



**THE FEDERAL  
REDISTRIBUTION  
SOUTH AUSTRALIA**

# Submission COB22

Matt Burnell MP

# MATT BURNELL MP

## FIGHTING FOR THE NORTH

Augmented Electoral Commission for South Australia  
South Australian Redistribution  
Australian Electoral Commission  
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By email: [FedRedistribution-sa@aec.gov.au](mailto:FedRedistribution-sa@aec.gov.au)

Thank you for the opportunity to provide comments on objections to the proposed redistribution of federal electorates in South Australia, released by the Redistribution Committee for South Australia on 27 March 2026.

I provide this submission in my capacity as the Federal Member for Spence, an electorate I have been proud to represent in the Parliament of Australia since 2022.

My comments principally concern objections relating to the proposed boundaries of Spence, Makin and O'Donoghue (Grey). These are the Divisions most directly affected by the matters raised in the enclosed comments.

I also want to acknowledge the number of South Australians and other observers who have taken the time to engage with this process. I note that 415 objections were lodged in response to the proposed redistribution. Those objections followed the 18 suggestions and 9 comments on suggestions considered by the Redistribution Committee in preparing its proposal.

Of the 415 objections received, just under 200 were identified as being objections germane to the Redistribution Committee's proposed boundaries for the electorates of Spence, Makin and O'Donoghue (Grey).

I recognise the independence of the Redistribution Committee for South Australia in preparing the proposed redistribution, and of the augmented Electoral Commission for South Australia in considering the proposal, objections and comments on objections under the provisions prescribed by the *Commonwealth Electoral Act 1918* (the Act).

I also have a great appreciation of the duties and responsibilities entrusted to the Australian Electoral Commission, both during and between elections, informed in part by my time as a Member of the Joint Standing Committee on Electoral Matters.



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I acknowledge at the outset that Spence was required to lose a significant number of electors in order to satisfy the numerical requirements set out in section 66 of the *Commonwealth Electoral Act 1918*.

Spence commenced this redistribution as the Division with the greatest projected enrolment pressure. Its projected enrolment was 12.27% above the projected enrolment quota, significantly beyond the permissible 3.5% variance. It was therefore unavoidable that Spence would need to transfer a substantial number of projected electors to neighbouring divisions.

As such, I support several proposals made by the Redistribution Committee and a number of Submissions and Comments that outlined methods of ensuring that the number of projected electors within Spence would be reduced to permissible levels.

Conversely, there were also a number of decisions made by the Redistribution Committee which I disagree with, I will outline this basis of my disagreement through this submission through my comments on the objections made by other interested parties on the proposed redistribution of electoral divisions.

I support the proposed transfer of electors from Spence into Makin. While I deeply regret the prospect of no longer representing many constituents in those suburbs, I accept that the transfer is necessary to satisfy the statutory requirements for both affected Divisions.

I also support the use of the Little Para River as the new southern boundary of Spence. It is an elegant and readily identifiable natural boundary, and it appropriately consolidates communities within the Salisbury local government area (LGA).

I further support the Redistribution Committee's consideration in its proposal to retain the Gawler LGA wholly within Spence.

Gawler is a growing regional centre with deep and practical links to the surrounding outer metropolitan northern suburbs, and its retention in Spence is consistent with both community of interest and effective representation.

My objection to the proposed redistribution is primarily confined to the proposed transfer of Virginia, Buckland Park Riverlea Park and part of Waterloo Corner from Spence into O'Donoghue (Grey).



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Unlike Spence, O'Donoghue (Grey) commenced the redistribution within the permissible tolerance range with both the redistribution quota and the projected enrolment quota.

Once the proposed transfer of electors from Spence into Makin is made, Spence would also satisfy those requirements. In my submission, the further transfer from Spence into O'Donoghue (Grey) is therefore unnecessary.

