



# Suggestion 211

Liberal Party of Australia (SA Division)

14 pages



**Liberal Party of Australia (SA Division)**

Redistribution Committee for South Australia  
Australian Electoral Commission  
GPO Box 344  
Adelaide SA 5001

Dear Committee Members,

I submit a Suggestions Submission on behalf of the Liberal Party of Australia (South Australian Division).

Our Suggestions Submission comprises of the following:

1. A written submission with a summary of suggestions, commentary on the methodology we have used in formulating them, the suggestions in detail as summarised by mapping software tracking movements between divisions.

We would like to take the opportunity to thank the Commission's staff for their assistance to date.

Yours sincerely,



**Sascha Meldrum**

**State Director**

## OVERVIEW

This Suggestions Submission is made in response to the Australian Electoral Commissioner's invitation to members of the public to submit written suggestions about the redistribution of federal electoral boundaries in South Australia.

The Liberal Party acknowledges that South Australia will decrease its representation from 11 to 10 Federal Electoral Divisions. We note that in making the proposed redistribution, the Redistribution Committee is required by the Act to:

1. Ensure the number of electors in each proposed electoral division must not deviate by more than 10 per cent above or below the current enrolment quota. The current enrolment quota for South Australia was determined by the Electoral Commissioner to be 119,503.
2. As far as practicable, the Redistribution Committee will ensure that the number of electors enrolled in each electoral division at 20 January 2022 (the projection time) will not deviate by more than 3.5 per cent above or below the projected enrolment quota of 122,731.
3. Give due consideration, in relation to each proposed Electoral Division, to:
  - (i) community of interests within the proposed Electoral Division, including economic, social and regional interests;
  - (ii) means of communication and travel within the proposed Electoral Division;
  - (iv) the physical features and area of the proposed Electoral Division; and
  - (v) the boundaries of existing Divisions in the State or Territory'
4. Consideration of existing boundaries is subordinate to the other factors set out above.

In preparing this submission, the Liberal Party has adhered strictly to the elector constraints as set out in the Act, and has also paid due regard to maintaining community of interests, means of communication and travel, physical features and existing boundaries.

Further, and in response to the determination that South Australia would lose one Division decreasing its entitlement to 10 House of Representative Divisions at the next federal election, the Liberal Party's submission proposes the abolition of the Division of Adelaide.

## METHODOLOGY

At the outset, we note that the suggestions of the Liberal Party fully comply with the statutory requirements of Section 66 (3) of the *Commonwealth Electoral Act*.

### STARTING POINTS AND CORRIDORS

The drawing of electoral boundaries needs to begin from logical fixed starting points. It is anticipated that the Redistribution Committee will work both inwards from the corners of the state and from the Central Adelaide metropolitan area.

With regards to this process, there are nine distinct and logical regions that the Liberal Party has adopted so that the Committee can understand our reasoning:

- The Upper Northern region;
- The South Eastern / Riverland region;
- The Fleurieu / Kangaroo Island region; and
- Adelaide metropolitan region.

### ELECTORAL ENROLMENT

At both the time the quota is struck and at the 'projection time', the Act provides a maximum and minimum permissible variation from the average.

This variation has been provided by Parliament so that it is possible to also have regard for the aspects of the statutory criteria set out in Section 66 (3) (b) of the Act.

Therefore, one can assume that the full permissible variation can be employed to allow sensible Divisions to be drawn. There is no requirement that each Division must be drawn so that their actual enrolment has negligible variation from the quota, or that the projected enrolment should have negligible variation from the average divisional enrolment at the 'projection time'.

The Liberal Party's suggestions have sparingly made use of the flexibility offered by the margin of allowance.

### STATEWIDE SUMMARY OF PROJECTED ENROLMENT

The projected enrolment quota for South Australia at 20 January 2022 is **122,731**. To be within 3.5% of the projected enrolment, the number of electors in the **ten** South Australian seats must be between **118,436** and **127,026**.

