



Objection 487

Victorian Labor

42 pages

OBJECTIONS TO REDISTRIBUTION COMMITTEE'S PROPOSAL FOR VICTORIA.

**AUSTRALIAN LABOR PARTY
VICTORIAN BRANCH**

Victorian
Labor

28th June 2024

Augmented Electoral Commission for Victoria
C/O: Redistribution Secretariat
Australian Electoral Commission
Locked Bag 4007
Canberra, ACT 2601

By email: FedRedistribution-VIC@aec.gov.au and by online form

Dear Chair and Members,

Victorian Labor's objections to the proposed 2023-24 Victorian Federal Redistribution.

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

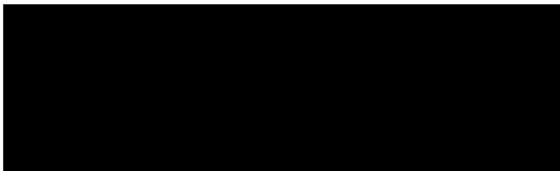
The narrative of what changes we propose and why, both in general and in terms of specific Divisions, divided by geographical region. A detailed account of the numerical transfers we make between Divisions are contained within the sections divided by geographical region.

An Excel spreadsheet containing affected SA1s in Victoria, and which Division we propose they be in. Where SA1s are split, they are assigned to a whole division, with the description contained in the narrative description of our transfers to take precedence over any inconsistency.

A MapInfo TAB file containing our proposed boundaries, again with the caveat that SA1s are not split in these maps, and that the boundaries outlined in our written submissions take precedence to the extent of any inconsistency.

Thank you in advance for your consideration of the suggestions made by the Victorian Labor.

Warm regards,



Steve Staikos
State Secretary
Australian Labor Party (Victorian Branch)

Introduction

The Australian Labor Party – Victorian Branch (“Victorian Labor”) thanks the Redistribution Committee for their hard work and their proposed redistribution of the boundaries of the Federal Electoral Divisions of Victoria. Each redistribution is complex, but we note that the Australian Bureau of Statistics’ error in the calculation of enrolment projections only compounded the already difficult task of abolishing an existing electoral Division.

Public suggestions informed by incorrect enrolment projection data

When deliberating on whether to make changes to the proposals of the Redistribution Committee, the Augmented Commission must consider the fact that the original suggestions made by Victorian Labor and all others were based on incorrect enrollment projections made available by the Australian Electoral Commission.

The accurate projections varied substantially from the incorrect projections. Whereas the numbers supplied at the beginning of the process had the shortfall from quota east and west of the Yarra about the same (51.9% of a Division short in the East and 48.1% in the West) the correct projections established that the shortfall in the East was 72.4% of a Division. Additionally, the revised projections established that the six outer western and northern Divisions (Lalor; Gorton; Hawke; Calwell; Scullin and McEwen) were collectively 28.4% of a Division above quota, a far cry away from the original estimate that these Divisions were collectively 14.6% short of quota.

In our opinion, it was not sound for the Committee to have compared suggestions with the proposed boundaries. Victorian Labor would have submitted a manifestly different suggestion had we had the accurate projections, as – we reason – would all others. While we understand the pressure the error placed on the redistribution timeline, reliance upon suggestions to the Committee which were informed by admittedly incorrect data is incongruent with the high standards maintained by the Redistribution Committee. Considering this, we submit that the Augmented Commission should not rely on any public suggestions which were informed by the erroneous projected population data when considering their decision.

Issues in the proposed boundaries for noting

In devising its proposed boundaries, the Redistribution Committee has made minimal changes to the boundaries of existing Divisions. Although the Redistribution is expected to apply for seven years, only 8.31% of current electors have been transferred to another Division. (In the Redistributions completed in 2021 11.36% of electors were transferred; in 2018 18.93% of electors were moved).

The minimising of elector movements between Divisions across the State has become an end in itself and clearly goes against the grain of S66 (3) of the Electoral Act which states:

“66 (3) In making the proposed redistribution, the Redistribution Committee:

(a) shall, as far as practicable, endeavour to ensure that, if the State were redistributed in accordance with the proposed redistribution, the number of electors enrolled in each Electoral Division in the State would not, at the projection time determined under section 63A, be less than 96.5% or more than 103.5% of the average divisional enrolment of that State at that time; and

(b) subject to paragraph (a), shall give due consideration, in relation to each proposed Electoral Division, to:

(i) community of interests within the proposed Electoral Division, including economic, social and regional interests;

(ii) means of communication and travel within the proposed Electoral Division;

(iv) the physical features and area of the proposed Electoral Division; and

(v) the boundaries of existing Divisions in the State;

and subject thereto the redistribution quota for the State shall be the basis for the proposed redistribution, and the Redistribution Committee may adopt a margin of allowance, to be used whenever necessary, but in no case shall the redistribution quota be departed from to a greater extent than one - tenth more or one - tenth less.

(3A) When applying subsection (3), the Redistribution Committee must treat the matter in subparagraph (3)(b)(v) as subordinate to the matters in subparagraphs (3)(b)(i), (ii) and (iv)”.

The Committee’s emphasis on the restriction of elector movements has elevated 66 (3) (b) (v) to a status contrary to (3A) as above.

Across the State we see in the proposals the effects of minimal change resulting in:

- Suboptimal boundaries unnecessarily dividing suburbs and LGA’s. For example, the division of Maribyrnong moves further into Merri-bek City Council, to return it back to Wills pushes that Division above quota. Such issues are created in most of the State’s proposed Divisional boundaries. Some, but not all, of these issues have been addressed in Victorian Labor’s objections.

- Far too many, often adjoining, Divisions have been placed at the upper end of the projected quota. For reference, these proposals have nine Divisions more than 3% above the allowable 3.5% variation from the quota. (In 2021 there were three such Divisions; in 2018 only one such Division). The effect, although unintentional is that it becomes far more difficult to make an objection involving two or three Divisions. Consequently, Division's proposed in this objection are at the upper end of the projected quota.
- Malapportionment has resulted in regions. Take the eight Divisions outside Melbourne in the north and west of the State. These run from Corio to Indi. At the projected time, these Divisions have been collectively set at 14.34% (or 18,246 electors) of a quota below the projected quota of 127 238. In 2021, by contrast, the same eight Divisions were collectively set at just 0.9% of a quota above the average. Similarly, whereas in 2021 the difference from the projected quota between all Divisions collectively either side of the Yarra was less than 0.4% of a quota (around 500 electors). This time it's 8.22% or 10,459 electors. Also, in 2024 the eight south east Melbourne Divisions running from Goldstein and Hotham and then to La Trobe are 11.26% of a quota above (14,327 electors) over the projected quota.

Summary

Despite these issues, Victorian Labor's objection does not argue for changes at scale nor for a restart of the redistribution process – we believe the time constraint of a fast-approaching federal election necessitates making the best out of situation we collectively confront. Consequently, Victorian Labor's objection is limited to:

- Contained significant changes to Menzies/Deakin/Aston – a geography already substantially impacted by the boundaries proposed by the redistribution committee.
- Contained less significant but critically important changes to Maribyrnong/Melbourne/Wills; and
- Limited changes in Chisholm/Hotham/Kooyong, Calwell/McEwen/Scullin/Jagajaga and Gellibrand/Fraser respectively.

The effects of the proposals contained in our objection comply with the population thresholds prescribed in Section 66 (A) of the Commonwealth Electoral Act (“the Act”). To assist the augmented committee, we append:

- i. SA1 level elector transfers in an Excel sheet**
- ii. Map files for the proposals**
- iii. Maps for the proposals**

Inquiry

Should the Augmented Commission wish to impanel an inquiry into the Redistribution under section 72(3) of the Commonwealth Electoral Act 1918, the Victorian Labor would relish the opportunity to appear before any such inquiry.

Note on SA1 splitting

Consistent with Victorian Labor’s approach to its initial suggestion to the redistribution in November 2023, SA1s are assigned to divisions without being split, where a split is necessary to give effect to specific boundaries that we have outlined in the written portion of our submission. Whilst the inconsistencies between our written submission and the SA1 data we have provided are small, in any case the boundaries identified in our written submission should take precedence over SA1 boundaries listed to the extent of any inconsistency.

Narrative

Three pillars underpin the objections laid out in Victorian Labor’s submission.

First, our objection seeks the restoration of boundaries based upon localities and local government areas, where we submit, their reunification outweighs the benefits of other boundaries which the Redistribution Committee relied upon in their proposed redistribution. Aligning with the reasoning of the Redistribution Committee, each of our discrete proposals are contained in order limit the impact on surrounding Divisions and have been made with due consideration of the redistribution as a whole.

Second, our objection argues for the maintenance of the radial orientation of Divisions which reflect “Spoke-and-Wheel” arrangement of Melbourne – to better support means of communication and travel and unite communities of interest. We speak more to this in the objections relating to Aston/Deakin/Menzies.

Third, in the proposals outlined in this objection, we have sought to limit elector movements, consistent with the Committee’s approach, to the greatest extent possible. Where our objection deviates from that posture is in our proposal for Menzies/Deakin/Aston – considering the Redistribution Committee already proposed significant elector movements in this area of Southeast Melbourne as a consequence of the proposed abolition of Higgins. We argue that in this context, the Augmented Commission should place less emphasis on elector movement in this geography in their decision making.

