it, “at least one division will need to include territory from both.”

Several other suggestions have referred to this boundary, while others have used it without directly mentioning it. Of particular note is the Liberal Party’s suggestion (#90), which (unlike me) presents the correct figures and then proceeds to draw the opposite conclusion to what they suggest. Because, it argues, 74% of a division’s worth of electors (89% projected) is not enough to justify a 29th substantially metropolitan division, it suggests that several areas, including the level 2 statistical areas of Bacchus Marsh, Gisborne, Kinglake, Macedon, Romsey and Wallan, be reclassified as non-metropolitan. But the result of doing this is to leave the totals just as far away from amounting to a round number of divisions; the remainder, now on the non-metropolitan side, is now 77% actual and 64% projected. No explanation is offered for why that justifies a regional division while 74% and 89% did not justify a metropolitan division.

My view of the metropolitan-regional issue is still that the best solution involves the construction of one division that unashamedly straddles the boundary, being basically peri-urban in character (my “*Burke*”), leaving the others to all sit clearly on one side or the other.¹

¹ I mentioned in my submission the fact that two of my other proposed divisions cross this boundary to a very minor extent: *Casey* in the Upper Yarra Valley and *Nicholls* at Clonbinane-Waterford Park. I should also have noted a third, namely the fact that French Island, although non-metropolitan, is in *Flinders*. It has only 86 electors and could easily be moved to *Monash* if that were thought desirable.

A number of the other suggestions offer conceptually the same idea, although there are small differences about the exact composition of the new division.

Another, complementary, way of looking at this question is to note that there is a belt of peri-urban territory that is within the metropolitan area boundary but not fully part of urban Melbourne. Having recourse again to the ABS, some thirty places inside the metropolitan boundary – of which the largest are Melton, Sunbury, Bacchus Marsh, Gisborne, Wallan and Healesville – are classified as urban centres in their own right and not part of the Melbourne urban centre. This territory, I suggest, should be regarded as available to be mixed in a division with either urban or regional areas, but not both. A division that stretches right across the peri-urban zone, incorporating non-trivial amounts of both urban Melbourne and of regional Victoria, has, to my mind, done some violence to community of interest; it should be regarded as a last resort.

Examples of suggested divisions that fail this test include *Gorton* as proposed by Mr McSweeney (#24) and Mr Walsh (#31); *Hawke* as proposed by Mr Walsh; *Lalor* as proposed by Mr Waddell (#13); and *McEwen* as proposed by Mr Walsh, Mr Ashley (#43), the Liberal Party, the Greens and the ALP (#100).

The Nationals include an interesting discussion of this point, much of which strikes me as very sensible. But the conclusion that *McEwen* and *Casey* can be regarded as predominantly regional seats is, I think, untenable; Gisborne, Sunbury and Wallan are clearly metropolitan in character, as are Lilydale and Mooroolbark. If the metropolitan area is to be “ringfenced” (and my argument is that it cannot be completely), places like that must surely be inside the fence.

Inner West: Fraser, Gellibrand, Gorton, Lalor

There is general agreement – Mr Waddell and the ALP are the exceptions – that *Lalor* should lose territory at its eastern end, principally in Point Cook. I particularly like Mr McSweeney’s suggestion of transferring the whole of the locality of Werribee South, thus avoiding the need to alter the boundary in Truganina. That means *Gellibrand* has to lose its Footscray end (except according to the Greens’ suggestion, which gives the excess in *Lalor* directly to *Fraser*, thus crossing a major corridor boundary), and the question is where should it go. There are three options: (a) shift *Fraser* eastward, taking the Braybrook-Footscray area from *Gellibrand* and *Maribyrnong*; (b) shift *Maribyrnong* southward, taking all of *Gellibrand*’s excess; or (c) attempt some compromise between (a) and (b). (A small correction: on page 30 of my submission, I inadvertently referred to “the westward shift of *Fraser*”; as is clear from the context, that should read “eastward”).

