

Local Council Representation Review

Final Report

**BOROONDARA
CITY COUNCIL**

June 2019

© State of Victoria (Victorian Electoral Commission)
Wednesday 5 June 2019

Version 1



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Recommendation

The Victorian Electoral Commission recommends that Boroondara City Council consist of eleven councillors elected from four wards (three three-councillor wards and one two-councillor ward).

This recommendation is submitted to the Minister for Local Government as required by the *Local Government Act 1989*.

Please see Appendix 2 for a detailed map of this recommended structure.

Executive summary

The *Local Government Act 1989* (the Act) requires the Victorian Electoral Commission (VEC) to conduct an electoral representation review of each municipality in Victoria before every third council general election.

The purpose of an electoral representation review is to recommend an electoral structure that provides fair and equitable representation for people who are entitled to vote at a general election of the council. The matters considered by a review are:

- the number of councillors
- the electoral structure of the council (whether the council should be unsubdivided or divided into wards and, if subdivided, the ward boundaries and the number of councillors per ward).

The VEC conducts all reviews based on three main principles:

1. taking a consistent, State-wide approach to the total number of councillors
2. if subdivided, ensuring the number of voters represented by each councillor is within plus-or-minus 10% of the average number of voters per councillor for that local council
3. ensuring communities of interest are as fairly represented as possible.

Current electoral structure

Boroondara City Council currently comprises 10 councillors elected from a subdivided electoral structure of 10 single-councillor wards. The electoral structure was last reviewed in 2008, which made no changes to the overall electoral structure.

Visit the VEC website at vec.vic.gov.au to access a copy of the 2008 review final report.

Preliminary submissions

Preliminary submissions opened at the commencement of the current review on Wednesday 13 February 2019. The VEC received 200 submissions for the representation review of Boroondara City Council by the deadline at 5.00 pm on Wednesday 13 March 2019.

Preliminary report

A preliminary report was released on Wednesday 10 April 2019 with the following options for consideration:

- Option A (preferred option)
Boroondara City Council consist of eleven councillors elected from four wards (three three-councillor wards and one two-councillor ward).
- Option B (alternative option)
Boroondara City Council consist of eleven councillors elected from five wards (four two-councillor wards and one three-councillor ward).
- Option C (alternative option)
Boroondara City Council consist of eleven councillors elected from eleven single-councillor wards.

Response submissions

The VEC received 265 submissions responding to the preliminary report by the deadline at 5.00 pm on Wednesday 8 May 2019.

Public hearings

The VEC conducted two public hearings for those wishing to speak about their response submission at 6.30 pm on Tuesday 14 May 2019 and at 3.00 pm on Thursday 16 May 2019. In total, 19 people spoke at the hearings.

Recommendation

The Victorian Electoral Commission recommends that Boroondara City Council consist of eleven councillors elected from four wards (three three-councillor wards and one two-councillor ward).

This electoral structure was designated as Option A in the preliminary report. The final recommended electoral structure includes a minor adjustment to one of the ward boundaries from what was designated as Option A in the preliminary report. Please see Appendix 2 for a detailed map of this recommended structure.

Background

Legislative basis

The Act requires the VEC to conduct a representation review of each local council in Victoria before every third general council election, or earlier if gazetted by the Minister for Local Government.

The Act states that the purpose of a representation review is to recommend the number of councillors and the electoral structure that provides 'fair and equitable representation for people who are entitled to vote at a general election of the Council.'¹

The Act requires the VEC to consider:

- the number of councillors in a local council
- whether a local council should be unsubdivided or subdivided.

If a local council is subdivided, the VEC must ensure that the number of voters represented by each councillor is within plus-or-minus 10% of the average number of voters per councillor for that local council.² On this basis, the review must consider the:

- number of wards
- ward boundaries
- number of councillors that should be elected for each ward.

Public engagement

Public information program

The VEC conducted a public information program to inform the community of the representation review, including:

- public notices printed in local and state-wide papers
- public information session to outline the review process and respond to questions from the community
- a media release announcing the commencement of the review and the release of the preliminary report
- a submission guide to explain the review process and provide background information on the scope of the review

¹ Section 219D of the *Local Government Act 1989*.

² *ibid.*

- an information email campaign targeted at known community groups and communities of interest in the local council area
- sponsored social media advertising geo-targeted to users within the local council area
- ongoing information updates and publication of submissions on the VEC website.

More information on the VEC's public information program for the representation review of Boroondara City Council can be found at Appendix 3.

Public consultation

Public input was accepted by the VEC via:

- preliminary submissions at the start of the review
- response submissions to the preliminary report
- public hearings that provided an opportunity for people who had made a response submission to expand on their submission.

Public submissions are an important part of the review process but are not the only consideration. The VEC ensures its recommendations comply with the Act and are formed through careful consideration of public submissions, independent research, and analysis of all relevant factors.

The VEC's principles

Three main principles underlie all the VEC's work on representation reviews:

1. Taking a consistent, State-wide approach to the total number of councillors.

The VEC is guided by its comparisons of local councils of a similar size and category to the council under review. The VEC also considers any special circumstances that may warrant the local council having more or fewer councillors than similar local councils.

2. If subdivided, ensuring the number of voters represented by each councillor is within plus-or-minus 10% of the average number of voters per councillor for that local council.

This is the principle of 'one vote, one value', which is enshrined in the Act. This means that every person's vote counts equally.

3. Ensuring communities of interest are as fairly represented as possible.

Each local council contains a number of communities of interest. Where practicable, the electoral structure should be designed to ensure they are fairly represented, and that geographic communities of interest are not split by ward boundaries. This allows elected

councillors to be more effective representatives of the people and interests in their particular local council or ward.

Developing recommendations

The VEC bases its recommendations for particular electoral structures on the following information:

- internal research specifically relating to the local council under review, including data from the Australian Bureau of Statistics and .id³; voter statistics from the Victorian electoral roll; and other State and local government data sets
- small area population forecasts provided by .id
- the VEC's experience conducting previous electoral representation reviews of local councils and similar reviews for State elections
- the VEC's expertise in mapping, demography and local government
- careful consideration of all input from the public in written submissions received during the review and via oral submissions at the public hearing
- advice from consultants with extensive experience in local government.

Deciding on the number of councillors

The Act allows for a local council to have between five and 12 councillors but does not specify how to decide the appropriate number.⁴ In considering the number of councillors for a local council, the VEC is guided by the Victorian Parliament's intention for fairness and equity in the local representation of voters under the Act.

The starting point in deciding the appropriate number of councillors for a local council is comparing the local council under review to other local councils of a similar size and type (Principle 1). Generally, local councils that have a larger number of voters will have a higher number of councillors. Often large populations are more likely to be diverse, both in the nature and number of their communities of interest and the issues of representation.

However, the VEC also considers the particular circumstances of each local council which could justify fewer or more councillors, such as:

- the nature and complexity of services provided by the Council
- geographic size and topography
- population growth or decline

³ .id is a consulting company specialising in population and demographic analysis and prediction information products in most jurisdictions in Australia and New Zealand.

⁴ Section 5B(1) of the *Local Government Act 1989*.

- the social diversity of the local council.

Deciding the electoral structure

The Act allows for a local council ward structure to be unsubdivided—with all councillors elected ‘at-large’ by all voters—or subdivided into a number of wards.

If the local council is to be subdivided into wards, there are three options available:

1. single-councillor wards
2. multi-councillor wards
3. a combination of single-councillor and multi-councillor wards.

A subdivided electoral structure must have internal ward boundaries that provide for a fair and equitable division of the local council.

The Act allows for wards with different numbers of councillors, as long as the number of voters represented by each councillor is within plus-or-minus 10% of the average number of voters per councillor for that local council (Principle 2). For example, a local council may have one three-councillor ward with 15,000 voters and two single-councillor wards each with 5,000 voters. In this case, the average number of voters per councillor would be 5,000.

Over time, population changes can lead to some wards in subdivided local councils having larger or smaller numbers of voters. As part of the review, the VEC corrects any imbalances and considers likely population changes to ensure ward boundaries provide equitable representation for as long as possible.

In considering which electoral structure is most appropriate, the VEC considers the following matters:

- the VEC’s recommendation at the previous representation review and the reasons for that recommendation
- the longevity of the structure, with the aim of keeping voter numbers per councillor within the 10% tolerance for as long as possible (Principle 2)
- communities of interest, consisting of people who share a range of common concerns, such as geographic, economic or cultural associations (Principle 3)
- the number of candidates in previous elections, as large numbers of candidates can lead to an increase in the number of informal (invalid) votes
- geographic factors, such as size and topography
- clear ward boundaries.

Boroondara City Council representation review

Profile of Boroondara City Council

Boroondara City Council is a densely populated urban council located in Melbourne's inner-east. It is predominantly residential and home to some of Melbourne's oldest and most affluent suburbs. The city contains significant commercial districts, a number of educational, health and recreational facilities and is well-served by public transport.

Boroondara covers 60 square kilometres and includes the suburbs of Ashburton, Balwyn, Balwyn North, Camberwell, Canterbury, Hawthorn, Hawthorn East, Kew, Kew East and parts of Mont Albert, Glen Iris and Surrey Hills. Boroondara City Council identifies 80 Neighbourhood Character Precincts, each with its own character and design guidelines.⁵ There is much interest in retaining the character of established neighbourhoods and the need for appropriate development.⁶ There has been sustained growth in high- and medium-density living, particularly around commercial precincts and in the suburbs of Hawthorn, Kew, Camberwell and Balwyn.⁷

The population of Boroondara is expected to grow at a modest rate of 0.7% annually for the period 2021-2031, from a total population of 167,231 currently to 199,314 by 2031.⁸ This growth is likely to be uneven, however, being greatest in Camberwell and Hawthorn, while remaining relatively stable in Ashburton, Balwyn North, Canterbury, Glen Iris and Kew East.⁹

Boroondara's population profile is similar to other urban councils but with a slightly higher proportion of people in the 15–24 years, 45–64 years and 65+ age groups and a lower proportion of people in the 0–14 years and 25–44 years age groups when compared to Greater Melbourne.¹⁰ These rates vary by suburb; Hawthorn for instance has a far greater number of people aged between 20 and 39 years, whereas Deepdene has an older age profile and Ashburton has more people aged between 0 and 14 years.¹¹

The major industries employing Boroondara residents are professional, scientific and technical services (15%), health care and social assistance (14.2%), education and training (10.5%), and

⁵ See City of Boroondara 'Neighbourhood Character Study', <https://www.boroondara.vic.gov.au/planning-building/planning-controls-and-policies/neighbourhood-character-study>, accessed 30 May 2019.

