



1 November 2023

Electoral Representation Advisory Panel  
c/o Victorian Electoral Commission  
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Melbourne VIC 3000

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**VIA EMAIL**

Dear Electoral Representation Advisory Panel,

**Re: Response Submission on Proposed Electoral Structure - Brimbank City Council**

I write to provide a submission in response to the proposed electoral structure of the Brimbank City Council, which has been endorsed by the Council at its meeting on 31 October 2023.

**Number of Councillors**

With single member wards pre-determined, Council acknowledges that the Panel is therefore only able to make recommendation regarding the appropriate number of Councillors to be elected, in a range from five to twelve Councillors in accordance with the Act. Council agrees with the preliminary position of the Panel that eleven Councillors is the preferred number.

Council notes that, in determining the appropriate number, it is important that consideration be given to the size, geography, population and the number and distribution of voters in the municipality.

The key reasons for supporting the retention of status quo (Brimbank is currently served by eleven Councillors), are:

- The overall change to the electoral model will be limited to a move to single member wards which will enhance the communication effort.
- Any reduction from eleven could reduce the diversity of representation for the Brimbank community.

- Any increase in representation would increase the cost to the community associated with Councillor allowances, professional development and associated support costs.
- Brimbank’s voter:councillor ratio is currently comparable to similar metropolitan councils (12,380 compared to 12,188), meaning any increase or decrease in councillor numbers would make Brimbank less comparable.
- An odd number of Councillors reduces the likelihood of the Mayor having to exercise a casting vote and there being a stalemate in the election of Mayor and Deputy Mayor.

### **Ward Names**

Brimbank Council notes that that each model contains some ward names that are new and are based on natural features, built features, roads, rivers, lakes, suburbs or localities found within each ward.

This concept is generally supported as it is important wards to be easily recognisable, to give a sense of locality being represented and for voters to more easily associate with the ward.

Council does, however, in order to avoid confusion, suggest that where possible suburb names be avoided where such suburbs are split over two or more wards or where two or more suburbs are contained within one ward.

### **Ward Boundaries**

Council acknowledges the challenges of identifying suitable ward boundaries whilst responding to the legislative requirement that ward boundaries must result in a structure where the number of voters per ward does not vary by more than 10 per cent from the average number of voters for all of the wards.

Given the timeframes involved, Council has not sought to offer variations to the boundaries within each Model but instead encourages the panel to achieve the following outcomes:

- Established and distinct communities should not be unnecessarily split between two or more wards.
- Where ward boundaries are proximate to major roads and railway lines, the ward boundary should follow that geographic feature where possible.
- Where ward boundaries are proximate to existing suburb boundaries, the ward boundary should follow the suburb boundary where possible.

- Wards should not be overly complicated in shape.

### **Models**

Council’s submission in respect to each of the models proposed in the Preliminary Report dated October 2023, is now provided below:

#### **Model 1 - A single-councillor ward structure with 11 councillors**

*Under this model, Brimbank City Council would adopt an 11-ward structure. Each ward would be represented by one councillor, in line with the requirements of the Act. The proposed ward names for this model are: Deer Park Ward, Derrimut Ward, Horseshoe Bend Ward, Jones Creek Ward, Keilor Plains Ward, Kings Park Ward, Kororoit Creek Ward, Organ Pipes Ward, St Albans Ward, Sunshine Ward, Sydenham Ward.*

Whilst acknowledging that this Model has some advantages (ie based on current electoral structure, and has clear boundaries), Council does NOT prefer this Model for the following reasons:

- It is least stable and with greater potential for wards to be outside the +/- 10% range by 2028 than for the other 2 models.
- Derrimut Ward contains limited connectivity between the Derrimut and Sunshine West communities.
- Kororoit Creek and Sunshine wards are divided by the train line.
- Sunshine central business district is split between 2 wards.
- Split between Sydenham and Kings Park wards is arbitrary.
- Metropolitan Ring Road intersects Derrimut Ward.
- Some suburbs split between wards, notably St Albans.

### **Model 2 – A single-councillor ward structure with 11 councillors**

*Under this model, Brimbank City Council would adopt an 11-ward structure. Each ward would be represented by one councillor, in line with the requirements of the Act. The proposed ward names for this model are: Albanvale Ward, Cherry Creek Ward, Copernicus Ward, Grasslands Ward, Horseshoe Bend Ward, Kings Ward, Kororoit Creek Ward, Mount Derrimut Ward, Organ Pipes Ward, St Albans Ward, Sunshine Ward.*

Whilst acknowledging that this Model has some limitations (ie unclear boundaries in the north, some central suburbs are spread across multiple wards, and Sunshine central business district is split between 2 wards), this model IS generally more preferred by Council for the following reasons:

- It is most effective at keeping communities of interest together.
- It generally has clearer and stronger ward boundaries
- It groups communities in the south well.
- It is within Councillor:Voter deviation range of +/- 10% and is likely to be so until the 2028 election

### **Model 3 – A single-councillor ward structure with 11 councillors (alternative version)**

*Under this model, Brimbank City Council would adopt an 11-ward structure. Each ward would be represented by one councillor, in line with the requirements of the Act. The proposed ward names for this model are: Albanvale Ward, Copernicus Ward, Grasslands Ward, Kings Ward, Maribyrnong River Ward, Mount Derrimut Ward, Organ Pipes Ward, St Albans Ward, Sunshine Ward, Sunshine West Ward, Watergardens Ward.*

Whilst acknowledging that this Model has some advantages (ie uses some easily identifiable and familiar boundaries, and keeps some entire suburbs together), Council does NOT prefer this Model for the following reasons:

- Maribyrnong River Ward has irregular boundaries and lacks a community interest, particularly due to the connecting Sunshine and Keilor Park.
- Residents might not identify with shapes of some wards.
- Parts of the suburb of St Albans are divided across 4 wards
- Organ Pipes Ward is quite disperse with unclear and irregular boundaries.

**Submission conclusion**

Model 1 – not preferred

Model 2 – preferred Model

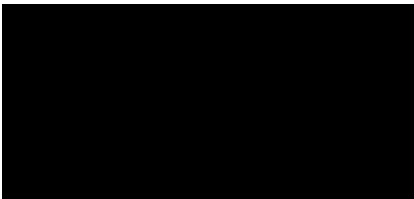
Model 3 – not preferred

I appreciate the Panel’s consideration of this submission to the electoral structure review of Brimbank City Council. I or an authorised delegate from Council would like to speak in support of Council’s submission on Wednesday 15 November 2023.

For inquiries please contact Mark Brady, Manager Governance and Risk at



Yours sincerely,



Fiona Blair  
Chief Executive Officer