



**THE FEDERAL
REDISTRIBUTION
SOUTH AUSTRALIA**

Submission OB411

Liberal Party of Australia (SA Branch)



Redistribution Committee for South Australia,
Australian Electoral Commission,
Locked Bag 4007,
CANBERRA ACT 2601

By email: FedRedistribution-sa@aec.gov.au

Dear Committee Members,

The Liberal Party of Australia – South Australian Division makes this submission to the Australian Electoral Commission augmented Electoral Commission for South Australia in response to the draft boundaries released as part of the “Ideas on the proposed redistribution” stage.

As previously noted, this redistribution has been triggered solely by the passage of time under section 59(2)(c) of the Commonwealth Electoral Act 1918, rather than by any change in representation entitlement or material malapportionment.

In these circumstances, we consider that the redistribution lends itself to an approach of minimal necessary change, with primary weight given to compliance with current and projected enrolment requirements, and appropriate regard to the secondary criteria set out in the Act.

While we acknowledge the work undertaken by the Redistribution Committee, we do not consider that the Proposed Boundaries consistently reflect this approach. Certain boundary alterations appear to extend beyond what is required to achieve compliance with the statutory criteria.

This stage of the process represents the first formal opportunity for public input on the draft boundaries. It therefore provides a clear pathway for the Commission to consider refinements in light of stakeholder feedback. The Liberal Party considers that some of the proposed alterations can be reconsidered and adjusted in a manner that more closely aligns with the legislative framework, while remaining within the permissible numerical tolerances.

Our submission does not seek to advance a wholly alternative configuration. Rather, it highlights specific areas where we consider the Proposed Boundaries depart from the statutory criteria, and where targeted modifications, which are broadly consistent with our initial "Ideas" submission, can be accommodated.

We thank the Commission's staff for their assistance to date and provide the following comments for consideration.

Yours sincerely,



Alexander Hyde

State Director

Liberal Party of Australia (SA Division)

Boundary changes

Grey (proposed O'Donoghue)

The Redistribution Committee has proposed transferring parts of the Division of Spence into the Division of Grey (proposed to be renamed O'Donoghue). The Liberal Party strongly opposes this boundary alteration.

In support of its proposal, the Committee has advanced three principal considerations: that Grey's projected enrolment at 8 April 2030 (132,595 electors) is within tolerance and therefore has capacity to absorb additional electors; that the transfer would support the "longevity" of the redistribution; and that the identified localities share land use characteristics and community of interest with the southern portion of the division.

While these observations are noted, they do not establish a compelling basis for boundary alteration under the Commonwealth Electoral Act 1918. Critically, the Committee itself acknowledges that Grey is within both current and projected enrolment tolerances. In the absence of any numerical imperative, there is no requirement to alter the division. In such circumstances, changes should only be pursued where they demonstrably improve outcomes against the secondary criteria, including community of interest, means of communication and travel, and physical features. No such case has been made by the Committee.

The reliance on "longevity" as a justification further weakens the proposal. This is a subjective and non-statutory concept that lacks a clear evidentiary basis and risks introducing unnecessary change where compliance with legislative requirements has already been achieved.

This position is reinforced by the submissions received during the initial "Ideas" phase of the redistribution process. Notably, none of the published Ideas proposed the specific alteration for Spence that was adopted by the Committee. Four submissions, including that of the Liberal Party, explicitly advocated no change to Grey. Other proposals suggested alternative configurations, including broader transfers from Gawler or adjustments involving Barker, but none align with the Committee's approach.

Beyond the absence of a numerical requirement, the proposed alteration does not represent an optimal outcome when assessed against the secondary criteria, particularly community of interest. The Committee's assertion that the affected localities share "strong community of interest ties" with the southern parts of Grey has not been clearly articulated or substantiated in terms of economic, social or regional characteristics.