⁶ City of Boroondara, *Boroondara Housing Strategy*, (Adopted 14 December 2015), Boroondara City Council, 2015. Available at <https://www.boroondara.vic.gov.au/sites/default/files/2017-05/Housing-Strategy.pdf>, accessed 30 May 2019.

⁷ .id, 'City of Boroondara: community profile', .id <https://profile.id.com.au/boroondara>

⁸ Department of Environment, Land, Water and Planning, *Victoria in Future 2016: population and household projections to 2051*. The State of Victoria Department of Environment, Land, Water and Planning, 2016.

⁹ .id, 'City of Boroondara: population forecast', .id <https://forecast.id.com.au/boroondara>

¹⁰ .id, 'City of Boroondara: community profile', .id <https://profile.id.com.au/boroondara>

¹¹ *ibid.*

the retail trade (9.4%).¹² The major businesses located in the area include professional, scientific and technical services, financial and insurance services, rental, hiring and real estate services, health care and social assistance and construction, and to a lesser extent the wholesale and retail trades.¹³ About 30% of all Boroondara residents work in the local area, which is a similar rate to surrounding councils.¹⁴

The City represents a generally affluent and well-educated population, with most indicators, such as median income, mortgage and rental repayments, education attainment and Socio-Economic Indexes for Areas (SEIFA)¹⁵ above the average rates for the state and Greater Melbourne.¹⁶ However, there are some areas in Ashburton, Kew and Hawthorn that perform poorly on some of the above measures, indicating more localised forms of social and economic disadvantage.¹⁷

The proportion of the City's population born overseas is 31%, which is lower than Greater Melbourne. However, in the past 10 years significant growth in the numbers of people born in China, India, Malaysia, Vietnam, Hong Kong and Sri Lanka has occurred, and has been more pronounced in some areas, such as the suburbs of Balwyn, Balwyn North, Camberwell and Kew.¹⁸ At the same time, rapid growth in medium and high-density living has shifted the demographic profile of some areas.

Current electoral structure

Boroondara City Council currently comprises 10 councillors elected from a subdivided electoral structure of 10 single-councillor wards. The electoral structure was last reviewed in 2008. The review recommended no changes to the overall electoral structure and minor adjustments to some ward boundaries.

Visit the VEC website at vec.vic.gov.au to access a copy of the 2008 review final report.

Subdivision review

The VEC was required to conduct a subdivision review of Boroondara City Council prior to the 2016 local government elections in order to restore Glenferrie Ward's enrolment to within the allowable plus-or-minus 10% deviation in time for the election. Visit the VEC website at vec.vic.gov.au to access a copy of the 2015 subdivision review final report.

¹² Australian Bureau of Statistics, *Census of Population and Housing, Australia, 2016*, cat. no. 2001.0, 27 October 2017, www.abs.gov.au, accessed 25 March 2019.

¹³ .id, 'City of Boroondara: economic profile', <https://economy.id.com.au/boroondara>

¹⁴ .id, 'City of Boroondara: community profile', .id <https://profile.id.com.au/boroondara>

¹⁵ Socio-Economic Indexes for Areas (SEIFA) is developed by the Australian Bureau of Statistics (ABS) to rank areas in Australia according to relative socio-economic advantage and disadvantage. The rankings use variables, such as income, education, employment, occupation and housing, derived from Census data to indicate relative socio-economic advantage and disadvantage for particular areas, including Local Government Areas. See: <https://www.abs.gov.au/websitedbs/censushome.nsf/home/seifa>

¹⁶ .id, 'City of Boroondara: community profile', .id <https://profile.id.com.au/boroondara>

¹⁷ Boroondara City Council, *Disadvantage and Social Exclusion in Boroondara*, Boroondara City Council, 2015. Available at www.boroondara.vic.gov.au, accessed 25 March 2019.

¹⁸ .id, 'City of Boroondara: community profile', .id <https://profile.id.com.au/boroondara>

Currently, three of Boroondara City Council's wards (Glenferrie, Junction and Maranoa Wards) have enrolments deviating outside the acceptable tolerance.

Preliminary submissions

At the close of submissions on Wednesday 13 March 2019, the VEC had received 200 submissions for the representation review of Boroondara City Council. This included 66 submissions that were made as form emails through the 'Boroondara Citizens for Better Democracy' website. A list of people who made a preliminary submission can be found in Appendix 1.

Number of councillors

Thirty submissions proposed increasing the number of councillors, twenty-three of these suggested eleven and seven suggested twelve. These submitters generally agreed that increasing councillor numbers would make Boroondara City Council consistent with similar councils and increase the diversity of views and interests represented on the Council. Some of those proposing eleven councillors suggested that an odd number would help prevent tied votes during council decision-making. Many submissions specified the number of councillors by way of expressing their preferred electoral structure.

Eighty submissions proposed keeping the number of councillors at 10. Most preferred 10 councillors to maintain the current electoral structure of 10 single-councillor wards and generally agreed that 10 councillors had served the community well. A large proportion of these submissions were based on one of three templates and argued variously that 10 councillors best met the needs of the community; that there were no forecasts indicating major population growth or increased communities of interest to justify an increase; and that the VEC had in the previous review recommended 10 councillors. In its submission, Boroondara City Council argued that there was no requirement to have a standardised state-wide approach to councillor numbers or for there to be an odd number of councillors, and that the VEC should consider the size of the local council area, particularly in relation to local councils covering a larger geographical area, when recommending the number of councillors. The Council also submitted that the community and all current councillors favoured retaining 10 councillors.

Five submissions proposed different options for reducing the number of councillors to five, eight or nine. Most of these submitters proposed a reduction according to their preferred subdivided electoral structure. Two submissions, including the Proportional Representation Society of Australia (Victoria-Tasmania) Inc. (PRSA), proposed nine councillors so that there would be an equal number of councillors per ward. One suggested reducing the number of councillors to improve accountability and collaboration.

Twenty-one submissions did not comment on the preferred number of councillors.

Electoral structure

The electoral structure was the main contention among preliminary submissions with most submitters arguing either to retain current single-councillor wards or change to a multi-councillor ward electoral structure. A small number (five) submitted in favour of an unsubdivided electoral structure.

Eighty-four preliminary submissions argued to retain single-councillor wards, generally because the current ward structure provides local representation, is consistent with communities of interest, and aligns well with Boroondara's neighbourhoods. Many of these submitters felt that single-councillor wards produce better electoral outcomes and that multi-councillor wards left councillors less accessible and less accountable to voters. Some of these submitters also used personal experiences to illustrate the benefits of being able to access a local councillor.

On the other hand, forty-six preliminary submissions were in favour of moving to multi-councillor wards. Many of these submissions argued that multi-councillor wards would increase the diversity of councillors and the interests they represented and would improve collaboration and facilitate a broader, whole-of-council approach to decision-making. A large number of these submissions, including those submitted as pro forma emails, argued that proportional representation was more democratic, fair and equitable than the preferential vote counting system. Other submissions in support of multi-councillor wards suggested that communities of interest extended beyond the neighbourhood to include work, shopping and entertainment areas, that communities of interest might also be defined according to age and ethnicity for example, and that Boroondara's communities of interest had increased since the last review. Some also felt that very few metropolitan Melbourne councils have single-wards and suggested that the adoption of multi-councillor wards must therefore have merit and that multi-councillor wards produced better electoral outcomes. In addition, a significant number of these submissions did not specify a preferred number of wards but argued that multi-councillor wards generally provide fairer and more equitable representation.

A number of submissions on both sides of the argument between single- and multi-councillor wards were chiefly based on email templates and pro forma submissions that were prepared for the review. The VEC remarked on this in its preliminary report, noting that template submissions tend to be less insightful for representation reviews as they do not necessarily reflect the detail of each submitter's perspective.

The small number of submissions in favour of an unsubdivided electoral structure argued that it would mitigate divisions within the Council, better promote a whole-of-council approach, and would better reflect communities of interest that exist across the local council area.

In response to the significant levels of community support for both single-councillor and multi-councillor wards, the VEC developed three viable options reflective of the arguments and issues raised in preliminary submissions.

Preliminary report

A preliminary report was released on Wednesday 10 April 2019. The VEC considered public submissions and research findings when formulating the options presented in the preliminary report.

The preliminary report pointed out the high level of community interest in the review and noted the organised campaigns run by both sides of the electoral structure debate. The preliminary report also specifically responded to Boroondara City Council's preliminary submission, including the Council's criticism of the 2015 subdivision review.

Number of councillors

When considering the appropriate number of councillors, the VEC assesses population data and other factors which may warrant an increase or decrease in the number of councillors, such as projected population growth or special circumstances relating to distinct communities of interest.

Boroondara City Council has had 10 councillors for over 20 years. The VEC found that because of sustained population growth, a higher voter-to-councillor ratio compared to comparable local councils, and emerging challenges such as planning for and supporting residential and commercial developments within the local council area as well as an increasingly culturally diverse population, the number of councillors should be increased to 11. The issue of an odd number of councillors, which many submissions argued was important to prevent tied votes, was not a major consideration in the VEC's deliberations.

Electoral structure

There was limited support for an unsubdivided electoral structure among submissions and the VEC excluded this as an option in its considerations. Unsubdivided electoral structures are not suited to densely populated residential areas, largely due to the likelihood of longer lists of candidates on ballot papers at election time and complexities with identifying and relating to local councillors within an urban population. The City of Melbourne is the only metropolitan local council with an unsubdivided electoral structure but follows a different electoral model from all other local councils in Victoria.