Summary of the effects of Victorian Labor's objections

1. Maribyrnong/Melbourne/Wills: Restore the existing border between Maribyrnong and Wills, reuniting the now divided localities of Glenroy-West, Oak Park and Pascoe Vale South to the natural border of the Moonee Ponds Creek, respecting the strong communities of interest within these suburbs. Return the previously held locality of Gowanbrae from Maribyrnong to Wills, uniting the Merri-bek local government area in one Division. Alter the southern border between Wills and Melbourne to accept the committee's proposal for Brunswick East to be united in Wills, but return the rest to Melbourne, returning Carlton North-Princess Hill and Fitzroy North to Melbourne – restoring a social and economic community of interest and returning to a natural and LGA boundary established by Brunswick Road. Transfer North Melbourne and parts of Parkville from Melbourne to Maribyrnong, extending its southern border to unite the communities of interest of Kensington, North Melbourne and Parkville.

2. Aston/Deakin/Menzies: Restore to Menzies its historical boundary of the Eastern Freeway which was removed in 2021. Transfer from Deakin to Menzies the suburbs of Warranwood, Park Orchards, Ringwood North, and Croydon Hills which were a part of Menzies since its establishment in 1990 until 2018, and also transfer Croydon. This results in all of Manningham Council currently in Deakin being placed back into its historical boundaries within Menzies. Deakin assumes the Eastern Freeway & Ringwood Bypass/Mt Dandenong Rd as a northern boundary and gains nearly all of Whitehorse by taking what is currently in Menzies as well as what is proposed to go to Menzies from Kooyong and Chisholm. Our objection unites the suburbs of Donvale, Park Orchards, Warrandyte South, Blackburn South, Blackburn, and Blackburn North currently divided between Deakin and Menzies by the Blackburn Rd/Surrey Rd/Springvale Rd boundary. Our objection also unites the suburbs of Heathmont and Ringwood by retaining the Dandenong Creek boundary between Deakin and Aston. Aston instead takes Bayswater North, Kilsyth, Kilsyth South and Croydon South from Deakin, with Bayswater Rd as a boundary with Deakin and Mt Dandenong Rd as a boundary with Menzies.

3. Chisholm/Hotham/Kooyong: Restore much of the existing boundary between Chisholm and Hotham to keep the localities of Chadstone, Glen Waverley and Mount Waverley united. Transfer Oakleigh East from Hotham to Chisholm, in line with the natural boundary of the Princess Highway and unites a community of interest. Transfer part of Malvern East from Chisholm to Hotham to unite the locality of Malvern East. Establish a clearer boundary between Chisholm and Kooyong by transferring the area of between Burke Road, Toorak Road, Tooronga Road and the Monash Freeway to sit within the Kooyong electorate.

4. Calwell/McEwen/Scullin/Jagajaga: Propose restoring the boundary between

Scullin and Calwell from Craigieburn Road East at Merri Creek, to maintain the local government boundary. Reunite the locality of Mernda in the division of McEwen and reunite the locality of Wollert in the division of Scullin via a transfer at Scullin's northern border. Transfer the area of Diamond Creek south of Diamond Creek Road and west of Ryans road to Jagajaga, given its stronger links to the locality of St Helena. To support these changes, transfer the localities of Plenty and Yarrambat, as well as SA1 20903121510, west of Ironbark Road, to the division of Scullin and transfer Mickleham north of Donnybrook Road to McEwen.

5. Gellibrand/Fraser: Return the locality of Spotswood from Fraser to Gellibrand, noting there was no numerical imperative to transfer it out. The proposed transfer conflicts with the physical features and area of the division, has no clear means of communication and travel and would divide communities of interest in Melbourne's inner-west.

Division names

Victorian Labor reiterates its support for a Division to be named after Margaret Tucker. We submit the Division of Gellibrand should assume this name. Should the proposal be adopted, then as noted in our original suggestion, Tucker would become the first Division in Australian history solely named after an Indigenous woman.

At the 2021 Victorian public hearing during the discussion about the then Redistribution Committee's proposal that a Division be named Tucker, the Chair of the Augmented Commission, Hon Susan Kenny AM KC made reference to her concerns that the proposed name 'Tucker' could be trivialised by some rhyming slang. We ask her to take note that a few weeks ago, when the Western Australian Committee proposed a Division be named after Vivian Bullwinkel that social media was initially full of disparagement of such a surname being used for an electoral Division. That talk quickly stopped dead in its tracks as soon as the sceptics became aware of the person for whom the Division was proposed to be named. We request that Ms Kenny and the other members of the Commission ask themselves whether the same dissipation would occur once people learn of the person behind the proposed Division of Tucker.

Maribyrnong/Melbourne/Wills

	Actual	Projected
Proposed Division of Melbourne	113,439	126,519
Transfer from the proposed division of Wills	+16,338	+16,907
Transfer to the proposed division of Maribyrnong	-10,881	-12,800
Adjusted proposed Division of Melbourne	118,896	130,546

	Actual	Projected
Proposed Division of Wills	120,791	130,444
Transfer from the proposed division of Maribyrnong	+ 11,403	+ 12,323
Transfer to the proposed division of Melbourne	-16,338	-16,907
Adjusted proposed Division of Wills	115,856	125,860

	Actual	Projected
Proposed Division of Maribyrnong	119,489	125,759
Transfer from the proposed division of Melbourne	+ 10,881	+ 12,880
Transfer to the proposed division of Wills	- 11,403	- 12,323
Adjusted proposed Division of Maribyrnong	118,965	126,314

Keeping Glenroy - West, Pascoe Vale South, Oak Park and Brunswick West in current Division of Wills rather than moving to Maribyrnong

Community of interests within the proposed Electoral Division, including economic, social and regional interests

GLENROY, PASCOE VALE SOUTH, AND OAK PARK

The western portion of Glenroy and the parts of Oak Park and Pascoe Vale South which are being moved from Wills to Maribyrnong form a cohesive community of interest with Fawkner, Hadfield, Pascoe Vale, and the parts of Glenroy, Oak Park and Pascoe Vale South which are remaining in Wills. The splitting of these suburbs along Pascoe Vale Road, a road across which communities are united rather than divided, is contrary to the principles outlined for the drawing of electoral boundaries in a redistribution.

Residents of Glenroy, Oak Park, Fawkner, Pascoe Vale South, Pascoe Vale and Hadfield share the same sporting clubs and community facilities. In fact, many of the residents of these suburbs and participants in sporting clubs all train at the Charles Mutton Reserve in Fawkner. This includes, but is not limited to, the Fawkner Bowls Club, Fawkner Netball Club, Northern Saints Football Club, Fawkner Tennis Club. The majority of members of these clubs which train at Mutton Reserve live in Glenroy, Pascoe Vale, Pascoe Vale South, Oak Park, Fawkner and Hadfield. These strong sporting and social connections are indicative of a shared community of interest.

Other clubs which the communities are connected to are Pascoe Vale Hadfield Cricket Club, Glenroy Calisthenics, West Coburg Bowling Club in Pascoe Vale, Therry Penola Football Club in Oak Park and Oak Park Football Club. Members of these clubs do not live in Essendon, Moonee Ponds, Kensington or Ascot Vale, which is demonstrative of a shared community between Pascoe Vale, Glenroy, Oak Park, and Brunswick West that does not extend into the suburbs further west.

Additionally, there are high proportions of Arabic and Urdu speakers, and Nepali and Indians in these suburbs, which connects them to each other. These communities identify with their shared community practices and spaces, and do not share the same linguistic, cultural and demographic overlaps with people in Essendon, Moonee Ponds, Aberfeldie Kensington where more common languages are Italian and Chinese. These linguistic communities in Glenroy exist on either side of Pascoe Vale Road, with the true north-south boundary being the Merri-bek LGA boundary, which is congruous with the Moonee Ponds Creek boundary.

BRUNSWICK WEST

The parts of Brunswick West and Pascoe Vale South which are proposed to be moved from Wills to Maribyrnong share significantly more in common with their neighbours

in Brunswick, Brunswick West and Coburg than they do with suburbs in Maribyrnong. Again, the north-south boundary dividing these communities is the LGA boundary, rather than the Tullamarine Freeway which has many crossing routes with which the suburbs of Brunswick West and Pascoe Vale South are united.

Residents of Brunswick and Brunswick West are a shared community, within the Merri-bek LGA, with amenities along Sydney Road and council facilities such as Brunswick Baths central to the civic life of residents. Sydney Road is also significant as a commercial hub, with retail shopping, cafes, bars, and restaurants all shared by residents of Brunswick West. Residents of Brunswick West also share a school catchment area, with the majority of the portion of Brunswick West that lies west of the Citylink encompassed by the Brunswick North West Primary School's zone. These shared social and educational boundaries are strongly indicative of a shared community of interest that does not extend to suburbs further west. Indeed, the school zone boundary reflects this community of interest as well as the transport patterns in the area.

Other economic factors connect these communities, including real estate prices and professional factors. Median house prices over the last 12 months differ between Brunswick West and Brunswick by only \$85,000, compared with a difference of \$360,000 with Essendon and \$150,000 with Moonee Ponds. Renters also comprise 48.1% and 47.7% of Brunswick and Brunswick West residents respectively, considerably higher than the 35.6% of Essendon residents and 38.6% of Moonee Ponds residents. Brunswick West has far more in common with Brunswick than it does with Essendon and Moonee Ponds. Occupational factors also connect Brunswick West and Brunswick more strongly than communities to the West, with Professionals making up a significantly larger portion of Brunswick and Brunswick West residents when compared to Essendon and Moonee Ponds, while Managers make up a significantly smaller percentage when comparing the same suburbs. These economic and professional indicators indicate a shared community between Brunswick and Brunswick West that does not extend to Essendon and Moonee Ponds.

