ELECTORAL REPRESENTATION REVIEW Moreland City Council

Final Report



26 October 2011

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Recommendation

The Victorian Electoral Commission (VEC) recommends that Moreland City Council consist of 11 councillors to be elected from two four-councillor wards and one three-councillor ward, using modified boundaries from the existing structure.

Background

Legislative basis

The *Local Government Act 1989* (the Act) requires the VEC to conduct an electoral representation review of each municipality in Victoria at least every 12 years. The Act specifies that the purpose of a representation review is to recommend to the Minister for Local Government the number of councillors and the electoral structure for a municipality, which will provide 'fair and equitable representation for the persons who are entitled to vote at a general election of the Council'.¹

The Act requires the VEC, as part of an Electoral Representation Review, to consider:

- the number of councillors in a municipality;
- whether a municipality should be unsubdivided or subdivided;
- if it should be subdivided, whether ward boundaries:
 - o provide for fair and equitable division of the municipality;
 - ensure equality of representation through the number of voters being represented by each councillor being within 10 per cent of the average number of voters represented by all councillors; and,
- if it should be subdivided, the number of councillors that should be elected for each ward.

The VEC and electoral representation reviews

The VEC has conducted electoral representation reviews since 2004 on appointment by local councils. The Act was changed in 2010 to define the VEC as the only agency authorised to undertake the reviews.

The VEC drew on its experience in mapping and boundary modelling and also engaged consultants with experience in local government to provide advice on specific local representation issues during the review.

¹ Section 219D of the Local Government Act 1989.

Profile of the City of Moreland

The City of Moreland was formed in 1995 by the amalgamation of the City of Brunswick and parts of the Cities of Broadmeadows and Coburg. The City includes the suburbs of Brunswick, Brunswick East, Brunswick West, Coburg, Coburg North, Fawkner, Glenroy, Hadfield, Oak Park, Pascoe Vale, and Pascoe Vale South.

At the 2006 census, the City recorded a population of 135,764 people. Over the next 10 years, the population is projected to grow by 8.27 per cent.²

Current electoral structure

The last electoral representation review for Moreland City Council took place in 2004. Following the review, the Minister for Local Government determined that the structure of Moreland City Council would be:

- 11 councillors;
- divided into three wards North-East Ward, North-West Ward, and South Ward;
- with three councillors for South Ward and four councillors for each of the remaining wards.

The electoral representation review process

The VEC proceeded on the basis of three main principles:

1. Ensuring the number of voters represented by each councillor is within 10 per cent of the average number of voters per councillor for that municipality.

Populations are continually changing. Over time these changes can lead to some wards having larger or smaller numbers of voters. As part of the review, the VEC corrected any imbalances and also took into account likely population changes to ensure these boundaries provide equitable representation until the next review.

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

The VEC was guided by its comparisons of municipalities of a similar size and category to the council under review. The VEC also considered any special circumstances that may warrant the municipality to have more or fewer councillors than similar municipalities.

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

Each municipality contains a number of communities of interest and, where practicable, the electoral structure should be designed to take these into account. This allows elected councillors to be more effective representatives of the people in their particular municipality or ward.

² Department of Planning and Community Development, Victoria in Future 2nd Release (2008).

The recommendation is based on:

- internal research specifically relating to the municipality under review;
- VEC experience from its work with other municipalities and in similar reviews for State elections;
- VEC expertise in mapping, demography and local government;
- careful consideration of all public input in the form of written and verbal submissions received during the review; and,
- advice received from consultants with wide experience in local government.

Public submissions were an important part of the process, but were not the only consideration during the review. The VEC seeks to combine the information gathered through public submissions with its own research and analysis of other factors, such as the need to give representation to communities of interest. The recommendation is not based on a 'straw poll' of the number of submissions supporting a particular option.

VEC research

In addition to the information provided in submissions, the VEC created a profile of the municipality based on population trends, development projections and demographic indicators. The VEC used the Australian Bureau of Statistics 2006 census community profiles, the Department of Planning and Community Development projections and voter statistics from the Victorian electoral roll. The VEC also undertook field work to view current and possible boundaries for each of the options presented in the preliminary report to evaluate their effectiveness.