Most submissions argued for either retaining the current single-councillor model or changing to a multi-councillor ward electoral structure. This was the main point of contention among those who submitted to the review, as was the case at the VEC's last representation review of Boroondara City Council in 2008. Comparing the two reviews, however, the VEC observed that support for

multi-councillor wards had increased since 2008, and compelling arguments were presented through submissions for both of these electoral structures.

The VEC reported that Option A catered for uneven population change more effectively than either of the alternative options and would reduce the risk of future ward boundary changes in between scheduled representation reviews.

Option A responded to arguments for a multi-councillor ward electoral structure and was modelled to capture communities of interest that span larger areas than local neighbourhood precincts, which were the original bases for the current single-councillor wards. The option responded to concerns in submissions about significant minorities of voters who may be unrepresented at elections in single-councillor wards, and the VEC was of the view that multiple and overlapping communities of interest have a better chance of being represented under the four-ward electoral structure.

The VEC determined that Option A largely kept neighbourhoods and geographic communities, including major shopping and commercial areas such as Camberwell Junction, together within the one ward; and with only four internal boundaries, it did not unnecessarily split communities of interest as was more likely under the single-councillor ward option. In many cases, Option A also followed clearer ward boundaries that did not rely as heavily on minor streets or arbitrary divisions.

Option A also offered voters a greater selection of candidates at election time compared with elections under the current single-councillor ward electoral structure.

Option B, on the other hand, balanced the desire for local representation seen through submissions and the support for multi-councillor wards. The VEC considered that Option B provided a low-impact change option for those preferring single-councillor wards. Like Option A, this option would also give voters more choice at election time than the current single-councillor ward electoral structure.

In Option B, key localities and major shopping and commercial districts, except for the Balwyn shopping precinct, are largely contained within their respective wards. The option did not have the potential to split communities of interest to the degree that the single-councillor wards otherwise would. Option B was also better able to accommodate uneven population change and reduce the risk of future ward boundary changes compared with single-councillor wards.

Option C was proposed as an alternative option in response to the support for retaining the current electoral structure. The VEC acknowledged that local neighbourhoods are important communities of interest and that a single-councillor ward structure permits councillors to potentially have stronger local connections.

The increase to 11 councillors, however, required some ward boundary changes to ensure that the option was as sustainable as possible based on population forecasts. That said, like the current 10 single-councillor wards, the wards in Option C would be more susceptible to uneven population change impacting the voter to councillor ratios in between scheduled reviews.

Options

After careful consideration, the VEC put forward the following options:

- Option A (preferred option)
Boroondara City Council consist of eleven councillors elected from four wards (three three-councillor wards and one two-councillor ward).
- Option B (alternative option)
Boroondara City Council consist of eleven councillors elected from five wards (four two-councillor wards and one three-councillor ward).
- Option C (alternative option)
Boroondara City Council consist of eleven councillors elected from eleven single-councillor wards.

Public response

Response submissions

The VEC accepted submissions responding to the preliminary report from Wednesday 10 April 2019 until 5.00 pm on Wednesday 8 May 2019. The VEC received 265 response submissions. This included 58 submissions made as form emails through the 'Boroondara Citizens for Better Democracy' website. A list of people who made a response submission can be found in Appendix 1. Table 1 indicates the level of support for each option.

Table 1: Preferences expressed in response submissions*

Option A	Option B	Option C	Other
154*	7	29	18^

* The total number of submissions includes as **one submission** the 58 submissions made as form emails through the 'Boroondara Citizens for Better Democracy' website. Consistent with the preliminary report, where these submitters did not change the pro forma message substantially, they were considered to form part of the one submission.

^ 'Other' as a category includes: four submissions that preferred either Option A or Option B; eight submissions that did not nominate a preference but argued for multi-councillor wards; four submissions that argued for maintaining the status quo of ten single-councillor wards; and two submissions deemed out of scope.

The VEC notes a significant increase in response submissions supporting either one of the multi-councillor ward structure options, as shown in Table 2 below.

Table 2: Percentage of all preferences expressed in response submissions

Option	Number of submissions	Percentage
A	154*	73.68%
B	7	3.36%
C	29	13.94%
A and/or B	4	2.4%
Multi-councillor	8	3.85%
Status Quo	4	1.92%
Out of scope	2	0.96%

* This number includes as **one submission** the 58 submissions that were made as form emails through the 'Boroondara Citizens for Better Democracy' website.

Almost three quarters of the total number of response submissions supported Option A, although 25 of these did not state a reason why. Together, submissions in support of Options A and B accounted for about 77% of all response submissions. Factoring in those that supported both Option A and Option B in their submission, as well as those arguing for a multi-councillor ward structure without specifying an option, brings the total number of response submissions in

support of a multi-councillor ward structure to approximately 83%¹⁹ of the total. On the other hand, about 14% of response submissions supported Option C, which when combined with those supporting the current structure, brings the rate of support for a single-councillor ward structure to about 16%.

Out of the 208 response submissions, 153 were new submitters who did not provide a preliminary submission. Most response submitters (about 75%) supporting Option A were new submitters and less than half (about 43%) of those providing submissions in support of Option C were also new submitters.

About 20 submissions in support of Option A were primarily concerned with the issue of Council's dealings with the Dorothy Laver Reserve, though some of these provided additional reasons for their preference.

A number of response submitters, including Boroondara City Council, were highly critical of the VEC's preliminary report. Boroondara City Council's response submission stated that the VEC had 'been extremely discourteous' to not include the Council's proposed 10 single-councillor ward structure, which the Council had developed and adjusted to accommodate future population change, as an option in the report. The Council also asserted that the VEC: had largely ignored community opinion; been inconsistent in its approach to the review process; used data selectively; proposed inappropriate electoral structures and ward boundaries; failed to provide evidence for some of its assertions; and proposed electoral structures that would not comply with an anticipated Local Government Bill, specifically the requirement that in a multi-member ward structure, equal numbers of councillors are to represent each ward. A number of other response submissions made similar claims, particularly that the VEC had ignored community support for a 10 single-councillor ward electoral structure.

The VEC responds to these criticisms in this report through the discussion from the public hearing (see page 27) and the 'Findings and recommendation' section from page 28.

Number of councillors

While all options put forward in the preliminary report were electoral structures consisting of 11 councillors, a small number of submissions argued for maintaining the current number of 10 councillors or for increasing the number of councillors to 12.

Those who argued for 10 councillors did so in support of maintaining the current electoral structure, which they believed had and would continue to work well for the Boroondara community.

¹⁹ This percentage includes as **one submission** the 58 pro forma email submissions made via the 'Boroondara Citizens for Better Democracy' website.

The small number of submissions advocating twelve councillors, all of whom supported the four-ward electoral structure, did so in order to achieve an equal number of three councillors to represent each ward. One submitter argued that an equal number of councillors per ward would be fairer for all voters as residents or voters in a two-councillor ward, when all other wards consist of three-councillors, might feel disadvantaged.

There was general agreement among all other submitters that 11 councillors was appropriate for Boroondara City Council. Many of these submitters argued that increasing the number of councillors to 11 was appropriate for the current size of the population, projected changes in population and increasing diversity. Some also suggested that an odd number of councillors was important for reducing the possibility of tied votes during council decision-making and leading to the Mayor having a casting vote.

Of those submissions that supported Option C, and therefore 11 councillors, some did so reluctantly and preferred instead the current structure consisting of 10 councillors. Boroondara City Council's submission was the most critical of the VEC's recommendation to move to an eleven-councillor electoral structure. In its submission, the Council asserted that the VEC was incorrect to identify 'a growing appetite for changing the number of councillors'²⁰ and that the evidence used to support increasing the number of councillors was without foundation. It did not feel that the main arguments presented in the preliminary report, such as population growth and change or increasing diversity, were sufficient to justify the VEC's recommendations on the appropriate number of councillors. The Council's submission also stated that 'on previous occasions the VEC has argued in favour of odd numbers of Councillors, to overcome a perceived problem with the Mayor having a casting vote'. The Council stated that an odd number of councillors was not a requirement of the Act and would not necessarily prevent tied votes.

Electoral structure

The majority of response submissions (from Table 2) indicated support for a multi-councillor ward electoral structure, most of them favouring the four-ward structure proposed in Option A. There were, however, strong arguments presented for all options put forward in the preliminary report.

Support for Option A

Many submitters felt that Option A more effectively accommodated population change and reduced the chance of future ward boundary adjustments. These adjustments, some submitters argued, would create uncertainty for voters and potentially disrupt some areas due to the possibility that voters would be moved into a different ward in the event of a subdivision review. Other submitters suggested that because most other metropolitan local councils had

²⁰ It should be noted that Boroondara City Council's submission did not include the full quote from the VEC's preliminary report in its submission: 'Nonetheless, and particularly compared with the VEC's last representation review of Boroondara City Council in 2008, there is also a growing appetite among the local community for changing the number of councillors and/or the electoral structure.'

multi-member wards, Option A would make Boroondara City Council consistent with these other councils, while a few felt that the same electoral structure must have merit if it had been so widely adopted across metropolitan Melbourne.

A large number of submissions suggested that the ward boundaries in Option A corresponded with communities of interest, and in most cases the use of major roads as boundaries were clear and recognisable. A few suggested that the boundaries worked well by keeping the major shopping and commercial precincts within their respective wards, particularly the Balwyn shopping precinct, which was divided in the other options. Two submitters proposed minor adjustments to the ward boundary separating the proposed Belmore and Ferndale wards, which both felt would make the boundary more identifiable and effective.

The most prominent view presented in response submissions in support of Option A, including the 58 pro forma email submissions, was that it would encourage greater diversity among councillors and would allow for a more diverse Council to be elected than what was currently the case or possible in single-member wards. Many also believed that Boroondara City Council had changed significantly in recent times, particularly in relation to increasing social and cultural diversity, and that this prompted the need to change the electoral structure.