In analysing the current and projected enrolments of the existing Divisions, it becomes very clear that by abolishing the Division of Adelaide, all Divisions can gain the required number of electors to be within the quota tolerance without a substantial geographical re-configuration of the boundaries within the state

The Liberal Party submission has all Divisions within the required tolerance.

<b>Suggested Divisions</b>	<b>Actual enrolment</b>	<b>Projected enrolment</b>
Barker	117,354	120,428
Boothby	117,600	120,534
Grey	118,798	119,441
Hindmarsh	118,754	120,981
Kingston	121,499	124,678
Makin	124,573	126,911
Mayo	115,812	119,527
Port Adelaide	122,473	126,387
Sturt	119,921	121,745
Wakefield	118,247	126,678
<b>Grand Total</b>	<b>1,195,031</b>	<b>1,227,310</b>

## **ADDRESSING THE ENROLMENT SHORTFALL IN THE UPPER NORTHERN REGION**

### **Grey enrolment**

At 4 September 2017, there were 102,264 electors in the electorate of Grey. As the number of members of the House of Representatives to which South Australia is entitled has been reduced to ten, all remaining seats will be required to gain a large number of voters.

As at 20 January 2022, Grey's projected enrolment is 102,612. The projected enrolment quota for South Australia at 20 January 2022 is 122,731.

To be within 3.5% of the projected enrolment, the number of electors in the ten South Australian seats must be between 118,436 and 127,026. This means Grey must gain at least 15,824 electors but could gain up to 24,414 electors.

It is the Liberal Party's submission that by working inwards from the corners of the state, the Division of Grey should gain the additional and necessary population from within the central northern region, with the inclusion of parts of Wakefield Division.

This logical approach would see Grey take in the remaining southern part of Wakefield, Clare and Gilbert Valleys and Mallala and the western section of Light, joining the like-minded community of interests of those LGAs already present within the existing Division of Grey.

Townships would include Clare, Auburn and Riverton and as far south as Lower Light, Tarlee and across to Eudunda.

These changes would increase the number of projected electors in Grey to 119,441, in line with the required increase.

### Communities of interest

The expansive Grey electorate contains the industries of mining (oil, gas, copper, uranium, opals, iron ore), smelting (lead and steel), tourism, fishing, agriculture, aquaculture and forestry.

To facilitate expansion of the electorate the LGA areas of Wakefield, Clare and Gilbert Valleys, Light and Adelaide Plains contain the most "like" industries being mainly small agricultural communities similar to those in the adjacent mid north and Yorke Peninsula.

Communication to the expanded community areas would therefore be relevant given the similar social and economic demographic.

Alternatively the areas near the Gawler River to the south and the Barossa to the East contain the more intensive industries of horticulture and viticulture which would be difficult for the member to service adequately given the already large number of industries contained in the electorate and furthermore contain a different cultural and economic demographic.

## **ADDRESSING THE ENROLMENT SHORTFALL IN THE SOUTH EASTERN / RIVERLAND REGION**

### **Barker enrolment**

At 4 September 2017, there were 106,009 electors in the electorate of Barker. As the number of members of the House of Representatives to which South Australia is entitled has been reduced to ten, all remaining seats will be required to gain a large number of voters.

As at 20 January 2022, Barker's projected enrolment is 108,383. The projected enrolment quota for South Australia at 20 January 2022 is 122,731.

To be within 3.5% of the projected enrolment, the number of electors in the ten South Australian seats must be between 118,436 and 127,026. This means Barker must gain at least 10,053 electors but could gain up to 18,643 electors.

It is the Liberal Party's submission that by working inwards again, that the heart of the Barossa should be represented within one electoral district. The Division of Barker currently contains some of the Barossa District Council area and should gain most of the remainder within the LGA and part of Light Regional Council, currently in the Divisions of Wakefield and Mayo.

Townships then included would be Kapunda, Truro, Nuriootpa and Tanunda. This would increase the number of projected electors in Barker to 120,428, in line with the required increase.