It would also have real consequences for the communities affected. It would divide the Playford LGA whilst also transferring a small part of the Salisbury LGA into a rural electoral division. The proposal would also remove interconnected outer metropolitan communities from Spence and place them within a division whose character and representational task are overwhelmingly rural, regional and remote in nature.

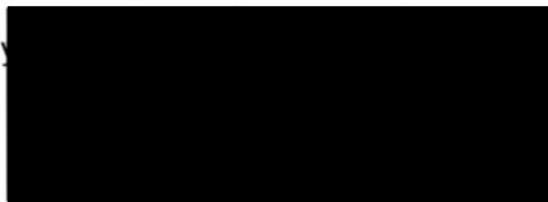
In its further deliberations, I would respectfully request the augmented Electoral Commission for South Australia:

- 1) adopt the proposed transfer of electors from Spence into Makin;
- 2) retain the Gawler LGA wholly within Spence;
- 3) reverse the proposed transfer of electors from Spence into O'Donoghue (Grey) in its entirety;
- 4) consider an alternate proposal to transfer electors within the portion of the electorate of Spence from the Light LGA into O'Donoghue (Grey) to achieve a stated objective of the Redistribution Committee to increase the number of electors in O'Donoghue (Grey) which would also result in unifying the LGA within O'Donoghue (Grey).


I have enclosed detailed comments on the objections to the proposed redistribution of federal electorates in South Australia for further consideration.

Please contact Alex Pados on 08 8258 6300 in my Electorate Office if any further information is required by the augmented Electoral Commission for South Australia as part of this process.

Yours sincerely





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 May 2026



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# Comments on Objections to the Proposed Redistribution of Federal Electorates in South Australia

## Background

The redistribution of federal electorates for South Australia is conducted by way of the framework prescribed by the *Commonwealth Electoral Act 1918* (the Act).

These provisions require the Redistribution Committee for South Australia to produce its proposed redistribution for the state, in accordance with the provisions outlined in section 66 of the Act. Some of the requirements set out numerical tolerances for the allowable size of electorates but also require consideration of factors such as communities of interest, means of communication and travel, physical features and existing boundaries of Divisions in the State as factors requiring the Redistribution Committee's consideration.

The numerical criteria for the purposes of this redistribution is set out below.

	<b>Quota</b>	<b>Permissible Minimum Electors</b>	<b>Permissible Maximum Electors</b>
Enrolment as at 12 August 2025	130,786	117,708	143,864
Projected enrolment as at 8 April 2030	136,333	131,562	141,104

	<b>Current enrolment</b>	<b>Current variation</b>	<b>Projected enrolment</b>	<b>Projected enrolment variation</b>
O'Donoghue (Grey) on current Grey boundaries	129,724	-0.81%	132,595	-2.74%
Spence after proposed transfer to Makin only	125,349	-4.16%	139,334	+2.20%
Makin after proposed transfer from Spence	137,273	+4.96%	139,308	+2.18%
O'Donoghue (Grey) under proposed redistribution	133,313	+1.93%	137,070	+0.54%
Spence under proposed redistribution	121,760	-6.90%	134,859	-1.08%

At the commencement of the redistribution, the current Division of Spence was projected to have 153,055 electors as at 8 April 2030. This placed Spence 12.27% above the projected enrolment quota. This is far greater than what is permitted under section 66(3)(a) of the Act.

The Division of Makin, in contrast, was projected to contain 125,587 electors as at 8 April 2030, a negative variance of 7.88%.

The proposed boundary change by the Redistribution Committee to transfer electors from Spence to Makin is a sound way of correcting both matters simultaneously.

By contrast, the current Division of O'Donoghue (Grey) was already within the permitted ranges for both the redistribution quota and the projected enrolment quota.

### **Proposed Boundary Changes: Spence to Makin**

I support the proposed transfer of electors from Spence to Makin, notwithstanding that it would mean no longer representing communities I have been honoured to serve since 2022. I accept that this transfer is necessary to address the numerical position of both Divisions under section 66 of the Act.