Many submissions in support of Option A argued that proportional representation was more appropriate given the changing demography of Boroondara City Council and would provide a more diverse selection of candidates and elected councillors. Most of these submitters felt that the opportunity to elect multiple councillors through proportional vote counting would provide individuals and groups currently under-represented a better chance at being elected or having appropriate representation. For many of these submitters, the current electoral structure and its associated counting system left significant minorities without adequate representation. A small number of submissions contended that councillors elected on a simple majority could not represent the diverse views and interests of a ward or the local council area more broadly. Multi-councillor wards, they argued, would be more equitable as it would enable multiple groups and interests to be represented within the one ward.

Some submitters, including those provided as a form email, suggested that Option A better represented communities of interest. This was mainly because they believed communities of interest existed beyond where one lived, or the smaller areas proposed in the single-councillor option. These submitters argued that communities of interest included, for example, where people worked, where their children went to school, and where they shopped and socialised. Others suggested that non-geographic communities of interest also existed, relating to age, cultural and social backgrounds, and to community-wide concerns, such as resident, community and special interest groups. As such, many submitters felt that the larger wards in Option A better provided for multiple, overlapping and broad-based communities of interest to be

effectively represented than would be the case in either of the other options. Furthermore, it was felt by some that under Option A communities of interest would be less likely to be divided.

On a related note, many submitters felt that the larger, multi-councillor wards in Option A would better enable councillors to address issues spanning larger areas, as well as council-wide issues. Some of these submissions felt that the smaller, single-councillor wards supported a parochial, inward looking and protective approach to issues, and that this was to the detriment of fair and equitable representation across all areas of the local council area. A few submitters commented that Option A would encourage councillors to view local issues from a broader perspective and to take a more critical view during council decision-making.

A large number of submitters felt that multi-councillor wards would provide residents with more options for who to contact on a particular issue and to ensure representation in cases where their local representative was absent from debate or voting. Some of these submitters were concerned that under a single-councillor electoral structure they would be left unrepresented if a local Councillor was removed from the Council decision-making process due to a conflict of interest. While about 20 submissions focused on the Council's recent decision in respect to Dorothy Laver Reserve to make this point, a significant number of other submissions supporting Option A raised the same issue of fair and equitable representation more broadly. These submitters also suggested that having the option of contacting multiple councillors would resolve any perceived bias in what issues councillors take to the Council.

Many supporters of Option A felt that multi-councillor wards would encourage councillors to work together more effectively and share workloads, generating better solutions to issues facing a particular ward or Boroondara City Council as a whole.

Many of the submitters in support of Option A raised concerns about the Council's active involvement in promoting single-councillor wards during this review. These submitters did not feel it was appropriate for the Council to promote a particular electoral structure, but rather saw the Council's role as one of encouraging and responding to community input and concerns on the issue and representing multiple views.

Support for Option B

While support for Option B was lower than support for Option A, submitters preferring Option B addressed important points relating to fair and equitable representation. Most were of the view that having multiple councillors provided voters with more options, which would be particularly important for representation when a councillor was absent for any reason. One submitter felt that having two councillors would allow residents to contact the councillor they felt most at ease with and would provide a better chance that multiple viewpoints would be represented.

Some submissions argued that an increase to at least two councillors per ward would improve the diversity of councillors. Others suggested that Option B would enable councillors to share workloads, cooperate to develop solutions to issues and provide a more collegiate approach to issues than they felt was the case in single-councillor wards.

Supporters also preferred Option B over Option A due to the size of the wards, arguing that the smaller wards in Option B would be more able to provide local representation, and that overall Option B was an effective compromise between the local, small-area representation of Option C and the larger, more expansive view of communities of interest in Option A. One submitter who argued along these lines felt that Option B better captured communities of interest as it was more focused on including suburbs. Another submitter felt that Option B would encourage councillors to feel more responsible for a larger part of the local council area and more effectively represent council-wide issues.

Support for Option C

A large number of submissions supporting Option C did so reluctantly and because it was the closest option to the current arrangement. Some suggested that the changes proposed in Option A and Option B were solely for the sake of change and that there was no good reason presented in the preliminary report for the VEC's recommendations.

Most of the submissions in support of Option C (as well as those advocating 'no change') felt that the present structure had worked well and would continue to do so into the future. This view was largely argued on the benefits of local representation and the geographic communities of interest represented by single-councillor wards. It was suggested by most submitters in support of Option C that councillors were more likely to live locally and therefore have a good understanding of the local area and its issues, and were more accessible and accountable to voters within their ward. Many, including Boroondara City Council, also argued that having one local and identifiable councillor to contact was better than having multiple councillors.

Many argued that both Option A and Option B would be confusing for residents, would reduce the accountability of councillors and would limit the accessibility of councillors. Some submissions pointed out that residents currently have easy access to their local representative and are able to approach them while out and about in the community. These views were also presented by the Council in its submission, adding that Option C better represents communities of interest and that 'Councillors act for a diverse range of voices across the community and are more accountable' in the single-councillor ward option.

Many submitters felt that single-councillor wards better reflected the distinctiveness of different neighbourhoods and the elements that made local communities diverse. Councillor Coral Ross contended that Boroondara City Council is already diverse, particularly in relation to the gender mix of councillors, which currently consists of five women and five men, in addition to half the

councillors being born overseas and being the only local council in Victoria to have a blind councillor. Councillor Ross also asserted that the size of the wards proposed in Option A and Option B, the increased costs of election campaigning and political involvement would adversely affect women's participation in local council elections. Councillor Ross asked the VEC to consider whether the trend towards multi-councillor wards more broadly would result in lower numbers of women participating in elections and being elected across Victoria.

Many supporters of Option C contended that the VEC had not adequately or fairly considered the weight of preliminary submissions advocating a 'no change' argument. This was particularly the case in the Council's submission, which also criticised the VEC's approach and principles, and suggested that the VEC, in developing its recommendations, had a pre-determined outcome. Boroondara City Council also questioned why the VEC had not considered the City's community satisfaction survey²¹ results, which the Council argued reflected high levels of community satisfaction. Both the Council's submission and Councillor Ross questioned why the VEC proposed structures in Option A and Option B that would not comply with the requirement of the anticipated Local Government Bill to have an equal number of councillors representing each ward in any subdivided electoral structure.

A strong view was put forward in submissions that multi-councillor wards would encourage political affiliations and partisan involvement in elections, going against the expectations that local residents have of their elected councillors. Numerous submitters did not believe that the application of proportional representation, as would be the case in both Option A and Option B, to be beneficial to voters. According to some submissions, including that of Boroondara City Council, this was because preferential voting was used at both State and Federal jurisdictions and there was no reason local government should be any different. Furthermore, two submitters felt that proportional voting could result in the election of candidates with little support, whereas another submission suggested that preferential voting provides a result more acceptable to voters.

Some submitters felt the structure and size of the wards proposed in the multi-councillor ward options, especially Option A, were problematic. These submissions argued variously that part of the larger wards could be unrepresented if all councillors came from the same part of the ward and that campaign costs and councillor workloads would increase. Other submissions argued that multi-councillor wards could result in the duplication of councillor workloads and that the sharing of workloads would be difficult to achieve equitably.

Other submissions felt that the resemblance of Option A to the pre-amalgamation councils—the former Cities of Hawthorn, Kew and Camberwell—was problematic. Boroondara City Council

²¹ Results of the Council's community satisfaction survey for 2018 can be found at:
<https://www.boroondara.vic.gov.au/about-council/have-your-say/community-satisfaction-survey>

argued that re-instating the old boundaries went against the work done to present Boroondara as one community, whereas Councillor Ross argued that the wards in Option A allocated a disproportionately high number of councillors to the former City of Camberwell at six councillors, while the former Cities of Hawthorn and Kew would be allocated three and two councillors, respectively.

Concerns were raised by a few submitters that all options, in particular Option A and Option B, divided communities of interest or made them less clear. Boroondara City Council and Councillor Ross argued that containing the major commercial centres of Glenferrie Road and Camberwell Junction in the one ward as in Option A was problematic as they have different interests; both submissions noted that the proposed Gardiner Ward combines the suburbs of Hawthorn East and Ashburton, which have different interests; and, according to Councillor Ross, Option B and Option C divide important school catchment areas. The Council argued that in Option B, communities of interest are not clearly captured within wards, providing the example of part of Deepdene being in Maling Ward. The Council raised concerns about unclear ward boundaries as well, such as the minor roads demarcating the proposed Belmore and Ferndale Wards in Option A and those dividing the proposed Swinburne and Ferndale Wards in Option B. They also suggested that major arterial roads, such as High Street, Barkers Road and others are compromised by some of the ward boundaries in Option C, which was criticised for relying too heavily on minor roads as ward boundaries.

Finally, both the Council's and Councillor Ross' submissions questioned why the VEC would put forward Option C when Belmore Ward had a current deviation of +9.7%, close to the accepted plus-or-minus 10% deviation.

Ward boundary adjustment

Two submissions, both of which supported Option A, contended that the boundary separating the Belmore and Ferndale Ward in this option was inappropriate. One of these suggested that the better ward boundary would be Riversdale Road. The other argued that the ward boundary, which used minor roads resembling a 'dog leg' at its eastern point would be improved if the boundary was adjusted to run along Prospect Hill Road as proposed, then north along Highfield Road and finally east along Canterbury Road to the local council's eastern border. Boroondara City Council also referred to this issue with the proposed ward boundary, noting the boundary was not ideal when compared to using either Canterbury Road or Riversdale Road. All proposed adjustments were modelled, but only the suggestion that maintained Prospect Hill Road and used Highfield and Canterbury Roads instead of the minor roads as boundaries maintained a viable voter-to-councillor ratio.

Public hearings

The VEC conducted two public hearings for those wishing to speak about their response submission at 6.30 pm on Tuesday 14 May 2019 and 3.00 pm on Thursday 15 May 2019. Both public hearings were held in the Zelman Room at the Hawthorn Arts Centre, 360 Burwood Road, Hawthorn.

A list of the 19 people who spoke at the hearings can be found in Appendix 1.

Most speakers—12 out of 19—spoke in favour of Option A. One speaker spoke in support of Option B and six spoke in support of Option C and/or for retaining the current structure of ten single-councillor wards.