Residents of Brunswick and Brunswick West play at the same community and sporting clubs. Many of these clubs play at the adjoining fields of Gillon Oval and Reaburn Reserve in Brunswick. Some of the clubs and residents of the suburbs that train at these two adjoining fields include the Brunswick Cricket Club, Brunswick Dragons Football Club, Brunswick Netball Club, Brunswick Mallet Sports Club, Futsal OZ, West Brunswick Tennis Club. Members of these clubs live in Brunswick, Brunswick West, Coburg and Coburg North and train together at these grounds, and are a close and clearly defined community with each other. Sports clubs in Moonee Ponds and Essendon do not use these same facilities and make use of fields such as Ormond Park and Essendon Recreation Reserve which are less accessible to residents of Brunswick West. Social infrastructure like this draws together communities, creating distinct communities of interest in Moonee Ponds and Essendon when compared to Brunswick and Brunswick

West.

MERRI-BEK COUNCIL

Currently, the entirety of Glenroy, Pascoe Vale South, Oak Park and Brunswick West are part of the Merri-Bek Council along with the rest of the division of Wills.

The borders of the City of Merri-bek, taken together with the fact that these borders co-incide with significant features of physical terrain, mean that the LGA is a significant community of interest, physically distinct from surrounding suburbs, separated by clearly identifiable boundaries.

MUSLIM COMMUNITIES

A community of interest of substantial size is the Muslim community, with substantial Muslim populations in Fawkner, Coburg, Glenroy, Hadfield, Coburg North, and Pascoe Vale, and significantly higher-than-average populations in Brunswick, Brunswick West, Oak Park, and Pascoe Vale South. This is a singular and deeply connected community with a number of overlapping services and amenities including Islamic schools, mosques, halal butchers, and retail and hospitality venues. Many of these businesses have the Arabic script next to English signs and menus, because of how embedded the language, culture and religion is in this community. This community is united within the suburbs that make up the current boundaries of Wills. Just 3.2% of Australians identify as Muslim but in Fawkner this rises to 34.7%, in Glenroy it is 18.7%, and in Hadfield Muslims comprise 21.3% of the population.

This community has deep roots in the region dating back to the post-war migration of the 1950s and 60s. Key community institutions that are indicative of this significant community of interest are the Coburg Islamic Centre, the King Khalid Islamic College, Darul Ulum College in Fawkner and Glenroy Private in Glenroy. The locations of these community centres is indicative of the community that exists in Hadfield, Glenroy and Fawkner in particular, which are connected to each other within Wills. The link between the Glenroy and Fawkner is one that simply does not exist between Glenroy and suburbs like Essendon and Niddrie.

NEPALESE COMMUNITY

The Nepalese Community is a growing community of interest, with Coburg and Glenroy home to the largest numbers of people from a Nepali-speaking background around Victoria. Nepalese residents of Glenroy live either side of Pascoe Vale Road, the proposed new boundary, and are united across it. This border would sever this community. This community of interest is evident through a number of Nepalese organisations based within the current boundaries of Wills. Community spaces and organisations based within the current boundaries of Wills, and within Glenroy in particular which is proposed to be split, include Didi Bahini Samaj, the Nepalese Association of Victoria, The Federation of Nepalese Community Associations of

Australia and the Merri-bek libraries, which have some of Australia's first collections in Nepali.

Means of communication and travel within the proposed Electoral Division

The 19 Tram and the 530 and 531 buses connect Brunswick in the south of the electorate all the way through Sydney Road and Coburg, Fawkner and Hadfield. The Upfield train line does the same. These suburbs along the Sydney Road corridor are reliant on public transport and well connected through the tram, trainline, and bus routes listed above. Conversely, residents of areas such as Glenroy and Oak Park are significantly more likely to commute by car, and are served within the division by arterial roads such as north-south Pascoe Vale Road which bisects Glenroy and Oak Park, and east-west road such as Rhodes Parade and Hilton Street which connect the suburbs of Glenroy and Oak Park with Hadfield and Pascoe Vale. This shared travel brings people together, with common road and public transport routes drawing together a community of common interest.

The physical features and area of the proposed Electoral Division and the boundaries of existing Divisions in the State

For travel and communication north of Bell St, Coburg, Pascoe Vale Road is as important as Sydney Road. Both roads are easily traversed and flow well and the communities on either side of them are deeply linked because of the services and commerce that the roads provide. Fawkner residents are connected to the amenities of Hadfield and Glenroy on the other side of Sydney Road due to their accessibility and proximity. In the same way, the segments of Glenroy and Oak Park either side of Pascoe Vale Road are deeply connected. Those residing east of Pascoe Vale Road frequently travel to the East for access to supermarkets, public transport, and services like Glenroy Library, while those on the East frequently travel West for services such as Oak Park Primary School and Glenroy West Primary School. Pascoe Vale Road is not a road which separates disparate communities - it sits in the middle of one.

The Moonee Ponds Creek Trail serves as a more appropriate natural border that makes use of geography and is a better differentiator of communities. The exception to this is described above, as the Merri-Bek Council, roads, and demographics make the Tullamarine Freeway a more appropriate boundary north of the Albion-Jacana freight line.

Moving Gowanbrae from current division of Maribyrnong to current division of Wills

Community of interests within the proposed Electoral Division, including economic, social and regional interests

Gowanbrae, Glenroy, Oak Park, Pascoe Vale and Hadfield are similar suburbs. Gowanbrae shares more with these suburbs, than suburbs like Essendon, Moonee Ponds, Strathmore and Kensington, and is divided from them by an LGA boundary and significant road infrastructure.

SERVICES AND CATCHMENT ZONES

Gowanbrae is the only suburb that is in the Merri-Bek City Council which sits outside the division of Wills. The rest of the suburbs in the division of Wills are also in Merri-Bek City Council (Glenroy, Pascoe Vale, Pascoe Vale South, Hadfield, Oak Park, Fawkner, Brunswick, Brunswick West, Coburg and Coburg North).

Residents in Gowanbrae also fall into the catchment zones for both primary and secondary schools in the Division of Wills, in Glenroy (Glenroy West Primary and Glenroy Secondary School). Families in Gowanbrae are also more likely to access early childhood education services provided by Merri-Bek City Council of which the majority falls in the Division of Wills. The existing social infrastructure for many of the families and particularly the older residents in Gowanbrae also provides a deep and important connection to the Wills community. Sporting clubs like the Glenroy Bowls Club, Tennis Club and Football Club also provide a convenient and valuable active and social connection for the residents of Gowanbrae to the community of Wills. These shared sporting and educational infrastructure draw in common groups and are indicative of a valuable community of interest shared with communities in Glenroy, and other suburbs in Merri-bek.

GOWANBRAE, FAWKNER, AND HADFIELD ARE SIMILAR SUBURBS

The residents of Gowanbrae were strongly opposed to being removed from Wills in the 2019 redistribution and organised several submissions and petitions in opposition. This is because Gowanbrae residents argued that they were an integral part of Merri-Bek and Wills, and shared services, retail centres, sporting clubs and lifestyles with those in Glenroy, Oak Park, Pascoe Vale and Hadfield, far more so than in Moonee Ponds and Essendon.

The data above and the feedback we have received from the Gowanbrae community reinforce the arguments that we have made about the similarities between Gowanbrae and nearby Glenroy and that they should be returned to the Division of Wills.

CITY OF MERRI-BEK

Gowanbrae since its inception has always been within the Merri-Bek City Council, and without their exclusion, the Division of Wills would almost entirely contain the single LGA of Merri-Bek.

Gowanbrae has a large Christian population, with 44.7% identifying as Catholic or Anglican in the 2021 Census. Church communities are the centre of the spiritual and social lives of parishioners, however Gowanbrae residents rely overwhelmingly on churches in Glenroy, indicative of the connection between Gowanbrae and Glenroy. Glenroy is home to the significant parishes of the Corpus Christi Catholic Church on Melbourne Ave, the Glenroy Pascoe Vale Uniting Church on Wheatsheaf Rd, and The Church of Jesus Christ of Latter-day Saints on Glenroy Rd, as well as Wesleyan Methodist, Anglican, Baptist, and Pentecostal churches as the most accessible locations for Gowanbrae residents. The shared community offered by religious groups fundamentally intertwines the lives of these 44.7% of Gowanbrae residents with the Glenroy, Oak Park, and Pascoe Vale communities and is indicative of a strong shared community.

Means of communication and travel within the proposed Electoral Division

Coventry Street provides the only access by road in and out of Gowanbrae. In the context of our submission to this redistribution, that means that Gowanbrae's connection to surrounding suburbs is based on shared communities of interest, as we have outlined above in relation to education, sporting and faith communities, rather than transport links that are as strong to Wills as to Maribyrnong by virtue of this single access point.

The physical features and area of the proposed Electoral Division & the boundaries of existing Divisions in the State

Pascoe Vale Road is an insignificant boundary, with communities, faith groups, and council borders straddling this border through Oak Park and Glenroy. The southern border of Gowanbrae is marked by the Albion-Jacana freight line, which is impenetrable to vehicles and pedestrians outside of the trail along the Glenroy border and the Tullamarine Fwy along the Tullamarine border. With this border offering a barrier to views and movement, this represents an appropriate physical barrier. Through Glenroy, the Albion-Jacana freight line represents a less significant obstacle as there are multiple points for pedestrians and vehicles to cross, as well as public transport crossing in the form of the 542 bus.

