Local Council Representation Review



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Version 1



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Recommendation

The Victorian Electoral Commission recommends that Whitehorse City Council consist of 11 councillors elected from five wards (four two-councillor wards and one three-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 the persons 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 details of 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

Whitehorse City Council currently comprises 10 councillors elected from five two-councillor wards. More information on Whitehorse City Council and the current electoral structure is available in the council fact sheet on the VEC website at vec.vic.gov.au.

Prior to the last representation review in 2007, Whitehorse City Council was comprised of 10 councillors elected from five two-councillor wards. Visit the VEC website at wee.vic.gov.au to access a copy of the 2007 review final report.

Preliminary submissions

Preliminary submissions opened at the commencement of the current review on Wednesday 3 July 2019. The VEC received 24 submissions for the representation review of Whitehorse City Council by the deadline at 5.00 pm on Wednesday 31 July 2019.

¹ Section 219D of the Local Government Act 1989.

Preliminary report

A preliminary report was released on Wednesday 28 August 2019 with the following options for consideration:

- Option A (preferred option)
 Whitehorse City Council consist of 11 councillors elected from five wards (four two-councillor wards and one three-councillor ward).
- Option B (alternative option)
 Whitehorse City Council consist of 10 councillors elected from five two-councillor wards, with adjustments to the current ward boundaries.

Response submissions

The VEC received 11 submissions responding to the preliminary report by the deadline at 5.00 pm on Wednesday 25 September 2019.

Public hearing

The VEC conducted a public hearing for those wishing to speak about their response submission at 7.00 pm on Monday 30 September 2019. Two people spoke at the hearing.

Recommendation

The Victorian Electoral Commission recommends that Whitehorse City Council consist of 11 councillors elected from five wards (four two-councillor wards and one three-councillor ward).

This electoral structure 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 the persons who are entitled to vote at a general election of the Council.'²

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.³ 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
- media releases 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

² Section 219D of the Local Government Act 1989.

³ 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 Whitehorse 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
- a public hearing 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 .id⁴; voter statistics from the Victorian electoral roll; and other State and local government data sets
- small area forecasts provided by .id for relevant local council areas
- 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.⁵ 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

⁴ .id is a consulting company specialising in population and demographic analysis and prediction information products in most jurisdictions in Australia and New Zealand.

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

- population growth or decline
- 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 be developed with 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 outcomes from previous elections indicate that 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.

Whitehorse City Council representation review

Profile of Whitehorse City Council

The City of Whitehorse is located about 15 kilometres east of Melbourne's CBD and covers an area of 65 square kilometres. It is primarily suburban but also contains numerous parks, waterways and important natural environments, such as Blackburn Lake and Wurundjeri Wetlands.

The City of Whitehorse contains the suburbs of Blackburn, Blackburn North, Blackburn South, Box Hill, Box Hill North, Box Hill South, Burwood, Burwood East, Forest Hill, Mitcham, Mont Albert, Mont Albert North, Nunawading, Surrey Hills, Vermont and Vermont South. It includes major commercial centres, industrial precincts and several educational and health facilities, all of which play an important part in the local economy and employment.⁶

Separate houses make up the majority of dwelling types but have decreased considerably from about three-quarters of the total housing stock in 2006 to about two-thirds currently. Major growth has taken place in medium- and high-density living, particularly around major activity centres, and also in the number of renters.

Healthcare and social assistance is the largest employment industry in the local council area. In 2016 it made up 18.2% of all employment and employed 12,586 people. It was also the biggest employer of the City's residents, employing about 10,000 local residents. The number of residents working in accommodation and food services, professional, scientific and technical services, and education and training has increased substantially since 2006, whereas those working in manufacturing and wholesale have declined. The City of Whitehorse has a high proportion of its working population (about 32%) classed as professionals. There are a large number of domestic (about 11,167) and international (about 6,248) students residing in the local council area, who together comprise about 11% of the total resident population. The council area is the local council area, who together comprise about 11% of the total resident population.

⁶ Department of Environment, Land, Water and Planning (DELWP), Planning Schemes Online, Whitehorse Planning Scheme, http://planning-schemes.delwp.vic.gov.au/schemes/whitehorse, accessed 15 August 2010

⁷ .id, 'City of Whitehorse: community profile', <u>https://profile.id.com.au/whitehorse</u>, accessed 15 August 2019.

⁸ Ibid.

⁹ .id, 'City of Whitehorse: economic profile', https://economy.id.com.au/whitehorse, accessed 15 August 2019.

¹⁰ .id, 'City of Whitehorse: community profile', https://profile.id.com.au/whitehorse, accessed 15 August 2019.

¹¹ Australian Bureau of Statistics (ABS), *Census of population and housing: time series profile, Australia, 2016, 2003.0, 2017.*

¹² Ibid.

¹³ Ibid.

The City of Whitehorse ranks well on a range of income and economic measures and is considered a relatively affluent local council area.¹⁴ However, there are some areas, particularly in the suburbs of Box Hill, Burwood, Burwood East and Forest Hill, where levels of social disadvantage are high.¹⁵

Currently, 38.4% of residents in the City of Whitehorse were born overseas. ¹⁶ In 2006 this figure was 29.1%. The growth of people born overseas has increased at a faster rate than for Greater Melbourne overall, which increased from 28.6% to 33.8% over the same period. ¹⁷ Significant growth has occurred among people born in China, who in 2006 comprised 4% of the City's population and by 2016 had grown to 11.5%. In some suburbs, including Burwood and Box Hill, more than half the residents were born overseas. ¹⁸

The population of the City of Whitehorse grew from 144,767 in 2006 to 162,078 in 2016.¹⁹ It is expected to continue to grow at a rate of about 1.2% per year, to be 195,470 in 2026 and 207,840 by 2031.²⁰ Some suburbs, such as Box Hill and Burwood East, are projected to grow at a much faster rate. The Box Hill Metropolitan Activity Centre (MAC) in particular will experience rapid population growth, from about 9,000 residents currently to 17,943 by 2031.²¹

Current electoral structure

Whitehorse City Council currently comprises 10 councillors elected from five two-councillor wards. More information on Whitehorse City Council and the current electoral structure is available in the council fact sheet on the VEC website at wee.vic.gov.au.