The Redistribution Committee noted that 12 submissions advocated using the Little Para River in determining where the new boundary of both Divisions should be set as part of transferring 14,043 electors from Spence into Makin.

The Redistribution Committee described the arguments made in those 12 submissions as strong and succinct. I am in agreement with that view.

The Little Para River is an appropriate southern boundary for Spence because it follows a clear and identifiable natural feature. It also assists in bringing both Divisions within the required numerical ranges, particularly Makin, while consolidating a greater portion of the Salisbury (LGA) within a single Division.

**S14** by the Australian Labor Party (South Australian Branch) proposed resolving the numerical imbalance between Makin and Spence by transferring electors from Spence to Makin using the Little Para River as the natural boundary. **S18** argued that the surplus electors in the current electorate of Spence could address Makin's shortfall and agreed with the Little Para River as an appropriate new boundary between the two divisions. **CS9** described this proposed transfer of electors as logical and proportionate.

**OB111** supported this view whilst objecting to O'Donoghue (Grey) extending into the outer metropolitan Playford LGA. **OB411** likewise supported the logic concerning the Spence to Makin adjustment whilst opposing transferring electors from Spence into O'Donoghue (Grey).

## **Other local government areas in Spence**

I also support the Redistribution Committee's proposal to retain the entire Gawler LGA within Spence. The Redistribution Committee acknowledged the strong arguments put by the Town of Gawler and others concerning Gawler's community of interest with the outer metropolitan northern suburbs of Adelaide and ultimately concluded that the Gawler LGA should remain wholly within Spence.

That conclusion is sound. Gawler is a regional hub, but it is also firmly tied to the outer northern growth structure. Its practical links to surrounding parts of Spence are evident in employment, services, schooling, shopping, transport and community networks.

The Redistribution Committee also considered submissions concerning the localities of Concordia and Kalbeeba, which are part of the Barossa LGA. Three submissions proposed transferring these localities from Spence in order to unify the Barossa LGA within a single Division. The Redistribution Committee decided against that course, having regard to the stronger community of interest those localities have with the Gawler township. That reasoning is consistent with the treatment of those localities during the 2018 redistribution, and I support it continuing to inform the present redistribution.

A number of submissions across the earlier stages of this redistribution also raised proposals concerning the portion of the Light LGA that sits within Spence. The Redistribution Committee did not appear to address those proposals directly in its report, other than by not proposing to adopt them. The Light LGA unification was then revisited in objections to the proposed redistribution, and I address it further below.

## **Proposed Boundary Changes: Spence to O'Donoghue (Grey)**

I strongly object to the proposed transfer of Virginia, Buckland Park, Riverlea Park and part of Waterloo Corner from Spence into O'Donoghue (Grey).

The basis of my objection is not that Spence should not decrease in size. Spence is the largest electorate in South Australia in terms of the number of electors within its current boundaries. This issue had sufficiently been corrected by the Redistribution Committee proposing to transfer more than the required number of electors into the adjoining electorate of Makin which is conveniently the smallest electorate in the State, and it already contains a portion of the Salisbury LGA.

Any further transfer from Spence requires a statutory justification under section 66 of the Act. In my submission, that justification is not made out where the receiving Division is already within the permissible ranges and the additional transfer would divide a local government area with a strong community of interest. Future enrolment preference should not be given determinative weight over the express considerations in section 66 once the numerical requirements can already be satisfied.

**OB286** made this point by identifying that O'Donoghue (Grey) was already within the current and projected ranges. **OB411** reached the same conclusion from a different perspective, arguing that O'Donoghue (Grey) was already within tolerance and that the proposed boundary alteration did not improve the statutory criteria. **OB365** likewise described the proposed expansion as being driven by growth in neighbouring metropolitan electorates, rather than by a need within O'Donoghue (Grey).