Public involvement

The VEC values the local knowledge and perspectives presented by the public in written submissions. The public were given two opportunities to provide submissions during the review. Their input was considered by the panel in forming the options in the preliminary report and they were also invited to respond to these options. In addition, a public hearing was held to enable people to speak in support of their submissions and supplement it with information.

To ensure transparency in the process, all written submissions were published on the VEC website and all verbal submissions were heard at a public hearing.

To raise awareness of the review and encourage the public to engage with the process, a full public information campaign was undertaken.

Advertising

In accordance with sections 219F(4) and 219F(7) of the Act, the VEC ensured public notices were placed in local newspapers.

Notification of the review appeared in the local newspaper *Moreland Leader* on Monday, 11 July. The notice detailed the process for the review and called for public submissions. A general notice covering several reviews was printed in *The Age* and the *Herald Sun* on Tuesday, 5 July.

Notification of the release of the preliminary report appeared in appeared in the local newspaper *Moreland Leader* on Monday, 29 August. The notice detailed the options contained in the preliminary report, including a map of each option, instructions on how to access a copy of the preliminary report and how to make a submission in response to the report.

Media releases

The VEC produced two media releases for this review and distributed these to the local media. These releases corresponded with the notice of review on Monday, 11 July and with the notice of release of the preliminary report on Monday, 29 August.

Public information session

The VEC held a public information session for people interested in the review process on Tuesday, 26 July at the Council Chambers, Moreland Civic Centre, 90 Bell Street, Coburg.

Information brochure and poster

An information brochure was provided to the Council to be distributed to residents through the Council's network, such as in libraries and service centres. A poster was provided to the Council to be displayed in public spaces.

Helpline

A dedicated helpline was established to assist with public enquiries concerning the review process.

VEC website

The VEC website delivered up-to-date information to provide transparency during the preliminary and response stages of the review process. All submissions were posted on the website and an online submission tool was created to facilitate the submission process. The preliminary report was available for electronic download on the website.

Guide for submissions

A guide for submissions was developed and distributed to those interested in making submissions. Copies of the guide for submissions were available on the VEC website, in hardcopy on request, and were provided to the Council.

Preliminary report

In accordance with the requirement of the Act, the VEC produced a preliminary report outlining its preferred option and two alternative options proposed for Moreland City Council. The report was released on Monday, 29 August.

Preliminary submissions

By the close of preliminary submissions at 5.00pm on Monday, 8 August, the VEC had received three submissions.

The VEC received one submission Mr Stephen Luntz and two from organisations, the Moreland Branch of the Australian Greens and the Proportional Representation Society of Australia (Victoria-Tasmania) Inc.

The submission from Mr Luntz noted the municipality's high population growth rate in comparison to other metropolitan councils and stated thatthis will continue, exceeding the growth anticipated by the VEC in the Guide for Submissions. Mr Luntz referred to major developments within the Brunswick area and noted that further development, such as the Tip Top and Coburg Hill sites, is likely to see the City overtake the number of residents in other metropolitan municipalities. For this reason, and to reflect the population diversity in the City of Moreland, Mr Luntz did not support reducing the number of councillors.

Mr Luntz could see no reason to create an additional ward, as it would likely create a smaller ward(s) with fewer councillors, which would be unlikely to fairly represent the diversity in the City. He was undecided on boundary changes but strongly supported maintaining the existing structure of 11 councillors from two four-councillor wards and one three-councillor ward.

Mr Luntz also discussed the representation of different political parties on Council and how multiple candidates from the same party might split the vote in a ward. The VEC, in conducting electoral representation reviews, does not consider the impact of any change to the electoral structure on any political party or specific political interests.

The submission from the Moreland Branch of the Australian Greens recommended retaining the existing multiple ward structure that provides for proportional representation. The submission noted that a return to a single-councillor ward structure would not offer the choice and range of views currently represented on the Council.