Prior to the last representation review in 2007, Whitehorse City Council was comprised of 10 councillors elected from five two-councillor wards. Visit the VEC website at vec.vic.gov.au to access a copy of the 2007 review final report.

¹⁴ ABS, Census of Population and Housing: Socio-Economic Indexes for Areas (SEIFA), Australia, 2016, 2033.0.55.001. 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,

https://www.abs.gov.au/ausstats/abs@.nsf/mf/2033.0.55.001, accessed 15 August 2019. See also ABS, '2016 Quickstats: Whitehorse (C)',

https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/LGA26980?opendocument, accessed 15 August 2019.

¹⁵ .id, 'City of Whitehorse: social atlas', https://atlas.id.com.au/whitehorse, accessed 15 August 2019.

¹⁶ .id, 'City of Whitehorse: community profile', https://profile.id.com.au/whitehorse, accessed 15 August 2019.

¹⁷ Ibid.

¹⁸ Ibic

¹⁹ ABS, Census of population and housing: time series profile, Australia, 2016, 2003.0, 2017.

²⁰ Department of Environment, Land, Water and Planning (DELWP), *Victoria in Future 2019*, 2019, https://www.planning.vic.gov.au/land-use-and-population-research/victoria-in-future, accessed 10 October 2019

²¹ .id, 'City of Whitehorse: population forecast', https://forecast.id.com.au/whitehorse, accessed 15 August 2019.

Preliminary submissions

At the close of submissions on Wednesday 31 July 2019, the VEC had received 24 submissions (including two submissions made by the one submitter) for the representation review of Whitehorse City Council. A list of people who made a preliminary submission can be found in Appendix 1.

Number of councillors

The majority of preliminary submissions were in favour of either increasing the number of councillors to 11 or retaining the current number at 10. A small number of submitters suggested either nine or 12 councillors would be appropriate.

Two submitters proposed reducing the number of councillors to nine. Aaron Hewitt suggested nine councillors would make Whitehorse City Council consistent with similar local councils. The Proportional Representation Society of Australia (Victoria-Tasmania) Inc. (PRSA) proposed nine councillors in preference for an odd number of councillors to ensure a majority vote was reflected in election results and to avoid tied votes during the Council's decision-making. Nine councillors was also proposed in preference for a structure of three three-councillor wards.

Ten submitters proposed retaining the number of councillors at 10, many of who felt the current structure was working well. For example, Brian Pell argued that 10 councillors would be consistent with similar Metropolitan Melbourne local councils and Peter Lucas felt that 10 councillors would be enough to cover the local council area. None of the submitters supporting 10 councillors felt an even number of councillors would be problematic.

Nine submitters proposed increasing the number of councillors to 11, mainly to accommodate population growth, particularly in Box Hill. Some of those in favour of increasing councillor numbers to 11 compared the City of Whitehorse to other Metropolitan Melbourne local councils and that this would be consistent with the VEC's principles and its recommendations in recent representation reviews.

Whitehorse City Council submitted that increasing councillor numbers to 11 would not drastically alter its position in relation to the voter-to-councillor ratios of similar local councils. The Whitehorse Branch of the Victorian Greens submitted that councillor workloads and representation would be improved with 11 councillors and Kieran Bates argued that 11 councillors would better represent the whole local council area.

Three submitters proposed increasing the number of councillors to 12; two preferred an even number of councillors so the Council's decisions could be determined by a full council and not by a majority of one. Warwick Dilley suggested 12 councillors to provide an equal number of four councillors per ward in his preferred three-ward electoral structure and to address councillor workloads. Judy Sharples argued that increasing the number of councillors to 12 would

accommodate population growth, particularly the growth occurring in Box Hill, and provide a two-councillor ward specifically for Box Hill MAC.

Electoral structure

The majority of submitters favoured a multi-councillor electoral structure. There was some support for a single-councillor electoral structure and minimal support for an unsubdivided electoral structure.

In its submission, Whitehorse City Council provided a comprehensive submission and presented five different electoral structures, including a preferred option of 11 councillors elected from five wards (four two-councillor wards and one three-councillor ward) and an alternative option of 11 councillors elected from four wards (three three-councillor wards and one two-councillor ward). The Council's submission also provided arguments against continuing with the current electoral structure, a single-councillor ward structure and a structure of nine councillors elected from three three-councillor wards. A number of submitters supported one or the other of the Council's preferred and alternative electoral structures.

Unsubdivided

Ms Sharples suggested Whitehorse City Council should be unsubdivided, though only if an option to create an additional ward to contain the Box Hill MAC was not possible. Ms Sharples did argue, however, that an unsubdivided electoral structure would be of benefit to voters as councillors would be elected from, and concerned about, the whole local council area.

Single-councillor wards

Four submitters proposed Whitehorse City Council should be subdivided into single-councillor wards; three submitters preferred 10 single-councillor wards and one preferred 11 single-councillor wards. Peter Allan argued in his second submission that 11 single-councillor wards would be consistent with the additional reforms proposed as part of the Local Government Bill 2019.

Submitters argued that in single-councillor wards, councillors would deal with residents' issues more directly and be more involved in community events. It was also suggested that single-councillor wards would improve representation, enhance accountability, assist with councillor workloads, strengthen community cohesion, improve the City's management of development and remove the potential for conflict between councillors elected from the same ward.