The western border of Gowanbrae is the Tullamarine Fwy, one of the busiest freeways in Australia and a clearly recognisable boundary. Gowanbrae is also bordered on the west by the Western Ring Path, a bike path that largely follows the Western Ring Road but

deviates at this point around Gowanbrae, offering a secondary natural boundary.

Melbourne retains Carlton North, Princes Hill and Fitzroy North

Community of interests within the proposed Electoral Division, including economic, social and regional interests

Fitzroy North, Carlton North and Princes Hill share communities of interest and similar demographics to other suburbs in Melbourne rather than Wills.

COUNCILS

Adding Fitzroy North, Carlton North and Princes Hill would add two additional Councils – Melbourne City Council and Yarra City Council to Wills. Currently, all suburbs in Wills are also in Merri-Bek City Council, which allows for tailored local government services and cohesive service delivery. Preserving this near 1:1 between the Federal division and LGA vastly assists with advocacy and service delivery, as well as the public recognisability of electorate boundaries.

As the 2021 Report of the augmented Electoral Commission for Victoria into the Redistribution of Victoria into Electoral Divisions noted, that redistribution was considered successful as it “kept together or improved existing communities of interest [...] represented by local government areas and localities, where possible”. The historical continuous connection of Merri-Bek and Wills demonstrate that keeping together these communities is both possible and necessary.

MEDIAN INCOME, HOUSE PRICES

The median house price for a property in Princes Hill, which is currently the closest suburb to the border of Wills, is over \$2.1 million. Contrast this with the closest suburb to it which is in Wills (Brunswick), with the median house price being \$1 million less expensive.

The average weekly income for residents of Princes Hill is \$2,218. This is compared with \$1,436 in the suburb of Fawkner, and \$1,523 in the suburb of Hadfield. The difference widens as you move further away from the border of Wills and Melbourne. East Melbourne’s average weekly income is \$2,345 and Dockland’s residents have an average weekly income of \$1,957. Economic factors like this give a strong impression of communities that are not similar to each other across Wills and Melbourne.

The average house price between the suburbs of Princes Hill, Carlton North, and Fitzroy North is \$1.7 million, compared with an average of \$1.32 million for the neighbouring suburbs of Brunswick, Brunswick East, and Brunswick West, and an average of \$810,000 for the suburbs of Glenroy, Hadfield, and Fawkner further north in the division. These figures illustrate that Princes Hill has far more in common with East Melbourne and

Docklands than with suburban communities in Hadfield and Fawkner.

EDUCATIONAL LEVELS

Educational levels of Fitzroy North, Carlton North and Princes Hill are similar to other suburbs in Melbourne rather than suburbs in Wills.

In terms of level of highest level of educational attainment at Bachelor’s or above, the average across the seat of Melbourne is 54 % and the seat of Wills is 40.6%. While Brunswick, the suburb in Wills closest to Melbourne electorate has a level of 55.4%, this radically drops in the suburb immediately north in Wills, Coburg, to 41.7% The gap between Wills and Melbourne’s educational levels widen as you move further from the current boundary.

Suburb	Highest level of educational attainment
Carlton North (Melbourne)	Bachelor’s Degree Level and Above (62.9%)
East Melbourne (Melbourne)	Bachelor’s Degree Level and Above (60.6%)
Princes Hill (Melbourne)	Bachelor’s degree Level and Above (58.2%)
Brunswick (Wills)	Bachelor’s Degree Level and Above (55.4%)
Coburg (Wills)	Bachelor’s Degree Level and Above (41.7%)
Hadfield (Wills)	Bachelor’s Degree Level and Above (23.7%)
Glenroy (Wills)	Bachelor’s Degree Level and Above (30.1%)

These education statistics are indicative of a communities fundamentally similar to each other in Melbourne, rather than in Wills.

SOCIALISING

Social and civic amenities are already separated between the existing border of Brunswick Road. This is a result of the existing Council boundaries as well as the natural border of the Linear Park Reserve and Princes Park. Retail and hospitality venues and their clientele are also already differentiated, with Sydney Road a hub for the existing

residents of Brunswick, served by the 19 Tram and Upfield Train line, while residents of Princes Hill and Carlton North are served by venues in Lygon St, Carlton, and Fitzroy North by those on Brunswick Street and Smith Street by the north-south running trams. The shared facilities and commercial hubs differentiate these two areas into two distinct communities of interest. Victorian Labor supports the committee's proposal to unite the suburb of Brunswick East in Wills as a means by which to gain electors, which share a community of interest with the rest of Brunswick and whose boundaries are easily recognisable.

Means of communication and travel within the proposed Electoral Division

Public transport corridors give the best picture of direct differences between the areas of Princes Hill, Carlton North, and Fitzroy North with the areas of Brunswick and Brunswick West. The existing public transport options in many cases do not intersect with the existing border, such as the 96, 11, and 86 tramlines. The proposed boundaries complicate existing relationships, incorporating residents of Carlton North and Fitzroy North who otherwise have no connection or relationship with Coburg and Fawkner into the same community. The roads and public transport options are largely disparate, and indicate separate and distinct communities.

The physical features and area of the proposed Electoral Division & the boundaries of existing Divisions in the State

If Wills accepted Brunswick East in the redistribution, there is still a natural boundary between Wills and Melbourne if Melbourne were to retain Carlton North, Fitzroy North and Princes Hill. The intersection of Brunswick Rd and Lygon Street is a major intersection which overlaps (currently) the divisions of Melbourne and Wills.

It is an effective border as it runs as the southernmost border for Wills and part of the northern border for Melbourne. This intersection, and more specifically Brunswick Road is recognised as a major road based on the amount of vehicle and bicycle traffic it experiences and therefore would be a clearly recognisable and simple border to maintain. The proposed border which incorporates multiple council areas along the borders of Royal Parade, Cemetery Road, Princes Street, Alexandra Parade, Queens Parade, along with small sections of Smith Street and Hoddle Street are needlessly complicated and needlessly connect entirely disparate communities.

Maribyrnong take North Melbourne and Parkville

Community of interests within the proposed Electoral Division, including economic, social and regional interests

North Melbourne and Parkville already share a council (Melbourne City Council) with suburbs in Maribyrnong: Flemington and Kensington. Already these communities receive the same local government services and congregate at shared local spaces. This includes areas like Royal Park and the Flemington Road Cricket Oval which straddle Flemington Road, and North Melbourne Recreation Reserve which serves the communities of North Melbourne and Kensington. North Melbourne and Parkville also share communities of interest with areas like Flemington and Kensington such as significant Chinese and Vietnamese communities that are not replicated in Carlton and Carlton North. Maribyrnong is also an electorate with 5 LGAs, while adding North Melbourne and Parkville will not affect this.

MEDIAN INCOME

North Melbourne and Parkville have median personal and family income closer to suburbs in Maribyrnong than suburbs in Melbourne. They also have similar work from home practices to suburbs in Maribyrnong rather than in Melbourne (See table 1). N.B. Personal income recorded for Parkville is substantially lowered by high student population from Melbourne University – recorded family income demonstrates that Parkville is more closely aligned with suburbs in Maribyrnong than Melbourne. This data demonstrates that shifting North Melbourne and Parkville into Maribyrnong would connect communities with strong economic similarities.

Table 1

Suburb	Median weekly income	Work from home
Moonee Ponds (Maribyrnong)	Personal: \$1,113 Family: \$2,926	38.6%
Flemington (Maribyrnong)	Personal: \$927 Family: \$2,221	39.8%
Travancore (Maribyrnong)	Personal: \$1,027 Family: \$2,288	39.9%
North Melbourne (Melbourne)	Personal: \$943 Family: \$2,478	39%
Parkville (Melbourne)	Personal: \$586 Family: \$2,567	34.5%
West Melbourne (Melbourne)	Personal: \$1,047 Family: \$2,397	38.5%
Richmond (Melbourne)	Personal: \$1,356 Family: \$3,096	45%
East Melbourne (Melbourne)	Personal: \$1,532 Family: \$3,733	45.9%
Collingwood (Melbourne)	Personal: \$1,338 Family: \$2,817	48%
Abbotsford (Melbourne)	Personal: \$1,354 Family: \$3,024	45.8%

LANGUAGE / CULTURE

North Melbourne and Parkville have on average, more non-English speaking households than other suburbs in their electorate (Richmond, East Melbourne, Collingwood, Abbotsford). They also have a far high proportion of parents born overseas than other suburbs in their electorate (Richmond, East Melbourne, Collingwood, Abbotsford). North Melbourne and West Melbourne have figures closer to suburbs in Maribyrnong – see Table 2. These multicultural factors demonstrate communities that share values and characteristics between North Melbourne, Parkville, and Flemington, communities which are different from those in suburbs such as Richmond and Abbotsford.