The submission also suggested expanding the size of the South Ward to include all parts of Brunswick and increasing the number of councillors to four, while reducing North-East Ward to three councillors.

The submission from the Proportional Representation Society of Australia (Victoria-Tasmania) Inc. argued that an even number of councillors in multi-councillor wards could be problematic in terms of the principle of majority rule and lead to distortions in the result. The Society recommended that if an 11-member structure was retained, it should be composed of two three-councillor wards and one five-councillor ward. The Society, however, also noted that a nine-member council, with three three-councillor wards, or a 12-member council, with four three-councillor wards, could remove the disparity between ward sizes and achieve fairness and parity in the power of each vote.

A list of submitters, by name, is available in Appendix One. Copies of the submissions can be viewed on the VEC website vec.vic.gov.au.

Preliminary options

The VEC assessed a range of electoral representation models that may suit Moreland City Council. In doing so, the VEC considered the projected population change, the desire to maintain communities of interest, and the number of voters and number of councillors compared with other municipalities. The VEC developed three options for public consultation.

The City of Moreland has an estimated 109,744 voters represented by 11 councillors and sits between the Cities of Kingston and Darebin in the band of metropolitan municipalities of comparable population size, but have fewer councillors (9). The VEC recommended an increase from 10 councillors at the Council's last electoral representation review conducted in 2004, in recognition of the special characteristics that exist in the City, including the City's ageing population, cultural diversity and a tradition of intensive community consultation and engagement. The VEC did not recommend a reduction in the number councillors in its preliminary report, as it found these characteristics were still evident in the municipality.

In determining possible boundaries, the VEC considered development projections provided by the Department of Planning and Community Development. The projections show that the large developments of Coventry Street Retirement Village, Industry Lane, Pentridge Village and Whelans Site will lead to a greater level of growth in the north-east of the City. In addition, in the longer term, Coburg Hill (at the former Kodak site) and future stages of the Pentridge Estate developments will add to the projected growth in the north-east of the City.

In the last review, the VEC anticipated development in the North-East Ward. However, this development has been slower than predicted and, as a consequence, the current deviation for South Ward now falls outside the tolerance. The Act requires that where a ward structure applies, the deviation to be no more than +/- 10 per cent from the

average number of votes per councillor across the municipality. As a result, boundary changes were necessary in the current review.

In addition to addressing the current deviation in voter numbers for South Ward and preparing for long-term growth, the VEC considered communities of interest in recommending an appropriate structure. The VEC also recognised that the City has experienced a high rate of gentrification since the Council's last review, particularly in the south of the municipality, where, for example, the trend is continuing to move north from the suburb of Brunswick. The VEC is aware that in areas of significant demographic and social change, new residents are likely to have different expectations of the Council than former residents. The VEC considers this as an important principle in considering possible shifts in the historical communities of interest and proposing boundaries that reflect these communities.

The VEC also recognises that cultural diversity creates important communities of interest which may have particular needs and therefore expectations from their local Council. The City of Moreland is considered to have a culturally diverse population, with more than 39 per cent of the population born outside Australia.³ In preparing the models, the VEC aimed to ensure these communities were fairly represented within the proposed wards.

The VEC did not propose an option for a single-councillor ward structure, with 11 councillors, as wards would be subject to even greater pressure from population changes and unable to absorb population changes from the large-scale residential developments in the municipality.

The preliminary report detailed three options that were under consideration by the VEC. The options were:

- Option A (Preferred Option) that Moreland City Council consist of 11 councillors to be elected from two four-councillor wards and one threecouncillor ward, using modified boundaries from the existing structure.
- Option B (Alternative Option) that Moreland City Council consist of 11 councillors to be elected from three three-councillor wards and one twocouncillor ward.
- Option C (Alternative Option) that Moreland City Council consist of 11 councillors to be elected from three three-councillor wards and one twocouncillor ward, using different boundaries from those of Option B.

³ Australian Bureau of Statistics: 2006 Census of Population and Housing – Moreland City Council community profile.

