



The Federal Redistribution 2003
South Australia



Public Suggestion # 18

Australian Labor Party, South Australian Branch

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This suggestion contains coloured maps that have been reproduced in black and white. The original coloured maps may be viewed at the office of the Australian Electoral Officer for South Australia, Level 9, 1 King William Street, Adelaide.

**Australian Labor Party
South Australian Branch**

Submission to the 2003

AEC Redistribution Committee of South Australia

4th July 2003

1.0 Overview

On the 19th February 2003 in accordance with section 48 of the *Commonwealth Electoral Act 1918*, the Electoral Commissioner determined that, as a result of population changes between the States and Territories, South Australia will be entitled to eleven members in the House of Representatives at the next general election. The State currently has twelve House of Representatives members.

The ALP submits there is no need to change the name of any Division.

This submission includes eleven individual maps and a general strategy that provides for an effective application of the criteria set down in the *Commonwealth Electoral Act*, Section 66 (b).

2.0 Application of requirements of the *Commonwealth Electoral Act*

The *Commonwealth Electoral Act 1918* establishes a set of principles in Section 66 (b) to which the Redistribution Committee must give consideration in preparing a proposal.

Specifically it requires the number of electors in each proposed Division to not deviate by more than 10% above or below the enrolment quota for a Division. The quota of electors for each Division in South Australia was determined by the Electoral Commissioner on 13 March 2003 to be 94,834.¹

At the 13 July 2007, the projected number of electors enrolled in each Division shall not be less than 96.5% or more than 103.5% of the average Divisional enrolment for the State at that time.

Section 66 (b) lays down the criteria the Committee must use in its proposed redistribution, in relation to each proposed Electoral Division, namely:

- community of interests within the proposed Electoral Division, including economic, social and regional interests;
- means of communication and travel within the proposed Electoral Division;
- the physical features and area of the proposed Electoral Division; and
- the boundaries of existing Divisions in the State.

These principles are explicitly stated to be subject to the strict requirement for future enrolments to sit within the margin provided for the projected time.

The consideration of existing boundaries is subordinate to the other considerations. This submissions proceeds on the basis that the Redistribution Committee will once again consider it has no option but to meet the numerical criteria but will seek to apply the other criteria as much as possible.

¹ Page 100 Public Notices- Redistribution of federal Electoral Boundaries in South Australia- Notice of Public Consultation The Advertiser Saturday 7 June 2003

3.0 Past Approach of the Redistribution Committee

The Final Report of the 1999 South Australian Federal Redistribution made a distinction between what it referred to as country seats (Grey, Wakefield and Barker), and the metropolitan seats.

The report was not explicit in identifying Mayo as distinct from either country or metropolitan groupings, or distinct from both groupings of seats.

This may be reasonable on the grounds that the majority (i.e. some 20,000 electors) of Campbelltown (C), a metropolitan council, were retained in Mayo, as was much of the Aberfoyle Park suburb, with the Adelaide Hills area consisting of 'commuter' towns and substantial areas of land used for primary production. Mayo is currently a mix of metropolitan and country areas.

Wakefield similarly retained approximately 15,000 electors in the Township of Gawler – a town better described as an outer suburb of Adelaide as it has substantial commonality with Adelaide's northern suburbs, as argued in the ALP's 1999 submission.

4.0 Summary of the ALP approach to the 2003 redistribution

The ALP has pursued various options in redrawing the state into eleven Divisions without regard to any particular seat's abolition.

It is apparent that three Divisions will be composed of towns of various sizes surrounded by land used for primary production (agriculture, livestock etc.). This will obviously include Divisions that would accommodate the far north and the south-east.

This is consistent with current electoral Divisions.

In addition, one Division will have a substantial parcel of land used for primary production, but have the majority of its population in the metropolitan area.

Again, this is largely consistent with electoral Divisions as drawn in 1999.

The ALP proposes that the Division of Wakefield be abolished, and the northern suburbs be the population source of a metropolitan/country hybrid Division.

This choice enables:

- The currently divided Spencer Gulf region to be within one Division (Grey);
- South Australia's entire Murray River system, its basin & the Coorong to be located in one Division (Barker); and
- South Australia's Mt Lofty Ranges to be located in one Division (Mayo).