My view is that (c) is clearly unsatisfactory; Mr McSweeney’s attempt demonstrates the problem, with a boundary that slices through the middle of Footscray. Mr Ashley also makes the attempt and ends up cutting Keilor and Melton in half. Option (b) is certainly possible, and can produce quite a neat *Maribyrnong*, uniting most of the municipality of that name with parts of its existing territory on the other side of the river. But the price is paid in the neighboring divisions: the northern part of the existing *Maribyrnong* becomes difficult to fit anywhere (Mr Walsh gives it to *Fraser* and *Calwell*, producing a boundary that separates Essendon from Essendon North; the Liberal Party gives it to *Wills*, which is only possible if one radically rearranges the inner northern suburbs; Mr Hook (#99) gives all of Avondale Heights to *Fraser*, making it straddle the Maribyrnong River), and *Gorton* remains confined to the high growth areas of the City of Melton, forcing it to be very low on actual enrolments (the Liberal Party has it 7.1% below average, Mr McSweeney 8.9% below and the ALP 9.7% below).

The advantage of (a), as in my submission (with which Dr Mulcair (#34) and Mr

Lamond (#101) broadly agree), is that it avoids any radical revision of *Maribyrnong* and enables *Fraser* to transfer a substantial area of low-growth territory from its north to *Gorton*, stabilising the latter's enrolments and allowing it to shed Melton, which becomes available for the new division.

Special mention must be made of the ALP's suggestion, which transfers a large irregularly shaped section from the north of *Lalor* to *Gorton*, violating the same corridor boundary that the Greens do (but more so). This enables the *Lalor-Gellibrand* boundary to shift east instead of west, allowing *Gellibrand* to move further into Footscray and also take Sunshine. *Maribyrnong* expands into the rest of Braybrook, leaving *Gorton* left with about a third of Melton. The resulting *Fraser* is quite neat, but otherwise this approach seems to have no redeeming features.

Outer West: Ballarat, Corangamite, Corio, Wannon and the new division

Most suggestions agree on the need for *Corangamite* to shed electors in its west to *Wannon*, although some would give a larger share than I suggest to *Ballarat*. (Mr Waddell, as already mentioned, is an exception; his view that *Corangamite* is fundamentally a rural division is in my opinion not sustainable.) The question then is whether to leave *Corio* entirely or substantially as it is, or whether, as I propose, to exchange territory with *Corangamite* so as to give the latter a more sustainable growth rate and return to the use of the Barwon River as the boundary through urban Geelong. Without that change, *Corangamite* has to go very low on actual enrolments in order to fit within the projected tolerance: Mr Ashley has it at 9.3% below average, the ALP at 9.8% below.

Dr Mulcair agrees conceptually with my approach but transfers Bannockburn to *Corio* instead of Drysdale; this makes it impossible to transfer the whole of Belmont, leaving the southern Geelong suburbs fractured. Mr Ashley and Mr Lamond both do something similar. While I agree that Bannockburn ideally should be in *Corio*, no-one has found a way of doing so that does not, in my view, create worse problems elsewhere. (Putting it in *Ballarat*, as Mr McSweeney and the ALP do, or *Wannon*, as the Liberal Party, the Greens and Mr Hook do, strikes me as foolish; as long as the Geelong area will fit in two divisions, Bannockburn obviously should be in one of them.)

With *Wannon* gaining from *Corangamite* it needs to lose territory elsewhere; the choice is between Stawell and/or Ararat on the one hand, or the areas closer to Ballarat on the other (or some of both, as Mr Walsh and the Greens suggest). I think the Ballarat option works much better; it provides the scope for *Ballarat* to shed Bacchus Marsh, and Stawell and Ararat seem to me better connected with the division's Western District heartland than are places like Beaufort and Linton. The southward shift also risks pushing *Mallee's* enrolment too high: Mr Lamond has it at 9.6% above average enrolment, Mr Walsh, Dr Mulcair and Mr Ashley at 9.7% and the Greens actually outside the legal limit at 10.2%.