*"The proposed boundary expansion appears to be driven solely by projected growth in neighbouring metropolitan electorates, not by any need within Grey itself."* **OB365**

The Redistribution Committee appears to have proceeded on the basis that O'Donoghue (Grey) could benefit from gaining growth areas to facilitate a more even future enrolment distribution. That may be a consideration. It cannot, however, be determinative in circumstances where O'Donoghue (Grey) is already within range and the proposed gain performs poorly against communities of interest, local government coherence, means of communication and travel, and physical boundaries.

The Redistribution Committee appears to have treated these localities as connected to Lewiston and Two Wells, north of the Gawler River. In my submission, that treatment gives insufficient weight to the Gawler River as a contemporary and historical administrative and geographic boundary across federal, state and local government.

I note that Riverlea Park was formally established as a distinct locality in 2022 and is being delivered as South Australia's largest master-planned urban community.

**OB406** submitted that Riverlea Park is a significantly urban area that will only become more urbanised over time, and that it is significantly different in character from semi-rural localities such as Lewiston and Two Wells.

"Riverlea Park is a significantly urban area that will only become more urbanised over time and is significantly different in character from the semi-rural localities of Lewiston and Two Wells." **OB406**

**OB371**, from the District Council of Ceduna, made the same point from a regional council perspective. It described the proposed transfer area as a major greenfield growth corridor transitioning into a metropolitan suburb and argued that those communities do not share the same regional interests as the communities that define O'Donoghue (Grey).

Other submissions made the contention in plainer community terms. **OB153** submitted that Riverlea would be better represented in an urban electorate. **OB132** described Riverlea as *"basically Adelaide"*. **OB165** described Riverlea as more connected to the metropolitan area than to regional South Australia. **OB197** opposed expanding O'Donoghue (Grey) to include Riverlea or other parts of outer suburban Adelaide.

These objections are differently expressed, but they point in the same direction. Riverlea Park and the surrounding Playford localities are urbanising communities with stronger links to Adelaide's outer north than to regional South Australia.

The transfer is also difficult to justify by reference to means of communication and travel. The affected localities are functionally oriented towards Adelaide's north and the City of Playford. Their service, transport, commercial and community links run towards Spence and adjoining northern metropolitan communities, rather than across the vast regional and remote network of O'Donoghue (Grey).

**OB411** by the Liberal Party of Australia (SA Branch) made a practical service-access point, observing that residents of Virginia are far closer to the Spence electorate office in Salisbury than to the regional electorate offices associated with O'Donoghue (Grey).

At first, I found this to be a novel argument, but this could be considered as a pertinent example of considering the means of communication and travel in a proposed Electoral Division, which is a criterion prescribed by section 66(3)(b)(ii) of the Act.

It is also illustrative to note the difficulty for an elector in Virginia to have to travel in the vicinity of 90 minutes in order to attend the nearest Grey Electorate Office in Kadina should their suburb be transferred into it under the proposal by the Redistribution Committee.

The Redistribution Committee's report recognises the desirability of readily recognisable boundaries, including natural and administrative delineations. That principle supports the Little Para River boundary between Spence and Makin. It also supports caution before revising the City of Playford boundary in the north-west of Spence.

I would urge the augmented Electoral Commission to apply restraint before dividing a unified local government area, particularly where no numerical necessity under section 66 of the Act makes that course unavoidable.

## **Objections**

Objections to the proposed transfer from Spence to O'Donoghue (Grey) demonstrate a convergence of views across diverse perspectives.

The convergence between **OB286**, **OB406** and **OB411** is particularly significant. Those objections come from different political and representational perspectives: the Member for Grey, SA Labor, and the Liberal Party of Australia (SA Branch). They are joined by objections from regional councils, community groups and constituents.

Taken together, they identify the same essential defect: the proposal would place outer metropolitan Playford communities into a Division whose character, scale and day-to-day representational task are rural, regional and remote.

That convergence should be given weight. The same defect is identified from different starting points: the proposal uses high-growth Playford communities to adjust a rural and regional Division that was already within tolerance. The more technical objections make that point through statutory criteria and numerical analysis.