Community of interests within the proposed Electoral Division, including economic, social and regional interests

The existing southern portion of Grey, including Lewiston and Two Wells, already represents a relatively limited peri-urban component within an otherwise predominantly regional and rural electorate. The proposed inclusion of additional peri-urban localities, including Virginia and Waterloo Corner, would further dilute this established character of Grey. By contrast, these areas are more appropriately aligned with Spence, which exhibits a more coherent peri-urban profile. Retaining these localities within Spence would better reflect the principle of grouping areas with similar land use, settlement patterns and community characteristics.

This distinction is further supported by demographic evidence. Country of birth data from the 2021 ABS Census indicates that the Lewiston–Two Wells SA2 closely reflects the profile of Grey, with a high proportion of Australian-born residents (82.2%, consistent with Grey at 82.2%) and comparatively limited representation of overseas-born populations. In contrast, the Virginia–Waterloo Corner SA2 exhibits a more diverse profile, with a lower Australian-born share (65.2%) and a higher proportion of residents born overseas, including Vietnamese (5.9%), Cambodian (1.5%) and Indian (1.3%) populations.

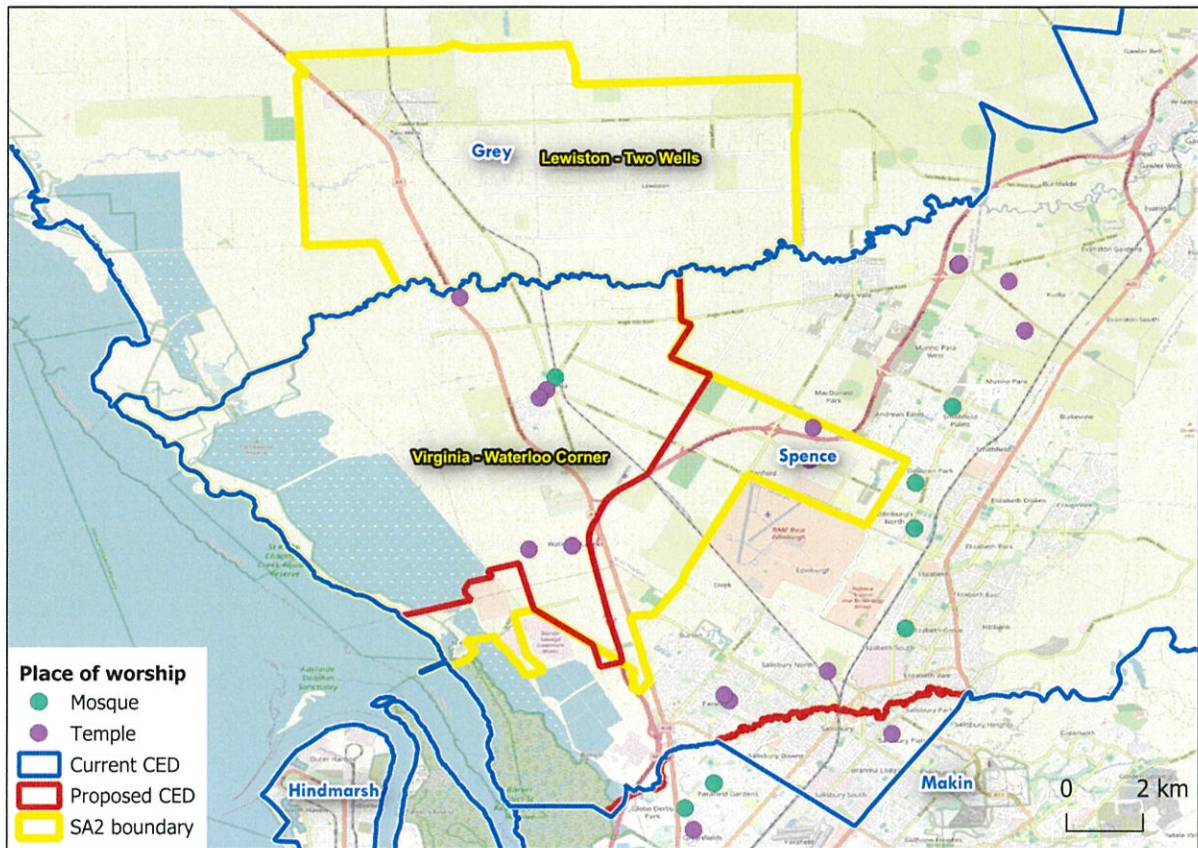
At the electorate level, these differences are also evident. Spence records the highest concentration of Afghanistan-born residents in South Australia (1.5%), followed by the adjoining Division of Makin (1.4%), compared to a negligible share in Grey (less than 0.01%). A similar pattern is observed for the Vietnamese-born population, with Grey recording a very low share (0.11%) relative to Virginia–