### Communities of Interest

The Barossa Valley is perhaps one of the strongest communities of interest in the region and yet representation in the Federal Parliament sees the area currently split in three Federal electorates of Barker, Mayo and Wakefield.

### Regional History

The Barossa community has a unique culture. Settled in 1842 by English and German settlers the Valley soon established its own unique culture and lifestyle much of which remains today.

### Geography

The Barossa region surrounds the 'Valley' which is formed by the North Para River. The main road through the valley, Barossa Valley Way, connects the main towns of Nuriootpa, Tanunda, Rowland Flat and Lyndoch. Other major towns in the region include Angaston, Williamstown and Greenock and Seppeltsfield.

### Industry

Perhaps best known internationally as a premier wine region, the Barossa Valley has established itself as a premier tourism region on the back of its food and wine industry.

The Australian Geographical Indication "Barossa" was entered in the Register of Protected Names on 27 December 1996 making it an official description of an Australian wine zone. This 'zone'

encompasses an area that roughly overlaps the LGAs of Barossa District Council and Light Regional Council.

Whilst being one of South Australia's premier tourist destinations, the area also includes light and heavy industry through to viticulture and agriculture.

The current electorate of Barker has large areas of wine making and viticulture in the Coonawarra and the Riverland, while the largest industry in the current Barker electorate is Agriculture. The addition of the remaining Barossa community with these industries would mean the Member is representing similar communities with common industries across the electorate.

#### Communications

The Barossa is covered by two local newspapers:

Established in 1908, the *Barossa Light and Herald* covers the entire Barossa, including Tanunda, Nuriootpa, Angaston and Lyndoch, home delivers to every household in Gawler and distributes to surrounding districts such as Kapunda, Eudunda, Mt. Pleasant, Kersbrook, Williamstown, Roseworthy, Hamley Bridge and Riverton.

Established in 1918 *The Barossa Leader* serves the Barossa Valley including Nuriootpa, Tanunda, Angaston and Lyndoch as well as Gawler, Kapunda, Eudunda, Mt. Pleasant, Williamstown, Roseworthy and surrounding areas.

Community Radio station 'Triple B FM' also broadcasts across the region and is the only local Barossa focused radio.

Currently both papers and radio cover a region that has three MPs representing it. It would benefit the community if communications could be simplified with one MP representing a region covered by the same print media and radio outlets.

#### **Wakefield Enrolment**

At 4 September 2017, there were 114,533 electors in the electorate of Wakefield. As at 20 January 2022, Wakefield's projected enrolment is 121,533.

Wakefield's projected enrolment is high enough to meet the minus 3.5% threshold of the projected enrolment quota, however it could gain up to 5,493 electors.

It is the Liberal Party's submission that, on the principle of working inwards from the corners of the State, Wakefield elector numbers would be reduced by the necessary encroachment of both the Grey and Barker Divisions.

This would reduce projected enrolment below the minimum requirement. In order to bridge this gap, the northern suburbs of the Salisbury LGA within the Divisions of Makin and Port Adelaide should be moved into the Division of Wakefield. This area represents similar communities as those living in the Playford LGA which makes up the majority of the new Division of Wakefield.

It is our submission that the entirety of Playford LGA and parts of the suburbs of Salisbury, Paralowie, Elizabeth and Munno Para should be included in the Division of Wakefield.

These changes would increase the number of projected electors in Wakefield to 126,678.

### Communities of Interest

The areas of Salisbury, Elizabeth and surrounding suburbs are communities of interest with in regard to medical facilities, shopping precincts, public transport and defence and manufacturing industries.

In our submission, the RAAF Base Edinburgh and Edinburgh Parks defence precinct are in the Wakefield Division which also includes the former Holden manufacturing site.

The Lyell McEwin Hospital is well utilised by the communities in the area which draws people from throughout the Division.