Diversity

A principal concern for speakers, particularly those in favour of either of the multi-councillor wards, related to the diversity of councillors and the diversity of views represented on the Council. Many submitters spoke in favour of Option A as a means to improve the diversity of candidates and elected councillors, particularly in relation to age, cultural and political diversity. Harry Hook, for example, presented the view that Option A would promote diversity on the Council and provide large minority groups with a better chance of being elected and/or represented. Bob Stensholt, in support of Option B, felt that multi-councillor wards would provide more chance that a mix of views would be represented. Similar arguments put forward by speakers in support of Option A included: the need for a plurality of views to be represented on the Council to better reflect the diversity of Boroondara's communities and cater for recent demographic and social changes; increased diversity to better inform the Council's decision-making; and increased diversity of councillors to ensure a variety of political views were represented.

William Chandler, supporting Option A, suggested that there is significant diversity in the community and felt that such diversity was best served by providing voters with the option of contacting more than one councillor, thus providing more opportunities for voters to engage with councillors in their own way.

Boroondara City Council, represented at the public hearing by the Mayor, Councillor Jane Addis, stated that single-councillor wards better reflected the diversity of the Boroondara community and that diverse political views were already represented on the Council. Councillor Ross argued that councillors were already diverse and were possibly more diverse than other local councils in relation to gender, heritage and disability. Councillor Cynthia Watson reiterated these points, suggesting as well that the professional and educational backgrounds of current councillors were likewise diverse. In contrast, a speaker in support of Option A suggested that given the level of community support for multi-councillor wards a more representative Council would not have

unanimously supported the single-councillor ward structure, and this they argued indicated that change was necessary.

Councillor Ross argued against the notion that multi-councillor wards increase diversity, stating instead that due to the size of the wards, the associated costs of campaigning and the tendency towards partisan political involvement, multi-councillor wards would possibly reduce or limit the participation of women in local government. Councillor Ross stated that there is evidence to support her argument that when multi-councillor ward structures are introduced the number of women elected as councillors decreases.

One speaker in favour of Option A argued that there was little incentive to run against some of the councillors under the current single-ward arrangement as they were well-established among their electorates and that this prevented a more diverse selection of candidates standing for election.

Communities of interest

Speakers in favour of Option C argued that the smaller, single-councillor wards better represented Boroondara's communities of interest. These submitters emphasised local neighbourhoods and local representation as critical features of the single-councillor ward structure. Most speakers in support of Option C suggested that the elected councillors in single-councillor wards were more likely to know their local area and be more attuned to local issues, which enhanced local representation. Some of these speakers also argued that the current system of single-councillor wards is understood by residents, that residents know their local representatives and do not desire change. Jane Nathan, for example, suggested that residents want councillors that belong to and have grown with their community.

Mr Stensholt stated that he supported Option B because it balanced the benefits of local representation, proportional representation and the opportunity for residents to connect with more than one councillor. Other speakers also suggested that proportional representation was the most effective system to ensure that multiple communities of interest were represented.

Speakers supporting Option A tended to present communities of interest in more varied ways, arguing that geographic communities of interest were only one type of interest that needed representation on the Council. For example, some speakers suggested that age cohorts, such as younger people, were an important but under-represented community of interest, while others pointed out shared interests that existed across geographic areas, such as concerns about the environment, cycling and public transport. Harry Hook outlined his experience of schooling, shopping and getting about more generally to suggest that he identified with the area of the ward he would reside in under Option A and that others in this ward would also find it familiar. Dr Ken Coghill stated that communities of interest are not static, can vary over time and have a wider

meaning than just locality. This dynamism, Dr Coghill argued, demanded a more dynamic local council, which would be enabled under a multi-councillor ward electoral structure.

Some of the speakers supporting Option A suggested that there were larger issues beyond the small geographic focus of the single-councillor wards. They argued that multi-councillor wards would be better equipped to address these broader issues. A few speakers also suggested that the larger wards would better represent interests that cannot be contained in single-councillor wards.

The size of the wards in Option A were problematic for many supporters of Option C. According to Councillor Addis, it is possible that in the larger wards of Option A all of the elected councillors might come from the one area and thus leave a significant portion of the ward without a local representative. Councillor Addis felt that this outcome could limit residents' access to councillors and stated that in larger, multi-councillor wards her role as a councillor would not be as effective. Councillor Ross felt that it would be difficult for councillors to represent a ward the size of a state parliamentary seat, and that such an expectation would lead to career politicians nominating for elections.

Responding to the claim that multi-councillor wards would increase councillor workloads, some speakers in favour of Option A suggested that this would not necessarily be the case, arguing instead that councillors could share workloads and cooperate on particular issues. Ken Eley felt that Option A would challenge the singular focus of councillors in single-councillor wards and lead to greater levels of cooperation. Helen Tsoutsouvas felt that with more than one councillor per ward, communication and engagement with residents would be improved.

A number of speakers argued that Option A accurately reflected communities of interest and felt that it would unite them. This was not the view of Councillor Ross, who spoke about the division of communities of interest and school catchment areas in Option C (due to the addition of another ward and councillor and adjusted ward boundaries); the bringing together of very different communities in Option B, namely the suburbs of Hawthorn East and Ashburton; and that having two major shopping precincts—Glenferrie Road and Camberwell Junction—with differing interests in the same ward under Option A would pose major problems.

When some of the speakers were asked why they thought support for multi-councillor wards had increased since the last review, those in support of Option A or Option B responded that Boroondara City Council had changed and grown more diverse, with one suggesting that there were more interest groups active in the area. This, they argued, required more diversity within the local council. In contrast, Councillor Watson responded to the same question suggesting that support for multi-councillor wards was due to specific issues, and emanated from residents who were unhappy with a particular council decision.

Many of the speakers in favour of Option A argued that a lack of representation could result from single-councillor wards when the elected representative was absent from council debate and decision-making. As Catherine Diggins contended, this was particularly the case in relation to the Council's decision regarding Dorothy Laver Reserve, which because of a conflict of interest the local councillor was unable to participate in the proceedings. Some argued that this left a section of the community opposed to the Council's final decision without representation and a say in the matter. Others suggested that having only one local representative meant that if they did not share the same views as the community on a particular issue, the community's concerns would not be represented in a single-councillor ward structure.

However, Councillors Addis, Ross and Watson, speaking in support of Option C, each responded to these concerns by stating that residents could approach councillors outside of their own wards in order to have a particular issue addressed. This was also the experience of Mary Drost, who felt able to contact all 10 councillors if necessary. The Boroondara councillors also each argued that all councillors were properly informed of developments across the local council area and that in fact it was a requirement that councillors represent the whole local council and not just their ward. Councillor Addis and Councillor Ross suggested that this was enabled through strategic planning. Furthermore, Councillor Ross argued that even if a councillor did not agree with a resident or group on a particular issue, it was the councillor's responsibility to represent their concerns regardless, and categorically denied that she would ever do otherwise.

Democratic principles

Councillor Addis outlined key democratic principles, such as the representation of diversity and accessible and accountable elected representatives, to show how single-councillor wards uphold these principles while multi-councillor wards fail them.

Some of the speakers in support of Option A suggested that democratic principles relating to open and transparent debate had been eroded at Boroondara City Council, noting that opportunities for residents to speak to council affairs and at council meetings had declined. According to some submitters, this was why they supported changing to a multi-councillor ward electoral structure. Ian Hundley in particular felt that open dialogue and accountability, both integral to democracy, had declined. He made these claims with particular reference to Boroondara City Council meetings and question time, pointing out that the Council does not live-stream or record council meetings, and felt that Option A would improve accountability and foster a more open and accessible local council.

Geoffrey Goode of the PRSA outlined the number of effective votes²² that each option represented: Option A provided effective votes to 73.5% of voters, Option B 63% and Option C

²² An effective vote is defined by the PRSA as a vote that has a direct effect on the election of a candidate. For more information see: <http://www.prsa.org.au/>

57%. On the basis of these figures he argued that Option A was more democratic and out of all the proposed options was the most likely to provide fair and equitable representation.

Most speakers, regardless of the option they preferred, were concerned about political affiliations and partisan political involvement in local council elections. Andrew Simpson, speaking in favour of Option A, wanted politics removed from the Council altogether and felt it should play no role in the service-provision by local government. Others argued that politics was inevitable in local government and where policy decisions had to be made.

Proponents of Option C argued that multi-councillor wards would increase political involvement due to the size of multi-member wards and the associated costs of campaigning, whereas speakers in favour of Option A argued that particular political affiliations were already present on the Council and among councillors. Some suggested that this left members of the community with different political views unrepresented. One of the Boroondara councillors suggested that a number of the submissions and speakers in support of Option A or Option B had their own political motivations.

VEC principles and processes

Many speakers, particularly those speaking in favour of Option C, criticised the VEC on a number of accounts. Michael Doyle asserted that the preliminary report contained numerous misleading and incorrect statements and failed to take an objective approach.

Councillor Addis questioned the integrity of the VEC's processes for not considering more objective measures, such as the community satisfaction survey, and relying too heavily on public submissions. The VEC, Councillor Addis argued, had not heard from the 'silent majority' or considered what she felt to be more 'reliable' sources of community sentiment. Councillor Addis and Councillor Watson argued that Boroondara City Council's consistently positive results in the community satisfaction survey was indicative of the community's general satisfaction with single-councillor wards. Ken Eley, on the other hand, disagreed with this assertion, and noted the community satisfaction survey as more reflective of local government services, which he felt the Council delivered very well and was not related to electoral representation.

The three Boroondara councillors who spoke at the public hearing also each suggested that the anticipated Local Government Bill 2018 (as it was introduced to the previous Parliament), would not allow for an unequal number of councillors per ward. They questioned why the VEC would recommend two options that would not comply with the new law if it was passed. On this point, it was explained by the VEC at the public hearing that the *Local Government Act 1989* as written must be the authority under which the VEC conducts these representation reviews. The shape of any changes to the *Local Government Act 1989* is a matter for Parliament and cannot be anticipated.

