

CITY OF PORT ADELAIDE ENFIELD REPRESENTATION REPORT

Prepared for:
City of Port Adelaide Enfield

Date:
13.09.2024

HOLMES DYER

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Executive Summary

The City of Port Adelaide Enfield is undertaking a review of its representation structure in accordance with the requirements of Section 11A, 12, 26, and 33 of the *Local Government Act 1999* (the Act). The previous review was completed in 2016 and resulted in the current composition of the Council. The current review process is scheduled to be completed by April 2025 to take effect at the 2026 Local Government elections.

The purpose of this Representation Review is to determine whether the communities of City of Port Adelaide Enfield are adequately represented by local government. The review assesses whether Council's current structure gives residents an effective pathway to interact with its Elected Member body, and if those communities would benefit from any changes to Council's current composition, size, or Ward structure.

Investigations into potential representation options and discussions with the City of Port Adelaide Enfield have been undertaken to inform the development of this document, which explored the following representation options:

- Boundary Realignment (7 Wards with 17 Ward Councillors)
- 6 Wards with 14 Ward Councillors
- 6 Wards with 12 Ward Councillors
- 3 Wards with 12 Ward Councillors
- No Wards

Each representation option explored carries with it a suite of benefits and some drawbacks when considered comparatively.

Council has identified 'Boundary Realignment (7 Wards with 17 Ward Councillors plus the Mayor)' as its preferred representation structure/composition, which proposes:

- The principal member of Council continues to be a Mayor, elected by the community (noting that as part of amendments to the Act undertaken in June 2022, the ability for Council's principal member to consist of a chairperson elected by the council member body was removed);

- The Council area remains divided into Wards;
- The total number of Ward Councillors remains at 17 plus the Mayor;
- There is a seven Ward structure (as close as practicable to the existing Ward boundaries);
- The existing Ward names of Outer Harbor, Semaphore, Port Adelaide, Parks, Enfield, Northfield, and Klemzig are retained; and
- Ward representation is adjusted to within allowable tolerances by:
 - » Shifting Semaphore South from Port Adelaide Ward into Semaphore Ward
 - » Relocating the portion of Valley View that is within the Council area from Northfield Ward into Klemzig Ward

In accordance with Section 12(7) of the Act, interested persons are invited to make a written submission to Council on the Representation Report (this document), and more specifically the composition and structure that Council proposes to introduce on the day of the Local Government elections in 2026.

Submissions are welcomed throughout the consultation period, which runs from **Monday 16 September 2024** until **Friday 11 October 2024**.

Submissions can be made:

- In writing addressed to PO Box 110, Port Adelaide SA 5015
- Via email to consultation@cityofpae.sa.gov.au
- Online via the ParticipatePAE website (<https://participate.cityofpae.sa.gov.au/>)

Further information regarding the Representation Review can be obtained by contacting Kate Leighton (Team Leader Governance) on (08) 8405 6902 or by email at kate.leighton@cityofpae.gov.au

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1. Introduction

Section 12 (4) of the *Local Government Act 1999* (the Act) requires each Council to undertake a review of all aspects of its composition and the division (or potential division) of the Council area into wards, as prescribed by the Minister every eight years by a notice published in the Government Gazette.

The Act provides the statutory framework for undertaking a Representation Review, which must be conducted in accordance with Sections 12, 26(1)(c) and 33 of the Act.

Section 12 of the Act specifically requires a Council to undertake a review of its composition and electoral structure as previously adopted; identify and contemplate alternative options; and consider whether its community would benefit from an alternative composition or ward structure, pursuant to Section 12 (3).

The City of Port Adelaide Enfield last completed a Representation Review in 2016 and is now required to undertake and complete another review by April 2025, in accordance with the provisions of the Local Government (General) Regulations 2013, to ensure fair and equitable representation of all electors prior to the 2026 Local Government election.

This paper has been provided in accordance with the requirements of Section 12 (5) and Section 12 (6) of the Act and examines:

- The advantages and disadvantages of various options that are available to the Council;
- Whether the number of Ward Councillors should be reduced;
- Whether the division of the area into Wards should be abolished;
- How Council's preferred Representation Option relates to specific principles under Section 26 (1) (c) and Section 33 of the Act; and
- Other relevant issues such as demographic trends, population projections, residential development opportunities, and representation comparisons with select Metropolitan Adelaide Councils.

The proposed representation structure presented within this report reflects the current position of the Council based upon the review process. No decision will be made in respect of the future composition and structure of the City of Port Adelaide Enfield until due consideration has been given to public submissions on this report as required by Section 12 (7) of the Act.

2. Background

The City of Port Adelaide Enfield forms one of the largest Councils within Metropolitan Adelaide. Situated on Kaurna traditional lands and covering an area of 97km², the Council represents voters residing across 51 suburbs.

The City of Port Adelaide Enfield has a rich history, with Port Adelaide playing a central role in the colonisation of South Australia. The Council area contains a diversity of land uses, with industrial and commercial land uses situated along Port Adelaide River, the northern portion of the Council area, and within the suburb of Regency Park. The remainder of the Council area supports a range of mixed-use and residential land uses. The Council area also contains some of the State’s finest historical buildings and landmarks, which includes nearly 100 State heritage places, over 200 local heritage places, nearly 100 ‘representative buildings’ (formerly known as Contributory Items), seven Historic Areas and four Character Areas.

The City of Port Adelaide Enfield was established on 26 March 1996, when the City of Port Adelaide and the City of Enfield were amalgamated.

The City of Port Adelaide Enfield currently comprises the Mayor and seventeen Ward Councillors. The council area incorporates seven wards (refer to Figure 1) which includes:

- Outer Harbor Ward – 2 Ward Councillors
- Semaphore Ward – 2 Ward Councillors
- Port Adelaide Ward – 2 Ward Councillors
- Parks Ward – 3 Ward Councillors
- Enfield Ward – 3 Ward Councillors
- Northfield Ward – 3 Ward Councillors
- Klemzig Ward – 2 Ward Councillors

The current structure was adopted by the Council at the completion of the previous Representation Review period in 2016 and came into effect at the 2018 Local Government elections.

It is important to acknowledge that the current Representation composition within the City of Port Adelaide Enfield has been long-established and experienced by the local community, with numerous Representation Reviews previously undertaken indicating a general preference for retaining the existing Ward and Elected Member body structure.

As of 29 February 2024, there were 90,157 electors within the City of Port Adelaide Enfield, with an average Ward quota of 1:5,303. Table 1 provides an overview of the number of electors within each ward and demonstrates the level of variance from the prescribed Ward quota.

Since the previous Representation Review, the Northfield Ward has experienced significant growth with an additional 3,681 electors, which has resulted in the Ward ratio being 13.6% greater than the Ward quota.

Therefore, the City of Port Adelaide Enfield is required to address the under-representation of the Northfield Ward so that the variance of the ratio from the Ward quota is less than 10%; taking into consideration representation ratios at the time of the next Representation Review (in approximately 8 years’ time).