The ALP determined that it will not attempt to use the process of the Federal Redistribution as a partisan tool. It will not attempt to achieve that which has not been achieved in recent general elections, i.e. gaining requisite (notional) support in a marginal Liberal held seat. Equally, the ALP has an expectation that its electoral outcomes in marginal seats will not be diminished noticeably.

4.0 Federal Divisions in more detail

4.1 Adelaide

The federal Division of Adelaide is based on the City of Adelaide and surrounding areas. For any federal Division based on central business districts, Redistribution Commissions are hard pressed to construct boundaries that reflect a broad community of interest in terms of shared socio-economic levels or even lifestyle or other demographic identifiers.

Adelaide is an electorate whose communities are only united by their proximity to the CBD.

The ALP believes the Division of Adelaide can meet both quota and community of interest criteria with minimal change to existing boundaries.

The ALP suggests that the Division of Adelaide continue the movement of the 1999 Federal Redistribution by incorporating more electors from the north-east.

This suggestion also allows Sturt to expand to its east and incorporate more electors from the suburbs of Rostrevor, Newton and Paradise, uniting a community in doing so.

This has the effect within Adelaide of uniting the areas of Northfield, Oakden and Hillcrest with Clearview & Enfield. All of the suburbs are contained within the City of Port Adelaide & Enfield Council.

This suggestion is consistent with the Division of Adelaide drawn from 1968 to 1988 - comprising a northern and north-eastern suburban expanse, following North East Road.

The proposed alteration of the western boundary to Days Road (instead of the Adelaide-Gawler Railway) is cosmetic.

Local methods of communication within the proposed Division include the Messenger *Standard*, which services the inner north-eastern suburbs north of the Torrens River up to and including the suburb of Gilles Plains (attachment C).

The proposed boundaries are set out in attachment A.

The estimated 2PP result for this proposed Division (based on the 2001 federal election results) is a decrease in the Labor vote of 0.1%, with no change in the electoral outcome.

4.2 Barker

In drawing the Division of Barker, the ALP assumed that Wakefield would lose the Yorke Peninsula to Grey.

Barker could meet quota requirements through minor changes to its current boundaries, requiring the retention of Wakefield as a Division concentrating on the Riverland and Adelaide Hills. Alternatively, Barker can be redrawn in a fashion that establishes two country Divisions with a substantially deeper community of interest.

As stated above, the ALP has, in this suggestion, put forward the northern suburbs as being the population base of a metropolitan/country hybrid Division. This is a direct consequence of the ALP's view that South Australia's entire Murray River system, its basin (as far as practicable) (see attachment D) & the Coorong should be located in the single Division of Barker (see attachment A).

This enables South Australia's Mt Lofty Ranges, including Kangaroo Island, to be located in one Division – Mayo.

This approximates Barker's 1984-1988 boundary in that Barker excludes Kangaroo Island and Fleurieu Peninsula (the original Mayo); and encompasses the Riverland (see attachment E).

Also through 1903-1921 & 1934-1948, Barker has included much of the Riverland (i.e. its southern area, using the River Murray as a boundary) (see attachment F).

The Division of Barker as suggested fulfils community of interest criteria by consisting of rural areas sharing common economic and regional interests in agriculture (see attachment G), water management (see attachment H), and salinity (see attachment I).

Transportation within Barker (as proposed) is facilitated throughout the division by a network of roads that appear to receive substantial use (given the small population centres) (attachment J).

It is of interest that the incorporation of the Riverland into Barker, and Yorke Peninsula into Grey, are redistributive outcomes that have been anticipated by the *Yorke Peninsula Country Times* (attachment K).

Barker as proposed will have the lowest growth of any Division at 1.98%, whereas the States' will be 4.30%. The ALP believes that any future incorporation of electors into Barker will be sourced from the neighbouring electorate of Mayo (as proposed) which has a greater relative population growth projection. The two neighbouring electorates will equalize each other without impacting substantially on the stability of other electorates' boundaries.

The estimated 2PP result for this proposed Division (based on the 2001 federal election results) is a decrease in the Labor vote of 1.2%, with no change in the electoral outcome.

4.3 Bonython

The state of South Australia will consist of three country Divisions, and one Division consisting of a largely metropolitan elector base and a rural hinterland.

The ALP suggests Bonython be this Division.

The federal Division of Bonython is clearly Adelaide's northern metropolitan and outer metropolitan seat. The Elizabeth City Centre which is currently being extensively renovated is the regional centre for the entire area and is one obvious focus for the community in Bonython.