Waterloo Corner (5.9%) and Spence (1.3%), both above the South Australian average of approximately 1.0%.¹

These differences are also reflected in the spatial distribution of community infrastructure. Place of worship mapping (shown below) indicates a concentration of mosques and temples within Spence, including within the Virginia–Waterloo Corner SA2 and surrounding areas, corresponding with the presence of the established diaspora communities. By comparison, there are no equivalent facilities within the Lewiston–Two Wells SA2 of Grey, nor any comparable clustering further north across the electorate.

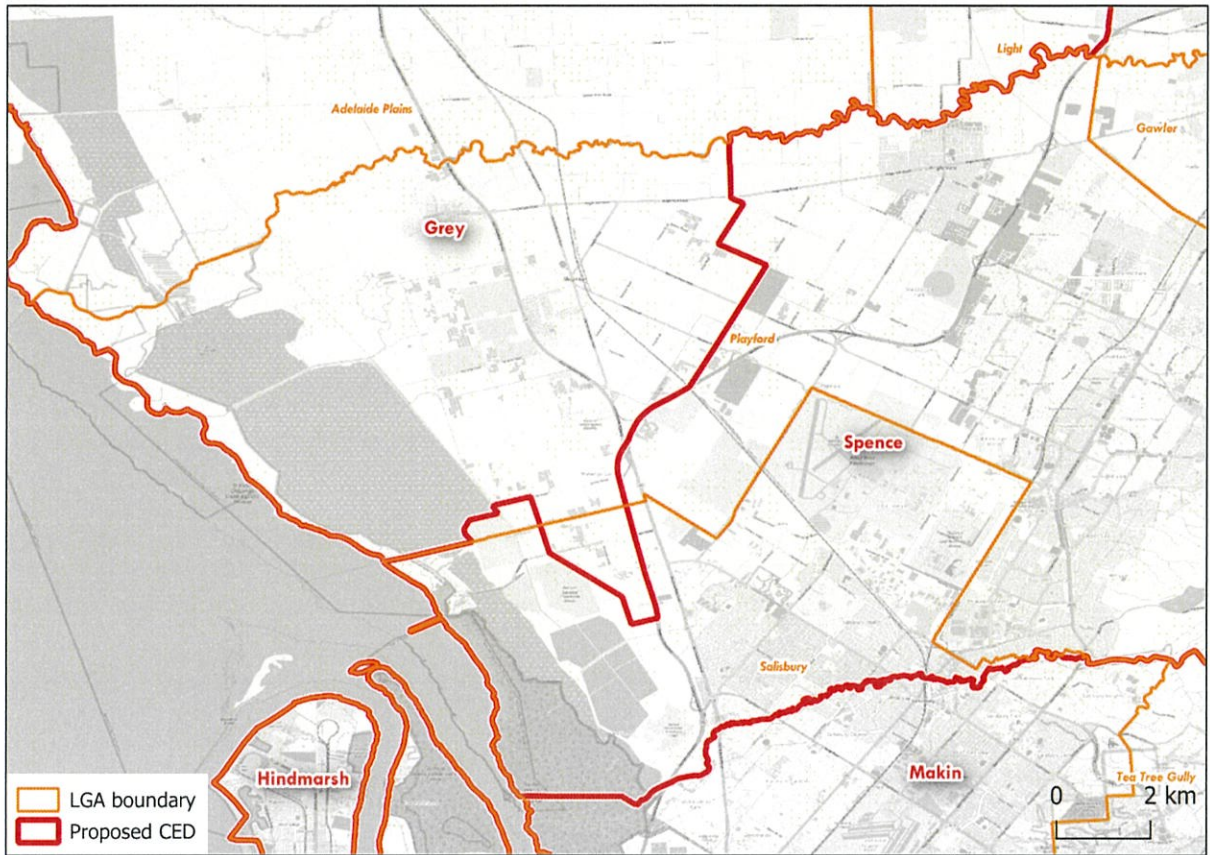
In this context, the proposed boundary change would relocate these localities, and associated community infrastructure, away from the electorate in which their primary user base resides and into one where such facilities are less prevalent. This would weaken the alignment between community infrastructure and the populations it serves and does not represent an optimal outcome when assessed against the statutory requirement to consider community of interest.