Findings and recommendation

The VEC's findings

The VEC acknowledges the high level of interest in the Boroondara City Council representation review from across the local community, as well as the meaningful contributions to the review from residents, community groups and Boroondara City Council itself.

During the course of the review, however, there were also a number of criticisms directed towards the review processes and the VEC's principles. The VEC refutes any suggestion that it commenced the review with a pre-determined outcome, that community opinions were ignored, and that information was used selectively to develop the options in the preliminary report and recommendation in this report. The VEC takes an independent and impartial approach to all of its functions, and the integrity of all electoral processes—including these reviews—is fundamental to ensuring and protecting the trust that Victorians rightly deserve and expect in their statutory electoral authority.

The Act establishes a strict procedure for representation reviews, which the VEC applies consistently in its reviews of local councils across Victoria. In addition to legislated parameters that prescribe what the VEC can and cannot consider as part of each review, the key principles used by the VEC are shaped from best practice and the approaches used to review state and federal electoral boundaries across Australia. An important element of the review process is the opportunity for the public to contribute and for communities to have their say on the future of their local council's electoral structure. In considering submissions, the VEC carefully looks at the merits of each of the arguments put forward and, while submitters will not always agree with one another, it is the merits of those arguments rather than just weight of numbers that prompt further scrutiny and inquiry in the course of a review. For this review, the VEC received and processed over 450 submissions, and each submission was carefully assessed and considered.

During the VEC's analysis of submissions, however, it was clear that several factors influenced the community's participation in this review. As this report has already discussed, the main contention in the review was whether or not Boroondara City Council should remain with single-councillor wards or change to a multi-councillor ward electoral structure. There were organised campaigns on both sides that championed their cause and, admittedly, may have generated interest and participation in the review, but also distorted the opportunity for those people to contribute their own genuine perspectives to the arguments. In addition, there were submitters to both stages of this review and at the public hearing who refused to accept or acknowledge different perspectives and others who chose to challenge the process instead of contributing to the actual questions that are before the VEC for this review.

Nonetheless, through an analysis of the arguments presented in preliminary submissions as well as its own research, the VEC found compelling evidence that a multi-councillor ward structure would provide fair and equitable representation for the voters of Boroondara City Council. The VEC put forward two multi-councillor ward options in its preliminary report for further consultation. In addition, an assessment of the community's sentiment and the arguments in favour of retaining single-councillor wards also prompted a third option comprising single-councillor wards. All three options put forward in the preliminary report were viable and in different ways were considered to provide fair and equitable representation. As with all representation reviews, the preliminary options were provided for public submissions as a further opportunity for the VEC to collect and consider arguments in respect to each of the options before making its final recommendation.

In its submissions and its presentation at the public hearing, Boroondara City Council directed the VEC to the community satisfaction survey as a reliable and objective gauge of community opinion. Boroondara City Council should rightly celebrate its results on many of the survey's measures, however, the VEC notes that the community satisfaction survey is not necessarily a reliable measure for determining the performance of a local council's electoral structure. The survey largely reflects community sentiment around operational delivery by local councils and the consumption of council services; it does not go to the question of ensuring fair and equitable representation for voters.

The VEC consults publicly available data and evidence when developing its options and presents the information in an open and transparent way. All relevant evidence was referenced in the preliminary report and in no way did the VEC use data 'selectively' or fail to qualify its findings. Instead, and perhaps inadvertently, Boroondara City Council's response submission incompletely quoted the VEC's observation about the growing appetite (among preliminary submissions) for changing the electoral structure of the local council.

The VEC was also criticised for not including a 10 single-councillor ward electoral structure among its options in the preliminary report. The VEC modelled Boroondara City Council's proposal using projected enrolments to 2028, which would be the last election before the next scheduled review. According to the projected figures, this model would not satisfy the accepted plus-or-minus 10% deviation in the proposed Junction Ward. While the use of minor roads as ward boundaries was difficult to avoid, many boundaries in the Council's proposal were not based on best practice boundaries. Moreover, an analysis of all the preliminary submissions and the VEC's own research determined that 11 councillors was appropriate for Boroondara City Council, making further consideration of a 10-councillor ward structure inappropriate.

The Council was critical of the VEC for proposing two electoral structure options that would not satisfy an anticipated Local Government Bill. Boroondara City Council is correct in stating that

the Bill as it stood in 2018 included the requirement that in any subdivided council there must be an equal number of councillors per ward. However, this Bill was introduced to the Victorian Parliament in May 2018 and lapsed at the dissolution of the Parliament for the 2018 State election. As stated, the *Local Government Act 1989* continues to form the legal framework for the constitution, role and governance of Victorian local councils, as well as the responsibilities of the VEC for these reviews. There were arguments during this review that the law, as it stands, allows a broader range of electoral structures and that councillor numbers can range from five to 12. Similarly, the VEC would be open to justified criticism if it ignored the law as it stands and pre-empted the Parliamentary process.

Number of councillors

The three options in the VEC's preliminary report for this review only included models comprising 11 councillors. While several submitters to the review and speakers at the public hearing preferred having an odd number of councillors to prevent tied votes during council decision making, this was not a material consideration of the VEC. Instead, the VEC considered a range of factors, including the arguments in preliminary submissions, demographic data, population projections and information about communities of interest. Instead, the main factors considered by the VEC in recommending the increase in the number of councillors were:

- sustained population growth in Boroondara over the past two decades
- a relatively high voter-to-councillor ratio
- comparisons with similar metropolitan Melbourne councils
- social and demographic change, including increasing diversity and communities of interest
- planning pressures, such as those relating to the development and growth of medium and high-density living
- social disadvantage in some areas of the Council.

Electoral structure

The electoral structure attracted the most significant interest from submitters and it was also the most contentious issue to be considered in this review.

In its preliminary report, the VEC observed increasing support in submissions for Boroondara City Council to change to a multi-councillor ward electoral structure when compared to the last review. In preliminary submissions, support for a multi-councillor ward structure accounted for 36% of all submissions (which included as one submission the 66 pro forma email submissions). In response submissions this support had swelled to 83% of all submissions (again, including as one submission the pro forma emails, which numbered 58). Almost three-quarters of all response

submissions favoured Option A. There was much less support for a single-councillor ward electoral structure, with support for Option C accounting for about 14% of all response submissions and minimal support for maintaining the status quo.

However, the VEC's recommended electoral structure is not solely determined by public submissions and the proportion of support presented for any particular option. While submissions do indicate a level of community support for the different options, each of the options is analysed, tested at the public hearing, and considered alongside the VEC's representation review principles and research.

Option A: Four-ward electoral structure

The VEC's recommended electoral structure comprises four multi-councillor wards, three three-councillor wards and one two-councillor ward. This was the VEC's preferred option in the preliminary report and received the most support in response submissions. Minor ward boundary adjustments have been made to the original electoral structure proposed as Option A and these affect the boundary separating Belmore and Ferndale wards (see below). These adjustments were made in response to feedback from submissions, providing a more recognisable boundary.

Option A (with minor adjustments) most effectively accommodates current and projected population changes. There is minimal risk that ward boundaries will need to be adjusted before the next scheduled representation review. This creates more certainty for voters in that they can be confident of remaining in the same ward until at least the next scheduled review. This option also provides clear and identifiable ward boundaries that most residents and voters will be familiar with, and which have been improved through minor adjustments.

Key commercial precincts and shopping districts are not divided in this model as is the case in Option B and Option C. This was a key consideration of submitters, including Boroondara City Council. While some of the wards bring together suburbs that have distinct characters, the VEC does not consider this to be a major issue, as the distinct communities within will be capable of electing suitable, representative candidates for the multi-councillor wards.

Option A represents a broader conception of communities of interest and does not divide communities to the same degree as either Option B or Option C. Many submitters suggested that their communities of interest extended beyond where they live to also include where they work, where they are educated or send their children to school and where they shop and socialise. Communities of interest also include groups with common interests, various age cohorts and different cultural communities. The larger wards in Option A better cater for communities that extend over larger areas or the entire local council area, and there is a greater chance that multiple communities of interest within a ward will be represented.

There is also a greater possibility that the larger wards will bring to councillors' attention broader issues affecting the Council and its residents, and through the sharing of workloads and cooperation will better enable councillors to develop solutions collectively. The VEC acknowledges that this outcome is not necessarily dependent on the electoral structure of a council but relies on the cooperation of councillors. The multi-councillor wards in Option A would certainly require councillors to work together on issues raised in their ward. This could, in turn, enhance the ability of the Council to represent council-wide matters and/or issues spanning multiple wards.

The VEC considers that the larger wards will provide for more varied views and interests to be represented in the one ward and that this will likely improve the representation of non-geographical communities of interest. Through proportional representation, Option A provides a better chance that a more diverse selection of candidates will stand for election and that significant minorities will have a greater opportunity of being elected and represented. This was the principal concern of many submitters and the VEC determines that Option A would allow for Boroondara City Council's increasingly diverse community to have a greater chance at being represented on the Council than under the alternative options.

The VEC found that the similarities between Option A and the former Cities of Kew, Hawthorn and Camberwell, while raised as an issue by a number of submitters including Boroondara City Council, would not affect fair and equitable representation. Indeed, there are important differences between the proposed wards in Option A and the former city boundaries that were in place more than 25 years ago.

Minor boundary adjustments

The VEC proposes a slight change to the boundary separating the eastern wards of Ferndale and Belmore. This is in response to submissions, including concerns raised by Boroondara City Council about the ward boundary included in the preliminary report. The only viable suggestion is to use Prospect Hill Road as proposed, however instead of running along Middlesex, Kent and Union Roads and Bona Vista Avenue, the VEC has moved the boundary north along Highfield Road and then east along Canterbury Road to the Council's eastern edge. This adjustment provides a clearer boundary that residents are more likely to be familiar with.

The change affects about 1,200 voters and improves the wards' voter-to-councillor ratio. It is not considered a major change as communities of interest would not be affected. Although such an adjustment would divide the suburb of Surrey Hills, which for one submitter supporting Option A was not a favoured outcome, the suburb is already divided between Boroondara and Whitehorse City Councils and is divided in all the options put forward in the preliminary report.