I suggest keeping the *Mallee-Wannon* boundary where it is, but giving Avoca, which belongs with the rest of the Shire of Pyrenees, to *Ballarat*. Taken in isolation there is a strong case for putting Maryborough in *Ballarat* as well, but it's too big for that to work properly (Mr Hook makes the attempt, and therefore has to keep Smythes Creek in *Wannon*; Mr Lamond splits the Shire of Central Goldfields) and it fits neatly in *Bendigo*.

I submit that the way *Wannon* currently extends into the outskirts of Ballarat is highly undesirable, and that *Ballarat* should at the very least include the whole of the level three statistical area of the same name. (The Liberal Party, among others, fails to address this problem; the ALP instead cuts in rather close to Ballarat on the eastern side.) In my proposal the City of Ballarat clearly occupies the centre of *Ballarat*. Bacchus Marsh and the towns immediately to its west (Ballan, Gordon and Mt Egerton) are then available to add to Melton

to form the basis of the new division, which I call *Burke*. (Although the Greens call this Bacchus Marsh-Melton division “*Gorton*”, making what is conceptually my *Gorton* the new division.)

The majority of the other suggestions agree with this move, but several then give the new division Sunbury instead of (some or all of) the Shire of Macedon Ranges. I think that’s possible, but it makes it very difficult to reconstruct *McEwen* in any rational way, as we shall see shortly. There is also a risk of giving the new division too much high growth territory – as in Dr Mulcair’s suggestion, which puts it 8.4% below average actual enrolment. The ALP gives it Wallan rather than Kyneton, which is possible but seems a bit of a stretch.

I would also draw attention to suggestion #84, which argues for Dergholm to be in *Wannon* instead of *Mallee*; this was discussed at the time of the 2002 redistribution and appears to be a case where following the municipal boundary has produced suboptimal results for the locals. The elector numbers involved are too small to worry about, so I suggest this would be a useful change to make.

Inner North: Cooper, Jajajaga, Maribyrnong, Melbourne and Wills

There seems to be general agreement that there is no need for large-scale changes in this region; the Liberal Party’s plan for constructing a new east-west division in the middle of it is the exception. (It’s a nice neat division, but it seems a completely unnecessary disruption to long-standing boundaries.) In my view there are three problems with the existing boundaries that should be addressed, all of them cases where the municipal boundaries are a poor guide to community of interest: Kensington should be united with Flemington instead of being split by the *Maribyrnong-Melbourne* boundary; Clifton Hill should be united in *Melbourne*, with Merri Creek as the boundary; and *Cooper* should lose its eastern extension into the suburbs of Bundoora and Macleod, surrounding La Trobe University.

I regret that I was unable to find a way of fixing all three simultaneously, but I am consoled by the discovery that no-one else has either. Instead my suggestion addressed the first two, transferring Kensington to *Maribyrnong* and bringing *Cooper* back to the creek. (Mr Walsh and the Liberal Party agree with me on this.) I now think it is possible to at least partly fix the Bundoora problem as well, by a small rotation of territory through *Jajajaga* and *McEwen*. As compared to the boundaries I proposed, make the following changes:

i) transfer all that part of Kingsbury SA2 east of Plenty Road from *Cooper* to *Jajajaga*: 2,864 electors (3,182 projected). (I note the Liberal Party also uses the Plenty Road boundary, although the rest of its *Cooper* is rather strange due to the creation of a new division to its south.)

i) shift the northern boundary of *Cooper* north to the Ring Road, transferring all of Bundoora – West SA2 from *McEwen* (originally in *Scullin*) plus an unpopulated sliver of Thomastown SA2 from *Scullin*: 4,159 electors (4,265 projected). (Mr Walsh makes this transfer but not the first one; he seems to think the loss of Clifton Hill needs to be offset, but it brings *Cooper* down exactly to average enrolment.)

iii) transfer Research – North Warrandyte SA2 (originally in *Menzies*) from *Jajajaga* to *McEwen*: 5,117 electors (5,281 projected).