In contrast, the Council's submission contended that the risk of future ward boundary adjustments and use of less clear ward boundaries would be greater under a single-councillor ward structure. The Whitehorse Branch of the Victorian Greens also identified the disadvantages of a single-councillor ward electoral structure, such as councillor isolation, limited options for residents connecting with councillors and more frequent boundary adjustments.

Multi-councillor wards

The majority of submitters favoured a multi-councillor ward structure consisting of either three, four or five wards. In its submission, Whitehorse City Council pointed out it had always had a multi-councillor ward electoral structure, and that such a structure was appropriate for the local council due to its size, voting population, use of familiar ward boundaries, communities of interest and longevity.

The PRSA advocated for a multi-councillor ward electoral structure to maximise the value of effective votes and increase voter choice.

Other arguments put forward by submitters in favour of a multi-councillor ward electoral structure were that it would enable the sharing of councillor workloads, accommodate population growth, better represent communities of interest and provide residents with more options when connecting with councillors. Some submitters suggested multi-councillor wards would increase diversity, provide community candidates with a better chance of being elected and prevent the major political parties from dominating elections.

Three ward electoral structure

Three submitters (plus the first submission made by Peter Allan) proposed an electoral structure of three wards. Mr Dilley argued for three four-councillor wards to better represent small groups and suggested that an equal number of councillors in each ward would be more equitable. Mr Hewett preferred three three-councillor wards as nine councillors would be consistent with the number of councillors and the voter-to-councillor ratio of similar local councils, such as Knox City Council and Darebin City Council. The PRSA also suggested its preference for three three-councillor wards to ensure parity between the different wards and to maximise the benefits of proportional representation.

Four ward electoral structure

Two submitters favoured a subdivided electoral structure of four wards (three three-councillor wards and one two-councillor ward). These submitters argued this electoral structure would be more democratic, increase diversity and provide smaller parties with a greater chance of being represented. A four ward electoral structure was the Council's second preference in its submission. The Council suggested that such a structure provided reasonable boundaries, contained Box Hill MAC in the one ward and catered for increases in the voter population.

Current five ward electoral structure

Seven submitters favoured retaining the current electoral structure of 10 councillors elected from five two-councillor wards, most of whom felt the current electoral structure was working well and provided fair and equitable representation. These submitters argued that the current electoral structure had community support, was understood by residents and provided stable local

government. It was also argued that councillors had a good understanding of local and council-wide issues under the current structure, supported the interests of residents and community groups and provided residents with options when connecting with their councillors. One submitter, Mr Pell, felt the current electoral structure had resulted in a suitably diverse selection of candidates and elected councillors.

Alternative five ward structure with 11 councillors

Six submitters preferred an electoral structure of five wards comprising four two-councillor wards and one three-councillor ward. Many of these submitters suggested that the current electoral structure was working well but identified the need for an additional councillor to accommodate population growth, particularly the growth occurring in Elgar Ward.

Five submitters argued that Elgar Ward should have three councillors, mainly on account of the high growth rate expected for this area. The other submitter, Andrew Davenport, suggested that Riversdale Ward should have three councillors to contain the suburbs of Mont Albert, Surrey Hills, Box Hill South and Blackburn South, which he argued were similar in character.

Numerous submitters suggested that the ward boundaries of the current electoral structure worked effectively and could, with slight modifications, continue to function just as well or be improved under a five ward structure of 11 councillors. Some submitters suggested that this proposal would provide better ward boundaries and would lead to minimal disruption for voters and residents.

In its submission, Whitehorse City Council argued that under its preferred five ward electoral structure, residents would be able to easily identify who their councillors were and that it would effectively cater for communities of interest. The Council also provided detailed voter numbers and growth projections to argue that its preferred structure more effectively complied with the legislated requirement that the number of voters represented by each councillor is within +/- 10% of the average number of voters per councillor and was the most sustainable over the long-term.

Preliminary report

A preliminary report was released on Wednesday 28 August 2019. The VEC considered public submissions and research findings when formulating the options presented in the preliminary report.

Number of councillors

The VEC proposed two options, of 10 and 11 councillors, as the appropriate number of councillors for Whitehorse City Council. In determining the appropriate number of councillors for the City, the VEC considered a range of factors, including population and voter numbers and projections, arguments presented in submissions and communities of interest. The VEC also

compared voter numbers and the voter-to-councillor ratio of the City of Whitehorse with similar local councils.

The VEC reported sustained population growth in the City, increasing from 144,767 to 162,078 between 2006-16,²² and noted also that several 11-councillor options were put forward for public consultation during the previous review in 2007. It also considered that the population would continue to increase at a rate of about 1.2% per year to be 207,840 by 2031,²³ with some areas likely to grow at a much faster rate. The VEC concluded that such growth would likely place pressure on councillor workloads and council services.

The voter-to-councillor ratio of Whitehorse City Council, which is reasonably close to the median (11,770) of all Metropolitan Melbourne local councils, was also considered. It was shown that increasing the number of councillors to 11 would reduce the voter-to-councillor ratio to 10,700. While somewhat below the median, the VEC determined that this would increase relative to population growth.

As such, the VEC considered either 10 or 11 councillors would be appropriate to ensure fair and equitable representation for voters in the City of Whitehorse. The VEC reported that retaining 10 councillors would keep the voter-to-councillor ratio close to the median of all Metropolitan Melbourne local councils and given that the Council does not face significant social issues would be appropriate for fair and equitable representation. It reported that increasing the number of councillors to 11 would also be appropriate, as such an increase would not drastically impact the City's voter-to-councillor ratio and 11 councillors would accommodate population growth, particularly in and around the Box Hill MAC.