Table 2

Suburb	Non-English speaking households	Percentage where only English used at home	Residents with at least one parent born overseas
Flemington (Maribyrnong)	39%	58.4%	59.6 %
Travancore (Maribyrnong)	40.5%	57.1%	63.6 %
Keilor East (Maribyrnong)	42.1%	63.3%	58.9%
Parkville (Melbourne)	38.9%	66.3%	57.2%
North Melbourne (Melbourne)	44.5%	53.5%	64.2%
Richmond (Melbourne)	26.7%	71.5%	53.1
Collingwood (Melbourne)	28.8 %	68.3%	58.6%
Abbotsford (Melbourne)	27%	71%	55.2%

Median house prices also align North Melbourne more closely with suburbs like Kensington and Flemington than Carlton and Carlton North. North Melbourne has a median house price of \$1.18 million over the last year, \$105,000 more than in Flemington and \$130,000 more than Kensington, but \$297,000 less than Carlton North and \$287,000 less than Carlton. Economic factors such as this demonstrate similarities that indicate a strong shared community.

School catchment zones also support this configuration, with zones for Debney Meadows Primary straddling Flemington and Parkville, Flemington Primary School straddling Parkville, Ascot Vale, Travancore, and Flemington, and all North Melbourne public schools straddling Parkville and North Melbourne. Schools draw in similar communities, and these shared zones demonstrate a shared community of interest.

Means of communication and travel within the proposed Electoral Division

57, 58, and 59 trams travel through North Melbourne and Parkville into Flemington and Kensington, as well as through the division of Maribyrnong into Moonee Ponds and Essendon. The Craigieburn train line also passes from North Melbourne into the rest of Maribyrnong, via Kensington, Ascot Vale, Moonee Ponds, and Essendon. These keep North Melbourne connected to rest of Maribyrnong under a restructured map.

Roads already pass from North Melbourne and Parkville into Kensington and Flemington, including Macaulay Road, Racecourse Road, and Mt Alexander Road. These roads keep the communities connected, and tie together commercial and geographic zones.

The physical features and area of the proposed Electoral Division & the boundaries of existing Divisions in the State

The boundaries of North Melbourne as a suburb are ideal for electoral boundaries, with Victoria Street along its southern border already acting as a significant shifting point between suburban and urban areas. North Melbourne is home largely to townhouses and some detached homes, while south of this border is far more characterised by high-rise apartment buildings and blocks of units. This is replicated along the eastern border of North Melbourne, with O'Connell Street separating low and medium-density housing with high-density housing in the suburb of Melbourne. This factor is replicated along the eastern borders of North Melbourne and Parkville, with Royal Parade representing a strong barrier as it is bordered by Princes Park north of Melbourne University which physically and culturally disconnects Princes Hill and Carlton North with Parkville.

Furthermore, existence of the University of Melbourne as a border around Parkville is natural, as it separates the campus and residential colleges which are exclusively home to University of Melbourne students and college staff, while its adjacent suburb of Carlton is residential. Grattan Street along the southern border of Parkville is a similar physical border separating the university from residential streets. Using strong geographic and physical features will more effectively group connected communities. Indeed, the communities of Flemington, Kensington and North Melbourne were united in the Division of Melbourne until the 2019 Federal election.

Aston/Deakin/Menzies

	Actual	Projected
Proposed Division of Deakin	124,392	130,314
Transfer from the proposed division of Aston	+ 4749	+ 4881
Transfer to the proposed division of Aston	- 8723	- 9140
Transfer from the proposed division of Menzies	+ 46,813	+ 50,278
Transfer to the proposed division of Menzies	- 49,608	- 51,216
Adjusted proposed Division of Deakin	117,172	124,647

	Actual	Proposed
Proposed Division of Menzies	120,713	128,860
Transfer from the proposed division of Deakin	+49,608	+ 51,216
Transfer to the proposed division of Deakin	-46,813	-50,278
Adjusted proposed Division of Menzies	123,983	130,299

This portion of our submission will cover our objection to the proposed divisions of Menzies, Deakin, and to a minor extent Aston.

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

We acknowledge that because the enrolment in Menzies and Deakin are projected to be

under the quota designated in Section 66(3)(a) of the Act by some 2,563 electors and 4,358 electors respectively, that a redistribution is necessary under the Electoral Act to bring both within the permissible range of the numbers of electors. The Committee has in response proposed the following:

- Menzies will take some 19,543 projected electors from the locality of Box Hill and part of the localities of Blackburn, Blackburn South, and Box Hill South currently within the Division of Chisholm, and 14,599 projected electors from the localities of Mont Albert and Mont Albert North and part of the localities of Balwyn, Balwyn North, and Surrey Hills from the Division of Kooyong. It will give 2,390 projected electors from the locality of Wonga Park to the proposed Division of Casey, and 2,181 projected electors from the locality of North Warrandyte to the Division of Jagajaga;
- Deakin will take some 20,933 projected electors from those parts of the localities of Blackburn, Blackburn North, Donvale, Mitcham, Nunawading, Park Orchards, Ringwood North and Warrandyte South currently located within the Division of Menzies, as well as 1,548 projected electors from that part of the locality of Burwood East currently located within the Division of Chisholm. Finally, Deakin will give 10,594 projected electors in the localities of Bayswater North, Heathmont, Kilsyth South and Ringwood to the proposed Division of Aston.

The Committee's reasoning scrutinised in our objection is stated under its subheading, 'Proposed Division of Menzies':

- "377. The Division of Menzies shares a boundary with two of the electoral divisions which are proposed to undergo substantial changes due to the proposed abolition of the Division of Higgins...;
- "378. These changes would unite the localities of Box Hill, Mont Albert, and Mont Albert North, each of which is currently split across two electoral divisions, within one electoral division."

We further highlight that in the 2021 Redistribution of Victoria, the AEC reasoned:

- "126. A number of objections, comments on objections and submissions to the inquiry disagreed with the Redistribution Committee's proposal to use Whitehorse Road as the northern boundary of the Division of Chisholm and proposed alternatives such as Canterbury Road, Koonung Creek or Gardiners Creek be used. It was argued that communities of interest would be improved by avoiding the split of shopping precincts and uniting all or some of Box Hill, Box Hill North, Blackburn and Blackburn North in one electoral division...;
- "127. In addition to arguments for a different northern boundary for the Division of Chisholm, a number of objections, comments on objections and submissions to

the inquiry provided competing arguments as to the most appropriate placement of the localities of Box Hill, Blackburn, Nunawading and surrounds. Some supported the Redistribution Committee's proposal that these northern areas of Whitehorse City Council be located in the Division of Menzies. Others argued that the southern boundary of the Division of Menzies should not cross Koonung Creek in this area and instead the Division of Deakin should extend further west to incorporate Box Hill, Blackburn, Nunawading and surrounds;

- "128. The augmented Electoral Commission noted the range of arguments regarding communities of interest in this area, however, was not able to accommodate all proposals without significant impacts on electoral divisions elsewhere."

To begin, we stress that our objections and our proposed boundary changes would only affect the electorates of Menzies and Deakin, as well as some minor adjustments to Deakin's boundary with Aston. It involves absolutely no impact on the broader state-wide distribution of electorates: no other electorate need be affected. Our objection argues that with significant impacts on other electoral divisions necessitated by the abolishing of Higgins, the AEC should revisit the arguments regarding communities of interest in this area. Our objection proposes that the necessary net transfer of electors can be better achieved with regards to the Section 66 factors by prioritising the uniting of communities of interest within Local Government Areas on the northern or the southern sides of the Eastern Fwy and the Ringwood Bypass/Dandenong Rd: Menzies thus representing the community north of the Eastern Fwy substantively within the City of Manningham, and Deakin thus representing the community south of the Eastern Fwy substantively within the City of Whitehorse.

Our submission takes the following structure:

- 1. Means of communication and travel and physical features:** The means of communication and travel used by electors across Melbourne's east are not in fact reflected in the proposed divisions of Deakin, Menzies, and to a lesser extent Aston. Blackburn Rd, Surrey Rd and Springvale Rd are notable north-south transport links, but their significance pales in comparison to the Eastern Fwy & Ringwood Bypass/Mt Dandenong Rd and its associated parkland which clearly divides suburbs into distinct communities of interest along its north and south sides. A Menzies/Deakin boundary consisting substantively of the Eastern Fwy & Ringwood Bypass/Mt Dandenong Rd more accurately reflects the different ways in which Menzies and Deakin electors actually gather and socialise. Ringwood and Heathmont residents should not be split from one another by Canterbury Rd when they primarily travel and socialise in the same area. Bayswater Rd would better divide the communities of Deakin from those of Aston;
- 2. Communities of interest** The community of interest consideration militates against the proposed alteration. The proposed alteration takes Menzies and Deakin further away

from their historical roots as east-west oriented divisions serving communities above and below the Eastern Fwy respectively. The proposed alteration divides the community of interest in the City of Whitehorse as well as the City of Manningham. The proposed alteration artificially divides Maroondah residents from Ringwood and Heathmont and wrongly collects them with Knox residents in Aston despite these specific Maroondah communities socialising, communicating and using means of travel together in notably different ways to that of Knox or further east Maroondah communities such as Bayswater North;

3. Alternative proposals: A more appropriate and proportionate response to Menzies needing electors, having regard to the statutory factors, is to return Menzies north of the Eastern Freeway to its traditional role as an east-west division spanning Bulleen to Croydon Hills. Deakin can offset the electors taken by Menzies north of Oban Rd by returning to its historical centring as an east-west division centred atop Nunawading and Mitcham, taking electors currently in Menzies from the City of Whitehorse as well as those electors in Whitehorse that were to be transferred from Kooyong and Chisholm to Menzies.