The ALP maintains its argument, as stated in the ALP's 1999 Federal Redistribution Submission, that Gawler is a part of metropolitan Adelaide.

The ALP believes that there are many good arguments supporting a community of interest between Gawler and other areas in the Division of Bonython, some of which are canvassed below.

Gawler is integrated with the northern suburbs through its multiple train stations within TransAdelaide's metropolitan public transport system (attachment L).

Traffic volumes along Main North Road between Munno Para and Gawler are substantial (26000 both directions, with 8600 bypassing Gawler), indicating some 8000 vehicles travelling from Gawler, south on Main North Road, every day (attachment M).

The Town Council of Gawler is a member of the Northern Adelaide Development Board, along with the Playford and Salisbury City Councils. These three councils share multiple characteristics and have a history of co-operating with each other to solve shared problems, such as by being members of the Northern Adelaide Waste Management Association.

The community of interest between Gawler and the rest of the northern suburbs is reinforced by the establishment of negotiations surrounding the Northern Partnership between the State of South Australia, the City of Playford, The City of Salisbury, and The Town of Gawler, the purpose of which spans social, economic and environmental issues (see attachment N, Memorandum of Understanding to Establish the Northern Partnership).

The State Government's Metropolitan Adelaide Development Program 1996-2000 (January 1997) identifies Gawler (C) as part of the Adelaide Region, as is Aldinga Beach in the south. The Program includes several maps that show clearly that Gawler and its immediate surrounds are included in the metropolitan area for planning purposes. The Northern Adelaide Plan encompasses the local government areas of Elizabeth, Munno Para, Salisbury and Gawler. (see attachment O).

Trinity College is a major multi-campus educational institution based on the southern outskirts of Gawler. Trinity has students that live throughout the northern suburbs and beyond, as is evident in the Routes for School Bus Travel (attachment P). The College plays a central role in the lives of its students, not only in academia, but after hours and weekend sporting and other extra-curricula activities, thereby establishing itself as the centre of an expansive parent/student/teacher community.

Gawler High School also connects Gawler to the northern suburbs by being a member of the Adelaide North Group of District - Secondary Schools (attachment Q)

Privately operated bus services operate throughout the Division as suggested, including those on route to destinations such as Yorke Peninsula, Port Pirie et cetera, and Balaclava (attachment R)

The Lyell McEwen Hospital, located at Elizabeth Vale, continues to be the primary health facility for residents of the northern suburbs and beyond. Its strategic importance

is emphasised by the ongoing redevelopment of the facility, consisting of a new women's and children's area, intensive care and high dependency unit, and coronary care unit (appendix S).

The ALP suggests that Gawler, the Munno Para Shopping Centre and the Elizabeth City Centre be included in the one federal Division.

Gawler has relatively recently benefited through the development of a Woolworths – Big W. The re-development of the Munno Para Shopping Centre will increase the gross leasable floor area from 15,550 m² to 26, 740 m². The total proposed floor area is 29, 732 m².

In comparison, the owners of Elizabeth City Centre (Gandel Retail Trust) are working on a \$120 million redevelopment of the Centre. The Harris Scarfe store is currently being upgraded with the larger shopping centre redevelopment likely to commence during the later part of 2003. The redevelopment may include cinemas, larger supermarkets and up to 45 new speciality shops. Completion is expected over a three-year period. The centre is currently approx 70,106m² and after the development will be 86,423m².

The Elizabeth City Centre is and will continue to be the northern metropolitan (and in cases country) regions' primary shopping, community and business centre.

The ALP suggests the areas within the suburbs of Salisbury East and Salisbury Heights that were redistributed to Bonython in 1999 be returned to Makin on the grounds of both communities of interest and quota criteria.

The southern boundary of Bonython has been suggested to assist with meeting criteria regarding quota, utilising the main roads of Park Terrace and Waterloo Corner Road, and the Little Para River. Park Terrace (in part) separates the suburb of Brahma Lodge from the industrial park of Salisbury Plain.

The estimated 2PP result for this proposed Division (based on the 2001 federal election results) is a decrease in the Labor vote of 5.9%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.4 Boothby

The ALP suggests that the Division of Boothby can further its community of interest integrity and satisfy quota criteria while maximising the use of existing boundaries. This can be done simply by incorporating more of the suburb of Aberfoyle Park (currently divided between Boothby and Mayo) into Boothby.