Electoral structure

The VEC was presented with a range of different electoral structures in preliminary submissions and modelled all of these as part of the review process. The VEC also acknowledged the various models and high level of detail provided by Whitehorse City Council in its submission.

Unsubdivided

The VEC did not consider an unsubdivided electoral structure to be suitable for Whitehorse City Council. This was due to the current and projected population of the City of Whitehorse and the number of candidates likely to run for election. In the past three elections there have been between 30 and 34 candidates across the five wards. It was determined that although this number of candidates was not unusually high for a Metropolitan Melbourne local council, in an

²² ABS, Census of population and housing: time series profile, Australia, 2016, 2003.0, 2017.

²³ Department of Environment, Land, Water and Planning (DELWP), *Victoria in Future 2019*, 2019, https://www.planning.vic.gov.au/land-use-and-population-research/victoria-in-future, accessed 10 October 2019.

unsubdivided electoral structure the size of the ballot paper would likely be overly large, potentially confuse some voters and lead to more informal votes.²⁴

Single-councillor ward electoral structure

Responding to some support in preliminary submissions for single-councillor wards, the VEC modelled single-councillor ward structures for 10 and 11 councillors. The VEC reported that both structures were problematic mainly due to significant and uneven population growth, especially in the current Elgar Ward, and found that to be sustained over the medium- to long-term, the Box Hill MAC would need to be divided between wards. This was not considered appropriate. It was also reported that both the 10- and 11-councillor single-councillor ward models relied on somewhat arbitrary boundaries, such as minor roads, and split communities and suburbs to a significant degree. For these reasons, the VEC did not progress these options for further consultation.

Multi-councillor ward electoral structures

On the basis of submissions, population and voter projections and the VEC's own research, a multi-councillor ward electoral structure was determined to be the most appropriate structure for Whitehorse City Council. In developing the options presented in the preliminary report, the VEC considered and modelled a range of multi-councillor ward electoral structures.

Two three-ward electoral structures consisting of nine or 12 councillors were considered. However, as it was determined that either 10 or 11 councillors would be the most appropriate number of councillors for Whitehorse City Council, the VEC did not consider these three-ward structures to be appropriate.

The VEC considered the alternative proposal from the Council's submission of 11 councillors elected from three three-councillor wards and one two-councillor ward. The VEC noted that this proposal received minimal support in preliminary submissions and reported that the four wards used unclear ward boundaries and split communities of interest, such as the Blackburn shopping strip. For these reasons, the VEC determined not to progress this model for further consultation.

Ms Sharples' proposal for an electoral structure of six two-councillor wards was also considered. The VEC concluded that 12 councillors would be too high for Whitehorse City Council and found the proposal for one ward to contain the Box Hill MAC would not be possible as voter numbers were too small to sustain a two-councillor ward.

²⁴ The VEC has generally observed that informal voting increases as more candidates are listed on the ballot paper. See State of Victoria (Victorian Electoral Commission), *2016 Local Government Elections Report*, 2017, https://www.vec.vic.gov.au/Publications/CouncilElectionReports.html, accessed 23 August 2019.

The VEC considered two options—11 councillors elected from five wards (four two-councillor wards and one three-councillor ward) and the current electoral structure of five two-councillor wards, with minor ward boundary changes—to be the most appropriate for Whitehorse City Council.

Option A: 11 councillors elected from five wards

It was considered that Option A in the preliminary report resembled the current structure, with an extra councillor allocated to Elgar Ward. The additional councillor was justified on account of rapid population growth in the area, high levels of cultural and ethnic diversity, and evidence of social disadvantage. The VEC considered that being allocated three councillors would enable Elgar Ward to absorb population growth more effectively than with just two councillors. It was also noted that all but one of the submitters in support of this model agreed Elgar Ward should have three councillors.

The VEC reported the ward boundary changes proposed in this option would affect 19,953 voters or about 17% of total voters. The transfer of voters for each ward was as follows:

- Elgar Ward would gain 5,147 voters from Riversdale Ward as a result of moving the ward boundary to Riversdale Road and Station Street. It would gain the suburb of Surrey Hills (3,288 voters) and part of Box Hill South (1,859 voters).
- Riversdale Ward would gain 4,908 voters from Central Ward by moving the ward boundary north to Canterbury Road. It would gain a large part of Blackburn South (4,908 voters).
- Morack Ward would gain 2,556 voters from Central Ward by adjusting the ward boundary to Canterbury and Blackburn Roads. It would gain most of Forest Hill (1,474 voters) and a small section of Blackburn South (1,082 voters).
- Springfield Ward would gain 2,306 voters from Morack Ward by moving the ward boundary from Canterbury Road to Boronia Road. It would gain a part of Vermont (2,306 voters).
- Central Ward would gain 5,036 voters from Springfield Ward by moving the ward boundary to Springvale Road. It would gain small sections of Blackburn (131 voters), Forest Hill (913 voters) and a large part of Nunawading (3,992 voters).

The VEC considered the ward boundaries to be an improvement from the current electoral structure and superior to those proposed in Option B, particularly the use of Springvale Road to separate Central and Springfield Wards and a larger section of Blackburn Road to separate Riversdale and Morack Wards.

The VEC reported that this option would more effectively absorb projected rates of growth over the long-term than Option B.

The benefits of multi-councillor wards and proportional representation counting, such as voters having a good degree of choice at election time, having options when connecting with councillors and being provided a good chance of electing candidates representing significant minorities were also outlined.

The VEC also noted views in some submissions that preferred an equal number of councillors in each ward. This was identified as a potential drawback of Option A.

