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13 March 2024

Ward Boundary Review Panel  
Victorian Electoral Commission

Via Email Only: [SouthGippsland.WardReview@vec.vic.gov.au](mailto:SouthGippsland.WardReview@vec.vic.gov.au)

Dear Review Panel

Hello and thank you for considering my submission.  
I am a South Gippsland Shire Council (SGSC) Councillor and am extremely concerned about the proposed boundary realignment for the Coastal Promontory Ward (Coastal Prom).

I write from the perspective of a SGSC Coastal Prom Councillor, a SGSC Audit and Risk Committee Member, member of the Municipal Association of Victoria's Emergency Management Committee, member of the Local Area Emergency Response Team and resident of Venus Bay (8 years part time, 4 years full time).

Firstly, I am unsure of the core objective of the proposed Coastal Prom Ward boundary realignment model? It appears to go against the stated goal of a roughly even number of ratepayers for each ward  $\pm 10\%$ ? I cannot understand the explanation provided for the Coastal Prom deviation well above this, "it was felt that such change was necessary to sensibly rebalance all wards to adhere to the  $\pm 10\%$  requirement." when it actually creates a 25% imbalance?

**This proposed change makes the existing disparity of workload, population and geographic spread between the three wards greater not smaller.**

The only explanation I can think of is that in this review the part time residents of the Coastal Communities are being excluded from the figures. Is it assuming the part-time population won't register to vote as it's now an additional procedural requirement?



Is this realignment based on the theory that many ratepayers will slip the data net because of the extra step in the enrolment process and thus somehow, they cease to exist as a strain on Ward councillors and council resources? This approach is perplexing and lacks common sense to me as a ward councillor for the Coastal Prom for the past three years.

To suggest that the part time communities, who pay equal rates are somehow a lesser burden on the Councillors representing them and shouldn't be counted in boundary review is not understanding the reality of what Councillors working in traditional "holiday" towns are facing in adapting to climate change, the advent of the offshore wind industry and changes in the way people live and work in our regional communities.

We face -

- Massive jumps in the part time population working from weekenders post-covid not reflected in data.
- We've changed the working from home paradigm and only have reporting mechanisms for permanent or non-permanent classifications to measure population.
- Incorrect basic permanent population data coming out of the 2021 census due to covid fines at the time.
- Managing the expectations and delivery outcomes for multiple residential demographics AND catering to the short-term rental and tourism market.
- A difficult to reach visitor, tourism population important for the economic viability of the towns.
- Stretched Emergency response resources and multi-agency land management.
- Declining volunteer numbers in traditionally underserved towns creating big gaps in health and emergency services.
- Under resourced voluntary committees of management responsible for huge stretches of coastline underfunded and under-resourced.
- Vulnerable populations with increased demands on council with storm surges, erosion, isolation and increasingly regular extreme weather events.

From my lens this proposed realignment goes against the stated purpose; to allow for current and future population forecasts and sensibly dispersed Council and Councillors resources. At its heart I believe this ward boundary proposal is missing local information, lived experience, due diligence and strategic risk mitigation.



It is my firm belief that every ratepayer in the communities of Venus Bay, Walkerville, Sandy Point, Waratah Bay and Yanakie should be counted in this boundary review. I believe it's time Fish Creek got included in the Coastal Prom Ward and ceased to be split into multiple wards but that is the only change I would recommend to the existing ward boundaries.

**The statistical underestimation of growth and change post COVID is reflected across the Coastal Prom Ward and doesn't appear to have been taken into account in this review.**

Venus Bay is currently the second highest economic residential rate base behind Leongatha and ahead of Korumburra. Yet the 2021 Census paints a different picture of a small township that has decreased in size since the 2016 Census. The 2021 census says Venus Bay has a population of 910, local data says around 1800 permanent residents. Even the starting figures the panel are working with, if you are focusing only on the permanent population and dismiss the part time numbers, are wrong.

Following is a statement by Wendy Lawrence, the Regional Area Manager for the 2021 Census and she confirmed we are using inaccurate ABS data and outlining the reasons why the data is inaccurate.

*"I worked for the ABS as field manager for the area covering Venus Bay, Tarwin Lower up to Inverloch during the 2021 census. The period prior to the Census Night, Census Night itself and some of the follow up phases occurred during COVID lockdowns. There was a lot of confusion during this time, and I am convinced that many people who were resident in Venus Bay on census night. were reluctant to admit that because they might have been living there while still registered to vote at their previous Melbourne address. If you recall, people would have been liable for fines if they had been found to be breaking lockdown rules. In addition to this issue, guidelines on treatment of holiday houses as second homes were completely absent, and I am certain that many people did not complete the Census returns correctly. There was also an element of "government suspicion" expressed in general on social media and in public. This was especially due to the government lockdowns and other pandemic issues. While we did report a couple of outright refusals, many more would not have been apparent to us. So, the resulting number of residents is, I firmly believe largely understated. As a Venus Bay resident who has moved permanently to Venus Bay in 2018, I am absolutely certain the full-time population has increased since 2016. Many other measures have supported this including new builds, electricity connections, chemist data etc. The 2021 Census could not be rescheduled due to the pandemic, and I am very confident the 2026 Census will demonstrate a big increase in permanent residents."*



I have been working with Council, Gippsland Southern Health, the Primary Health Network and others to address this gap in accurate data and help gather the services needed for a population as large as Foster. The truth is people lied or got fined during the last census and this has created inaccurate population data.

On top of this is a lack of recognition of the real numbers and a lack of consideration of the resource strain that comes with supporting communities with multiple demographics, full time, part-time, short-term rentals and visitors and the biggest geographical spread already in the shire.

