



# Comment on objections 118

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Augmented Electoral Commission  
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## **COMMENTS ON OBJECTIONS TO PROPOSED REDISTRIBUTION**

Dear Commission Members,

Thank you for the opportunity to submit my views on the proposed redistribution of Victorian electorates. This submission focuses on the proposed boundaries of Melbourne, Macnamara, and Kooyong.

I welcome the Redistribution Committee's proposed redistribution of the Division of Macnamara. In my view these adjustments are the most appropriate application of the legislative criteria guiding electoral boundary decisions, specifically:

- Means of Travel and Communication
- Communities of Interest
- Physical Areas and Boundaries
- Existing State Boundaries, although this factor being subordinate to the considerations above.

As the Federal Member for Macnamara, I offer this commentary addressing several objections to the proposed redistribution. Regardless of the final boundaries, I am committed to representing the electorate of Macnamara with pride.

The Commission has diligently considered communities of interest within the existing Macnamara electorate and the proposed division, which keeps these communities cohesive. The proposed Division of Macnamara adjusts boundaries to follow St Kilda Road, uniting a larger portion of the locality of Melbourne with the proposed Division of Melbourne. St Kilda Road serves as a significant boundary between South Yarra, Windsor and Prahran to the east, and South Melbourne, Albert Park, and Port Melbourne to the west. These distinct communities are appropriately reflected in the proposed divisions of Macnamara and Melbourne. The Commission rightly highlighted major pedestrian and transport corridors that connect voters on both sides of the Yarra River within the proposed Division of Melbourne.

I commend the Commission for these proposals for the following reasons:

1. The current Division of Macnamara is projected to fall short of the minimum number of expected voters required by electoral Act, while the current Division of Melbourne is within these limits. The proposed Division of Macnamara is set to gain 5,251 projected voters from the Windsor area to meet these requirements. As a result, 4,424 voters currently residing in Macnamara's South Yarra and Melbourne's west of Punt Road will be transferred to the proposed Melbourne Division. This is a well-considered and appropriate adjustment, minimizing disruption to voters or communities of interest, as Windsor was previously part of Macnamara, and this exchange connects key physical features such as Yarra Park and the Royal Botanic Gardens.
2. St Kilda Road is not just a significant eight-lane highway but also a vital transport corridor for both people and goods. This connectivity is underlined by extensive tram lines, roads, bike tracks, and bus routes converging along St Kilda Road. These transport routes emphasise St Kilda's role as a central hub, akin to how east-west travel from Caulfield to Elsternwick converges on St Kilda. Tram and bus routes from St Kilda to the CBD pass through like-minded suburbs such as Albert Park, Port Melbourne, South Melbourne, and Middle Park, reinforcing community cohesion. Conversely, there are limited or no bus or tram routes which cross St Kilda Road from South Yarra/Prahran into these communities.

While objectors have voiced their concerns, there is a common theme among their objections. Below, I summarise and provide my responses in line with the Committee's criteria:

#### Means of Communication and Travel and Physical Features of the Proposed Division.

Several objections suggest that the West Gate Freeway serves as a physical boundary and that areas to the north (Southbank, South Wharf, and Fishermans Bend) should be transferred from the proposed Division of Macnamara to the proposed Division of Melbourne. While these areas fall under the City of Melbourne, their obvious association with neighbouring suburbs like South Melbourne and Port Melbourne outweighs any perceived connection to the CBD.

The West Gate Freeway does not serve as a primary means of travel for Fishermans Bend and Southbank residents and is thus an inappropriate boundary. Residents of Fishermans Bend face Port Phillip Bay and travel daily via bridges and crossings such as Ingles St, Salmon St, and Todd Road over the West Gate Freeway. Fishermans Bend and Port Melbourne form a continuous community sharing the same postcode, shopping districts, and school catchments.

In contrast, there is no direct northern crossing from Fishermans Bend to the north of the Yarra without accessing the Citylink Tollway or Bolte Bridge. For example, travelling to Federation Square from Fishermans Bend requires merging onto the West Gate Freeway or traveling south through South Melbourne. This scenario applies to both public transport and car travel, demonstrating that the West Gate Freeway does not define community boundaries or local communication and travel patterns.

Future developments in Fishermans Bend must be considered, as the state government's urban renewal aims to strengthen communication and travel means and communities of interest, regardless of the West Gate Freeway. Planned transport routes, shopping precincts, and parks will connect South Melbourne, Port Melbourne, Fishermans Bend, and Southbank.

Several submissions argue against St Kilda Road as the boundary for the proposed Macnamara and Melbourne Electorates, suggesting South Yarra and Prahran be included in Macnamara. The Movement and Place Framework established by the Victorian Government sets a hierarchy for major local and arterial roads, prioritising movements along and across routes with respect to network connectivity, the road environment, and destination places. St Kilda Road, as an eight-lane M2 route, facilitates significant movement of people and goods, particularly via general traffic and trams, and holds high strategic importance for cyclists. It is categorised as a connector, efficiently linking regions and strategic centres north-south. As noted by the Commission in its report, there is no comparable physical or natural boundary between South Yarra and Richmond like St Kilda Road. The major tram route follows Chapel Street north into Church Street towards North Richmond.