### Shopping and Entertainment

The constituents of the proposed Wakefield Division conduct their shopping and entertainment locally. The Elizabeth and Munno Para shopping centres are located within several minutes of these suburbs which provide essential, everyday services to the constituents of these suburbs.

## **ADDRESSING THE ENROLMENT SHORTFALL IN THE FLEURIEU / KANGAROO ISLAND REGION**

Media reports within the Division of Mayo which claims the Liberal Party is keen to see the Division of Mayo dissolved have been incorrect and totally without foundation. On the contrary, the Liberal Party submission is for the seat of Mayo to increase electors by between 8,364 and 16,954 voters.

### **Mayo Enrolment**

As at 20 January 2022, Mayo's projected enrolment is 110,072. The projected enrolment quota for South Australia at 20 January 2022 is 122,731.

To be within 3.5% of the projected enrolment, the number of electors in the ten South Australian seats must be between 118,436 and 127,026.

This means Mayo must gain at least 8,364 electors but could gain up to 16,954 electors.

It is the Liberal Party's submission that those new electors should come from the Divisions of Kingston and Boothby. The hills communities within Onkaparinga and Mitcham LGAs, including Aberfoyle Park and Coromandel Valley should move into the Mayo Division to ensure it meets elector requirements.

A small change in the division's northern extent to accommodate Barker's need for additional electors sees the boundary follow that of the Adelaide Hills LGA.

The suggested changes would increase the number of projected electors in Mayo to 119,527, in line with the required increase.

### **Kingston Enrolment**

As at 20 January 2022, Kingston's projected enrolment is 110,793. To be within 3.5% of the projected enrolment, the number of electors in the ten South Australian seats must be between 118,436 and 127,026.

This means Kingston must gain at least 7,643 electors but could gain up to 16,233 electors.

It is the Liberal Party's submission that Kingston should gain additional electors from the Division of Boothby. This makes up for those electors that were moved into Mayo from the Onkaparinga LGA as well as the need to increase elector numbers by at least 7,643 voters.

Kingston should gain additional voters at its northern extent from within the Marion and Mitcham LGAs, taking in the suburbs of Seacombe Downs and Flagstaff Hill.

This would increase the number of projected electors in Kingston to 124,678 in line with the required increase.

### **ADDRESSING THE ENROLMENT SHORTFALL IN THE ADELAIDE METROPOLITAN REGION**

The necessary boundary creep from the regional South Australian Divisions means an encroachment on the Adelaide Metropolitan area from the northern Division of Makin and the southern Division of Kingston.

This naturally leads to one of the metropolitan seats being abolished and splitting the voters between the remaining six Divisions.

At 4 September 2017, there were 110,351 electors in the electorate of Adelaide. As at 20 January 2022, Adelaide's projected enrolment is 114,268.

It is the Liberal Party's submission that the current seat of Adelaide should be absorbed by surrounding electorates.

#### **Boothby Enrolment**

As at 20 January 2022, Boothby's projected enrolment is 109,835. This means Boothby must gain at least 8,601 electors but could gain up to 17,191 electors.

As voters move into the Divisions of Mayo and Kingston to meet their numerical requirement, the coastal location means that Boothby requires that its northern boundary be shifted northwards.

It is the Liberal Party's submission that Boothby gain electors from the Divisions of Hindmarsh, including the northern sections of Holdfast Bay and Marion LGA. With the northward shift of the boundary, Boothby would take in the seaside suburb of Glenelg.

Together with some required change to the southern boundary, this adjustment would increase the number of projected electors in Boothby to 120,534 in line with the required increase.

If quota permits it is the party's strong preference to retain the southern suburbs of Seaview Heights, Seaview, Seacliff and Flagstaff hill in the Division of Boothby due to communities of interest in particular in regard to tertiary education, medical, public transport, shopping and entertainment services.

#### Communities of interest

Glenelg and Brighton are beach-side suburbs of Adelaide. Located on the shore of Gulf St Vincent, the area is a prime tourist and retail destination due to its beach and many attractions. Both have active beach communities, strong surf lifesaving clubs as well as tourism and retail connections.