That leaves all three divisions looking fine on actual enrolments, but *McEwen* is slightly above the tolerance on the projections. To fix that, it can lose a small slice of territory to *Scullin* (not much, because as noted above *Scullin* is also near the upper limit); I suggest relocating the boundary along Hendersons Road Drain east to the freeway reservation, transferring 723 electors (731 projected) in Mill Park – North SA2.

Otherwise this region is mostly uncontroversial. Other suggestions, including numbers 10, 19, 28 and 29, agree on restoring the Yarra as a divisional boundary (Mr Waddell and Mr

McSweeney are the exceptions), although several of them (including Mr Walsh and the ALP) exempt North Warrandyte from this. I have no strong feelings about that; it would make the northern divisions at that point easier (the rotation just referred to could be accomplished without having to give added electors to *Scullin*), but I think the river is a better boundary and the divisions to the south (*Casey*, *Deakin* and *Menzies*) are all above average enrolment anyway on my proposal and so don't need the additional electors.

The Greens agree about uniting Kensington and Flemington, but would do it by moving Flemington into *Melbourne*; that makes it impossible to rectify the Clifton Hill boundary, and sets up a further round of changes to *Wills* and *Maribyrnong* that seem to me much less satisfactory (including a boundary through the centre of Glenroy). Dr Mulcair would leave the *Maribyrnong-Melbourne* boundary where it is and give *Maribyrnong* Gladstone Park instead, which also removes the ability to fix the Clifton Hill problem. Mr Ashley and the ALP also leave Kensington in place and fix the *Cooper-Jagajaga* boundary, but they make the Clifton Hill problem worse, moving the boundary westward. Mr Waddell proposes a more interesting departure from precedent in giving Southbank to *Melbourne* (rather than return *Menzies* to the Yarra boundary); this is far from impossible, but at this stage strikes me as unnecessarily disruptive, as seen by the odd northern boundary of his *Wills*.

Outer North: Bendigo, Calwell, Indi, McEwen, Mallee, Nicholls and Scullin

There is more disagreement about how to handle the outer northern divisions. My approach to regional Victoria is largely dictated by the changes already discussed to *Ballarat* and the creation of the new division: *Bendigo*, having lost its share of the Shire of Macedon Ranges, can take Maryborough (the Nationals agree with this); that leaves *Mallee* needing extra electors, and Echuca is the obvious place to get them; and *Nicholls* can then take the rest of the non-metropolitan part of the Shire of Mitchell.

Several suggestions (including Mr McSweeney's, Dr Mulcair's, the Liberal Party's and the ALP's) involve transferring the Euroa area from *Indi* to *Nicholls*; this strikes me as a decidedly inferior approach. While the existing boundary splits the Shire of Strathbogie, I think it marks a real division between the Hume Highway corridor and the Goulburn Valley; Euroa and Violet Town belong with Benalla and Wangaratta much more than with Nagambie and Shepparton. (In Mr McSweeney's and the ALP's version, Euroa itself is transferred but not Violet Town.) Such a change would also sever one of the main lines of communication between the Shire of Murrindindi in the south and the main part of *Indi* in the north.

It seems to me to be more of a priority to transfer the Kinglake area to a metropolitan division (I suggest *McEwen*, with which Mr Hook agrees, although the eastern end of it around Toolangi could plausibly go to *Casey*) rather than having it in a division that stretches to the New South Wales border.

In the outer metropolitan area, I suggest that the priority is to create divisions that lie along rather than across corridors, providing scope for future movement and mixing high- and low-growth territory. Principally, that means fixing *McEwen*, which currently stretches right across the north of Melbourne; my proposal confines it to the east of Darebin Creek, along the Plenty Road corridor and places east. With that done it is relatively straightforward to fit *Calwell* and *Scullin* into the remaining space: *Calwell* can take most of the City of Hume, with the remainder (the northern and central parts of Craigieburn) combining with the Epping corridor and the urbanised parts of the Shire of Mitchell to form a reworked *Scullin*.