1. Means of communication and travel and physical features

Consistent orientation of Divisions

Electoral maps covering metropolitan Melbourne, both federal and state, have almost always overwhelmingly reflected the dominant orientation of Melbourne's transport links and communities of interest. While Melbourne has developed around Port Phillip Bay it has maintained a radial approach, similar to a wheel, with inner Melbourne electorates clustered around similar suburbs, while surrounding electorates stretch outwards to embrace communities that share common transport links. Depending on the area, these electorates may have a north/south through to an east/west orientation, but they consistently radiate outwards from the centre of Melbourne, acknowledging and embracing that that is an accurate reflection of relevant transport links, community of interest and the development of a great city. This rightly dominates the middle ring of Melbourne from an electoral perspective.

Outer suburban and peri-urban Melbourne has then tended to embrace an approach akin to the rim of a wheel. That is, communities of interest that share similarities in terms of more recent development and the interface with non-urban areas along the outskirts of the city as a whole. There is an opportunity at this redistribution to acknowledge and reinforce this approach by reorientating Menzies and Deakin, as proposed, to their more traditional, and existing orientation towards the centre of Melbourne. This is entirely consistent with the rest of metropolitan Melbourne. The current proposed boundaries for these two seats are at odds with the Commissions

proposed boundaries across metropolitan Melbourne and largely at odds with the existing boundaries for much of these areas.

The Eastern Freeway & Ringwood Bypass/Mt Dandenong Rd

The reshaping of Deakin and Menzies necessitated by the changes to Chisholm and Kooyong provides an opportunity to rebalance both electorates around serving contiguous groups on opposite sides of the Eastern Fwy & Ringwood Bypass/Mt Dandenong Rd. This major road has long been a societal border for Melbournians, in much the same way as a river or mountain. We propose that Deakin should primarily serve the southern side of the Eastern Fwy & Ringwood Bypass/Mt Dandenong Rd, while Menzies accounts for northside constituents.

The Eastern Fwy serves as a geographical boundary dividing the City of Manningham from the City of Whitehorse. This freeway not only demarcates administrative boundaries but also influences community behaviours and travel patterns. The Eastern Fwy runs alongside the Koonung Creek and associated parkland which is a persistent natural border that becomes especially forceful at the intersection of Mullum Mullum Creek Reserve, Deep Creek-to-Loughlan Rd, and the Melba Tunnel.

The Eastern Fwy, Ringwood Bypass, and Mt Dandenong Rd act as a physical and psychological barrier, subtly reinforcing the idea of the City of Manningham having a distinct community with its own identity and amenities, separate from those in the City of Whitehorse. Residents on either side of the Eastern Fwy have little incentive to travel out of their Local Government Area and across the Eastern Fwy in order to access their services, shopping, or work.

Additionally, using the Eastern Fwy & Ringwood Bypass/Mt Dandenong Rd as the boundary for Deakin and Menzies will permit residents in the easternmost third of Menzies to easily travel on these roads to services in the westernmost third of Menzies without ever leaving the Division of Menzies.

Transport Corridors

We see Melbourne's eastern residents as predominantly travelling east-to-west to access their services, rather than north-to-south. Residents in Heathmont (AEC's Deakin) share more in common with those in Box Hill (AEC's Menzies) than they do with those living in Warranwood (AEC's Deakin). This is because they rely upon Whitehorse Rd/Maroondah Hwy, Canterbury Rd, or the Belgrave train line to travel within their region – all of which run east-to-west. Likewise Doncaster Rd, Reynolds Rd, Heidelberg-Warrandyte Rd, and Plymouth Rd all connect communities of interest while Park Rd and Stintons Rd provide links between the residents of Croydon Hills (AEC's Deakin) and Templestowe (AEC's Menzies).

For Deakin, centring Whitehorse Rd/Maroondah Hwy as well as Canterbury Rd means

a member of Parliament could better represent the importance of these major roads to their community members living on their north and south sides. These citizens rely far more on roads that run east-to-west to commute for work, reach important services, and participate in community or cultural events, than they do on north-to-south roads. This argument is expanded upon in Part 2(iii). Five major shopping precincts south of the Eastern Fwy & Ringwood Bypass/Mt Dandenong Rd and north of Glen Waverley are found on east-to-west transit corridors:

- 1.** Box Hill Central is just off Whitehorse Rd/Maroondah Hwy and atop the Lilydale/Belgrave train line;
- 2.** Eastland Shopping Centre is just off Whitehorse Rd/Maroondah Hwy and abreast of the Lilydale/Belgrave train line;
- 3.** Mitcham Shopping Centre is just off Whitehorse Rd/Maroondah Hwy and abreast of the Lilydale/Belgrave train line;
- 4.** Forest Hill Chase is just off Canterbury Rd;
- 5.** Blackburn Square runs on Springfield Rd.

Our objection has collected the residents on either side of Dorset Rd in the seat of Aston rather than Deakin. Unlike the east-west travel taken by most communities south of the Eastern Freeway, Bayswater North residents that live alongside Dorset Rd primarily travel north-to-south. Dorset road connects the suburbs of Bayswater, Bayswater North, and Boronia, providing essential amenities and hosting diverse community events. Stretching through Boronia Mall in the south to Chandler Village Shopping Centre and Dorset Square Shopping Centre in the north, the road ensures residents have convenient access to shopping precincts. Religious centres such as St. Joseph's Boronia Catholic Church, Bayswater Uniting Church, and the Sri Vakrathunda Vinayagar Temple along with their community gathering spaces are reached directly off this main road, while healthcare needs are met by facilities including the Boronia Medical Centre and Dorset Road Medical Centre. Dorset Road also connects locals to events including the Boronia Festival and the Bayswater Carols by Candlelight. The road is a major family destination for activities, including the Boronia Community Market at Dorset Square Shopping Centre and natural spaces such as Old Joes Creek, Tormore Reserve, and Dorset Recreation Reserve. We see Bayswater North residents as thus having a strong incentive to be participants in the seat of Aston which is predominantly to their south, rather than being situated on the fringe of Deakin, whose other constituents primarily travel east-to-west.

2. Communities of interest

Formed and cohesive political identity of Menzies

We think it is worth stating firstly that there is a clear community and identity around voting in the Division of Menzies. Menzies has held Donvale since 1989, and contained the suburbs of Warrandyte South and Park Orchards since 1994. Warranwood was in Menzies from 1994 until 2021, and Croydon Hills was in Menzies from 2003 until 2018. All of these suburbs are excluded from participating in their community of concern in the AEC's draft plan for Menzies.

Residents of Bulleen, Templestowe Lower, Templestowe, Doncaster, Doncaster East, and Warrandyte have thus voted in the Division together with the suburbs of Donvale, Park Orchards, Warrandyte South, and Warranwood for either side of 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.

Formed and cohesive civic identity of the City of Manningham

Menzies historically held the role of serving the residents of the City of Manningham. Menzies' boundaries were identical to those of the City of Manningham from 1994 until 2010, when the Division also gained part of the City of Maroondah. Prior to the AEC's 2024 draft redistribution for Menzies, the most drastic reduction of Manningham Council from Menzies was the loss of just six local roads between Worrell St and Oxford St from Menzies to Deakin in 2010.

The residents of Manningham shop, play, and worship at venues found within their community, fostering a sense of familiarity and convenience. Mulum Mulum Stadium in Donvale and Warrawee Park in Park Orchards host various sports leagues and community events throughout the year. Manningham residents shop at the precincts Westfield Doncaster, Jackson Court Shopping Centre, Devon Plaza, and Tunstall Square Shopping Centre, all located on Doncaster Rd. Reynolds Rd hosts The Pines Shopping Centre, at least 7 reserves, and connects Manningham through the extensive Mulum Mulum Creek Linear Park (MMCLP). The MMCLP is a significant feature in the City of Manningham. 11 kilometres of park wind through Donvale, Park Orchards, Warrandyte, Doncaster East and Templestowe, separating the urban and rural parts of the city. Residents on either side of the MMCLP utilise its green space for all manner of recreation including BMX, horse riding, and cricket.

Mediterranean and Semetic communities have deep-rooted cultural and religious ties within Manningham. Roughly 15,000 Manningham residents identified with Greek or Italian ancestry in 2021. Popular Mediterranean restaurants are concentrated

along Doncaster Rd, in Croydon, and in Templestowe Village. Faith and culture are intertwined closely with education across Manningham, visible through the Greek school in Doncaster and Catholic Schools including St Anne's in Park Orchards, Our Lady of the Pines as well as Whitefriars in Donvale, St Kevin's in Templestowe Lower, through to St Clement of Rome in Bulleen. Places of worship such as Saint Haralambos Greek Orthodox Church in Templestowe, the Italian Parish of St. Clement of Rome in Bulleen, and Our Lady of the Pines Catholic Church (built for students of the school) in Donvale play pivotal roles in these communities' lives. Notable too are the pair of Coptic churches, St. Bishoy & St. Shenouda's Coptic Orthodox Church in Bulleen, and St Athanasius Coptic Church in Donvale. Whitefriars Park in Donvale is also the site of the Coptic Diocese of Melbourne, and the University of Divinity's Coptic Orthodox campus. Finally, Manningham is home to the North Eastern Jewish Centre, notable as the metropolitan Synagogue furthest from Melbourne's CBD, and the only Synagogue north of the Eastern Fwy. The boundary proposed in the AEC's draft 2024 plan would split many of these linked religious institutions across two electorates, reducing the capacity of these groups and their congregations to advocate for shared needs and cultural services.