¹ <https://abs.gov.au/census/find-census-data/quickstats/2021/CED404>, <https://abs.gov.au/census/find-census-data/quickstats/2021/CED409>, <https://abs.gov.au/census/find-census-data/quickstats/2021/402011027>, <https://abs.gov.au/census/find-census-data/quickstats/2021/40201035>



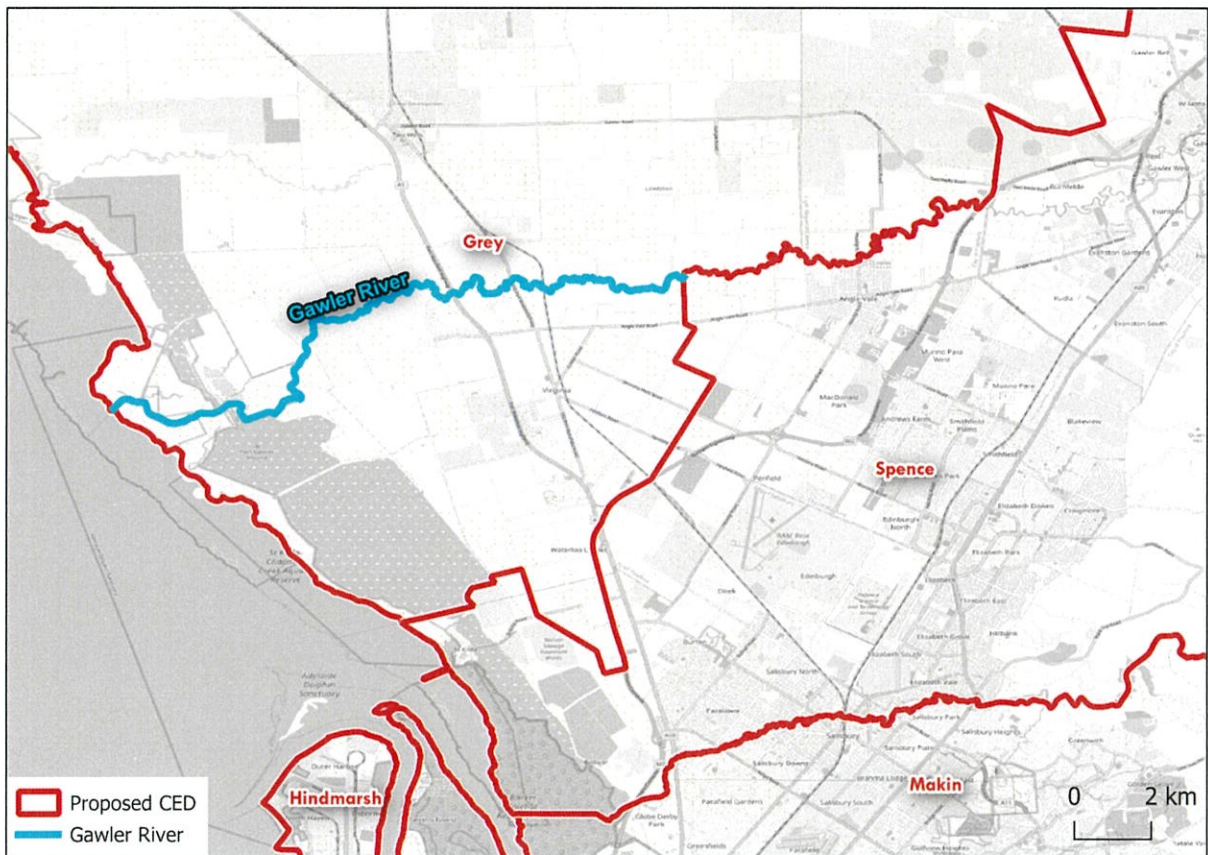
Finally, Local Government Areas are commonly recognised through the Proposed Redistribution report as reflecting established communities of interest. The current boundary provides a clear and coherent alignment, with the Adelaide Plains LGA wholly contained within the Division of Grey and the City of Playford wholly within the Division of Spence.