The ALP puts considerable effort into justifying its use of the locality boundary between Craigieburn and Roxburgh Park to separate (respectively) *McEwen* and *Calwell*. It has a point, in that the boundary is more prominent on the ground than one might think from a quick glance at a map, but it is far from a major barrier; I think my use of Aitken Creek,

further north, is at least as good. Mr Ashley uses Malcolm Creek, through the northern part of Craigieburn, which seems acceptable on its own terms but leads to a very high-growth *McEwen*. Mr Hook runs the boundary down Craigieburn Road, which I think is less satisfactory. The Liberal Party and the Greens keep all of the relevant area together in *Calwell*, but then have to chop through Westmeadows at its south-western end. The Liberal Party also creates a very odd-looking *Scullin*, stretching from Epping right around to North Warrandyte; Mr Hook's is more compact but crosses the Plenty River in problematic fashion.

Suggestion #87 endorses the idea of a north-south oriented *McEwen*, although their way of doing it would be hopelessly over the permitted tolerance on projected enrolments. Other suggestions have mostly been less ambitious here, resulting in divisions that often contain awkward mixes of territory and also serious inequalities in enrolments. Mr Walsh's *McEwen* stretches from St Helena to Kilmore; the Greens' version stretches from Research to Woodend. Dr Mulcair has *Calwell* at 9.8% below average enrolment, while the Greens and the Liberal Party have it 9.9% below; Mr Ashley and Mr Lamond have *McEwen* at 9.8% below, Mr Hook at 9.9% below and the ALP at 10.0% below, only 50 electors clear of the legal limit. I submit that the Committee should not tolerate these sort of inequalities unless there is demonstrably no alternative.

Outer East: Aston, Bruce, Casey, Gippsland, Holt, La Trobe and Monash

The transfer of the Bunyip-Garfield area from *Monash* to *La Trobe* is common to almost all the suggestions (Mr Lamond would split it between the two); many agree with me in also moving Lang Lang and Koo Wee Rup. Suggestions #7 and #8 are keen for the Shire of Cardinia to be united in a single division, which this would accomplish. The majority would leave the *Monash-Gippsland* boundary where it is, but I remain of the view that a small further equalisation there is desirable. (The Liberal Party agrees, although it does it a little differently.) Suggestion #69 would move it in the other direction, taking the view that *Gippsland* needs to grow (a view shared by the Nationals, although they address it in a different fashion). Since it is already above average enrolment I see no merit in this; he points out that it would align with the state district boundary, but the district boundary is a bad one, splitting Moe from Newborough, and there will be a state redistribution next year anyway, so it seems to me that district boundaries should carry very little weight.

There is also a wide measure of agreement on leaving *Aston* and *Casey* substantially unchanged. Mr Lamond is the only one to suggest any changes to *Aston*; he would shift *Casey* west so as to enable *La Trobe* to take the core area of the Dandenong Ranges, disrupting *Aston* and *Deakin* in the process. The Liberal Party would have *Casey* give up part (but only part) of Kilsyth to *Deakin* for no good reason (it is easier to fix the other end of *Deakin*); Mr Hook makes a similar move, but as part of a larger plan to allow *Casey* to take the Emerald-Gembrook area from *La Trobe*. I regard this as a thoroughly desirable objective, but whether it justifies the messy look of his *Deakin* and *Menzies* is another question.

Several other suggestions agree with my approach of treating the area between Eastlink and the edge of the metropolitan area as a unit, to contain the three divisions of *Bruce*, *Holt* and *La Trobe*. All of them, however, have been less radical than I have in combining high- and low-growth areas. I believe that the admittedly somewhat ungainly look of my *Bruce* and *Holt* is a price worth paying for both generally strong boundaries and more stable enrolments. Without such a reworking it is impossible to prevent one (and possibly two) of the three divisions going dangerously close to the lower bound of current enrolments: *La Trobe* goes down to 9.7% below average enrolment in Mr Waddell's and Mr Hook's versions and 9.8% below in the ALP's; *Holt* clears the 10% mark by only 12 electors in Mr Lamond's version, and is actually below it with both Mr McLaren and the Greens, although I could not get Mr McLaren's figures at that point to add correctly.