**The workload on councillors in high tourism areas is immense and it seems the panel have taken the view that having a mix of permanent, part time and visitor populations reduces the load somehow. In reality the opposite is true, we have two or three groups to listen to in each community, we also have the greatest distances to travel and the greatest asset and infrastructure challenges ahead.**

You may be required to stick to limited data sources (such as ABS) initially in this review, but I believe need to do due diligence before making final decision. Along with inaccuracies in permanent population data the numbers swell to 10,000 people over summer in Venus Bay with similar boom and bust patterns in all our coastal communities. To ignore the impact of tourism and the visitor economy on the division of council resources is, in my view, foolhardy and irresponsible from a risk mitigation frame.

**Pre COVID there may have been a business as usual approach to population growth planning for regions like South Gippsland and it was thought the shire would remain stable with the only significant long term growth slated to be in Nyora due to its proximity to Melbourne, it is clear now we must prepare for growth at both ends of the shire; one planned, one imposed due to the offshore wind industry.**

SGSC's own strategic planning is incorporating predicted booms in population growth, industry and economic activity in the Coastal Prom ward due to the renewable energy transition, Marinus Link and wind farms off the East and South Gippsland coastlines.

Marinus Link runs in from Waratah Bay (within the Coastal Prom Ward) and Barry Beach is slated to be the operations and maintenance port for all of the wind farm operations (within the Coastal Prom Ward).





**I would recommend the panel review the major pieces of work undertaken by SGSC during the current council term to address the massive challenges ahead for the Coastal Prom Ward via our Coastal Strategy, Strategic Risks and Advocacy Priorities.**

[The South Gippsland Coastal Strategy](#) may help the panel understand the nonsensical nature of the current boundary realignment recommendations. You only have to look at the current [SGSC Advocacy priorities](#) to see the massive work ahead for Council in our coastal communities. Council's strategic risks – in table 1 below - also paint a picture.

One only has to learn from places like Wonthaggi with the desal plant and the impact on surrounding towns to forecast the impact major infrastructure projects will have on the Coastal Prom ward; I believe to ignore this important reality in the ward boundary realignment is setting Councillors up to fail at supporting communities through economic, social and environmental growth and change.

The issues in the proposed realignment are much bigger than stated concerns about a collection of towns having a different of focus due to being coastal or rural/agricultural, it's about bringing the boundary review into line with the reality of SGSC's future, not relying on outdated and incomplete data and ignoring the key role South Gippsland is playing in the national grid framework and energy transition.

**The Planning Institute of Australia (PIA) has recognised the massive task ahead and South Gippsland's leadership in managing growth and change in the existing Coastal Prom Ward by awarding SGSC with the national award for "Planning Excellence in Community Resilience and Climate change".**

PIA concurred with the challenges and wicked problems ahead, the need for an overhaul of our thinking around adaptation planning, addressing historical underinvestment and the pressures these communities face in terms of infrastructure, energy, tourism and the basics.

I will be presenting at the Coastal Council Roundtable next week on the largely unaddressed challenges ahead specific to the pressures of growth and change on the Coastal Prom coastline, including seemingly insurmountable drainage and planning issues around Venus Bay, Tarwin Lower, Walkerville South, Sandy Point and Port Welshpool. Many of the wicked problems ahead are shared amongst our coastal Councils in relation to planning schemes, coastal hazards and resource inadequacies with a focus on bringing ALL our ratepayers, part time or full time, into conversations about adaptation planning, insurance and liability and planning



properly for the future. These are hard and necessary conversations to have with our coastal communities and our Councillors will of course be in the thick of leading them.

To be frank, the panel decision on the new ward boundaries will impact whether I run again, the job of representing the Coastal Prom Ward as it is, is already enormous. I understand the job ahead must be to tackle coastal hazard risks and welcome a major role in the state's energy transition and I ask you to seriously consider my submission in your deliberations as to whether the Coastal Prom Ward already has enough on its plate.

I am aware deadlines were moved to allow for our disaster response in SGSC but ask that you consider a new panel hearing time? I and others in the Council group would appreciate the opportunity to speak and the hearing has been scheduled to be at the same time as SGSC's legislated monthly meeting, Wednesday 20 March 2024 at 2.00pm. Is it possible to reschedule this or to at least create a 1.00pm time slot for councillors and staff whom this impacts most?

Thank you for your consideration.

Yours sincerely

**Cr Sarah Gilligan**  
Coastal Promontory Ward Councillor  
South Gippsland Shire Council



**TABLE ONE – COUNCIL’S ADOPTED STRATEGIC RISKS**

**That Council adopt the following Strategic Risks:**

- 1. Financial Sustainability - Inability to ensure that financial sustainability is maintained**
- 2. Cyber Security - Exposure, loss of critical assets and sensitive information, or reputational harm as a result of a cyber-attack or breach**
- 3. Assets and Infrastructure - Inability to sustainably fund Council obligations, services and infrastructure**
- 4. Disaster and Catastrophe - Inadequate preparedness and inability to adapt to support the community during an emergency event/recovery**
- 5. Climate Change - Failure to protect natural landscape, coastlines and townships character**
- 6. Statutory and Regulatory Compliance - Failure to meet legislative and regulatory compliance while maintaining a culture of good governance**
- 7. Human Resource Management - Inability to attract and retain key staff**
- 8. Community Safety - Inability to ensure community safety within council managed assets**
- 9. Reputation - Loss of trust in Council administration and elected members**
- 10. Local Economy and Industry Growth - Failure to diversify, stimulate and support the local economy and industry growth**