Formed and cohesive civic identity of the City of Whitehorse

The AEC draft plan reinforces a significant split affecting the community of interest residing in the City of Whitehorse, by grouping residents from as far south as Eley Rd with electors north of the Eastern Fwy rather than grouping residents as west as Warrigal Rd with those as east as Heatherdale Rd. The AEC rationale provided:

“378. These changes would unite the localities of Box Hill, Mont Albert, and Mont Albert North, each of which is currently split across two electoral divisions, within one electoral division.”

However, the Blackburn Rd, Surrey Rd and Springvale Rd boundary between Deakin and Menzies still fractures the localities of Blackburn South, Blackburn, Blackburn North, Donvale, Park Orchards, and Warrandyte South. Extrapolating further, the plan to have Deakin represent half of Donvale, Park Orchards, and Warrandyte South also means splitting two suburbs of the City of Maroondah, Heathmont and Bayswater North, between Deakin and Aston. The decision therefore not only does nothing to mend the divide of Blackburn and Blackburn South created by the 2021 Redistribution, the decision actually expands on the divide and further impacts City of Whitehorse residents as well as those in the Local Government Areas of Manningham and Maroondah. Given how many localities in Menzies, Deakin, and Aston are impacted by the AEC's proposed plan, we do not accept that uniting the localities of Box Hill, Mont Albert, and Mont Albert North is sufficient enough a change to address the needs of the community of interest in Whitehorse.

We see a strong, shared community of interest that extends through Whitehorse into the western third of the City of Maroondah. This is because these residents predominantly travel east-to-west to access their services, rather than north-to-south. Shopping districts such as Box Hill Central, Mitcham Shopping Centre, and Eastland Shopping Centre all run along east-to-west Whitehorse Rd/Canterbury Rd as well as the Lilydale/Belgrave train line. For worship, Box Hill Baptist Church, the Blackburn Church of Jesus Christ of Latter-day Saints, Fo Guang Shan Box Hill Temple, Guruji Maharaj Mandir Melbourne Ringwood, and the Sikh Sabha also all run along Whitehorse Rd/Canterbury Rd. Louise Multicultural Community Centre, to which many of these religious institutions belong, is likewise situated on Whitehorse Rd. And for recreation, Aqualink Box Hill, Aqualink Nunawading, and Ringwood Public Golf Course are all situated against east-to-west Canterbury Rd.

Similarly, parks in Whitehorse and the westernmost third of Maroondah usually run southwest-to-northeast, linking residents across suburbs. People who walk their dogs beginning at Blackburn Lake Sanctuary (Blackburn) will intersect with those that golf around Wattle Park (Box Hill South). Likewise, those who have a tennis match at Gracedale Park (Ringwood East) could feasibly ride their bikes to the event on tracks connected to Davy Lane Reserve (Forest Hill). The Mullum Mullum Creek Trail connects Eastland Shopping Centre (Ringwood) to the Melbourne Badminton Centre (Blackburn) via the Eastlink Trail and Koonung Creek Trail. Queen Elizabeth 2/Maroondah Hospital (Ringwood East) is a smaller metropolitan hospital. While the hospital is undergoing renovations to add 200 more beds, many residents in eastern Whitehorse and the westernmost parts of the City of Maroondah choose to attend the larger Box Hill Hospital for medical treatment, or access the Mitcham, Ringwood, and Vermont Private Hospitals which also generally take them further into Whitehorse.

Formed and cohesive cultural identity of the Chinese community

A community of interest of substantial size is the Chinese community which has been predominantly located in the City of Whitehorse for at least 20 years. 13% of Whitehorse residents were born in China. While the most visible participants of this community reside in Box Hill, the City of Whitehorse has thousands of citizens that reside beyond Box Hill and speak Mandarin at home, are Chinese migrants or have Chinese history. In 2021, 39% of Box Hill residents reported Chinese ancestry. 30.4% of Burwood East, 30% of Vermont South, 26.6% of Forest Hill, and 24.3% of Blackburn North residents also reported Chinese ancestry.

Box Hill is considered a cultural epicentre for Melbourne's Mandarin-speaking population, and specialised Chinese products in high demand are oftentimes only found in stores in Box Hill. 17.7% of Whitehorse residents either speaking Mandarin or Cantonese at home compared to just 5.9% of Manningham residents. And with 8.2%

of Whitehorse residents reporting they either cannot speak English well or not at all, uniting the Chinese community of Whitehorse in a single Division will better empower this burgeoning community to advocate for the services needed by peers which may otherwise go unnoticed or overlooked.

One argument that the AEC has not made but may have considered is that creating a boundary splitting members of the Chinese community of interest within Whitehorse artificially invents a community of interest between Chinese residents of Box Hill and a notable Chinese population of Doncaster, in the City of Manningham. However, this is easily discounted when considering the differences in means of travel utilised by Box Hill residents versus those of Doncaster. We also believe the argument for uniting electors from Box Hill with Chinese ancestry in a Menzies based primarily above the Eastern Fwy is weak, as the remainder of the City of Manningham has a much smaller number of residents reporting Chinese ancestry compared to what is seen in the broader City of Whitehorse. The suburbs of Warrandyte (<8.5%), Bulleen (20.1%), Templestowe Lower (21%), and Templestowe (23.9%) each have a community with less than one quarter reporting Chinese ancestry. Our objection would instead propose that Donvale's Coptic institutions and Park Orchard's Catholic and Christian institutions be prioritised for returning to Menzies, reflecting the Semitic and Mediterranean communities in Menzies would benefit from this change - see **Part 2(ii)**.

3. Alternative proposals

The boundary between Deakin and Menzies follows the Eastern Fwy to the Ringwood Bypass and into Mt Dandenong Rd, ending at Bayswater Rd. All of Whitehorse currently in Menzies or proposed to be sent to Menzies by Chisholm and Kooyong are instead taken by Deakin. To offset the taking of the City of Whitehorse by Deakin, Menzies regains from Deakin its historical suburbs Croydon Hills, Warranwood, and Park Orchards, as well as Ringwood North and some of Croydon. Deakin retains Heathmont and gives the suburbs of Croydon South, Kilsyth, and Bayswater North to Aston, with Dandenong Creek and Bayswater Rd serving as the substantive boundary between Deakin and Aston.

The southern boundary of Menzies is restored to be the Eastern Fwy, replicating existing Council and State (as well as historic Federal) boundaries. That boundary, which is the widest and busiest section of the Eastern Fwy as well as a significant parkland including Boronia Grove Reserve and Koonung Creek Reserve, was in place from the formation of Menzies in 1984 until 2021.

By gaining the suburbs of Croydon South, Kilsyth, and Bayswater North from Deakin, Aston now also shares a boundary with Menzies, which is a continuation of the Mt Dandenong Rd boundary used by Menzies with Deakin. This boundary terminates at Colchester Road, where Aston's boundary with Casey now begins. The boundary between Casey and Aston travels down Colchester Road and reconnects with the AEC's

proposed Canterbury Road boundary between these two Divisions.

Deakin would thus be centred on the major intersections in Nunawading and Forest Hill, with arterial roads and rail (Whitehorse Rd/Maroondah Hwy, Canterbury Rd, Springvale Rd, and the Belgrave/Lilydale Train Line) running through the Division's centre. Springvale Rd and Reynolds Rd would also be centred in Menzies with major community services including the Pines Shopping Centre and Mulum Mulum Stadium at the electorate's heart.

While the Divisions which share boundaries have now changed (for example, Chisholm no longer shares a boundary with Menzies; Deakin no longer shares a boundary with Casey), the boundaries external to those between Deakin with Menzies and those between Deakin with Aston have remained entirely intact. The surrounding Divisions of Kooyong, Chisholm, Bruce, Casey, and Jagajaga do not gain or lose SA1s to or from our proposed Menzies, Deakin, and Aston.

Chisholm/Hotham/Kooyong

	Actual	Projected
Proposed Division of Chisholm	121,443	130,602
Transfer from the proposed division of Hotham	+ 12,427	+ 13,876
Transfer to the proposed division of Hotham	- 11,541	- 12,711
Transfer to the proposed division of Kooyong	- 712	- 697
Adjusted proposed Division of Chisholm	121,770	131,238

	Actual	Projected
Proposed Division of Hotham	118,284	129,953
Transfer from the proposed division of Chisholm	+ 11,541	+ 12,711
Transfer to the proposed division of Chisholm	- 12,427	- 13,876
Adjusted proposed Division of Hotham	117,398	128,788

	Actual	Projected
Proposed Division of Kooyong	122,936	130,949
Transfer from the proposed division of Chisholm	+ 712	+ 697
Adjusted proposed Division of Kooyong	123,426	131,402