The proposed alteration would disrupt this alignment by splitting the City of Playford across Grey and Spence and introducing a portion of the City of Salisbury (albeit small) into Grey. This would fragment existing administrative boundaries and weaken alignment with Local Government Areas that play a significant role in delivering community services and infrastructure. Such outcomes reduce clarity for residents and diminish the coherence of representation.



Physical features and area of the proposed Electoral Division

The current boundary between the Division of Grey and the Division of Spence is reinforced by the Gawler River, which provides a clear and recognisable physical delineation between the two electorates and their respective Local Government Areas. This natural feature aligns with established administrative boundaries and contributes to a logical and easily understood division of communities, consistent with the requirement to consider physical features and area under the Act.



Means of communication and travel within the proposed Electoral Division

The proposed alteration raises concerns in relation to means of communication and travel within the proposed electoral division. The Division of Grey is already the largest electorate in South Australia by area and the fourth largest nationally. Its existing service model, including electorate offices located in Kadina, Whyalla and Port Pirie, is designed to service a vast regional catchment.

The inclusion of additional peri-urban localities such as Virginia and Waterloo Corner would introduce populations that are significantly more proximate to metropolitan

service centres. For example, residents of Virginia are currently located approximately 15 minutes' drive from the electorate office of Spence in Salisbury, compared to approximately 1.5 hours to Kadina, 2.5 hours to Port Pirie and 4 hours to Whyalla. This represents a material reduction in accessibility to their federal representative and associated services.

In this context, the proposed change would extend an already geographically expansive electorate into areas that are more functionally aligned with metropolitan Adelaide, reducing the efficiency and accessibility of representation. This concern is consistent with earlier submissions to the redistribution, including one which noted that the division is already geographically extensive and should not be enlarged unless strictly necessary.

Boundaries of existing Divisions in the State or Territory

The requirement in the Commonwealth Electoral Act 1918 to have regard to "the boundaries of existing Divisions in the State or Territory" is generally understood to support the preservation of existing boundaries where possible, promoting continuity and minimising unnecessary disruption to the electoral map. In this case, the proposed alteration departs from that principle by introducing change in the absence of a clear need to do so.

Accordingly, the proposed alteration to the Division of Grey is not supported by the statutory framework. The Division satisfies both current and projected enrolment requirements, with no numerical deficiency necessitating change. Further, the proposed transfer does not deliver a clear or demonstrable improvement against the legislated secondary criteria, including community of interest, means of communication and travel, physical features, or existing boundaries. On the contrary, the analysis indicates that the alteration would weaken alignment across these factors.