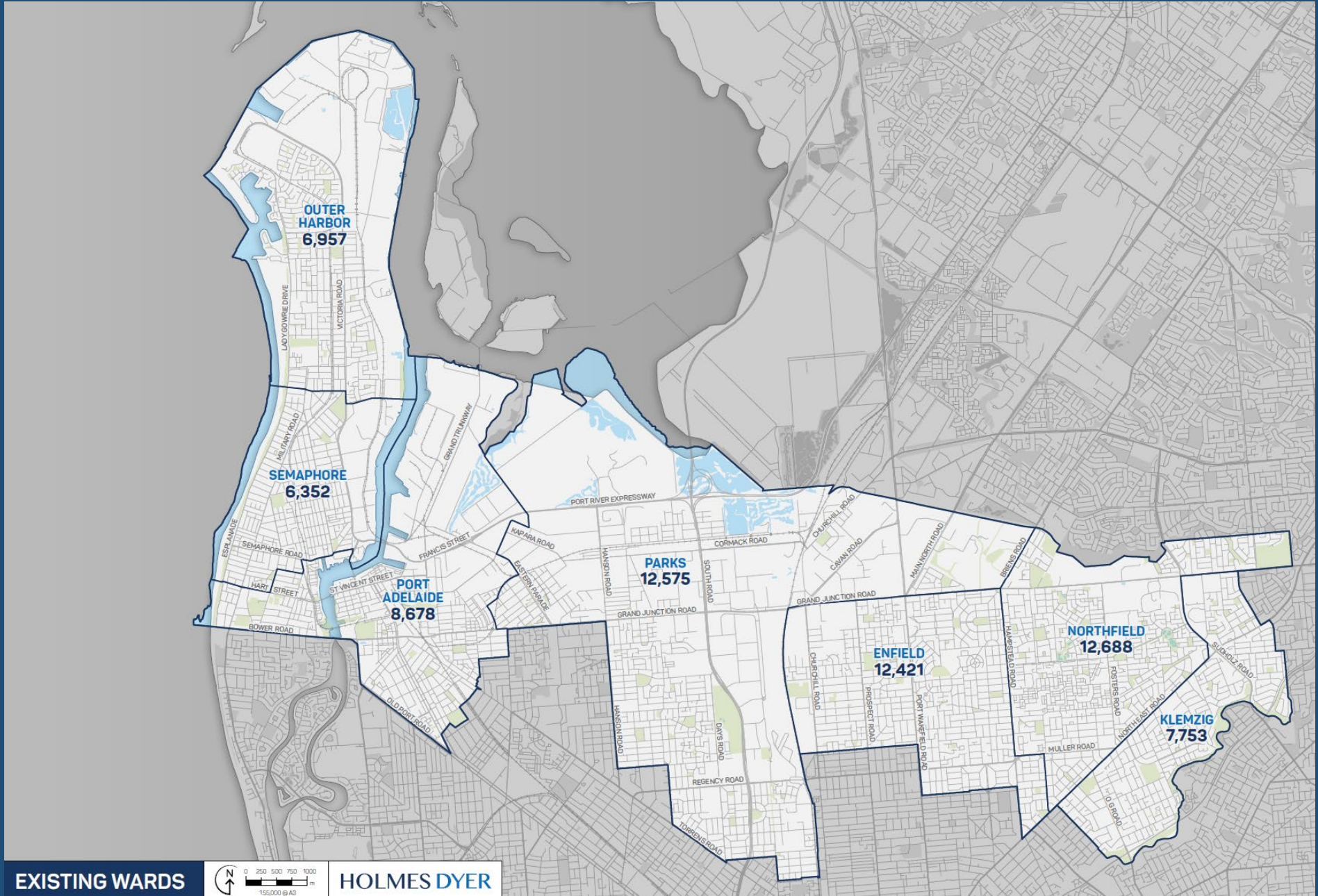
Table 1. Current Elector Representation and Ward Quota Variance

Ward	Ward Councillors	HoA Role	Council Roll	Electors	Ratio	Variance (%)
Outer Harbor	2	10,441	10	10,451	1:5,226	-1.45
Semaphore	2	10,089	10	10,099	1:5,050	-4.77
Port Adelaide	2	10,259	17	10,276	1:5,138	-3.11
Parks	3	15,148	16	15,164	1:5,055	-4.68
Enfield	3	16,029	20	16,049	1:5,350	+0.89
Northfield	3	18,030	43	18,073	1:6,024	+13.60
Klemzig	2	10,022	23	10,045	1:5,023	-5.28
Total	17	90,018	139	90,157		
Ward Quota					1:5,303	

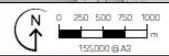
Source: Electoral Commission SA, House of Assembly Roll (29 February 2024)

City of Port Adelaide Enfield, Council Voters Roll (11 April 2024)

Figure 1. Current Ward Composition



EXISTING WARDS



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3. Proposed Representation Structure

3.1. Boundary Realignment (7 Wards with 17 Ward Councillors and a Mayor)

The City of Port Adelaide Enfield proposes the following electoral structure and composition having had regard to the relevant provisions of the Act, and through the information and analysis of potential representation options identified as part of investigations and discussions with Elected Members.

- The principal member of Council continues to be a Mayor, elected by the community (noting that as part of amendments to the Act undertaken in June 2022, the ability for Council’s principal member to consist of a chairperson elected by the council member body was removed);
- The Council area remains divided into Wards;
- The total number Ward Councillors remains at 17;
- There is a seven Ward structure (as close as practicable to the existing Ward boundaries);
- The existing Ward names of Outer Harbor, Semaphore, Port Adelaide, Parks, Enfield, Northfield, and Klemzig are retained; and
- Ward representation is adjusted to within allowable tolerances by:
 - » Shifting Semaphore South from the Port Adelaide Ward into the Semaphore Ward
 - » Relocating the portion of Valley View which is within the Council area from the Northfield Ward into the Klemzig Ward.

It is proposed that the Council area is divided into seven wards, with three wards each being represented by three Ward Councillors and the remaining four wards each being represented by two Ward Councillors – resulting in a total of seventeen Ward councillors. With the addition of the Mayor, there will be 18 Elected Members.

The proposed ward structure is a variation of the existing ward structure and incorporates the partial realignment of the boundary between the existing Semaphore Ward and Port Adelaide Ward (i.e. the inclusion of the whole suburb of Semaphore South within the Semaphore Ward; and the inclusion of the portion of Valley View located within the Council area within the Klemzig Ward) to achieve the acceptable variances from the 10% ward quota as specified by Section 33 (2) of the Act.

The proposed adjustments to the Semaphore Ward and Klemzig Ward boundaries are shown in Figure 2 (page 6), whilst the proposed Wards are described as follows:

Ward 1 (Outer Harbor Ward): The existing Outer Harbor Ward containing the suburbs of Outer Harbor, North Haven, Taperoo, Osborne and part of Largs North.