Option B: Five-ward electoral structure

Option B—four two-councillor wards and one three-councillor ward—balances the views of those advocating for local representation through single-councillor wards and those in support of multi-councillor wards.

Local representation was an important factor considered throughout the process. While the concept of small-area wards based around neighbourhoods is not as pronounced in Option B as it is in Option C, the wards are smaller than those in Option A and therefore retain an element of local representation, which was an important factor for many of those in support of single-councillor wards.

Option B does, however, split some important communities of interest, including the Balwyn shopping precinct. It also employs minor roads as boundaries separating the proposed Swinburne and Ferndale Wards and the Swinburne and Maling Wards. These boundaries could potentially confuse voters. Nonetheless, the option presents far less likelihood that ward boundary changes would be needed when compared to Option C.

The multi-councillor wards also support proportional representation and thus increase the likelihood that significant minorities will be represented. Importantly, Option B would provide voters in each of the wards with more options. It is likely that voters would have more choice of candidates at election time and be able to choose between two or three councillors when seeking to have an issue addressed.

On balance however, the VEC found that Option B provides less scope for diverse representation than Option A and it received minimal support in response submissions.

Option C: single-councillor ward structure

Option C was proposed as an alternative option in response to strong community sentiment for retaining a single-councillor ward electoral structure. It largely maintains the current structure, with only slight changes to the present boundaries to accommodate the additional ward. As such, most wards in this option retain their character, though in all wards small sections have shifted to neighbouring wards to meet the accepted plus-or-minus 10% deviation. However, some submitters felt that the changes made to include an additional ward would divide communities of interest, particularly associated with school catchment areas.

While there is some confidence that the ward boundaries would be sustained in the short- to mid-term, it is likely that ward boundary changes would be needed beyond this timeframe. As detailed in the preliminary report, population change in a densely populated urban council, particularly where it is likely to be uneven, is hard to predict with precision and it is likely that some of the single-councillor wards will grow at a rate beyond the accepted deviation of plus

10%. Such changes potentially undermine the integrity of the communities that the boundaries were initially established to contain.

Nonetheless, the single-councillor wards in Option C provide a good chance for candidates who live locally in their ward and have a good understanding of local issues to be elected.

Single-councillor wards could also enhance accountability and access to councillors. However, this must be balanced with the contrary view presented by many submitters, that single-councillor wards provide residents with less access to councillors and the Council, and in cases where a councillor is absent, a ward is left unrepresented by their elected councillor.

In Option C, residents do have the option of contacting or connecting with a councillor elected from another ward, but not all residents feel confident in doing this. There is some chance of duplication if residents are required to contact a councillor from outside of their ward.

Many felt that the single-councillor ward structure best represented the diversity of different neighbourhoods and communities. While Boroondara City Council argued that councillors in the current single-councillor structure are suitably diverse, and that a change to a multi-councillor ward structure would disadvantage women from standing for election and/or being elected, the VEC did not find sufficient evidence to support this. This latter claim was made on account of the size of wards, the associated costs of campaigning across larger wards and the politicisation of the election process, as factors that act as barriers to women's participation in local government. While the claim that larger wards act to prevent women from participating may have merit, it requires much more research and a full investigation into election participation rates and results for all Victorian councils over an extended period of time which is not possible through this review.

On balance, the VEC found that while Boroondara City Council has operated successfully under single-councillor wards for more than 20 years, Option C presented ongoing challenges with the growing and changing population, and the VEC found insufficient evidence to back submitters' claims in their arguments supporting this option.

Ward names

The VEC acknowledges that there is interest within Boroondara City Council for ward names that reflect the City's geography and history, such as ward names that recognise the Aboriginal and Torres Strait Islander culture and heritage of the City. Differing views on final ward names were expressed through submissions, with no clear consensus of opinion. Accordingly, the VEC has not changed the names in the recommended option since it was presented in the preliminary report. Should the community prefer alternative names to those provided, the Act provides for ward names to be altered by an Order in Council.

Summary

The VEC has determined that Option A offers the most appropriate electoral structure for fair and equitable representation for the voters of Boroondara City Council. It makes this recommendation in light of significant community support for a multi-councillor electoral structure, the need to represent communities of interest beyond the neighbourhood and the expressed need for a more diverse selection of candidates at election time.

The VEC's recommendation

The Victorian Electoral Commission recommends that Boroondara City Council consist of eleven councillors elected from four wards (three three-councillor wards and one two-councillor ward).

This recommendation is submitted to the Minister for Local Government as required by the *Local Government Act 1989*. The model was designated as Option A in the VEC's preliminary report for this review but includes a minor adjustment to the boundary between Ferndale Ward and Belmore Ward.

Please see Appendix 2 for a detailed map of this recommended structure.

Appendix 1: Public involvement

Preliminary submissions

Preliminary submissions were received from:

Adams, Roger	Cooper, Gemma-Jane
Addis, John	Cooper, Sandra
Addis, Councillor Jane	Crawford, David
Alexander, Sandra & Chris	Dipnall, Paul
Baker, Lynne	Doyle, Michael
Ball, Bobbie & Warwick	Drost, Mary
Barnett, Sue	Drury, Liz
Barrett, Frances	Edmonds, Jill
Beck, Bradley	Eley, Ken
Beck, Suzanne	Elliott, Ray & Anne C
Birrell, David & Denise	Fairlie, Jack
Birrell, Dinny	Fitzgerald, Ashley
66 submissions under the group 'Boroondara Citizens for Better Democracy'	Frankes, Lynn
Boroondara City Council	Friend-Pereira, John
Brown, Robert	Gray, Lynn
Burton, Elizabeth	Hall, Peter
Buxton, Benjamin	Harcourt, Dr J. K. OAM
Cairo, Sesto	Harry, Rohan
Camberwell Junior Football Club	Healy, Councillor Phillip
Canterbury History Group	Henty, Jenny
Chieng, Lawrence	Herron, Syd
Clark, Cameron	Hollingsworth, Lisa
Cooper, Alan	Hook, Harry
	Hundley, Ian
	Ives, Rosslyn

Judge, Astrid	Ngo, Maria
Kachami, John	Nicholls, Jack
Kasarik, Greg	O'Gorman, Lesley
Kellett, Sean	Papaemmanouil, Peter
Kelly, Robin	Paul, Margaret
Killen, Diana	Pearson, Belinda
Lai, Janice	Perkins, Wayne
Lamanna, Nicholas	Ponya, Tom
Lee, Neville OAM	Proportional Representation Society of Australia (Victoria-Tasmania) Inc.
Lighter Footprints Inc	Pruden, Charles
Lionetti, Ella	Riverdale Soccer Club
Litchfield, Cecilia	Robertson, Jennifer
Main, Peter	Robertson, Lynne
Mallis, Phillip	Robinson, Crysoula
Mano, Chris	Robinson, Peter
Marburg, Stuart	Robinson, Wayne
Marsland, Sally	Rogers, Glenn
McBeth, John	Ross, Graham
McIntyre, Peter	Ruddle, Lindsay
McLean, John AO	Scarfe, Greg
Meadows, Denny	Scott, Graham
Mettam, Joy	Scott, Kirsten
Mohandoss, Priya	Scott, Leona
Monaco, Rob	Sibelle, Eugene
Montano, Charles	Sim, Michael
Montano, Rocco	Smith, Kevin & Marie
Moschini, Fred	Smith, Tim MP
Neish, Peter	Smithers, Jennifer
Nestor, Angelo	

Smithers, Jonathan	Wardlaw, Ruth
Staddon, Sally	Watson, Cynthia
Stafford, Cass	Watson, Elliot
Staindl, Michael	Watson, Lane
Staszewski, Robert	Watson, Magnus
Stenshoult, Robert	Weibrecht, Brendan
Stokes, James	White, Jesse
Stolz, Chris	White, Renee
Talbot, Nicholas & Miller, Suzette	Whitehorn, Matthew
Thompson, Garry	Wilke, Erika
Thomson, Ross	Williams, Fiona
Treeby, Cheryl	Williams, Maree
Tsoutsouvas, Helen	Willox, Lorrae
Voce, Judith	Winkler, Edward
Wan, Chew	Wooley, Rod

Response submissions

Response submissions were received from:

Abrahams, Stephen	Bastwo, Eleeonor
Aims, Catriona	Bebee, Llyod
Arnold, Chris	Bennett, Karl
Ashton, Richard	Beuchat, Anne
Ashton, Jo	Beuchat, Michel
Bailey, Ro	Bissinella, Maree
Balanced Health and Psychology Counselling	Blunden, Julia
Balding, David	Bolton, Merril
Ball, Bobbie & Warwick	Borland, Helen
Barbis, Leopold	58 submissions under the group 'Boroondara Citizens for Better Democracy'
Barry, Dana	

Boroondara City Council	Debrett, Mary
Boroondara Reconciliation Network	De Simone, Giuseppe
Bowra, Robin	Deveson, Noelene
Brown, Janet	Diggins, Catherine
Bruce, Fiona	Diggins, Jennifer
Buchanan, Greg	Diggins, William
Burton, Elizabeth	Doan, Tam
Butler, Paul	Doufa, Vicky
Calwell, Fergus	Douglas, Dianne
Camberwell Lacrosse Club	Doyle, Michael
Campbell, Jennifer	Drost, Mary
Canny, Helen	Drury, Liz
Carre, Meredith	East, Roger Neal
Cerche, Terry	Eastaugh, Louise
Chandler, Ros	Eley, Ken
Chandler, William (OAM)	Falkland, Barbara
Coghill, Ken	Farmer, Felicity
Coghlan, Jasper	Fitzgerald, Ashley
Colliet, Kim & Lea	Folliard, Tim
Coltman, Tania	Ford, John
Cooper, Alan	Frankes, Lynn
Cooper, Gemma-Jane	Friend-Pereira, John
Cooper, Sandra	Froelich, Brian
Connor, Keith & Keryn	Gare, John
Cosgrove, Bryony	Glab, Elizabeth
Crisp, Simon	Gillespie, Tim
Currell, Alex	Gordon, Deborah
D'Andrea, Roberto	Gove, Keith
Davenport, Andrew	Green, Deahne