In the absence of a numerical imperative or a clear qualitative benefit, the proposal instead relies on non-statutory and inherently speculative concepts such as the "longevity of the redistribution" and associated "numerical benefits". These

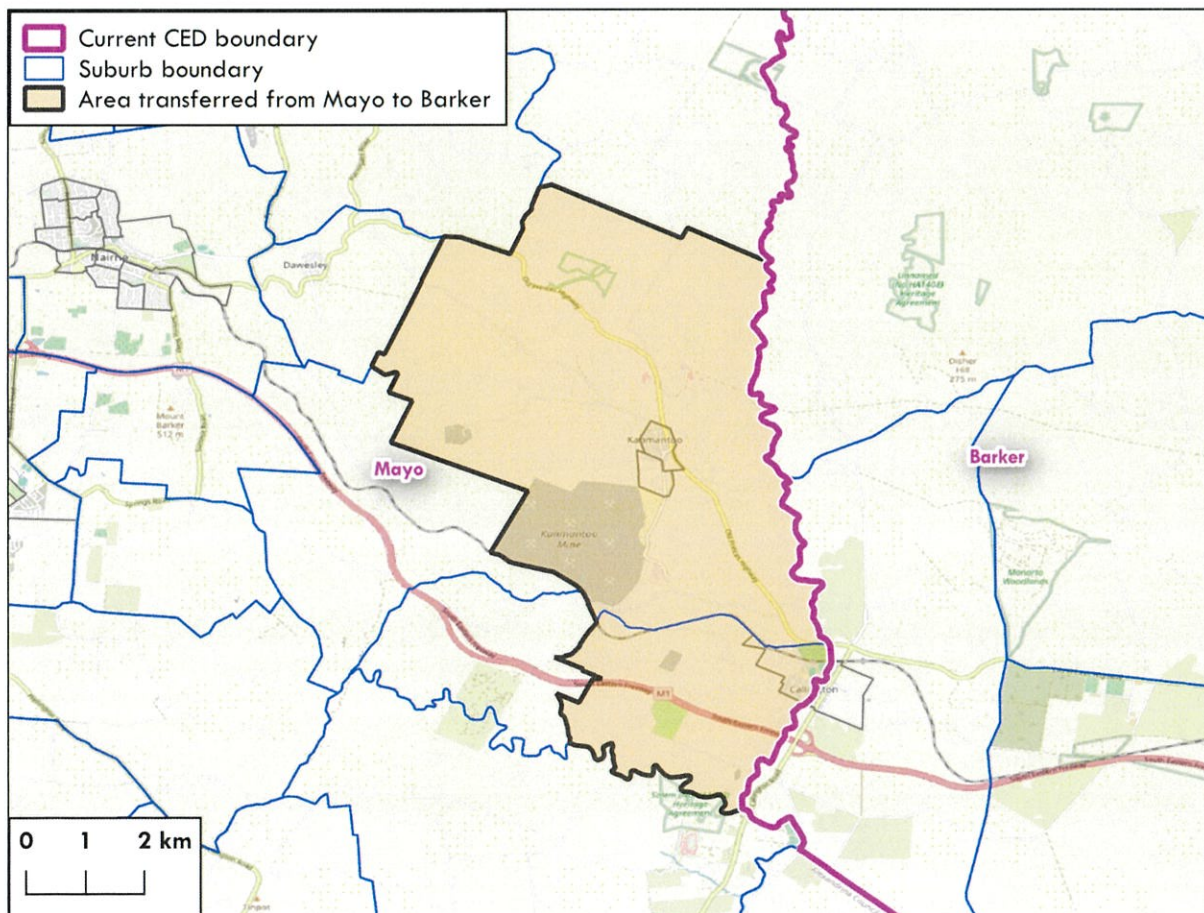
considerations are not grounded in the Act and do not provide a sufficient basis to justify boundary change.

Barker

The Committee has proposed that the Division of Barker incorporate part of the Alexandrina Council Local Government Area (LGA), along with the localities of Callington and Kanmantoo, from the Division of Mayo.