Ward 2 (Semaphore Ward): The existing Semaphore Ward containing the suburbs of Exeter, Semaphore, Birkenhead, Peterhead, Largs Bay and part of Largs North, along with the inclusion of Semaphore South.

Ward 3 (Port Adelaide Ward): The existing Port Adelaide Ward excluding Semaphore South, containing the suburbs of Alberton, Ethelton, Glanville, Gillman, New Port, Port Adelaide, Queenstown and Rosewater.

Ward 4 (Parks Ward): The existing Parks Ward containing the suburbs of Dry Creek, Ottoway, Wingfield, Gepps Cross, Mansfield Park, Angle Park, Woodville Gardens, Ferryden Park, Regency Park, Croydon Park, Dudley Park and Devon Park.

Ward 5 (Enfield Ward): The existing Enfield Ward containing the suburbs of Blair Athol, Broadview, Clearview, Enfield, Kilburn, Manningham and part of Sefton Park.

Ward 6 (Northfield Ward): The existing Northfield Ward excluding the portion of Valley View, containing the suburbs of Hampstead Gardens, Greenacres, Hillcrest, Northfield, Northgate, Oakden, Lightsview and part of Walkley Hights.

Ward 7 (Klemzig Ward): The existing Klemzig Ward containing the suburbs of Klemzig, Windsor Gardens, Holden Hill, Gilles Plains and part of Dernancourt, along with the inclusion of the portion of Valley View.

3.1.1. Level of Variance from the Prescribed Ward Quota

Table 2 provides an overview of the level of variance from the prescribed Ward quota under this proposal and demonstrates that all proposed Wards fall comfortably within the specified quota tolerance limits from 2024 to 2032 (year of next scheduled Representation Review) and, as such, all of the proposed wards can accommodate reasonable future fluctuations in elector numbers.

The proposed ward boundaries are considered to be appropriate and acceptable, as they align with long established suburb boundaries and / or Ward boundaries.

Further reasons for the rationale behind Council's decision, together with an analysis of compliance with relevant provisions and requirements of the Act are provided within Section 5 of the Report.

3.1.2. Adequate and Fair Representation

As required by Section 26(1)(c) and Section 33 of the Act, the proposed representation structure considers the desirability of reflecting communities of interest, unique natural topographical features, and ensuring a feasible level of communication between the community and Elected Members.

The proposed Representation composition will ensure that Electors receive adequate and fair representation and continues to guarantee that an optimal number of Elected Members (Ward Councillors and Mayor) are present to manage the affairs of Council, provide an appropriate level of representation, maintain richer democratic expression, offer a high-level of skillset diversity, experience and expertise, and provides for an appropriate level of access to communication between the community and the Council.

3.1.3. Communities of Interest

The City of Port Adelaide Enfield has a diversity of land uses and strong spatial layout which influence communities of interest.

In particular, the Council area contains:

- Strong employment land uses along the Outer Harbor and Semaphore Ward boundaries with the Port Adelaide River which are expected to intensify through the future submarine construction yard in Osborne.
- Areas of cultural, heritage and historical significance spread across a number of Wards.
- Unique topographical features due to the interface with the coastline, Port Adelaide River, North Arm Creek, and saltpans to the north.
- Large areas of land earmarked for Urban Renewal land in Kilburn / Blair Athol.
- Medium-to-high density residential areas such as Lightsvie and Oakden.

3.1.4. Ward Alignment

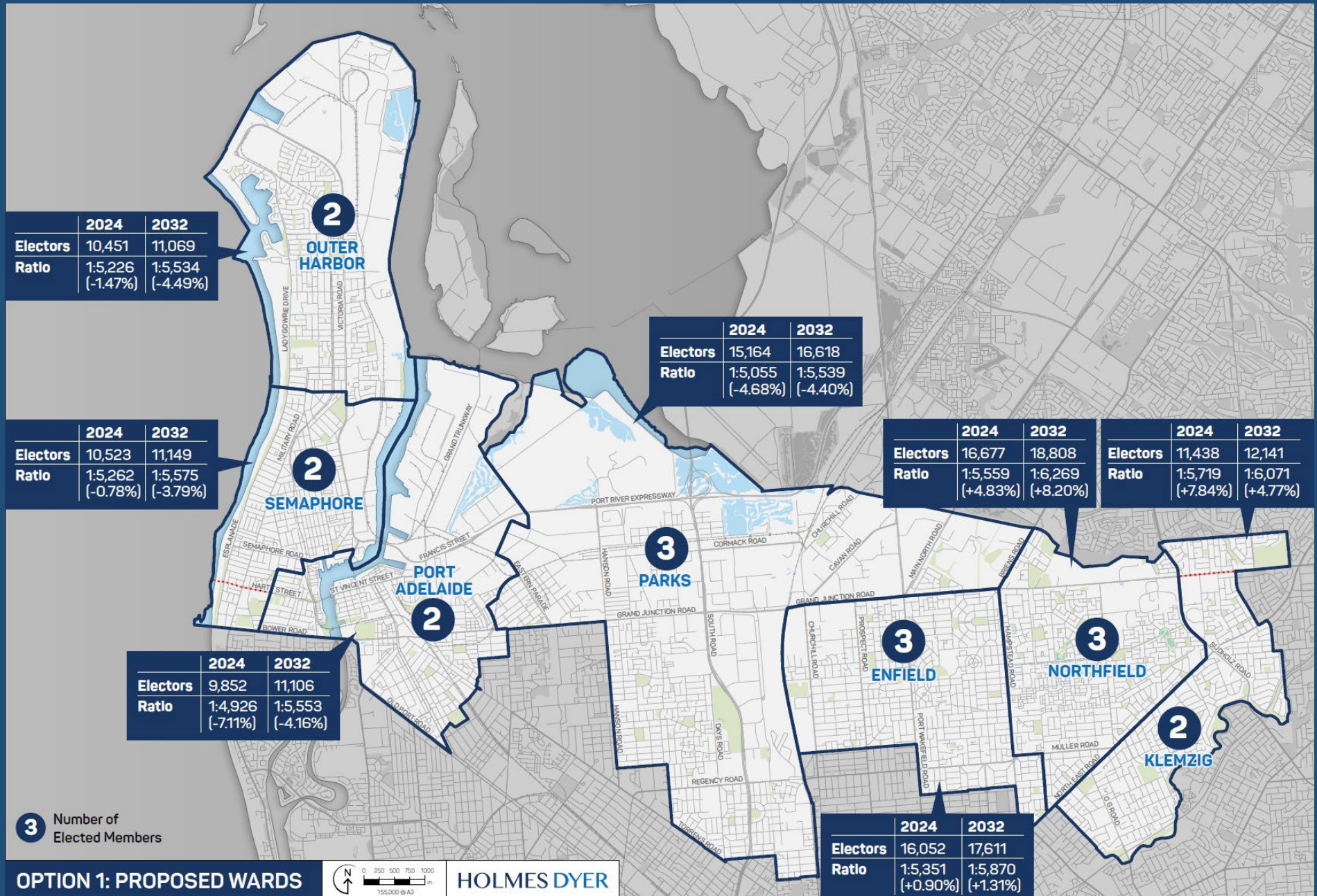
The proposal electoral structure will preserve the existing seven Ward structure, subject to a minor boundary realignment that will shift Semaphore South from the Port Adelaide Ward into Semaphore Ward, and relocate the portion of Valley View within the Council area from Northfield Ward into Klemzig Ward to achieve ward quotas.