The ALP proposes that the southern boundary with Kingston remain unchanged.

This reflects the community of interest within the suburban area of Belair, Blackwood, Coromandel Valley, Flagstaff Hill and Aberfoyle Park as outlined by Dr Bob Such MP in the South Australian 2003 Electoral Districts Boundaries Commission transcript (attachment T).

This community also has a common publication in the Messenger *Hills & Valley* (attachment U).

Bus routes 197J and 198J connect Blackwood Station and The Hub (Aberfoyle Park). These routes are outlined in attachment L and in more detail in attachment V.

The ALP suggestion is consistent with the 1977-1988 Boothby boundaries that incorporated Aberfoyle Park, Flagstaff Hill, Blackwood and Belair (attachment W).

A major community focus in the Division of Boothby is the shopping centre at Marion, Westfield Plaza, with its associated transport hub.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is a decrease in the Labor vote of 0.3%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.5 Grey

Grey on current boundaries has the estimated growth of 0.8% from enrolment date of 12/3/2003 to 31/7/2007, while the average electorate growth for the state is expected to be 4.30%. The only other electorate with less than 2% growth is Port Adelaide (1.28%).

The ALP proposal is to incorporate an area with higher population levels and the likelihood of, if not some growth, then at least a steady level of population.

Consequently the ALP proposes that the Yorke Peninsula, including the area known as the Iron Triangle which has a relatively higher population growth, be incorporated into Grey. This will increase Grey to over 50% of average state-wide growth (attachment B).

This major change has several advantages other than that mentioned above. It recognises the physical and geographical features of the area, placing the entire Spencer Gulf region in one Division, becoming a major focus for the electorate. Common economic issues such as those pertaining to fishing and aquaculture, mining and agricultural production would be shared across the electorate (attachment X).

The Yorke Peninsula is very similar to the Eyre Peninsula in terms of the importance of grain production to the local community. The ports used to transport grain are similar - Southern Wharf Services Pty Ltd is the operator of 6 of AusBulk's 7 bulk loading plants, including Port Giles, Port Lincoln, Port Pirie, Thevenard (near Ceduna) and Wallaroo (attachment Y). The importance of grain is evident in the upgrade of AusBulk's loading plant at Ardrossan to accommodate Panamax capacity carriers (attachment Z).

The ALP believes Grey will inevitably encroach further on the mid-north areas and onto the Wakefield Plains toward the Light River.

For this reason, and so as to minimise the disruption to adjoining electorates, it is proposed that Grey's neighbouring electorate be one that will experience considerably

greater relative population growth. Bonython on proposed (and existing) boundaries is expecting the second highest growth of electorates in the state. The two neighbouring electorates will equalize each other without impacting on the stability of other electorates' boundaries.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is a decrease in the Labor vote of 0.3%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.6 Hindmarsh

The federal Division of Hindmarsh is a Federation electorate that incorporates most of the suburbs west of the CBD of Adelaide. It is one of the three surviving original metropolitan South Australian federal Divisions.

Hindmarsh will require additional electors due to the higher quota resulting from the decrease in the number of South Australian divisions.

The ALP suggests that the existing communities of interest within Hindmarsh can be maintained without disruption, and the existing boundaries substantially retained.

Hindmarsh is limited in its west by the coastline and currently South Road is its eastern boundary. The ALP submits that South Road be maintained as the eastern boundary of Hindmarsh. Any subsequent changes must therefore be reflected in the north or south.

The ALP proposes that the northern boundary be redrawn to utilize Trimmer Parade and Crittenden Road (part). This boundary has been used throughout most of the post-war period - between 1949 and 1976, and between 1984 and 1988 (see attachment AA).

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is an increase in the Labor vote of 1.1%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.7 Kingston

Kingston as suggested enables the Division to meet quota requirements with minimal change to its boundaries.

The existing northern boundary of Kingston approximates the statistical subdivision boundary between Marion C - South and Marion C - Central (see attachment AB). It bisects O'Halloran Hill and Glenthorne Farm. There is no housing immediately to either side of the boundary and it is effectively an open space buffer zone between the residential suburbs on the northern side of the boundary (Marino, Seacliff Park, Seaview Downs and Seacombe Heights) and the suburbs on the southern side (Hallett Cove, Sheidow Park and O'Halloran Hill). The Olsen State Government and current Federal Government committed during the 1998 Federal election campaign (see attachment AC), to keeping this area as open space.