Option B: 10 councillors elected from five wards

The VEC considered Option B, an option of least change, which reflects the high level of community support for retaining the current electoral structure among preliminary submissions. The VEC outlined the boundary changes required to accommodate the significant growth expected in Elgar Ward, particularly the more significant changes required to Central Ward. In this option Riversdale Ward remains the same as it is currently, Morack Ward increases in size and the boundary separating Springfield and Central Wards is improved. The VEC considered the ward boundaries in Option B to be easily identifiable but noted that—like the current electoral structure—much of the boundary separating Central and Springfield Wards would be comprised of minor roads.

It was reported that the ward boundary changes would affect 6,017 voters or about 5% of the total number of voters and that this was significantly fewer than Option A, detailed as follows:

- Central Ward would gain 3,352 voters from Elgar Ward as a result of shifting part of the current ward boundary from Middleborough Road to Dorking Road. It would incorporate parts of Box Hill North (2,657 voters) and Box Hill (695 voters).
- Morack Ward would gain 2,556 voters from Central Ward by moving the ward boundary to Canterbury Road and Blackburn Road. It would gain parts of Blackburn South (1,085 voters) and Forest Hill (1,471 voters).
- Springfield Ward would gain six voters from Central Ward by including a more sparsely populated section of Nunawading due to a minor boundary improvement.
- Central Ward would gain 103 voters from Springfield Ward through the inclusion of a small section of Blackburn as a result of a minor boundary improvement.
- Riversdale Ward would remain unchanged.

According to the VEC's projected enrolment figures, Option B would be sustainable until the next scheduled review, but would not accommodate population change as comfortably as Option A.

It was reported that Option B would have an even number of councillors, which has been considered a disadvantage under the current electoral structure because of the increased possibility of tied votes during the Council's decision-making. However, submitters did not suggest the use of the Mayor's casting vote to resolve tied decisions was a major concern. In reviewing council meeting minutes for the 2018 and 2019 calendar years, the VEC found that tied votes rarely occurred.

The VEC also determined that Option B would provide the same benefits of multi-councillor wards, such as a good degree of choice for voters at election time, options for residents when connecting with their councillors and a reasonable chance that significant minorities can elect a candidate of their choosing.

The main strengths of Option B were that it would require minimal change from the current electoral structure, allocate an equal number of councillors to each ward and generally provide easily identifiable boundaries. However, the VEC also noted that some internal ward boundaries were not ideally placed in Option B, especially the boundary separating Central and Springfield Wards and the use of Dorking Road to separate Elgar and Central Wards.

Options

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

- Option A (preferred option)
 Whitehorse City Council consist of 11 councillors elected from five wards (four two-councillor wards and one three-councillor ward).
- Option B (alternative option)
 Whitehorse City Council consist of 10 councillors elected from five two-councillor wards, with adjustments to the current ward boundaries.

Public response

Response submissions

The VEC accepted submissions responding to the preliminary report from Wednesday 28 August 2019 until 5.00 pm on Wednesday 25 September 2019. The VEC received 11 response submissions. 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.

Preferences expressed in response submissions

Option A	Option B	Other
6	4	1

Six response submissions supported Option A, four supported Option B and one argued for a different electoral structure.

Option A

Whitehorse City Council submitted in support of Option A and noted that this option had been its preferred model in its preliminary submission. The Council's response submission outlined five positive features of Option A:

- 1. Easy to identify boundaries, which are all main roads
- 2. Easy for residents to identify their councillors
- Closely resembles the current ward structure, which will also minimise confusion for residents
- 4. Caters well for communities of interest; for example, the Box Hill MAC is contained in the one ward
- 5. The most robust option or structure regarding population growth and the requirement to ensure the number of voters represented by each councillor is within plus-or-minus 10% of the average number of voters per councillor.

In its submission, Whitehorse City Council also reiterated its support for 11 councillors, which compared well with similar Metropolitan local councils and was appropriate for future population and voter growth.

The Council's submission pointed out that compared with Option B the ward boundary changes proposed in Option A would impact far more voters. However, the Council argued that Option A performed better than Option B on most other accounts.

In his submission, Peter Allan felt that both options were reasonable, though on balance supported Option A as it better accommodated population growth. Aaron Hewitt preferred Option A because it accommodated the population growth in Box Hill and contained all of Box Hill in the one ward. Mr Hewitt also felt Option A made better use of main roads as ward boundaries and that these would be more familiar to residents than those proposed in Option B.

Brian Pell submitted that the ward boundaries in Option A were easily identifiable. Mr Pell argued that in Option B, the boundary between Central and Springfield Wards was less clear and the use of Dorking Road to separate Elgar and Central Wards divided Box Hill North, a proposal he suggested few residents would agree with.

Mr Pell did not believe that having three councillors in Elgar Ward was a concern, or would lead to inequality, as six councillors would be required to achieve a majority vote on the Council, which is the same as under the present electoral structure. Mr Pell did, however, express some concerns about where councillors elected from Elgar Ward would reside and suggested the population living within the Box Hill MAC may go unrepresented or overrepresented by a local councillor.

Dennis Law favoured multi-councillor wards for Whitehorse City Council and supported Option A because it provided clear ward boundaries and an odd number of councillors, which he felt would prevent deadlocked votes during the Council's decision-making.

John Malvestuto supported Option A but did not state a reason.

Option B

All of the submitters in favour of Option B were from Blackburn or Nunawading, and most felt the current structure was working well.

The Blackburn Village Residents Group Inc. submitted the current electoral structure provided stable representation and argued there was no compelling reasons for change. The Group felt that under Option B there would not be as many ward boundary changes and this would provide continuity for residents when connecting with their councillors. The Group also suggested the two-councillor wards provided diversity of representation, that the current voter-to-councillor ratio was reasonably close to the median and that projected population growth, particularly in some areas, should be considered when it actually takes place.

Many of the submitters in support of Option B were concerned that Option A, in proposing to increase the number of councillors in Elgar Ward, would over-represent the area and be unfair for voters in the other four wards.