This is further detailed within Section 7 of this report.

Table 2. Proposed Ward Structure – Elector Representation and Ward Quota Variance

Ward	Ward Councillors	2024 Electors	Ratio	Variance (%)	2032 Electors	Ratio	Variance (%)
Outer Harbor	2	10,451	5,226	-1.47	11,069	5,534	-4.49
Semaphore	2	10,523	5,262	-0.78	11,149	5,575	-3.79
Port Adelaide	2	9,852	4,926	-7.11	11,106	5,553	-4.16
Parks	3	15,164	5,055	-4.68	16,618	5,539	-4.40
Enfield	3	16,052	5,351	+0.90	18,286	6,095	+1.31
Northfield	3	16,677	5,559	+4.83	18,114	6,038	+8.20
Klemzig	2	11,438	5,719	+7.84	12,141	6,071	+4.77
Total		90,157			98,503		
Ward Quota		1: 5,303			1: 5,794		

Figure 2. Proposed Ward Map (Representation Structure Proposal)



4. Options Considered

4.1. Key Considerations

The Representation Report has been undertaken with consideration towards the following key consideration:

- Voter entitlements and projections
- Composition of the Council, including whether Councillors should represent Wards or the whole of the Council area
- Elector representation including:
 - » Elector numbers
 - » Quota (number of electors per Ward Councillor)
 - » Ward Quota (number of electors per Ward Councillor)
- Comparison with other comparable Metropolitan Adelaide Councils
- Number of Elected Members (Ward Councillors and Mayor)
- Whether the division of the area into Wards should be abolished, or if Wards should be retained, with consideration of Section 33 of the Act and associated matters such as:
 - » Ward structure
 - » Ward Councillors (single or multiple)
 - » Wards of varying representation (varying numbers of Ward Councillors per Ward)
 - » Area Councillors only (i.e. no Wards)
 - » Ward names

4.2. Options Considered

As part of preliminary Council investigations and workshops, a range of options were explored and considered with six options identified which incorporated the following representation compositions:

Option 1: Boundary Realignment (as detailed in Section 3.1)

Option 2: 6 Wards with 14 Ward Councillors and a Mayor

Option 3: 6 Wards with 12 Ward Councillors and a Mayor

Option 4: No Wards

Option 5: 3 Wards with 12 Ward Councillors and a Mayor

The following sections provide a summary of Options 2 – 6, **noting that Option 1 forms the proposed representation structure within this Representation Report.**

It is also noted that options with 15 and 16 Ward Councillors and a Mayor across a variety of ward structures were explored and discussed with Council during initial workshops. These ward structures were found to have little logical sense and contradicted many of the considerations required to be taken into account when formulating a proposal that relates to the boundaries of wards, pursuant to Section 33 (1) of the Act. As such, these options have not been included in the following sections.

4.2.1. Option 2: 6 Wards with 14 Ward Councillors and a Mayor

Option 2 assessed a 6 Ward, 14 Ward Councillors composition which envisaged the following Ward arrangement:

- Ward 1: Consolidation of existing Outer Harbor and Semaphore Wards, including the suburbs of Semaphore South, Glanville and Ethelton
- Ward 2: Suburbs of New Port, Port Adelaide, Ottoway, Queenstown, Alberton, Rosewater and Gillman

- Ward 3: The existing Parks Ward excluding the suburb of Ottoway
- Ward 4: The existing Enfield Ward including the suburb of Greenacres
- Ward 5: Suburbs of Northfield, Northgate, Lightsview, Oakden and Hillcrest
- Ward 6: The existing Klemzig Ward including the suburbs of Hampstead Gardens and Valley View

Whilst this composition represents logical communities of interest and would result in ward quotas within the 10% tolerance, the reduction of three Ward Councillors would result in substantially reduced representation which would place additional demand on Ward Councillors. It is considered that this option would not ensure adequate and fair representation with a Ward Quota of 1:6,440, which would result in the Council having the second lowest level of representation, when compared to other comparable Councils in metropolitan Adelaide (see Section 5.5). The level of representation would be reduced further by 2032 with the forecasted strong population growth resulting in a Ward Quota of 1:7,027.

Table 3. Preliminary Option 2 – Ward Councillor Representation

Ward	Ward Councillors	2024 Electors	Ratio	Variance (%)	2032 Electors	Ratio	Variance (%)
Ward 1	3	20,550	6,850	+6.37	21,773	7,258	+3.27
Ward 2	2	12,183	6,092	-5.41	13,734	6,867	-2.30
Ward 3	2	13,257	6,629	+2.93	14,528	7,264	+3.35
Ward 4	3	18,327	6,109	-5.14	19,923	6,641	-5.52
Ward 5	2	13,065	6,533	+1.44	14,865	7,433	+5.74
Ward 6	2	12,775	6,338	-0.81	13,561	6,780	-3.54
Total		90,157			98,384		
Ward Quota		1:6,440			1:7,027		

4.2.2. Option 3: 6 Wards with 12 Ward Councillors and a Mayor

Option 3 assessed a 6 Ward, 12 Ward Councillors composition which envisaged the following Ward arrangement:

- Ward 1: Suburbs of Outer Harbor, North Haven, Osborne, Taperoo, Largs North, and portions of Largs Bay, Peterhead, Semaphore and Semaphore South
- Ward 2: Suburbs of Birkenhead, New Port, Port Adelaide, Ottoway, Queenstown, Alberton, Rosewater, Gillman, and portions of Largs Bay, Peterhead, Semaphore and Semaphore South
- Ward 3: The existing Parks Ward excluding Ottoway
- Ward 4: The existing Enfield Ward excluding Manningham
- Ward 5: Suburbs of Northfield, Northgate, Lightsview, Oakden, Greenacres and a portion of Hillcrest
- Ward 6: The existing Klemzig Ward including the suburbs of Hampstead Gardens, Valley View and a portion of Hillcrest

With the inclusion of an elected Mayor, this option would satisfy the ‘member cap’ as outlined under Section 11(A)(1) of the Act by reducing the number of Members to 13. As a consequence, representation would be significantly reduced and there may be unreasonable demand placed on the Ward Councillors. When applied to current Elector numbers, the Ward Quota would be 1:7,513 which would result in the Council having the lowest level of representation when compared to other similar Councils in metropolitan Adelaide (see Section 5.5).