The communities of South Yarra and Richmond are connected across the Yarra River by foot, rail, tram, and road, sharing proximity to green spaces such as the Yarra River Parklands. Furthermore, east-west tram lines linking Malvern, Glen Iris, Camberwell, and Toorak to the CBD follow St Kilda Road northward. There are limited routes connecting South Yarra residents to Albert Park, Middle Park, and South Melbourne. As referenced by the Commission, the Yarra River crossing in South Yarra unites Yarra Park with the Royal Botanic Gardens. Multiple smaller footbridges connect residents across the Yarra River between South Yarra and Richmond, in contrast to major freeways and bridges in the west, which serve the entire state rather than the specific communities of Fishermans Bend and South Wharf.

#### Communities of Interest:

There is a clear community and voting identity in the division of Macnamara and Melbourne Ports, as it was known before 2019. Since establishment, Fishermans Bend and Port Melbourne residents have voted in this electorate, while Southbank, South Melbourne, and South Wharf residents have done so since 1906.

The distinct communities of interest on either side of St Kilda Road are evident in school catchment zones for local primary schools. Southbank residents fall within the catchment for South Melbourne Primary School, while Fishermans Bend residents attend Port Melbourne Primary School. There are no catchment zones which cross the Yarra in this area into the CBD.

In contrast, Richmond Primary School's catchment extends across the Yarra River into South Yarra. Albert Park serves as a clear physical feature and natural boundary between communities on either side. South Yarra Primary School's catchment lies east of Albert Park, while Middle Park Primary School and Albert Park Primary School's catchment areas lie west along Port Phillip Bay.

As previously stated, there is no connection or association between South Yarra and Prahran communities west of St Kilda Road in the existing or proposed Division of Macnamara. South Yarra and Prahran are aligned with Chapel Street and Toorak Road, while Fishermans Bend, South Melbourne, and Port Melbourne align alongside Albert Park, each having distinct shopping strips, travel routes, and outdoor spaces. The Victorian Electoral Commission's 2021 state redivision of the Albert Park and Prahran districts acknowledged St Kilda Road's strong physical boundary, defining communities of interest on both sides.

Several objections suggest that Prahran and Windsor are crucial communities of interest that should remain united. While the Chapel Street area north of Dandenong Road indeed shares similar features, there is no evidence to suggest that these communities have more in common with Port Melbourne and South Melbourne than they do with Richmond and the proposed Division of Melbourne.

As reported by the Commission, Macnamara must gain voters to meet numerical requirements. The proposed transfer of the entire Windsor area to the Macnamara Division is a fair and appropriate move, posing minimal disruption to communities of interest and means of travel. A portion of Windsor falls within the City of Port Phillip, fully encompassed in the current and proposed Division of Macnamara. Furthermore, Windsor Primary School's catchment crosses south of Dandenong Road. Windsor's proximity to St Kilda demonstrates overlap, as indicated by the LGA boundary. High Street serves as a clear division, marking the boundary between Windsor and Prahran along Chapel Street. Prahran and South Yarra north of High Street are undoubtedly connected and associated with the community extending into Richmond. Electors proposed for transfer to the Division of Melbourne primarily shop, dine, travel, and socialise along Chapel Street. In contrast, residents in East Prahran proposed for transfer to the Division of Kooyong congregate around Glenferrie Road, Toorak Village, and Malvern Central shopping district. This is further supported by east-west tram lines connecting voters across the proposed Division of Kooyong and north-south routes along Chapel Street leading directly to Richmond in the proposed Division of Melbourne. Culturally, both Richmond and South Yarra host a mix of cultural institutions, art galleries, and upscale dining options along Chapel Street up towards Swan St, and Bridge Road.

As mentioned, the West Gate Freeway does not serve as a means of travel or communication for Fishermans Bend and Southbank residents, who feel more connected to inner-south suburbs like Albert Park, Port Melbourne, and South Melbourne than to the CBD. This is evident in shopping strips, beach proximity, and school catchments.

Several objections refer to the Jewish community as a community of interest. While it is undoubtedly true that the community south of Dandenong Road is united and must not be divided. The Jewish community north of Dandenong Road is in a different category. The objection which suggests uniting an additional 600 members of the Jewish community with the electorate of Macnamara is insignificant as it ignores the clear physical features and means of travel and communication. Besides, there are significantly more members of the Jewish community in the adjacent suburbs with the locality of Toorak north of Malvern Road being home to over 1000 members of the Jewish community on its own.

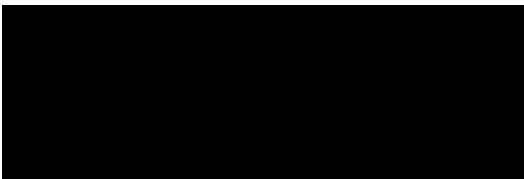
In addition to the points listed above, the submissions to transfer electors from Southbank and Fishermans Bend to the proposed Division of Melbourne and electors in South Yarra and Prahran to the proposed Division of Macnamara would be an excessive and disorderly transfer of over approximately 27,000 electors. As proposed by the Commission, the numerical requirements can be achieved by the transfer of approximately 9000 electors. Therefore, the transfer of 27,000 electors is not needed.

These comments align with my experience working in the area as the local Member of Parliament and lifelong resident. I endorse the Commission's proposed redistribution as the most suitable application of legislative considerations and clear communities of interest.

I would welcome the opportunity to participate in a public hearing to discuss my comments further, should one be scheduled.

Thank you for your consideration.

Sincerely,  
Josh Burns MP



Federal Member for Macnamara