Gurner, Sandra	Lamb, David
Hardy, Anthony	Lawrie, Ann & Ronald
Harvey, Dr Ken	Lee, Terry
Heath, Bill	Lighter Footprints Inc
Henriksen, Kari	Lightfood, David
Henty, Jenny	Lipa, Lilli
Hodgens, Geoff	Long, Bryan
Holloway, Michael	Lush, Winifred
Holmes, Mike	Mallis, Philip
Holroyd, Lynne	McArthur, Katherina
Hook, Harry	McKenzie, Ian
Hundley, Ian	McKissock, Murdo
Ilbery, Graham	McLean, John
Ingvarson, Lawrence	McNeice, Jennifer
Jarm, David	Meachim, Christian
Jeuniewicz, Amanda	Menelaou, Andrew
Jeuniewicz, Melissa	Mettam, Joy
Kelleher, Mary	Metzenthien, David
Kellett, Sean	Middleton, Richard
Kendall, Huon	Miles, Claire
Kendall, Michelle	Miller, Jenner
Kenner, Adrienne	Miller, Suzette
Keran-Black, Jonathan	Molloy, Garry
Kidson, George	Money, Catherine & Robert
Killen, Diana	Moschini, Fred
Kirk, Dianne	Muir-Morris, Ralph
Knight, Leigh	Mullerworth, Michael
Krelle, Marlene	Murphy, Grahame
Lamanna, Nicholas	Murray, Anthony

Nathan, Jane	Ross, David
Naughton, Michelle	Ross, Graham
Ngo, Maria	Russo, Paul
Norris, Adam	Scharley, Harold & Marie
O'Brien, Michael	Shelton, Elizabeth
O'Keefe, Noelene	Shiels, Russell
Ollquist, Ross	Simpson, Andrew
Pagliari, Rob	Smithers, Jennifer
Pant, Lauren	Smithers, Jonathan
Parker, Jarrod	Smythe, Deborah
Paterson, Sophie	Solly, Michael
Pearson, Belinda	Somerville, Robyne
Perkins, Wayne	Sparks, David
Pezzimenti, Montserrat	Staddon, Sally
Phillips, Neil	Staines, Andrew
Pocknee, Glenda	Staszewski, Robert
Porter, Aliya	Stensholt, Bob
Powell, Jenni	Stokes, James
Pradd, Les	Strang, David
Pratt, Susan	Stuart, Jennifer
Prince, Martin	Talbot, Nicholas
Proportional Representation Society of Australia (Victoria-Tasmania) Inc.	Taylor, Roger
Quin, Darren	Thornton, Julia
Ratepayers Victoria Inc.	Tsoutsouvas, Helen
Roach, Jack	Van Sebille, Deb
Roberts, Colin	Vella, Joe
Roberts, Darren	Vincent, Dawn
Ross, Councillor Coral	Vincent, Frank
	Voce, Judith

Vogels, Caroline	Wharton, Ashley
Walker, Angela	Wheeler, Matthew
Watson, Councillor Cynthia	Whelan, Dennis
Watson, Elliot	Wilks, Ann
Watson, Lane	William, Ross
Watson, Magnus	Williams, Josephine
Webster, Christopher	Williams, Maree

Public hearing

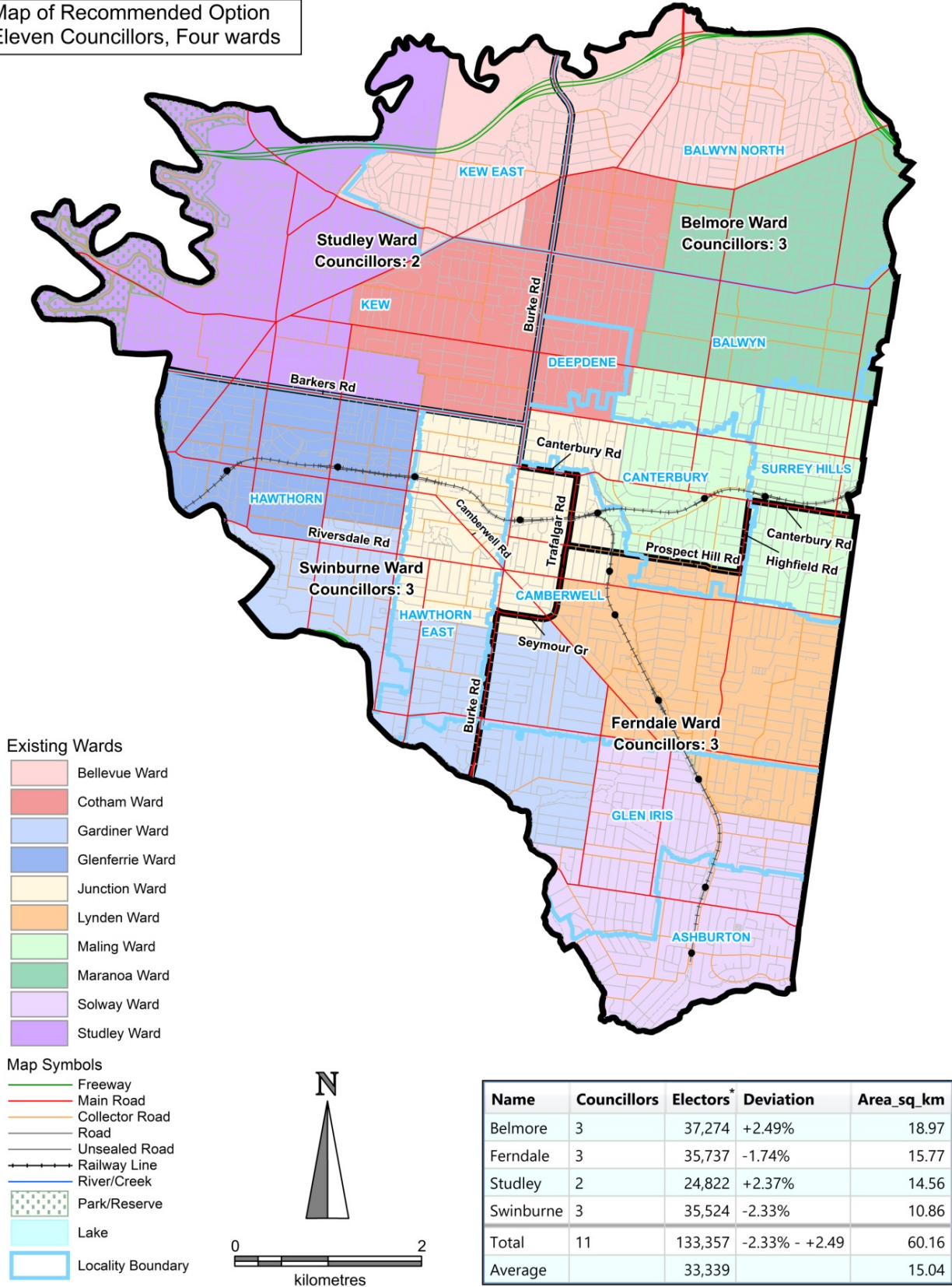
The following individuals spoke at the public hearing:

Addis, Mayor Jane (on behalf of Boroondara City Council)	Henty, Jenny
Chandler, William (OAM)	Hook, Harry
Coghill, Ken	Hundley, Ian
Diggins, Catherine	Nathan, Jane
Doyle, Michael	Pearson, Belinda
Drost, Mary (OAM)	Ross, Councillor Coral
Eley, Ken	Simpson, Andrew
Friend-Pereira, John	Stensholt, Bob
Goode, Geoffrey (on behalf of the Proportional Representation Society of Australia (Victoria-Tasmania) Inc.)	Tsoutsouvas, Helen
	Watson, Councillor Cynthia

Appendix 2: Map

Boroondara City Council

Map of Recommended Option
 Eleven Councillors, Four wards



Appendix 3: Public information program

Advertising

In accordance with the Act, public notices of the review and the release of the preliminary report were placed in the following newspapers:

Newspaper	Notice of review	Notice of preliminary report
<i>Herald Sun</i>	Thursday 17 January 2019	Wednesday 20 March 2019
<i>Progress Leader</i>	Tuesday 5 February 2019	Tuesday 9 April 2019

Media releases

A media release was prepared and distributed to local media to promote the commencement of the review on Wednesday 13 February 2019. A further release was distributed with the publication of the preliminary report on Wednesday 10 April 2019. A final media advisory was circulated on the publication date of this final report.

Public information session

A public information session for people interested in the review process was held on Thursday 14 February 2019 in the Zelman Room at the Hawthorn Arts Centre, 360 Burwood Road, Hawthorn.

Submission guide

A submission guide was developed and made available on the VEC website, or in hardcopy on request, throughout the review timeline. The submission guide provided information about the review, the review timeline and how to make submissions to the review.

Online submission tool

An online submission tool was developed and made available during the submission periods of the review. The tool allowed people to make a submission from the VEC website. During the preliminary submission stage, users also had the opportunity to map out their preferred subdivisions through the online submission tool using Boundary Builder. Boundary Builder included real elector numbers so that users could see if their preferred structures and numbers of councillors met the plus-or-minus 10% rule.

VEC website

The VEC website delivered up-to-date information to provide transparency and facilitate public participation during the review process. All public submissions were published on the website.

Email and social media engagement

The VEC delivered an information email campaign targeted at known community groups and communities of interest in the local council area. This included a reminder email at each milestone of the representation review process.

The VEC also published sponsored social media advertising that was geo-targeted to users within the local council area. This included advertising at both the preliminary submission and response submission stages. The total reach of these posts was 10,161 during the preliminary submission stage and 8,277 during the response submission stage.

Council communication resources

The VEC provided the Council with a communication pack that included information on the review in various formats. While the council is encouraged to distribute this information and raise awareness about the review, the VEC is an independent reviewer and all communications resources include reference and links to the VEC website and core materials.

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Victorian Electoral Commission

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2019