Colin and Julie Jacobson suggested that Option A would increase representation for 'Box Hill Central' and argued this would not be in the public interest as the area is already inconsistent with the character and scale of the local council area as a whole. Catherine Tenni felt that with

three councillors, Elgar Ward would have too much of a say at council meetings and they were more likely to be pro-development. Elspeth Drury felt that having the same number of councillors per ward suggested that each ward was equal, whereas allocating three councillors to Elgar Ward would suggest that this area was more important.

Ms Drury was also concerned that the proposed use of Springvale Road as the ward boundary separating Central and Springfield Wards would divide the Nunawading community.

The PRSA, which did not support either of the VEC's options in its response submission, argued it was preferable to have an odd number of councillors (as in Option A) but suggested that the lack of parity between the wards could result in an inequitable pattern of representation. The PRSA was also opposed to Option B as it consisted of an even number of councillors and five two-councillor 'stalemate' wards, where in each ward approximately two-thirds of the vote was required to secure a majority of councillors. The PRSA submitted instead that the electoral structure should have the same odd number of councillors per ward or be unsubdivided.

Public hearing

The VEC conducted a public hearing for those wishing to speak about their response submission at 7.00 pm on Monday 30 September 2019 in the Council Chamber, Whitehorse Civic Centre, 379 Whitehorse Road, Nunawading. Two people spoke at the public hearing, both in support of Option A.

Mr Pell reiterated his arguments from his response submission that multi-councillor wards had been successful in Whitehorse City Council and had led to a stable and strong Council. Mr Pell favoured Option A as it made good use of major roads as ward boundaries, which he felt would be easy for residents to identify. This was not the case with Option B, Mr Pell argued, which proposed the minor Fulton Road as the boundary between Riversdale and Central Wards and retained the unclear boundary between Central and Springfield Wards. Mr Pell also identified that splitting Box Hill North using Dorking Road would not be supported by local residents as it could contribute to concerns that local postcodes would change.

Mr Pell also suggested that the population projections referred to in the preliminary report may not have fully appreciated growth in other parts of the local council area.

Asked by the VEC's public hearing panel whether increasing councillor numbers to 11 was justified, Mr Pell stated that he did not have strong views about the appropriate number of councillors, but rather felt that the changes proposed in Option A were necessary to ensure the long-term stability of the overall structure. Mr Pell felt that while 10 councillors could be maintained through boundary adjustments this would likely result in a less sustainable electoral structure. Mr Pell also believed Option A was a more appropriate structure for population growth for the City of Whitehorse and would provide fairer representation for voters across all wards.

When questioned by the public hearing panel, Mr Pell did not express major concerns about the ward boundary splitting Nunawading in Option A and reiterated his previous comments that using Springvale Road as a ward boundary between Central and Springfield Wards would be less confusing for voters. Mr Pell also suggested that voters would not be too concerned about the boundary changes proposed in Option A. Lastly, Mr Pell felt it wise to make some minor adjustments to the current electoral structure, as in Option A, to ensure the Council's continued stability over the next three elections.

Mayor of Whitehorse City Council, Councillor Bill Bennett, speaking on behalf of the Council's submission, stated that councillors had unanimously endorsed Option A at the recent council meeting. The Mayor felt that the VEC's preliminary report and proposed options responded appropriately to the views of the local community. The Mayor suggested the Council supported Option A due to its long-term sustainability and reiterated the five features of Option A in the Council's response submission.

When asked by the VEC's public hearing panel about increasing the number of councillors, the Mayor identified population growth, especially in and around the Box Hill MAC in Elgar Ward, as important. The Mayor felt that because of the growth, providing Elgar Ward with three councillors was appropriate. The Mayor felt it was fairest for councillor numbers and workloads to be distributed according to voter numbers and density, and thus suitable for the fastest growing area of the local council to have three councillors. The Mayor was not concerned about the cost of an additional councillor as he felt it would bring more value and benefits to the community.

The Mayor suggested that in developing the models presented in the Council's preliminary submission, the Council had considered various electoral structures including single-councillor wards. The Mayor suggested that due to disparate growth the Council found maintaining the boundaries of 10 or 11 single-councillor wards over the long-term was very difficult, and that this number of wards would likely confuse voters about which ward they were in.

In response to a question from the VEC's public hearing panel about concerns raised in response submissions regarding the over-representation of Elgar Ward in Option A, the Mayor argued that although Elgar Ward would have three councillors it would be unlikely for it to have a greater say as councillors make decisions for the whole of the local council and contribute to issues in all parts of the local council area

On questioning, the Mayor felt that 'Riversdale' was a longstanding and suitable ward name, and that any change to the ward's name would also confuse voters.

Overall, the Mayor argued that in supporting Option A the Council wanted stability over the longer term. Increasing the number of councillors to 11, allocating the additional councillor to Elgar Ward and adjusting some of the ward boundaries were considered necessary changes to provide this stability.

Findings and recommendation

The VEC's findings

The VEC considered a range of views expressed in submissions and conducted its own internal research to inform its final recommendations regarding the appropriate number of councillors and electoral structure for Whitehorse City Council. In developing the following recommendations, the VEC considered factors such as current and projected population and voter numbers and communities of interest.

Number of councillors

The VEC proposed two options of 10 or 11 councillors in its preliminary report and considered that both would provide fair and equitable representation for voters.

It was considered that 10 councillors would maintain a voter-to-councillor ratio close to the median for Metropolitan Melbourne local councils, and as the current structure of 10 councillors appeared to be working effectively, would likely continue to provide fair and equitable representation for voters.