This composition would bring all Wards within the 10% tolerance limits. Whilst the variance of Ward 2 is close to -10% predicted growth within Port Adelaide and New Port would decrease this variance to -6.52% in 2032.

Most notably, this option would result in several suburbs being split across ward boundaries which may result in separation of communities of interest (Section 33 (1) (a)) and could lead to confusion within the community regarding what ward electors belongs to and who their Ward Councillor is (Section 33 (1) (d)).

Table 4. Preliminary Option 3 – Ward Councillor Representation

	Ward Councillors	2024 Electors	Ratio	Variance (%)	2032 Electors	Ratio	Variance (%)
Ward 1	2	14,531	7,266	-3.30	15,396	7,698	-6.39
Ward 2	2	13,637	6,819	-9.24	15,373	7,686	-6.52
Ward 3	2	15,164	7,582	+0.92	16,618	8,309	+1.05
Ward 4	2	15,255	7,628	+1.52	16,736	8,368	+1.76
Ward 5	2	15,712	7,856	+4.56	17,720	8,860	+7.75
Ward 6	2	15,858	7,929	+5.54	16,833	8,417	+2.35
Total		90,157			98,676		
Ward Quota		1:7,513			1: 8,223		

4.2.3. Option 4: No Wards

This Option assessed the abolition of the Ward structure and would involve the election of a specific number of Area Councillors. The reasonable range for the number of Area Councillors would be 12 to 17 with the range of ratios shown within the following table.

A ‘No Wards’ structure provides for simplified representation and reduces the chance of a Councillor being elected by default when there are no other candidates for a particular Ward. Despite this, it comes with several disadvantages, most notably being the risk of inequitable representation across the Council area.

Council expressed the view that Wards are favourable for several reasons and a ward structure has been in place within the Council since before amalgamation in 1999, therefore being a well recognised structure. This Option was not pursued further as the continuation of a Ward structure will ensure the Ward Councillors represent an equal distribution of the community and guarantees the opportunity for local issues to be addressed by Ward Councillors. Through discussions with the Elected Members, local issues are addressed in conjunction with Council-wide issues and a Ward structure does not prioritise attention to local issues.

Table 5. Preliminary Option 4 – Ward Councillor Representation

Ward Councillors	2024 Ratio	2032 Ratio
12	1 : 7,513	1 : 8,208
13	1 : 6,935	1 : 7,577
14	1 : 6,440	1 : 7,036
15	1 : 6,010	1 : 6,567
16	1 : 5,635	1 : 6,156
17	1 : 5,303	1 : 5,794

4.2.4. Option 5: 3 Wards with 12 Ward Councillors and a Mayor

Option 3 assessed a 3 Ward, 12 Ward Councillors composition which envisaged the following Ward arrangement:

- Ward 1: Combination of existing Outer Harbour, Semaphore and Port Adelaide Wards
- Ward 2: Combination of existing Parks and Enfield Wards
- Ward 3: Combination of existing Northfield and Klemzig Wards

As with Option 3, this option would satisfy the ‘member cap’ as outlined under Section 11(A)(1) of the Act by reducing the total number of Elected Members to 13 (12 Ward Councillors and one Mayor). As a consequence, representation would be significantly reduced and there may be unreasonable demand placed on Ward Councillors. When applied to current Elector numbers, the Ward Quota would be 1:7,513 which would result in the Council having the lowest level of representation when compared to other similar Councils in metropolitan Adelaide (see Section 5.5).

This option does allow for greater fluctuations of Elector numbers and demographic changes within each ward before the Ward Quota tolerance is reached.

This option also results in three large Wards which combine communities of interest with four Ward Councillors per Ward. This could allow for Ward Councillors to represent only a portion of the Ward as well as complications that may arise from having four Councillors.

Therefore, it was determined that this option would not be a benefit to the community and was not pursued.

Table 6. Preliminary Option 6 – Ward Councillor Representation

	Ward Councillors	2024 Electors	Ratio	Variance (%)	2032 Electors	Ratio	Variance (%)
Ward 1	4	30,826	7,706	2.60%	33,353	8,338	1.45
Ward 2	4	31,213	7,804	2.50%	34,226	8,556	4.11
Ward 3	4	28,118	7,029	-6.40%	31,045	7,761	-4.80
Total		90,157			98,624		
Ward Quota		7,513			8,219		

5. Local Government Participation and Elections Review

5.1. Purpose of Review

The Review focuses on:

- Local government participation and elections;
- Improving people’s engagement with Councils;
- Increasing the number and diversity of council members; and
- Increasing voter turnout.

The *Local Government Participation and Elections Review* has been prompted by the historically low participation (approximately one-third of eligible voters) in local government elections and the low number and diversity of candidates. Currently, it is not compulsory to vote in Council elections with compulsory voting being explored as a potential option to improve voter participation.

5.2. Implications for the Representation Review

While there may be some benefits to reducing the number of Ward Councillors, such as expedited decision making and cost savings for Councils, there are also drawbacks that need to be considered, such as a reduction in the number and diversity of candidates and a resultant increase in workload for Ward Councillors, which in turn could result in poorer quality of representation.

Discussions with the Elected Members highlighted that the decision to run as a candidate in a local government election is a significant undertaking that requires considerable passion and commitment. The cost, time and effort required to campaign can be substantial and for some people – prohibitive, particularly if the candidate does not have the backing of a political party.

Reducing the number of Ward Councillors positions may deter potential candidates from running for election, as they may feel they have a reduced chance of election or that once elected, the workload will be too great. This could result in an even greater reduction in the number and diversity of candidates nominating for election than is currently reported.

In the case of the City of Port Adelaide Enfield, reducing the number of Ward Councillors from 17 to 12 could be viewed as a significant decrease in representation and therefore increase in workload, which could alter the propensity of potential candidates to nominate for election, and in turn, result in a reduction in the number and diversity of candidates.

This combined with encouraging the active participation of the community in council processes could result in an increase in workload for Ward Councillors that is untenable.

This outcome would be contrary to the aim of the *Local Government Participation and Elections Review*.

As shown in the table below, in the event the number of Ward Councillors is reduced from 17 to 12, this would result in an increase in the number of Electors represented per Ward Councillor from 5,300 to 7,500, which could have significant workload ramifications with flow on effects on the number of future candidates and the quality of representation.

Table 7. Potential Workload Increase

	Number of Electors	Ratio with 12 Ward Councillors to Electors	Ratio with 17 Ward Councillors to Electors
2024	90,157	1 : 7,513	1 : 5,303
2032	98,676	1 : 8,223	1 : 5,794

6. Proposal Rationale

6.1. Principal Member

The principal member of the Council must constitute a Mayor in accordance with Section 51 (1) of the Act, with it acknowledged that as part of amendments to the Act implemented in June 2022, the ability for Council's principal member to consist of a chairperson elected by the council member body was removed.

It is noted that since the amalgamation of the Council area, the City of Port Adelaide Enfield's principal member has always been a mayor elected at large by the community.