Public response

Response submissions

Response submissions for the electoral representation review of Moreland City Council opened on Monday, 29 August and closed at 5.00 pm on Monday, 26 September. Eleven response submissions were received. Table 1 shows the level of support for each option based on the preferences expressed in each of the submissions.

Table 1: Preferences expressed in response submissions for each option.

Option A	Option B	Option C	Other
(Preferred	(Alternative	(Alternative	
Option)	Option)	Option)	
6	2	3	

Analysis of submissions

The VEC received six submissions that directly supported Option A (Preferred Option), proposing a three-ward structure consisting of two four-councillor wards and one three-councillor ward and using modified boundaries to the existing structure. Submitters argued that the existing electoral structure has served the community well, and supported the necessary boundary changes required to allow for population change. In support for this structure, one submitter (Mr Stephen Luntz) noted that Albion Street provided residents with a clearly identifiable boundary and that the boundary between North-East Ward and North-West Ward was also easily recognised as it uses the same boundary as the existing structure.

Two submissions recommended both Option B (Alternative Option) and Option C (Alternative Option), which both propose an electoral structure that consists of 11 councillors to be elected from four wards, with three three-councillor wards and one two-councillor ward, but arrange wards differently. The submissions from the Proportional Representation Society of Australia (Victoria–Tasmania) Inc. and Mr PJ Frayne argued that Options B and C were more in line with the principles of proportional representation than Option A, as these presented more wards with an odd number of councillors. The submitters argued that an odd number of councillors would ensure the majority of votes in the ward would elect a majority of councillors. Mr Frayne also suggested that smaller wards proposed in Options B and C would increase local representation and would strengthen the relationship between residents and their ward councillors. Mr Frayne argued that the North-East Ward in Option A comprises too many suburbs and that this should be considered a form of 'gerrymandering'.

While one submitter, Cr Lambros Tapinos, supported retaining a structure of 11 councillors from three wards (as proposed in Option A), he argued that the separation of the northern parts of Brunswick from South Ward would split older communities of interest that are still strong, dynamic and interconnected with the Brunswick area. Cr Tapinos proposed alternative models for consideration that unite all parts of Brunswick in South Ward and assigns four councillors to the ward to accommodate this change, while reducing number of councillors to three for a northern ward. Cr Tapinos also noted that there has been an increase in demand for property subdivisions in Brunswick and suggested that an additional councillor could reduce the heavy workload that has come from the complex planning applications.

Two further submissions did not support any option put forward by the VEC. The submissions from The Hon. Kelvin Thomson MP and Ms Jennifer Jacomb argued in support for a reinstatement of a single-councillor ward structure. A single-councillor ward structure was in place in the City of Moreland prior to the VEC's last electoral representation review of the City in 2004. The submissions suggested that this structure would strengthen the democratic process by increasing councillor accountability and providing local representation.

Public hearing

Everyone who made a submission in response to the report was invited to speak to their submissions and four individuals accepted. Members of the public were invited to attend and seven people, including the speakers, were present. The speakers were allocated 10 minutes each.

Two speakers spoke in favour of Option A. The speakers noted their preference for a multi-councillor system of proportional representation, arguing that this structure allowed a diversity of views to be represented. One submitter, Ms Marie Rowan, discussed the positive experiences she has had with the current council, and the notable shift in public involvement compared to the single-councillor structure in place prior to the 2004 review. Ms Rowan felt that the multi-councillor ward structure allowed a range of issues and voices to be represented, and emphasised how she felt much more involved in councillor decision-making under the current structure. Mr Stephen Luntz who also spoke in favour of Option A, suggested that this structure could best ensure a diversity of views would be represented by Council. Further, Mr Luntz suggested that the structure provided boundaries that were clearer and would better represent the communities of interest.

In his submission, Mr Luntz also acknowledged that there were merits in one of the alternative models proposed in a response submission from Cr Lambros Tapinos. In terms of reflecting communities of interest, Mr Luntz argued that Moreland Road and

Albion Street both offered a suitable boundary for South Ward and would be easily identifiable by residents. Mr Luntz also suggested that, if the VEC was to recommend a four-ward structure, his preference would be for Option C as the ward boundaries collects geographic communities of interest better than Option B.