And it's not as if these extremes are the price of particularly neat or well-established boundaries – quite the contrary. Nor does breaching Eastlink help much. Mr Waddell brings *Isaacs* across into Cranbourne; the Liberal Party mixes (in *Bruce*) Keysborough in with parts of Berwick. Lying the divisions along the corridors, as I propose, seems to me at least as satisfactory for communication and community of interest, with the benefit of greater democratic equity.

Two suggestions from locals (#6 and #17) argue for keeping the northern part of Berwick in the same division as Pakenham; this also is achieved by my proposal. Mr Ashley's suggestion, which is otherwise about the best of the alternative options for this region, falls short on that point.

Inner East: Chisholm, Deakin, Hotham, Isaacs and Menzies

Given the substantial agreement already noted on (a) restoring the Yarra River as the northern boundary of *Menzies* and (b) leaving *Aston* and *Casey* mostly intact, it is no surprise that most suggestions also feed the excess electors from the outer south-eastern growth area back up through the middle of the eastern suburbs to ultimately make up the deficit in *Menzies*. Most would do so, as I proposed, through *Deakin*, *Chisholm* and *Hotham*; there is disagreement about whether or not to also bring *Isaacs* into the mix, and if so how.

Mr Walsh substantially agrees with me as far as the southern end of *Chisholm*; he is then able to construct a nice-looking *Hotham*, but at the price of maintaining the odd east-west stretch of *Isaacs*, which he admits is unsatisfactory. Dr Mulcair swaps territory between *Hotham* and *Isaacs*, but not enough; he only takes half of Bentleigh East and is therefore left with an anomalous slice of Keysborough in *Isaacs*. Mr McSweeney, Mr Walsh, Mr McLaren and the Greens leave *Isaacs* as its old unsatisfactory self (Mr McSweeney makes a cosmetic change in central Dandenong).

Most suggestions broadly concur with the idea of extending *Menzies* eastward. Dr Mulcair gives it Croydon rather than Ringwood North, creating a very awkward shape. Mr Ashley, the Liberal Party and the Greens also oppose splitting off Ringwood North from *Deakin*, and solve the problem by pushing *Menzies* south across Koonung Creek. Not only does this breach a very strong and long-established boundary, but finding a new southern boundary is not easy: the Liberal Party's along Whitehorse Road is very poor, since it bisects commercial districts in Box Hill, Nunawading and Mitcham; the Greens and Mr Ashley keep Mitcham together but split Nunawading along Springvale Road. Mr Waddell would also cross Koonung Creek, but since his *Menzies* has retained its territory north of the Yarra it does not need as much additional territory and so goes only as far as Springfield Road.

The flow-on transfers from *Chisholm* to *Deakin* and *Hotham* to *Chisholm* are also relatively uncontroversial, although there are differences in the detail. Suggestion 28 also endorses the idea of an east-west orientation for *Deakin*. Some suggestions (such as Mr Walsh's and the ALP's) also involve *Chisholm* ceding territory to *Kooyong*; I did not find this necessary, so I would leave the existing boundary in place, but the effect either way is relatively minor.

Inner South: Dunkley, Flinders, Goldstein, Higgins, Kooyong and Macnamara

The remaining region consists of divisions that could be left either mostly or entirely unchanged. I proposed only one major alteration, a swap of territory between *Higgins* and *Macnamara* to regularise the shape of both; Mr McSweeney, Dr Mulcair and the Liberal Party agree with me about this. Regardless of whether this or a more limited adjustment is undertaken, there will be a resulting excess of electors in *Higgins*, and several suggestions (including Mr Walsh's, the ALP's and Mr Lamond's) involve shedding it by moving Hughes-

dale into *Hotham*. Although it is on the wrong side of the municipal boundary, I would argue that North Road and Warrigal Road are very strong boundaries and that it is better to leave Hughesdale where it is: I prefer my suggestion of a small transfer from *Higgins* to *Kooyong* in Camberwell South.