The ALP concedes that this is the best northern boundary for Kingston and reflects the differences between communities on either side of O'Halloran Hill.

The ALP believes that the best option to meet quota criteria is to reincorporate the CCDs from Mayo as listed in (attachment XXX) into Kingston. These CCDs comprise the townships of McLaren Vale and Willunga.

This approach capitalizes on electors' historical presence within Kingston.

It can be argued on community of interest grounds that these areas have more in common with the viticultural and tourism focus of Kingston as drawn in 1999 than Mayo.

The presence of Aldinga Bay, Dyson, Hardys Reynella, Horndale and St Francis wineries within Kingston as currently constituted establishes this commonality.

The ALP suggestion incorporates Tatachilla Lutheran College, Tatachilla Rd, McLaren Vale, within Kingston. The College is a central institution that establishes a community of families throughout the southern suburbs (attachment AD).

The urban southern area of Kingston is almost entirely defined and limited by its accessibility to Adelaide via four main transport corridors:

- Lonsdale Highway, west Dyson Road and Commercial Road
- The extended Southern Express Way
- South Road
- the train line to Noarlunga and bus routes beyond.

Transportation within the area to be reincorporated is primarily via the Victor Harbour Road (arterial) which connects to Main South Road. The towns are also serviced by Main Road (connecting Willunga and McLaren Vale with Victor Harbour Road), Briskay Road and Aldinga Road (connecting Willunga and Main South Road), and Tatachilla Road (connecting McLaren Vale and Main South Road) (attachment AE).

The State government in the 2003 State Budget recently announced the extension of the Metro ticket transportation system to include the whole area south of Noarlunga including McLaren Vale and Willunga. (attachment AF and AG from budget and bus route map)

The ALP proposes an eastern boundary reflecting the communities of interest as included by the 1998 federal election boundaries. (see attachment AH).

The metropolitan Adelaide 2020 Vision Planning Strategy of 1992 detailed the State Government's determination to restrict urban development in the south to areas west of South Road to Sellicks Beach, and that the eastern side south of the Onkaparinga River should retain its rural character. Additional land developments in the Malsin Beach and Aldinga area will assist in increasing population in Kingston as required by the quota standards set down in the Act. Attachment AI (maps 71, 72, 79, 100 and 101) identifies areas zoned Residential yet to be developed.

A more recent publication, The Metropolitan Adelaide Development Programme 1996-2000 (attachment AJ) makes it clear that the State Government is still committed to holding down housing growth on the southern metropolitan fringe with growth being confined to the coastal strip west of main South Road in order to maintain the rural character of the Willunga Basin.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is a decrease in the Labor vote of 0.8%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.8 Makin

The ALP believes the suburbs of Salisbury East and Salisbury Heights should be reincorporated into Makin, reverting to the pre- 1999 redistribution boundary. This satisfies the Commonwealth electoral act requirement for quota, minimizes elector displacement and capitalizes on electors' historical presence within Makin.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is an increase in the Labor vote of 0.1%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A and attachment XXX list the relevant CCDs.

4.9 Mayo

In drawing the Division of Mayo, the ALP assumed that Wakefield would lose the Yorke Peninsula to Grey, Gawler (at a minimum) lost to Bonython, and that Barker would be reconstituted to encompass the entire River Murray system and its basin.

The ALP proposes that the Commission excise the suburbs of Rostrevor, Newton and Paradise and place them in the Eastern suburbs Division of Sturt (see attachment A).

This enables South Australia's Mt Lofty Ranges, from the District Council of Light to the Fleurieu Peninsula and Kangaroo Island, to be located in the one Division- Mayo.

This approximates the Division of Mayo as first created, from 1984-1988 (attachment E).

Mayo, as proposed, fulfils community of interest criteria by consisting of rural areas sharing common economic and regional interests in generalised land use (i.e. livestock, as distinct from agriculture on the Murray plains) (attachment AK) and associated economies.

Both economic and regional interests are evident within the Mount Lofty Ranges Catchment (attachment AL) - an area within which local issues of natural resource management, specifically land and water degradation, vegetation, revegetation, habitat and primary production impact on people's economic, social and aesthetic lives (attachment AM).

Issues pertaining to ground water quality within the Mount Lofty Ranges Catchment are notably different to that of the River Murray Catchment. Attachment I shows the issue of ground water salinity appears to be limited to the area east of the Mount Lofty Ranges and Fleurieu Peninsula.