6.2. Wards / No Wards

The proposal is to retain a seven Ward structure (as close as practicable to the existing Ward boundaries). This is achieved via a partial realignment of the boundary between the existing Semaphore Ward and Port Adelaide Ward (i.e. the inclusion of the whole suburb of Semaphore South within the Semaphore Ward) and between Northfield Ward and Klemzig Ward (i.e. the inclusion of the portion of Valley View located within the Council area within the Klemzig Ward).

The proposal outlined in this Section is informed by previous considerations into potential representation options and discussions with the City of Port Adelaide Enfield undertaken to date. As discussed in Section 4.2.3, a no wards option through the abolition of the existing ward structure was considered by Council, as required by Section 12 (6)(a)(ii) of the Act. Noting that there are both advantages and disadvantages to having wards or no wards, the proposal maintains the division of the Council into wards for the following:

- The Ward structure has been in place within the Council since before amalgamation in 1999 and represents a well-recognised structure and established line of communication between Council and the local community.
- A Ward structure provides for guaranteed direct representation of all communities of interest and areas within the Council area; whilst a No Ward structure does not guarantee such direct representation.

- A Ward structure ensures that Ward Councillors represent an equal distribution of the community and guarantees the opportunity for local issues to be addressed by Ward Councillors
- A No Wards structure represents a significant financial and time-consuming undertaking for prospective Area Councillors during contested Council-wide elections which may deter suitable / quality candidates.
- Has the potential to increase the cost of conducting contested and supplementary Council-wide elections given that they must be conducted on a Council-wide basis.

Based upon the aforementioned, Council has resolved to retain the existing Ward structure but with a partial realignment of the boundary between the existing Semaphore Ward and Port Adelaide to achieve the acceptable variances from the 10% ward quota as specified by Section 33 (2) of the Act.

6.3. Area Councillors

The Act indicates that Councillors can be elected to represent the whole of the Council area, regardless of whether the Council area is divided into wards or whether there are no wards. In this case, Councillors would be referred to as Area Councillors who represent the whole of the Council area.

Whilst this arrangement has been considered as part of preliminary Council investigations and workshops, it was considered that the inclusion of Area Councillors would be unwarranted, unnecessary, and potentially costly additional tier of representation due to the following:

- The amount of expenditure required in a contested Council-wide election is considerable for Area Councillors and time-consuming as the task must be conducted across the entirety of the Council area. This financial and time-burdening task may prove prohibitive in the Council obtaining appropriate and/or quality candidates who may be deterred by such an undertaking.
- Ward Councillors generally consider themselves to represent the entirety of the Council area, not just their individual Ward. This is reflective within their roles

and actions within the Council Chamber through bringing a broader Council-wide lens over perspective matters.

- The City of Adelaide is the only metropolitan Adelaide council which incorporates a dual Ward and Area Councilor structure. The City of Adelaide does not form a comparable metropolitan council (refer to Section 6.5) and therefore the inclusion of Area Councillors in the context of the City of Port Adelaide Enfield is not considered applicable.
- There is no distinguishable status difference between Ward Councillors and Area Councillors, with each having no greater responsibility when compared to the other, and no need to comply with any extraordinary or additional eligibility requirements.

6.4. Number of Ward Councillors

Section 11A (1) of the Act requires Councils to adhere to a ‘member cap’, with a Council not to be comprised of more than 13 Elected Members. Where a Council exceeds this member cap an ‘exemption certificate’ must be sought by the Commission in accordance with Section 12 (11b). The City of Port Adelaide Enfield currently comprises 17 Ward Councillors and one Mayor; i.e. a total of 18 Elected Members.

Section 12 (6) (a) (i) requires the Representation Report to ‘examine the question of whether the number of members should be reduced’.

As part of workshops and investigations regarding potential representation options the Council considered a variety of options ranging from 12 to 17 Ward Councillors, with these options discussed within Section 4.2.

Section 33 (1)(f) of the Act specifies that Council’s need to ensure adequate and fair representation while at the same time avoiding over-representation in comparison to other councils of a similar size and type (at least in the longer term). Similarly, Section 26 (1)(xi) of the Act states that residents should receive adequate and fair representation within the local government system, while over-representation in comparison with councils of a similar size and type should be avoided.

Comparable metropolitan Councils have been selected based upon similar attributes such as number of electors, physical size, and existing examples of where the member cap has been exceeded. When comparing the City of Port Adelaide Enfield to other select Greater Adelaide councils the following can be established:

- The City of Port Adelaide Enfield has the fourth-highest elector ratio (i.e. the average number of electors represented by a councillor); and
- The City of Port Adelaide Enfield has the highest number of Ward Councillors.

Whilst not all Greater Adelaide Councils are included within the below comparison, it is further acknowledged that the City of Port Adelaide Enfield covers the fourth largest Council area.

Table 8. Comparison with Selected Greater Adelaide Councils

Council	Ward Councillors	Electors	Ratio
Playford (344.9km ²)	15	71,441	1:4,763
Salisbury (158.1km ²)	14	98,878	1:7,063
Port Adelaide Enfield (97.0km ²)	17	90,157	1:5,303
Tea Tree Gully (95.2km ²)	12	74,791	1:6,233
Charles Sturt (52.1km ²)	16	90,641	1:5,665
West Torrens (37.0km ²)	14	43,192	1:3,085

In regard to Ward Councillors, Charles Sturt is most similar to Port Adelaide Enfield and with only one less Ward Councillor, which results in a slightly lower level of representation at 1:5,665. However, Charles Sturt is close to half the geographical size of Port Adelaide Enfield.

All listed comparable Councils have a diversity of land uses and locational and socioeconomic attributes. Port Adelaide Enfield has notable features across the Council area, including heritage, industrial lands, coastal suburbs, maritime and shipping activities, significant infill housing development and a fast-developing defence manufacturing industry.

In summary, Port Adelaide Enfield is generally comparable to other Councils in metropolitan Adelaide in terms of physical size and Elector numbers but has unique features and issues that are not likely experienced by the other comparable

Councils. As outlined above, it is considered that the Council is not over-represented when compared to other Councils in metropolitan Adelaide.

- When determining the appropriate number of Ward Councillors for the Council area to ensure fair and adequate representation the following factors were considered:
- An optimal number of Ward Councillors are present to manage the affairs of Council;
- All Ward Councillors have an appropriate workload;
- There is an appropriate level of Elector representation;
- Ward Councillors provide for a high-level of skillset diversity, experience, and expertise to ensure for richer democratic expression, decision-making, and discussions between Elected Members; and
- An appropriate level of access to communication between the community and Council is maintained.

It is acknowledged by the City of Port Adelaide Enfield that a reduction to 12 Ward Councillors would result in substantial cost savings, with individual Ward Councillor allowances in the realm of \$25,800 per annum. Furthermore, the heightened shift towards electronic communication and accessibility to information reduces difficulties previously experienced by Ward Councillors regarding their day-to-day role and communication with both the community and Council.