One submitter, Ms Jennifer Jacomb, noted that her preference for 11 single-councillor ward structure was not one that the VEC had put forward as an option. Ms Jacomb discussed the history and ageing infrastructure of Brunswick and suggested these issues have gone under-represented as result of over-development in the area. Ms Jacomb argued that this would not be the case for a single-councillor structure, as councillors would be subject to higher levels of scrutiny and accountability. Further, Ms Jacomb suggested a single-councillor ward structure would be more democratic system in providing more candidates with the opportunity to run in an election. Ms Jacomb argued that the higher costs required for potential candidates to canvass electors in large multi-councillor wards would deter many from standing for election to the Council.

Another speaker, Cr Tapinos, who noted that his preference was not one that the VEC had put forward, spoke about the importance of uniting all the Brunswick area within South Ward. Cr Tapinos discussed the strong communities of interest within the area and how they identify with South Ward. Cr Tapinos argued that using Moreland Road rather than Albion Street as a boundary would be more effective in representing the communities of Brunswick. Cr Tapinos further noted that if Option A was not a viable option, his preference would be for Option B, which proposes boundaries that separate Brunswick East from Brunswick West.

Some speakers suggested that the Preliminary Report was not publicised widely enough and the four-week period for public submissions was not sufficient. The panel explained to speakers that the timeframe was set by Parliament in the Act, and was amended in 2008 to allow 28 days, rather than 14 days for public submissions at the preliminary and response submission stages. The advertising was arranged in consultation with the Council and complied with statutory requirements.

Findings and Recommendation

The VEC consulted on three options, including as its Preferred Option (Option A), retaining the existing structure but with modified boundaries. This report has summarised the process the VEC completed to gather information, including public submissions, and to develop and consult on the options under consideration. The VEC now provides its findings for recommendation to the Minister.

Number of councillors

As part of the electoral representation review, the Act requires the VEC to recommend the appropriate number of councillors for Moreland City Council. The Act allows for municipalities to have between five and 12 councillors.

The VEC is guided by its comparisons with Victorian municipalities of similar size and category in the State in determining the appropriate number of councillors for the council under review. As noted earlier, the City of Moreland has 109,744 voters represented by 11 councillors. The City sits between the Cities of Kingston (111,117 voters) and Darebin (100,121 voters) of metropolitan councils of comparable population size; however, these Councils have fewer councillors. With an estimated 9,977 voters per councillor, the City of Moreland sits well below the State average of municipalities with 11 councillors.

Moreland City Council increased from 10 councillors to 11 councillors following the last review in 2004. The VEC made this recommendation in recognition of the special characteristics that exist in the City, including the City's ageing population, linguistic and cultural diversity and a tradition of intensive community consultation and engagement. These VEC believes that these characteristics still apply.

The VEC also took into consideration the impact of the City's growing population, expected to rise by 8.27 per cent in the next 10 years, and the large residential developments planned in the north of the municipality.

The VEC considers that the City's characteristics and anticipated population growth justify the need to retain 11 councillors. The VEC is confident that a structure with 11 councillors would continue to provide fair and equitable representation for the residents of the City of Moreland.

Electoral structure

The Act also requires the VEC to recommend an appropriate electoral structure for the municipality. The VEC considered whether the municipality should be unsubdivided or subdivided into wards and, if subdivided, the positioning of ward boundaries and the

number of councillors to be elected for each ward to provide fair and equitable division and ensure equity of representation.

Currently, Moreland City Council comprises three wards, with two four-councillor wards and one three-councillor ward. The options put forward by the VEC were:

- retaining the current three-ward structure, with modified boundaries;
- creating four wards around the transport corridors that run north-south in the municipality; and
- creating four wards, with South and Central Wards that run in an east-west direction, and North-East and North-West Wards that run in a north-south direction.