Transport within Mayo (as proposed) is not dissimilar to the other country divisions, with a network of suitable roads, transport corridors limited to eastern state routes, and limited bus company services. Attachment R shows the "Adelaide to Angaston", "Tea Tree Gully to Mt Pleasant", "Adelaide to Meadows, Macclesfield, Strathalbyn", "Adelaide to Victor Harbour, Goolwa" and "Adelaide to Cape Jervis" bus routes.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is a decrease in the Labor vote of 1.6%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.10 Port Adelaide

Port Adelaide is a Division based clearly on the area of Port Adelaide and surrounding western suburbs. The southern and eastern boundaries have moved dramatically over various redistributions, but the clear anchor for the Division is the Port area.

The ALP believes that there will continue to be increasing communication between the areas of Salisbury, Mawson Lakes and Port Adelaide as the Gillman connector has opened up a direct route from Port Adelaide to the Salisbury Highway (attachment AN).

The marshland to the east and west of the Port Wakefield Road was once contained within the Division of Port Adelaide between 1977 and 1988.

This area adjacent to Barker Inlet is increasingly being used as a water filtration area, cleaning run-off water from both suburbs south of Grand Junction Road, and east of Port Wakefield Road.

The areas now incorporating wetlands include Little Para Wetlands in Globe Derby Park, Mawson Lakes (including the Greenfield Wetlands), Dry Creek, and Wingfield. The metropolitan street directory notes swamp adjacent to the Wingfield Wetlands and North Arm Creek.

The nature of the land in this area has historically made it an ideal location for the salt crystallisation pans that have existed in the area adjacent to Port Wakefield Road at least since the Great Depression.

Attachment AO verifies the environmental importance of this area.

The on-going growth in the areas surrounding Mawson Lakes will assist the Division of Port Adelaide meet its projected quota requirements.

The ALP proposes that the southern boundary be relocated to utilize Trimmer Parade and Crittenden Road (part). This boundary has been used throughout most of the post-war period - between 1949 and 1976, and between 1984 and 1988 (attachment AA).

The proposed movement of the eastern boundary of the Division of Port Adelaide to Days Road is cosmetic.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is an increase in the Labor vote of 0.1%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

4.11 Sturt

Sturt is a Division with a clear geographical base in Adelaide's eastern suburbs.

Sturt will require additional electors due to the higher quota resulting from the decrease in the number of South Australian divisions.

The ALP proposes that Sturt increase its number of electors by expanding to the east into the suburbs of Rostrevor, Newton and Paradise which are currently in Mayo.

This movement of electors unites a group of suburbs with a similar geographic location and demographic identifiers in one Division. It also unites large section of the Italian community in one Division (attachment AP).

It also allows for an excess of electors to be moved westward into the Adelaide electorate that similarly needs to increase its population to meet the quota requirements.

The community of interest criteria will be met through this suggestion by increasing the portion of the City of Campbelltown within this metropolitan Division.

Equally, the community of interest criteria is met within this area through public transport routes (attachment L).

The division of Sturt has covered eastern/north-eastern suburbs through to Athelstone for most of its existence since it's creation in 1949.

The estimated 2PP result for this proposed Division (based on the 2001 federal election result) is a decrease in the Labor vote of 0.8%, with no change in the electoral outcome.

The proposed boundaries are set out in attachment A.

5.0 Conclusion

The ALP has presented a set of boundaries for the South Australian federal Divisions which meet the criteria laid out in the Act (see summary of CCD movements, attachment XXX).

The ALP acknowledges that there are many other possible sets of boundaries that can be devised to also meet those criteria.

The Committee's job is to select, in an as objective manner as possible, the best set of boundaries from those proposed and any others the Committee may develop itself.

To recap, the ALP believes that an equality of elector numbers is the dominating provision of the Act and that the Committee should endeavour to set boundaries so that as near as practicable, the number of electors in each Division is equivalent.

The ALP submits that there are three major arguments the Commission should consider:

- The currently divided Spencer Gulf region to be within one Division (Grey);
- South Australia's entire Murray River system, its basin & the Coorong to be located in one Division (Barker); and
- South Australia's Mt Lofty Ranges to be located in one Division (Mayo).

The boundaries submitted by the ALP provide Divisions with clear communities of interest.