When considering the appropriate number of Ward Councillors to provide for a suitable level of representation Council has considered the following:

- The City of Port Adelaide Enfield covers the fourth largest Council area (97km²) compared to all other councils within Greater Adelaide;
- Since 2016 (date of previous Representation Review) the Council area has experienced substantial growth of 13.6% (+11,058), whilst significant growth has been observed within the Wards of Northfield, Port Adelaide, Parks, and Enfield. Population projections (refer to Section 7.6.2) further anticipate substantial growth within the Northfield and Port Adelaide Wards of 12.7%, whilst the overall Council area will experience growth of 9.3% (+8,647 electors) by 2032.
- Forecasted development activity (refer to Section 7.6.3) anticipates substantial growth up to 2041 within the suburbs of Port Adelaide, New Port, Enfield, Blair Athol and Oakden; with these forecasted development projections aligning with forecasted population data. It can be further anticipated that significant

employment opportunities, such as the establishment of a new submarine construction yard within Osborne which will create around 4,000 direct jobs, may have the potential to increase elector numbers through additional enrolments by both industrial activities and new residents.

- The City of Port Adelaide Enfield has a variety of unique features which include, but are not limited to, a fast-developing defence manufacturing industry, maritime and shipping activities, industrial land, significant infill housing, heritage areas, and social demographics which require greater attention from Elected Members. Therefore, a more diverse Elected Member body provides for greater variety of skillsets, experience, and expertise to deal with matters unique to the Council area.
- Forecasted development is based on assumptions which indicate notable residential growth within particular sites within Port Adelaide that are unlikely to be achieved in the short-to-medium term and would be subject to a variety of factors such as market demand, population growth, and planning policy and therefore are treated with a degree of caution.

The City of Port Adelaide Enfield have a strong preference towards ensuring that the current quality and level of representation provided to its electors is maintained, noting that the current level of representation provided has been long established and experienced by the local community and has remained the preferred representation composition throughout numerous Representation Reviews previously undertaken.

Given that the Council area covers the fourth largest Council area and therefore Wards are of a substantial size, and that the Council area is forecasted to undergo significant population growth, a reduction in the number of Ward Councillors could result in an excessive workload, reduced quality in communication lines between the community and Ward Councillors, and reduced diversity in the experiences and expertise available within the Elected body which may impact the quality of representation currently provided to electors. Furthermore, as demonstrated within Section 4.2, alternative representation options which reduce the Ward Councillors to 12 would result in the Council area having the lowest level of representation when compared to other similar Councils in metropolitan Adelaide.

Given these factors, the City of Port Adelaide Enfield has resolved that a reduction in the number of Ward Councillors would not benefit the community and may result in the community experiencing a detrimental level of representation. Therefore, it is considered that a reduction in the number of Ward Councillors is not warranted at this point in time and the proposal maintains the existing 17 Ward Councillors and one Mayor, totalling 18.

7. Legislative Requirements

7.1. Adequate and Fair Representation

In the context of comparable Councils, the City of Port Adelaide Enfield has the highest number of Ward Councillors and the fourth-highest level of representation. Whilst the City of Port Adelaide Enfield is generally comparable to other Councils in metropolitan Adelaide in terms of physical size and Elector numbers the Council area has unique features and issues that are not likely experienced by other comparable Councils.

It is considered that the proposed Representation composition ensures Electors receive adequate and fair representation and continues to ensure that an optimal number of Ward Councillors are present to manage the affairs of Council, provide an appropriate level of representation, maintain richer democratic expression, high-level of skillset diversity, experience and expertise, and provides for an appropriate level of access to communication between the community and the Council.

7.2. Ward Quota

Section 33 of the Act requires the City of Port Adelaide Enfield to address within its proposal the formation of Wards and tolerances around representation. Most critically, the number of electors represented by a Councillor must not, as at the relevant date, vary from the Ward quota by more than 10% unless demographic changes predicted by a Commonwealth or State government agency indicate that the Ward Quota will not exceed the tolerance as at the date of the next periodic election.

As detailed within Section 3, the proposed representation structure provides for representation within the allowable tolerances up to 2032, which is when the next Representation Review is scheduled.

7.3. Communities of Interest

Section 33 and Section 26(1)(c) of the Act outlines that a proposal relating to the boundaries of a ward or wards must take into account the desirability of reflecting communities of interest of an economic, social, regional or other kind. The City of Port Adelaide Enfield has a diversity of land uses and strong spatial layout which influence communities of interest.

The Council area has a rich history, with Port Adelaide playing a central role in the colonisation of South Australia. The Council area contains a diversity of land uses, with industrial and commercial land uses situated along Port Adelaide River, the northern portion of the Council area, and within the suburb of Regency Park. These employment land uses are anticipated to be further intensified through the future submarine construction yard in Osborne, which will create up to 4,000 to 5,500 direct jobs over the next 20-30 years.

The remainder of the Council area supports a range of mixed-use and residential land uses, with suburbs situated within Enfield Ward, Northfield Ward and Klemzig Ward containing predominantly residential and uses. This includes medium-to-high density localities such as Lightsview, and future infill sites (e.g. Oakden) which will result in an enhanced residential population.

The Council area also contains some of the State's finest historical buildings and landmarks which includes nearly 100 state heritage places, over 200 local heritage places, nearly 1000 'Representative Buildings' (formerly known as Contributory Items), seven Historic Areas and four Character Areas. These places have significance to the state in terms of their history, cultural significance and/or architectural merit, or due to their association with an important historical figure. Heritage places and areas throughout the Council are largely situated within consolidated pockets (e.g. Port Adelaide) and represent significant communities of interest due to their direct correlation to the identity of the relevant Ward area and, in some cases, suburb.

The Council area is currently divided into seven Wards which generally have logical groupings of communities of interest. The proposal preserves the existing seven Ward structure with minor boundary realignment involving shifting Semaphore South from the Port Adelaide Ward into Semaphore Ward, and relocating the portion of Valley View which is within the Council area from Northfield Ward into Klemzig Ward to achieve ward quotas.

The transition of Semaphore South into the Semaphore Ward forms a logical community of interest, as it represents a coastal suburb situated along the shoreline of the Gulf of St Vincent which is reflective of the predominantly residential nature of the Semaphore Ward and broader Lefevre Peninsula.

The transition of Valley View into the Klemzig Ward enables for clear and logical boundary definitions which provide for logical groupings of communities of interest.

This transition would result in the Klemzig Ward spanning across the entirety of the Council’s eastern boundary with the City of Tea Tree Gully and would provide for clear ward boundary delineation between Klemzig Ward and Northfield Ward through road ‘boundaries’ consisting of North East Road, Sudholz Road, and Walkleys Road.

The boundary realignment would affect a population of 724 voters within Semaphore South and 1,383 voters within Valley View. Communications with these voters can be successfully managed to these electors to reduce potential confusion about Ward structure and representation.