All the options put forward in the preliminary report were considered to likely meet the VEC's main electoral representation review principles. In considering suitable boundaries, the VEC sought to model boundaries that are sustainable until at least the next scheduled electoral representation review, circumventing the need for a subdivision review in the interim. The Act requires all wards in a ward structure to deviate from the average number of voters per councillor across the municipality by no more than +/- 10 per cent.

In modelling boundaries, the VEC had to address the current deviation in voter numbers for South Ward and allow for planned development in the North-East Ward. In assessing the current structure, the VEC noted there was value in using Albion Street as a boundary to moderate the current and future deviations. Further, some submitters argued that using either Albion Street or Moreland Road would provide a logical and clearly identifiable boundary that would be familiar for residents. The VEC considers there is merit in arguments that support the maintenance of familiar boundaries and believes that the proposed boundaries of the VEC's preferred option (Option A) would provide a sustainable structure through to the next electoral representation review.

The +/- 10 per cent tolerance requirement can create challenges in devising ward boundaries that reflect all communities of interest in a municipality. The VEC received submissions during the review that suggested that fair representation for communities of interest would be achievable through the boundaries presented in the VEC's preferred option. This option retains similar boundaries to the existing structure, and groups broader communities of interest into three wards. Some submitters argued that the use of Sydney Road in Option A as a boundary was more suitable in reflecting existing communities than the railway line used in Option B. They also suggested that many residents view their community in relation to whether they reside east or west of Sydney Road, not the railway line.

Several submitters were in favour of a multi-councillor system of proportional representation for the municipality, as they argued this structure offered electors a greater choice both as voters at elections and as constituents, provided effective representation of the community, and promoted a diversity of views on council. Further, some submitters considered the current structure was an improvement on the single-councillor ward system in place prior to the 2004 electoral representation review. Ms Marie Rowan at the public hearing emphasised her satisfaction with the structure in place for the past eight years, and suggested the current structure had delivered more representation for community interests.

There were some submitters who called for the reinstatement of a single-councillor ward structure and expressed disappointment in the options the VEC put forward. The VEC considered options for a single-councillor ward structure, but was unable to model boundaries that did not split communities of interest and were able to absorb the projected residential development.

The preliminary report, however, did contain two options with four multi-councillor wards, Options B and C. The smaller wards in these options grouped geographic communities differently and proposed boundaries that remained within the acceptable tolerance. Some submissions suggested these options provided more localised representation for geographic communities, which they argued would go underrepresented under the large wards proposed by Option A.

A response submission received from Cr Lambros Tapinos argued that the northern part of Brunswick, which currently sits outside of South Ward, is not effectively represented as it is disconnected from the rest of the Brunswick community. Cr Tapinos suggested two alternative structures for consideration by the VEC that unites Brunswick into the one ward. The VEC modelled both options to evaluate the viability of these structures and made available maps, describing the proposed options, at the public hearing.

Cr Tapinos' first option proposed a structure similar in composition to the three wards of the VEC's preferred option, but with four councillors for the proposed South Ward and only three councillors for North-East Ward. In this model voter numbers per councillor were within the acceptable tolerance for the short term, but according to development projections the wards would deviate to +19.46 per cent in the proposed North-East Ward by 2021. The VEC is reluctant to consider options that deviate beyond the allowable +/- 10 per cent before the next electoral representation review is due if other options that can contain the growth are available.

Cr Tapinos' second option also used a three multi-councillor ward structure, with boundaries that run from east to west across the City. When assessing this option, the VEC found that, with minor modification to a boundary between Cr Tapinos' North and

Central Wards, voter number deviations could be well contained until the next scheduled electoral representation review. The VEC, however, was concerned that this model compromises representation for the suburbs of Fawkner, Hadfield, Glenroy, Gowanbrae, Tullamarine and Oak Park. The VEC considers that the high levels of cultural and linguistic diversity in the north of the City is a special characteristic that demands higher requirements of local government. Therefore, the VEC considers that having only three councillors in Cr Tapinos' proposed North Ward might detrimentally affect representation for the communities within the area.