The Liberal Party supports the Committee's position that Callington should be contained within a single electorate and co-located with Kanmantoo, reflecting their shared community of interest. Accordingly, we support the transfer of Kanmantoo and the portion of Callington currently within Mayo into Barker.

However, consistent with our position on minimising disruption, we consider that this adjustment alone represents a sufficient transfer of electors to meet the primary numerical requirements. The additional proposal to transfer parts of the Alexandrina LGA would unnecessarily fragment the LGA across two electorates, whereas it is currently wholly contained within Mayo and could remain so if only the Callington and Kanmantoo adjustment were adopted.



Boothby

The Liberal Party supports the Committee's proposed adjustment to the Division of Boothby, whereby the remaining localities of the City of Mitcham LGA are transferred from the Division of Mayo into Boothby. As the Committee acknowledges in the Report, this approach reflects a clear and logical application of the statutory criteria, including the use of the Sturt River as a natural boundary, the consolidation of the Mitcham LGA within a single electorate, and responsiveness to consistent advocacy in public submissions.

Mayo

In relation to the Division of Mayo, the Liberal Party considers that the Committee's proposed alterations extend beyond what is required to address the projected enrolment position. The combination of the adjustment to Boothby and the transfer of Kanmantoo and the entirety of Callington to Barker is sufficient to resolve Mayo's projected numerical deficiency.

Additional changes therefore introduce a degree of redistribution that is not strictly necessary and risk creating a less coherent outcome. In particular, the inclusion of areas with a more residential Greater Adelaide character sits somewhat incongruently with Mayo's broader regional profile. A more limited adjustment would better maintain the existing balance of the electorate while still achieving compliance with the statutory requirements.

Seat names

The Liberal Party does not support the proposed renaming of the Division of Grey to O'Donoghue. This position is grounded in the Australian Electoral Commission's naming guidelines, which emphasise stability and continuity, including that every effort should be made to retain the names of original Federation divisions. While Grey was formally constituted as a single member division in 1903 following South Australia's initial at large representation, it is appropriately regarded as equivalent to a Federation electorate and carries longstanding historical significance.

The Liberal Party acknowledges and respects the distinguished legacy and service of Lowitja O'Donoghue and recognises the importance of appropriately commemorating individuals of national significance. However, while the Act does not require a name change to be linked to boundary changes, in practice renaming is typically associated with substantial changes to a division's composition or the creation of a new electorate. In the absence of such change, there is a strong convention toward retaining existing names.

As outlined in this submission, the proposed boundary changes to Grey are limited and not supported, and do not represent a material transformation of the division.

Concluding arguments

In the context of a redistribution triggered solely by the passage of time, the Liberal Party reiterates that the circumstances lend themselves to an approach of minimal necessary change, with primary weight given to the statutory criteria set out in the Commonwealth Electoral Act 1918. Where divisions already satisfy current and projected enrolment requirements, boundary alterations should only be made where they clearly improve outcomes against those criteria.

As outlined throughout this submission, the proposed changes to the Division of Grey do not meet this threshold. There is no demonstrated numerical deficiency, and the alteration does not deliver a clear improvement against the legislated secondary criteria. The analysis instead shows that the proposal would weaken alignment across community of interest, means of communication and travel, physical features, and existing boundaries, while relying on non-statutory concepts that lack a clear evidentiary basis.

This is particularly evident when compared with the Committee's approach to the Division of Boothby, where a clear and consistent rationale has been articulated. This includes recognising the strength of natural boundaries such as rivers, the benefits of maintaining Local Government Areas within a single electorate, and strong support in public submissions. In the case of Grey, the proposed changes run counter to these same principles. An existing natural boundary is crossed, a Local Government Area is split across electorates, and the alteration is not supported by public submissions or required to meet numerical thresholds.

In this context, the proposed alteration to Grey represents an unnecessary and inconsistent departure from the statutory framework and established redistribution principles and should not be adopted.

We thank the Commission for its consideration of this submission and trust that our arguments will be considered in the development of the Final Boundaries.