There are strong links within the communities in tertiary education, public transport and access to medical facilities.

### The Flinders Precinct

The Flinders University and Medical Centre precinct is well utilised by families and students in the Boothby area and draws people from throughout the Division.

### Shopping and Entertainment

The constituents of these suburbs conduct their shopping and entertainment within Boothby. The Marion Shopping Centre is located within several minutes of these suburbs. This centre provides essential, everyday services to the constituents of these suburbs.

### **Sturt Enrolment**

As at 20 January 2022, Sturt's projected enrolment is 106,669. The projected enrolment quota for South Australia at 20 January 2022 is 122,731.

The Division of Sturt must gain at least 13,709 electors but could gain up to 22,299 electors.

With the Liberal Party's proposal that the neighbouring seat of Adelaide be abolished and therefore its electors be absorbed by surrounding electorates, Sturt must absorb some electors from Adelaide.

The Liberal Party suggests that to maintain its character as an eastern suburbs seat and maintain the strong communities of interest for those eastern suburbs electors.

Sturt is an inner metropolitan, eastern suburbs seat and the Burnside and Campbelltown LGAs should remain in Sturt as the base of the electorate, with an expansion west into the City of Norwood Payneham and St Peters and Town of Walkerville and the remaining section of the City of Burnside to the edge of the city parklands including the suburbs of Dulwich, Kent Town, Walkerville, Gilberton and St Peters.

This would extend the River Torrens boundary from Marden into the City. It would also align local government boundaries which ensure communities of interest are accommodated. A seat based in the Norwood Payneham and St Peters, Campbelltown and Burnside LGAs is a sensible option.

This would increase the number of projected electors in Sturt to 121,745, in line with the required increase.

### Natural Boundaries

The Mount Lofty Ranges are an obvious natural boundary. Maintaining the eastern boundary as starting at the base of the Mt Lofty Ranges fulfils the criteria for the redistribution that, where possible, natural boundaries should be respected.

The developing suburbs Lights View and Northgate have strong connections with neighbouring suburbs of Hillcrest, Oakden and Gilles Plains and it makes sense to use the natural boundary of North East Road to be the northern boundary of Sturt.

### Communities of Interest

The Cities of Burnside and Campbelltown should remain the base of the electorate. The City of Norwood, Payneham and St Peters should also be contained entirely within Sturt along with the existing small part of the City of Tea Tree Gully as these LGAs all share strong communities of interest. These council areas all share a similar age, history, ethnicity and socio-economic background.

Dulwich, Rose Park, Eastwood and Toorak Gardens are contained within the City of Burnside, and the State Electorate of Bragg. Throughout its history, Sturt has always taken in the large majority of

Bragg and Burnside. Including these suburbs within Sturt would be a natural extension of the electorate. The community, sporting and social groups in Burnside reflect the strong community of interest that already exists. The addition of these suburbs will add to the community interests of Burnside residents.

The clear and strong eastern boundary of Sturt is the eastern boundaries of the Burnside, Campbelltown, and Tea Tree Gully LGAs. Joining the inner metropolitan communities contained within those LGAs with rural communities in Adelaide Hills Council would run counter to the requirements of the Act that the deliberations of the redistribution process evaluate natural boundaries, communities of interest and existing boundaries. Sturt needs to gain at least 13,709 electors and these electors should not come from Mayo, a rural seat.

#### Shopping and Entertainment

The constituents of these suburbs conduct their shopping and entertainment within Sturt. Burnside Village and the Burnside Civic Centre are within several minutes of these suburbs. The City of Burnside contains the Burnside Shopping Centre, the Burnside Hospital, the Civic Centre and the Library. These institutions provide essential, everyday services to the constituents of these suburbs. It is important that these suburbs and institutions be placed within the same electorate.