Mr Hook has a rather neat rearrangement of the three on similar lines, but giving more of Burwood to *Kooyong* and having it shed territory to *Chisholm* in return. Mr Walsh avoids the problem of the excess altogether by making only a minimalist transfer from *Macnamara* to *Higgins*, giving it just half of the Windsor indentation and otherwise leaving both divisions (and *Kooyong*) unchanged. This works on the numbers, but it means passing up the opportunity to fix a prominent anomaly.

I proposed no change to *Goldstein*, *Dunkley* or *Flinders*. More than half of the other comprehensive suggestions agree as regards *Goldstein*; the others have proposed substantial changes to bring it into the exchange of territory with *Higgins* and *Macnamara*, or with *Hotham* and *Isaacs*, or both. The Liberal Party, for example, would give it Bentleigh East; there's nothing wrong with that in isolation, but it seems unnecessary and produces an inferior boundary in its south, cutting through the commercial centre of Black Rock.

There is more consensus about *Dunkley* and *Flinders*. Only Mr Waddell and Mr Lamond would make major changes; they suggest (in slightly different ways) extending *Flinders* east around Western Port Bay, which involves undoing the improvement to community of interest that was made in the 2018 redistribution. Dr Mulcair suggests transferring the township of Baxter from *Flinders* to *Dunkley*; there's nothing especially wrong with that – Baxter can fit neatly either with Frankston or with Somerville-Hastings – but it would make the current enrolments, which I believe are what the Committee should primarily be looking at, less equal rather than more. I therefore recommend that Baxter should stay in *Flinders*.

Division names

Almost all of the comprehensive suggestions offer a name for the new division; several of them suggest new names for one or more other divisions as well, and a large number of other suggestions relate only to names. Not surprisingly, there is general agreement about using "*Hawke*" as a name, although some would attach it to the new division while others, like me, would take the opportunity to rename *Wills*. Apart from that, consensus on names is elusive (although I note that Dr Mulcair agrees with my suggestion of "*Burke*").

In my view, a key goal in the naming process should be the avoidance of confusion. There are already three divisions that duplicate the names of state electoral districts – *Cooper*, *Flinders* and *Melbourne*; evidently when *Batman* was renamed in 2018 no-one noticed (I certainly did not) that Queensland had created a district of *Cooper* just the previous year. *Melbourne* also duplicates the name of a Victorian municipality, as do another six divisions: *Ballarat*, *Casey*, *Corangamite*, *La Trobe*, *Maribyrnong* and *Monash*. *Ballarat* at least covers all the territory of its namesake municipality; *Maribyrnong* and *Melbourne* overlap in part, but the other four are in quite different places, although (with the possible exception of *Monash*) still close enough to provide fertile grounds for confusion. Mention should probably also be made of *Kooyong*, which shares its name with a suburb that unfortunately lies just outside its boundary.

I doubt that a single Victorian redistribution can do a great deal to sort out this mess. It requires co-operation between the three levels of government, and some sort of a national conversation about what division names are supposed to be doing. I endorse the suggestion of Tim Colebatch (#89) that the Commission should survey public opinion on the subject, although I have no great hopes that anything much will happen. Continuity is important and

inertia is powerful.

The good news is that, as numerous suggestions demonstrate, there are a great many identities from Victoria's history who could appropriately be honored, and who have not previously had their names attached to anything that is likely to cause confusion. I would stress again that the fact that I have generally used the existing names both here and in my original submission is purely a matter of convenience. It should not be taken as an endorsement of current naming practices or as any disparagement of the claims of any of those worthy figures.