The VEC considered the previous review of Whitehorse City Council in 2007, which put forward three 11-councillor options for the City as it was determined that voter numbers at the time warranted an increase in councillor numbers from 10 to 11. Since this time the resident and voter population of the City has continued to grow. In the 2006-16 period the population of the City increased by 17,311 people, from 144,767 to 162,078. From now until about the time of the next scheduled review prior to the 2032 Whitehorse City Council general election, population growth in the City of Whitehorse is expected to be at a greater rate than the last 10 years, increasing to about 195,465 in 2026 and 207,386 by 2031. The growth in some areas, including the Box Hill MAC, is projected to proceed at a faster rate again. The VEC determined that this growth, prompted by increasing development and cultural diversity, will likely place additional pressure on councillor workloads, elected representation, and council policy, planning and services.

In determining the appropriate number of councillors, the VEC also considered the voter-to-councillor ratio of Whitehorse City Council. While currently close to the median for similar local councils, continued growth in the number of voters will likely see the voter-to-councillor ratio rise significantly under a 10-councillor structure. As such, it was considered that increasing the number of councillors to 11 would likely see the voter-to-councillor ratio of Whitehorse City Council track close to the median in future years.

Furthermore, a strong case was put forward in submissions for increasing the number of councillors to 11. Most of those supporting this change argued that the increase was appropriate

for the City's population, especially given the high rates of growth expected in some parts of the local council area.

Electoral structure

The VEC considered that there was strong support in preliminary and response submissions for retaining a five ward structure and put forward two structures of five wards in the preliminary report, both of which were considered to provide fair and equitable representation for voters.

The VEC determined that both Options A and B would be sustainable over the long-term. In both options the number of voters represented by each councillor across all wards would remain within plus-or-minus 10% of the average number of voters-per-councillor until the next scheduled review. However, the VEC's modelling determined that Option A would perform better in this respect in the fast-growing Elgar Ward though not as well in Riversdale Ward. In both options the deviation from the accepted plus-or-minus 10% would be similar for Central, Springfield and Morack Wards.

While the VEC considered both options resembled the current electoral structure, changing to Option A would affect more voters than to Option B. The ward boundary adjustments in Option B, which were required to ensure the sustainability of the structure over the long-term, would potentially minimise confusion for voters as approximately 6,000 voters would be affected by the proposed changes compared with almost 20,000 voters under those in Option A. However, it was determined that the minimal impact on voters of Option B could be compromised by suboptimal ward boundaries.

The VEC considered Option A provided clearer ward boundaries than Option B. All the proposed ward boundaries in Option A used major roads, including Middleborough, Springvale and Blackburn Roads, which would all be familiar to residents. The use of Springvale Road as a ward boundary would split Nunawading, however, and this was an important issue among some submitters. Nonetheless, the use of Springvale Road would provide a clear and easily identifiable ward boundary and would be unlikely to leave voters confused about what ward they were in or who their local councillors were.

In contrast, the ward boundaries proposed in Option B were generally less clear. For example, the ward boundary separating Central and Springfield Wards in this option was largely retained and continued to follow locality boundaries using minor streets and, in some cases, lines cutting in between houses. The use of Fulton, Holland and Hawthorn Roads separating Riversdale and Central Wards provided relatively clear ward boundaries, but less so than the use of Canterbury Road to separate the same wards in Option A. The adjustments to the ward boundary between Elgar and Central Wards, which was required to maintain two councillors in the fast-growing Box Hill area, used the less significant Dorking Road and split Box Hill and Box Hill North.

Furthermore, it was considered that the five wards in Option A were more equal in size, ranging from 11.38 to 13.91 square kilometres, whereas those proposed in Option B ranged between 10.09 to 15.02 square kilometres. This factor, alongside the use of more solid ward boundaries in Option A, provided a neater subdivision of the local council area.

The VEC considered strong grounds existed for increasing the number of councillors to 11 and allocating three councillors to Elgar Ward. As addressed in submissions and revealed through the VEC's own research, some of the key challenges for Whitehorse City Council now, and increasingly over the coming years, are contained in Elgar Ward. The Box Hill MAC will continue to be the site of major residential and commercial developments and the area's population will likely double from about 9,000 currently to 17,943 in 2031. Elgar Ward (and Box Hill in particular) were shown to be culturally diverse with a significantly high percentage of residents born overseas. Parts of Elgar Ward were also considered to experience higher levels of social disadvantage. It was determined that these factors would most likely place pressure on councillor workloads and council services. The VEC considered that three councillors representing Elgar Ward would more appropriately reflect the representation needs of its residents, enable an equitable distribution of councillor workloads within the ward, and more broadly, provide for the fair distribution of workloads across 11 councillors and the whole local council area. As such, the VEC found that Option A would better respond to population growth and demographic change than Option B, particularly the growth occurring in Elgar Ward and in Box Hill.

While there was some concern from submitters favouring Option B that having three councillors in Elgar Ward and two councillors in the other four wards could lead to inequality, the VEC assessed the risk of this impacting council decisions to be low. A local council consisting of 11 councillors requires six councillors to resolve a decision, which is already the case under the current electoral structure.

The VEC also assessed the benefits of an additional councillor in response to the argument that a lack of parity between the wards in Option A could lead to inequitable representation. It was considered that three councillors in Elgar Ward would be equitable and more effective given the impact of voter growth and social diversity on councillor workloads. Moreover, the VEC also considered that while a lower quota of votes would be required for candidates to be elected from a three-councillor ward, the voter-to-councillor ratio and the large number of voters in the ward would mean that candidates in Elgar Ward would still need about the same number of votes to be elected as in a two-councillor ward. As such, it was determined that the benefits of an additional councillor outweighed the potential drawbacks of having one ward with three councillors and the other four with two.