Figure 1: Cr Tapinos' second option, proposing two four-councillor wards and one three-councillor ward in the City of Moreland, using the current voter estimate and deviations and estimated deviations projected to 2021.

The VEC also considered the number of residents that would be affected by a change from the status quo. Voter numbers show under Cr Tapinos' model, some 23,817 voters would directly affected by the proposed change. The VEC views this as considerable, compared to the 5,031 residents who would change to a different ward under the VEC's preferred option. Although the VEC sees merit in both options proposed by Cr Tapinos, the VEC formed the view that such a change would affect a significant amount of residents for, arguably, slightly better geographical grouping of the Brunswick area. The VEC considers that this does not outweigh the advantages of Option A, which provides familiarity and greater longevity until the next scheduled electoral reprepresentation review.

Summary

The VEC believes Option A (Preferred Option) of 11 councillors, with two four-councillor wards and one three-councillor ward, provides the most effective electoral structure for the residents of the City of Moreland. This structure provides sustainable boundaries that absorb current and projected voter number deviations until the next scheduled electoral representation review and fair representation for existing communities of interest. This structure puts forward the least disruption to residents by using a similar electoral structure and boundaries to the existing structure.

Recommendation

The Victorian Electoral Commission (VEC) recommends that Moreland City Council consist of 11 councillors to be elected from two four-councillor wards and one three-councillor ward, using modified boundaries from the existing structure.

S. H. Tully

Electoral Commissioner

Appendix 1: List of submitters

Preliminary submissions were received from:

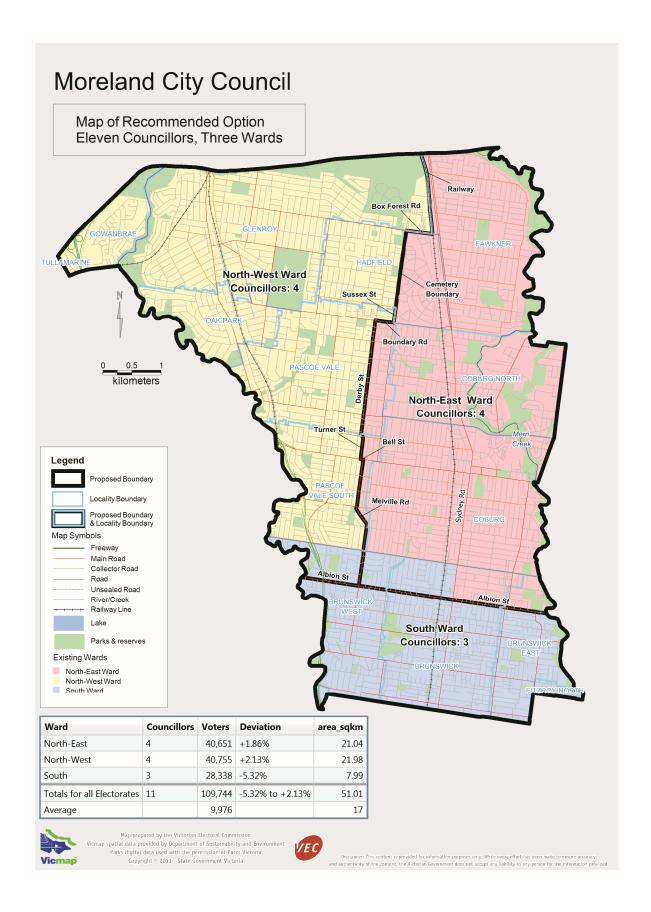
Name
Australian Greens (Moreland Branch)
Proportional Representation Society of Australia (Victoria-Tasmania) Inc.
Stephen Luntz

Response submissions were received from:

Name
Dahlstrom, M
Frayne, P
Humphreys, R
Jacomb, J*
Lloyd, P
Luntz, S*
Proportional Representation Society of Australia (Victoria-Tasmania) Inc.
Rowan, M*
Tapinos, L*
Thomson, K
Watkins, S

^{*} indicates those submitters who spoke in support of their submission at the public hearing on Thursday, 6 October.

Appendix 2: Map



Victorian Electoral Commission

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