## **Light Regional Council**

My primary position remains that the proposed transfer from Spence to O'Donoghue (Grey) should be reversed. I nevertheless make the following comments on submissions and objections that proposed unifying the Light LGA within O'Donoghue (Grey).

If, despite the concerns raised across the public submissions, the augmented Electoral Commission for South Australia concurs with the Redistribution Committee's view to increase the projected enrolment of O'Donoghue (Grey), I submit that unifying the Light LGA would be the more practicable way of doing so. This should only be considered as an alternative to the proposed Playford transfer, not as the preferred outcome of these comments.

This proposal is supported in several objections. **OB256** from Barunga West Council supported consideration of transferring parts of the Light Regional Council area currently within Spence into O'Donoghue (Grey) if a boundary adjustment is necessary. **OB376** suggested that retaining the Playford LGA portion in Spence could be offset by transferring parts of Light Regional Council instead. **OB399** from the City of Port Lincoln Council endorsed effective representation of regional and remote communities and supported the alternative option of incorporating elements of the Light Regional Council that are currently within Spence. **OB406** identified the Light Regional Council option as a way of adjusting boundaries without placing a high-growth urban community into a predominantly rural electorate.

**OB286** also identifies Light LGA localities as a more appropriate source of any further adjustment involving O'Donoghue (Grey), if such an adjustment is to be made at all.

This alternative proposal would transfer the localities of Hewett, Buchfelde and Gawler Belt into O'Donoghue (Grey). I would respectfully ask that the augmented Electoral Commission consider this only if deems it necessary to transfer further electors from Spence after affirming the proposed transfer from Spence into Makin.

## **Conclusion**

The objections and earlier public submissions point to a consistent position. Spence plainly had to lose electors. Makin plainly had to gain electors. The transfer from Spence to Makin, using the Little Para River as the new boundary, is the appropriate mechanism for achieving that outcome.

The further transfer from Spence into O'Donoghue (Grey) is different in kind. It is not required to bring either Division within the permitted numerical ranges. It would divide the City of Playford, move outer metropolitan growth communities into a largely rural, regional and remote Division, and weaken a boundary arrangement that can otherwise be justified by local government, community of interest and identifiable physical features.

The affected localities should not be treated as spare electors on a map. Virginia, Buckland Park, Riverlea Park and the relevant part of Waterloo Corner form part of the City of Playford and the outer northern growth structure of Adelaide. Their day-to-day links run towards the northern suburbs, not towards the regional and remote communities that define O'Donoghue (Grey).

I would contend that undue weight has been applied by the Redistribution Committee in proposing the transfer of these urban localities into a rural electorate that comprises of 92% of South Australia's land mass and has remained rural in its characteristics and population centres since 1903.

I believe that any defect that the Redistribution Committee has outlined to justify such a proposal should be given lesser weight when viewed in conjunction with provisions expressly provided for in section 66(3)(b) of the Act. In my submission, the further transfer from Spence to O'Donoghue (Grey) has the character of a remedy in search of a defect.

For those reasons, I respectfully submit that the augmented Electoral Commission should adopt the proposed transfer from Spence to Makin, retain the Gawler LGA wholly within Spence, and reverse the proposed transfer of Virginia, Buckland Park, Riverlea Park and part of Waterloo Corner from Spence into O'Donoghue (Grey).

If the augmented Electoral Commission concurs with the Redistribution Committee in its aim to increase the projected enrolment of O'Donoghue (Grey), transferring the remaining parts of the Light LGA in Spence into O'Donoghue (Grey) is the more cogent option. That approach would avoid placing a high-growth urban community into a predominantly rural electorate and would better accord with the communities of interest identified throughout the public material.

The objections which I have highlighted in my comment will hope to assist the augmented Electoral Commission for South Australia to ensure that the final boundaries set in its report will better reflect the community of interest to the electorates of Spence and O'Donoghue (Grey).

Again, I thank you for this opportunity to provide feedback.