The VEC considered the argument in support of 11 councillors (and Option A) that an odd number of councillors would reduce the chance of tied votes during the Council's decision-

making. This was not raised as a major concern in submissions, and a review of council meeting minutes revealed tied votes were a rare occurrence during the last two years. Moreover, with any number of councillors, the possibility for tied votes is not entirely removed as councillors are sometimes absent from meetings for any range of reasons. As such, the argument in favour of 11 councillors to avoid tied votes on the Council was not an important factor in the VEC's deliberations.

Overall, the VEC considered Option A involved an acceptable level of change and was warranted in light of the available evidence. Option A would provide an improvement to the current electoral structure and would maintain the electoral structure favoured by most submitters, which appeared to be working well for the voters of Whitehorse City Council.

Summary

The VEC considered a compelling case existed for increasing the number of councillors for Whitehorse City Council to 11. In particular, the City is experiencing a sustained level of population growth that is expected to increase over the coming years. The VEC also considered Option A largely resembled the current structure, but compared with Option B, Option A provided clearer and more easily identifiable ward boundaries and would not split communities of interest to the same degree. For these reasons the VEC considered Option A to be the most appropriate electoral structure for Whitehorse City Council.

The VEC's recommendation

The Victorian Electoral Commission recommends that Whitehorse City Council consist of 11 councillors elected from five wards (four two-councillor wards and one three-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.

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

Appendix 1: Public involvement

Preliminary submissions

Preliminary submissions were made by:

Allan, Peter (two submissions) Hewett, Aaron

Bates, Kieran Lucas, Peter

Berry, David Makhijani, Anne

Blackburn and District Tree Pell, Brian

Preservation Society Inc. Proportional Representation Society

Davenport, Andrew of Australia (Victoria-Tasmania) Inc.

Dilley, Warwick Sharples, Judy

Drury, Elspeth Simpson, Donald

Elgar Contact Trueman, Chris

Law, Dennis Victorian Greens, Whitehorse Branch

Haley, Gary Whitehorse City Council

Harris, Helen OAM Whitehorse Historical Society Inc.

Hassan, Hasan

Response submissions

Response submissions were made by:

Allan, Peter Malvestuto, John

Blackburn Village Residents Group Pell, Brian

Inc. Proportional Representation Society

Drury, Elspeth of Australia (Victoria-Tasmania) Inc.

Hewett, Aaron Tenni, Catherine

Jacobson, Colin and Julie Whitehorse City Council

Law, Dennis

Public hearing

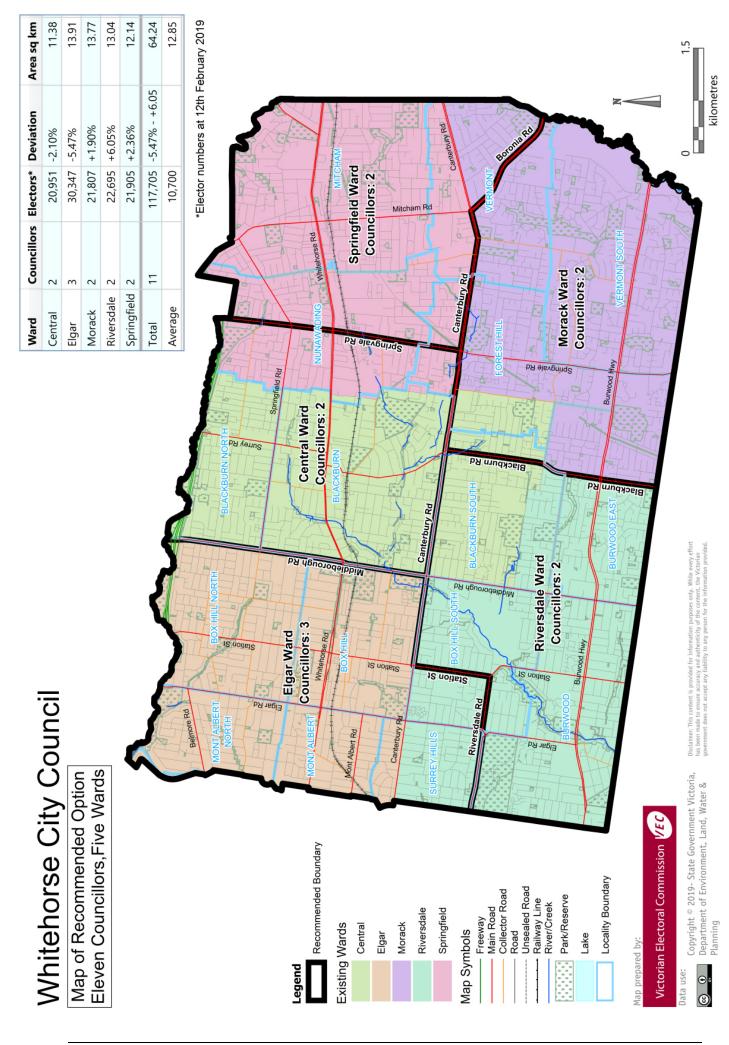
The following individuals spoke at the public hearing:

Bennett, Bill (Councillor, Mayor of Whitehorse City Council)

Pell, Brian

Appendix 2: Map

The map is provided on the next page.



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
Herald Sun	Thursday 6 June	Wednesday 7 August
Whitehorse Leader	Wednesday 26 June	Wednesday 28 August

Media releases

A media release was prepared and distributed to local media to promote the commencement of the review. A further release was distributed with the publication of the preliminary report. 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 Tuesday 2 July 2019 in the Council Chambers, Whitehorse Civic Centre, 379 Whitehorse Road, Nunawading.

Submissions 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 8,716 during the preliminary submission stage and 7,846 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.



Level 11, 530 Collins Street Melbourne Victoria 3000 Ph: 03 8620 1100 | Fax: 03 9629 8632 vec.vic.gov.au