The Parade, Norwood is also a hub of the eastern suburbs. To join all of the suburbs of the City of Norwood, Payneham and St Peters in Sturt would create clear boundaries to reflect Sturt's character as an eastern suburbs seat.

#### Religion

The constituents of Dulwich, Eastwood, Rose Park, Norwood and Toorak Gardens share strong religious ties and places of worship.

The Roman Catholic Parish of Burnside/Dulwich has its boundaries within Sturt and Adelaide, with one church in Adelaide, and the other in Sturt. Many Sturt Catholics also use St Ignatius Church in the Norwood Parish.

Sturt constituents make use of the Anglican Parish of Toorak Gardens. The parish boundary does not cross between Adelaide and Sturt, but it draws parishioners from within Sturt. There are a large number of Anglicans living in these suburbs with strong community ties with Anglican parishes in Sturt, in particular, the Burnside Parish.

#### Education

The families of Dulwich, Rose Park, Eastwood and Toorak Gardens have access to the same primary and secondary schools with Sturt.

The zoned area for Marryatville High School is on the border between Adelaide and Sturt, with the majority of Adelaide students coming from Dulwich, Rose Park, Toorak Gardens and about half of Norwood. As the Marryatville High School campus is in Sturt, it would be logical to include these suburbs within Sturt to accommodate zoning patterns as far as practicable.

Many families from Dulwich, Rose Park, Eastwood, Norwood and Toorak Gardens have children at non-government schools within Sturt, particularly Loreto College, Pembroke, St Ignatius and Seymour College.

#### Existing Boundaries

This option as far as practicable maintains existing boundaries. Current boundaries do not change in three out of four points of the compass.

## **Hindmarsh Enrolment**

As at 20 January 2022, Hindmarsh's projected enrolment is 114,716. This means Hindmarsh must gain at least 3,720 electors but could gain up to 12,310 electors.

In line with the Liberal Party's submission that the current seat of Adelaide should be absorbed by surrounding electorates, the eastern boundary of Hindmarsh should be extended as far east as the Division of Sturt to include the Adelaide LGA taking in the Adelaide CBD.

This suggestion would in effect merge the Divisions of Hindmarsh and Adelaide and incorporate both the Adelaide CBD and the Adelaide Airport into the one Division. This Division could just as easily be called Adelaide as Hindmarsh if the commission considers it reasonable to retain the name of the state capital.

This merger provides an opportunity for the northern areas of the Divisions of Adelaide and Hindmarsh to be moved into Makin and Port Adelaide respectively.

The changes would increase the number of projected electors in Hindmarsh to about 120,981, in line with the required increase.

### Communities of Interest

The Cities of Charles Sturt and West Torrens should remain the base of the electorate. In relation to the City of West Torrens, the majority if not all of this council area should be within the Division of Hindmarsh.

A pocket of the City of West Torrens currently exists within the Division of Adelaide. These LGAs all share strong communities of interest. These council areas share a similar ethnicity and socio-economic background.

### Religion

The constituents of Thebarton, Mile End, Torrensville share strong religious ties and places of worship.

The Greek Orthodox Community and Greek Orthodox Archdiocese are prominent in western Adelaide including suburbs currently located in the Division of Adelaide such as parts of Thebarton, Mile End. Both of these communities are also well represented and hold major community events like the Unley Greek Festival in Unley and the suburb of Adelaide is home to churches.

### Education

Many families of Greek heritage in the Division of Hindmarsh attend St George's College in the Federal Division of Adelaide.

Thebarton Senior College is on the border between Adelaide and Hindmarsh and attracts students from nearby suburbs in the Division of Adelaide. As the school campus is in Hindmarsh, it would be logical to include these suburbs within Hindmarsh.

## **Makin Enrolment**

As at 20 January 2022, Makin's projected enrolment is 109,253. This means Makin must gain at least 9,183 electors but could gain up to 17,773 electors. It would also need to gain additional voters lost to the Division of Wakefield as part of the Liberal Party proposal.