- 1.** We recognise the Redistribution Committee has sought to use the natural boundary of the Monash Freeway in their proposed boundaries. We submit the effect of splitting several localities across the two electorates has a greater impact than benefits achieved by adhering to the Monash Freeway as a boundary. As such, we submit the existing southern boundary of Chisholm and Hotham should be retained, but with the transfer of Oakleigh East (see point 2) from Hotham to Chisholm. The retention of this boundary will prevent the unnecessary splitting of multiple suburbs, namely Chadstone, Glen Waverley and Mount Waverley, thus preserving communities of interest together. It will also ensure that the ‘Monash National Employment and Innovation Precinct’, a community which comprises of high-tech businesses located both north and south of the Monash Freeway, that work closely with Monash University, is also retained as a single community within the Chisholm electorate.
- 2.** That Oakleigh East (between Clayton Road, Ferntree Gully Road and the Princes Highway), and as recommended by the Commission in its 2021 draft, be transferred from Hotham to Chisholm. While we recognise the Augmented Commissions decision to unite Oakleigh and Oakleigh East in their 2021 report, we submit that the transfer of Oakleigh East into Chisholm, is more appropriate – providing a more consistent and logical southern boundary (i.e the Princes Highway), it will also unite a community of interest, namely students attending Monash University.
- 3.** That Malvern East should not be split between Chisholm and Hotham, instead sitting entirely within the Hotham electorate. This is considered another logical change designed to avoid the unnecessary splitting of suburbs, thus keeping local communities together and improving federal representation. Using Wattle Tree Road, Malvern / Malvern East as the border between Chisholm and Hotham will further strengthen the link between the Malvern East community and the Hotham electorate.
- 4.** That the north-west boundary (between Burke Road, Toorak Road, Tooronga Road and the Monash Freeway), sit within the Kooyong electorate. This change will ensure that Chisholm’s boundaries align with the boundaries of the Ashwood and Malvern state electorates and preventing an additional, and unnecessary, overlap with the Hawthorn state electorate

Calwell/McEwen/Scullin/Jagajaga

	Actual	Projected
Proposed Division of Calwell	109,202	130,110
Transfer to the proposed division of McEwen	- 3391	- 7515
Transfer from the proposed division of McEwen	+ 37	+ 36
Transfer from the proposed division of Scullin	+ 2498	+ 2451
Adjusted proposed Division of Calwell	108,345	125,081

	Actual	Projected
Proposed Division of Scullin	114,895	126,602
Transfer to the proposed division of Calwell	- 2498	- 2451
Transfer to the proposed division of McEwen	- 7180	- 8453
Transfer from the proposed division of McEwen	+ 6748	+ 11,207
Adjusted proposed Division of Scullin	111,966	126,911

	Actual	Projected
Proposed Division of McEwen	105,617	128,403
Transfer to the proposed division of Calwell	- 37	- 36
Transfer from the proposed division of Calwell	+ 3391	+ 7515
Transfer to the proposed division of Scullin	- 6748	- 11,207
Transfer from the proposed division of Scullin	+ 7180	+ 8453
Transfer to the proposed division of Jagajaga	- 1827	- 1735
Adjusted proposed Division of McEwen	107,687	131,501

	Actual	Projected
Proposed Division of Jagajaga	118,529	123,151
Transfer to the proposed division of McEwen	+1827	+ 1735
Adjusted proposed Division of Jagajaga	120,358	124,888

Victorian Labor's amendments to the proposed boundaries for McEwen is intended to maintain the status quo in parts of the boundary between Calwell and Scullin while also addressing issues of best suiting the needs of the communities of interest in Wollert,

Mernda and part of Diamond Creek.

These amendments will minimise disruption to communities while bringing a strong and stable base for future redistributions. They reflect the principle that communities of interest should continue to have a high priority while also addressing the issue of continually moving communities in and out of divisions across successive redistributions.

We recommend restoring the boundary between Calwell and Scullin below Craigieburn Road East at Merri Creek, thereby maintaining the local government boundary in that locality and the current divisional boundary.

Practically, the community of Campbellfield further south has no relationship with the City of Whittlesea. They are connected to Hume City through schools, services, roads community organisations and even waste disposal. In particular multicultural organisations of this area are connected to Hume City, and we feel that keeping these communities connected is a very strong case.

Returning this area to the Hume City and using the LGA boundary is a very long held position and makes sense with community of the Campbellfield being in one division. The boundary follows the Merri Creek and contains the Merri Creek grasslands as well as the Cooper Street grassland nature reserve and the Craigieburn grassland nature reserve.

We strongly submit a change to the boundary along Donnybrook Road and the Hume Highway to extend further west on Donnybrook Road down to Deep Creek. This will align communities north of Donnybrook Road into McEwen and creates a balance of population to ensure that McEwen stays within the tolerances required under the Act.

Aligning all the new and emerging communities on the north side of Donnybrook Road creates a stronger community of interest and uses a large, divided carriage way as the boundary for the two divisions.

These boundaries also used for communities in relation to education, separating school zones as well as being used for sporting club catchments.

Moving further east and north, we propose reuniting Mernda in McEwen and Wollert in Scullin, reflecting the distinct communities of interest in those suburbs.

The splitting of Mernda at the last redistribution has led to community confusion and concern over split representation for that community. Examples of where these issues arise are educational facilities or sporting clubs being in one division, but their catchments are in another division. As the area that is currently being removed from McEwen into Scullin is small it makes practical sense for those numbers to be returned to McEwen. This is why we have also suggested the reunification of the township of Wollert which the vast majority still is in and has connection to the division of Scullin.

This will ensure that with the growth of the community, the township of Wollert can develop in one division and maintain the intent of community connectivity and community of interest. It also creates very solid divisional boundaries which all but alleviate any confusion for members of that community.

The amendment around the Diamond Creek locality is recommended on the basis of community of interest and is to move the area south of Diamond Creek Road and west of Ryans Road to the division of Jagajaga.

This minor change takes into consideration the fact that this Estate generally identifies as part of the St Helena community. There are strong connections with education, shopping and public transport routes. This is a common-sense amendment that creates stronger border being the continuation of Diamond Creek Road and Ryans Road culminating the intersection of the two.

We are aware that these amendments will require additional donations from McEwen to Scullin. It is therefore that our recommendation that the localities of Plenty and Yarrambat, as well as SA 20903121510, west of Ironbark Road return to the division of Scullin.

Gellibrand/Fraser

	Actual	Projected
Proposed Division of Fraser	121,865	129,206
Transfer to the proposed division of Gellibrand	- 1928	- 2016
Adjusted proposed Division of Fraser	119,885	127,186

	Actual	Projected
Proposed Division of Gellibrand	113,796	127,547
Transfer from the proposed division of Fraser	+ 1928	+ 2016
Adjusted proposed Division of Gellibrand	115,724	129,563

In making this submission, we note that there is no numerical imperative to move Spotswood from Gellibrand to Fraser. In fact, as shown in the table below, moving Spotswood from one division to the other has a negligible effect on the mean magnitude of variation from the projected enrolment quota.

Scenario	Electoral Division	Enrolment as at 9 August 2023		Enrolment as at 17 April 2028		
		Number of electors	Variation from redistribution quota	Number of electors	Variation from projected enrolment quota	Mean Magnitude of variation
Spotswood in Fraser(AEC Proposal)	Fraser	121,865	4.25%	129,206	1.55%	0.90%
	Gellibrand	113,796	-2.65%	127,547	0.24%	
Spotswood in Gellibrand (ALP Proposal)	Fraser	119,937	2.60%	127,190	-0.04%	0.93%
	Gellibrand	115,724	-1.00%	129,563	1.82%	

Therefore, we submit that Spotswood should be allocated to the most appropriate division based on the factors listed in paragraph 73(4)(b) of the Electoral act:

Based on these factors, we submit that Spotswood should remain in Gellibrand, not Fraser as the redistribution committee has proposed. The rationale for this is outlined below.

Community of interests

The community of Spotswood is socially and structurally connected to the neighbouring suburbs of South Kingsville, Newport and Williamstown (including Williamstown North). Electors in these suburbs have voted together in Gellibrand since 1968, as well as voting together in the Victorian State Electorate of Williamstown and Hobsons Bay City Council for over 30 years. As a result of this long history, residents of these areas (including Spotswood) have developed a strong sense of shared community identity through their collective advocacy on local issues.

The structural connection of these suburbs as a community of interest is further evidenced by the shared dependency on local services and community assets. Residents of Spotswood shop and socialise in Newport, gather in public parks and beaches in Williamstown, and share community infrastructure with South Kingsville. These suburbs

all rely on the services of Hobson Bay City Council and most share the 3015 postcode (captures Spotswood, South Kingsville and Newport).

Means of communication and travel within the Electoral Division

Spotswood sits along a clear transport corridor that links it to the suburbs to its south. Spotswood Station connects residents to other suburbs South along the Williamstown Train Line while Melbourne Road, Douglas Parade and Hall Street are all major road transport connections into Spotswood. It is worth noting that most of the traffic along these road transport corridors is to and from the West Gate Freeway itself rather than the suburbs to the freeway's north. In fact, both Melbourne Road and Douglas Parade change names at the West Gate Freeway (to Williamstown Road and Hyde Street respectively), indicating that the roads are primarily connections to the freeway itself and not to suburbs either side of it.

The physical features and area of the Electoral Division

The most significant physical feature of the area around Spotswood is the West Gate Freeway - a soon to be twelve lane freeway that is one of the busiest in Australia. The West Gate Freeway separates Spotswood from the suburbs to its north, significantly obstructing the physical, and therefore social connection. There is almost no pedestrian connection and limited road connection as discussed above. Moving Spotswood into Fraser would leave it as the only suburb in Fraser south of the West Gate Freeway, leaving it disconnected from the rest of the electoral division. It is worth noting that while we are proposing that the boundary follow the Hobsons Bay LGA boundary along Stony Creek, Hyde St and Francis St (not the freeway itself) no electors north of the freeway would be captured in Gellibrand.