7.4. Topography

The City of Port Adelaide Enfield contains unique natural topographical features, with its interfaces with the coastline, Port Adelaide River, North Arm Creek, and the salt pans to the north providing for strong natural boundaries. Physical boundaries which assist with Ward delineation include key vehicle and pedestrian crossing points, most notably including Grand Junction Road, Hampstead Road, and North East Road. These strong geographical boundaries provide for sound logic regarding utilising the Port Adelaide River and key vehicular roads as ward boundaries.

7.5. Feasibility of Communication

It is considered that the retention of the existing level of representation (17 Ward Councillors) provides for the most appropriate level of communication between Ward Councillors and the community. This is of particular relevance when considering the significant forecasted growth in Council electors which the Council area will experience by 2032.

7.6. Population and Demographic Change

7.6.1. Population Change

The Electoral Commission of South Australia (ECSA) provides the current number of Electors within Local Government Areas every six months, with a comparison of 2016 and 2024 electoral data for Port Adelaide Enfield indicating an increase of 11,058 (13.9%) electors since the previous Representation Review. All seven existing Wards recorded Elector growth, with substantial growth evident within the Wards of Northfield, Port Adelaide, Parks, and Klemzig. Specific elector Ward growth is depicted in the following table.

Table 9. Elector Growth by Ward

Ward	No. Of Electors		Difference (No.)	Difference (%)
	2016	2024		
Outer Harbor	9,512	10,451	+934	+9.8%
Semaphore	9,717	10,099	+382	+3.9%
Port Adelaide	8,630	10,276	+1,646	+19.0%
Parks	13,449	15,164	+1,715	+12.7%
Enfield	14,338	16,049	+1,711	+11.9%
Northfield	14,392	18,073	+3,681	+25.5%
Klemzig	9,061	10,045	+984	+10.8%

When the City of Port Adelaide Enfield undertook an Elector Representation Review in 2009 there were approximately 105,000 residents and 71,693 residents on the House of Assembly Roll. The current population is over 140,329 (forecast.id estimate) and the number of Electors on the House of Assembly roll is 90,018 (as of 29 February 2024). In those 15 years, the population has grown strongly and has increased by 33.6%, over 2.2% per year on average.

7.6.2. Population Projections

Population projections from PlanSA and forecast.id have been used to inform the future population and consequent Elector numbers for the Port Adelaide Enfield area. Population projections from PlanSA are provided at the Statistical Area (SA) 2 level, whilst forecast.id projections are provided at the SA1 and SA2 levels. An SA1 has an average population of 400 people, with multiple SA1’s aggregate to form an SA2. These projections are depicted within the following table.

Table 10. Population Projections (PlanSA & forecast.id)

	2021	2026	2031	2036	2041
PlanSA (High Series)	134,134	145,672	154,435	161,772	167,232
forecast.id	134,191	143,738	150,775	155,993	160,556

To determine Elector numbers in 2032 (date of next Representation Review), a growth rate has been calculated for an 8-year period which has regard to the PlanSA and forecast.id growth rates at the SA2 level. The growth rate utilised and forecasted population within each Ward is detailed within the following table.

Table 11. Population Projections (Revised Growth Rates)

Ward	No. of Electors (2024)	Growth Rate	Projected Elector No. (2032)
Outer Harbor	10,451	5.91%	11,069
Semaphore	10,099	5.95%	10,700
Port Adelaide	10,276	12.73%	11,584
Parks	15,164	9.59%	16,618
Enfield	16,049	9.71%	17,607
Northfield	18,073	12.78%	20,383
Klemzig	10,045	6.15%	10,663

Overall, the number of electors within the City of Port Adelaide Enfield will increase by 8,467 electors (9.3%).

7.6.3. Residential Development Growth

Discussions with staff members from Council’s Planning Department and analysis of development projection data undertaken by forecast.id have identified that there is considerable potential for future population growth due to predicted and anticipated residential development.

Forecasted development growth prepared by forecast.id anticipates substantial growth up to 2041 within the suburbs of Port Adelaide, New Port, Enfield, Blair Athol and Oakden. These forecasted projections align with forecasted population data as discussed within Section 7.6.2, which anticipates substantial growth within the Port Adelaide, Enfield, and Northfield Wards.

It is noted that based on discussions with Council’s Planning Department, some of the forecast.id data is likely to be based on unreliable assumptions. The most notable being residential growth figures for particular sites in Port Adelaide that are highly unlikely to be achieved, particularly in the short to medium term.

It is also acknowledged that residential growth projections are subject to a variety of factors such as market demand, population growth, and planning policy and therefore are treated with a degree of caution.

7.7. Section 26 (1) (c) of the LGA Act

Section 26 (1) of the Act establishes the matters that must be taken into account, as far as practicable, in the formulation of a proposal that relates to the boundaries of a ward or wards. This Section has been considered throughout this Representation Review process to arrive at Council’s proposed composition.

The matters raised in this Section of the Act include:

- (a) the resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community;
- (b) proposed changes should, wherever practicable, benefit ratepayers;
- (c) a council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently;
- (d) a council should reflect communities of interest of an economic, recreational, social, regional or other kind, and be consistent with community structures, values, expectations and aspirations;

- (e) the importance within the scheme of local government to ensure that local communities within large council areas can participate effectively in decisions about local matters;
- (f) residents should receive adequate and fair representation within the local government system, while over-representation in comparison with councils of a similar size and type should be avoided (at least in the longer term);

The representation structure proposed by Council is considered to satisfy these matters on the basis that it:

- Provides sufficient elected representatives to fulfil the roles and responsibilities of Council, noting that the Council area is forecasted to undergo substantial population growth;
- Reflects communities of interest and enables effective participation by local communities in decisions about local matters;
- Provides adequate and fair representation and avoids over and under-representation with all Wards within 10% tolerances at the time of the next Representation Review period; and
- Provides an effective form of local government for the community.

8. Public Consultation

In accordance with Section 12(7) of the Act, interested persons are invited to make a written submission to Council on the Representation Report (this document), and more specifically the composition and structure that Council proposes to introduce on the day of the Local Government elections in 2026.

Submissions are welcomed throughout the consultation period, which runs from **Monday 16 September 2024** until **Friday 11 October 2024**.

Submissions can be made:

- In writing addressed to PO Box 110, Port Adelaide SA 5015
- Via email to consultation@cityofpae.sa.gov.au
Online via the ParticipatePAE website (<https://participate.cityofpae.sa.gov.au/>)

Further information regarding the Representation Review can be obtained by contacting Kate Leighton (Team Leader Governance) via (08) 8405 6902 or by email at kate.leighton@cityofpae.gov.au

The image features a white background with two thick, dark blue lines that curve upwards from the bottom left towards the top right. The lower portion of the image is filled with a solid dark blue color. The text 'Appendix 1. Local Government Act Excerpts' is positioned in the lower right area of the white space.

Appendix 1. Local Government Act Excerpts