The Division of Makin should move south towards the City into the Port Adelaide Enfield and Prospect LGAs, so that the southern boundary becomes North East Road, bordering Sturt.

The developing suburbs of Lights View and Northgate have strong connections with neighbouring suburbs of Hillcrest, Oakden and Gilles Plains and it the Liberal Party submission that the Division of Makin should gain its required electors from within those suburbs.

This would increase the number of projected electors in Makin to about 126,911, in line with the required increase.

### **Port Adelaide Enrolment**

As at 20 January 2022, Port Adelaide's projected enrolment is 119,176. Port Adelaide's projected enrolment is high enough to meet the minus 3.5% threshold of the projected enrolment quota but could gain up to 7,850 electors.

The Port Adelaide Enfield LGA could be expanded to include the northern area of the current Division of Adelaide through to the new boundary of Sturt.

This would increase the number of projected electors in Port Adelaide to about 126,387.

## **NAMING OF DIVISIONS**

The Liberal Party's submission does not recommend any changes to the names of existing electoral Divisions.

The current names reflect either significant localities or features within each Division or recognise individuals who have made outstanding contributions to Australia.

In both instances, current Division names are well accepted by the community and there is nothing to be gained by changing them.

## **COMMUNITY OF INTERESTS**

The Liberal Party recognises the difficulties faced in attempting to establish a precise definition of what constitutes a 'community.'

We submit that the Redistribution Committee should, subject to quota considerations, seek to create electorates that, where ever possible, incorporate existing whole communities. This means that, where a group of electors identify themselves as part of an existing 'community', an effort should be made to avoid dividing them between Divisions.

This is not to suggest that a Division should only comprise electors from a particular cultural, professional or socio-economic group. A typical 'community' will still include a diverse range of citizens. Individuals who shop in the same area, read the same local newspaper or send their children to schools in a local area are likely to identify as part of a 'community.' However, they are still likely to encompass a broad range of socio-economic and cultural groupings.

In rural Divisions, economic, social and regional interests tend to have a greater salience and LGA boundaries are generally a far stronger indicator of community of interest than elsewhere in the State.

By and large, LGA boundaries also reflect the significant natural physical features of the State. Therefore, electoral boundaries should be drawn in rural areas that incorporate whole LGAs in the one Division where possible, subject to the necessary numerical considerations and requirements as set out in Section 66 (3) of the Act. Our suggested boundaries in regional areas are heavily based on LGA boundaries with minor exceptions.

Finally, in metropolitan areas, LGAs are less helpful than in rural areas. Therefore the use of locality boundaries in metropolitan areas will be much more useful in determining local 'community of interest' as residents know which suburb they live in and including whole suburbs in Divisions where possible helps to avoid any confusion.

The Liberal Party has used locality boundaries extensively in its submission - trying to avoid splits as far as possible - and railway lines, major roads and waterways have been used as boundaries where necessary. Major roads have often provided an obvious boundary in metropolitan Divisions. They frequently serve as postcode and locality boundaries, and will often clearly denote a community of interest.

## **CONCLUSION**

While the above material has outlined the most important factors the Liberal Party has adopted in developing our approach and what we believe the Redistribution Committee should take into account, the list is by no means exhaustive.

For example, it may be appropriate to consider the history of electoral boundaries in a particular area or boundaries that have been long established may be more worthy of preservation. None of the principles discussed above can be absolute, and there will at times be conflict between them.

In conclusion, the Liberal Party submits that this redistribution process must be conducted fairly and impartially, and has no doubt that the Redistribution Committee will pursue an outcome that enhances electoral fairness.

It is important to discount any proposal, which is intended to pursue a political advantage at the expense of electoral fairness and community of interest. The outcome of the redistribution must be fair, so the Redistribution Committee's decisions will be accepted - and respected - by the public.

**SUGGESTIONS SUBMISSION**

**STATEWIDE MAP – LIBERAL PARTY OF AUSTRALIA (SA DIVISION)**

