Attachment B

Written Submissions

Written Submission 1

THE NORTH ADELAIDE SOCIETY INC. (TNAS)
Elbert Brooks BA LLB GDLP MBA, Chairperson

5 October 2025

SUBMISSION:

DRAFT COMMUNITY ENGAGEMENT CHARTER

DRAFT COMMUNITY ENGAGEMENT POLICY

City of Adelaide Drafts for Consultation

"At the City of Adelaide, we want our community to be a part of the decisions that shape the future of our city. We value your insights, ideas and experiences, and by listening and working together, we can create a city that's better for everyone."

"Project Information", City of Adelaide webpage, 1 Oct 2025

By **email only** to
ouradelaide@cityofadelaide.com.au

charter	*a formal statement of the rights of a country's people, or of an organization or a particular social group, that is agreed by or demanded from a ruler or government*
consultation	*"the act of exchanging information and opinions about something in order to reach a better understanding of it or to make a decision, or a meeting for this purpose"*
engagement	*"the fact of being involved with something"* *"the process of encouraging people to be interested in the work of an organization, etc."*
policy	*a set of ideas, or a plan of what to do in particular situations, that has been agreed officially by a group of people, a business organization, a government, or a political party*

https://dictionary.cambridge.org/dictionary/english/

SUBMISSION OF
THE NORTH ADELAIDE SOCIETY INC.
(TNAS)
5 OCT 2025

This submission was not generated by "AI".

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INTRODUCTION[1]

1. The City of Adelaide came into existence on 31 October 1840 and was the first elected local government body in Australia.[2] Although it is a capital city council, nonetheless it is a local council with a diversity of communities, issues, precincts and circumstances as applies to other areas of local government. The North Adelaide Society Inc. (**TNAS**) has 55 years of engagement and participation with local communities, elected councils, and administrators.

2. The manner of engagement, participation, and consultation by individuals and communities in an elected council and its deliberations, and in the work and administration of a council corporation, have a profound macro and micro effect on their lives and wellbeing, and on the liveability of local communities. That cannot be overstated and is too often devalued.

3. Communities are created, nurtured, and sustained if mutually authentic local community engagement, participation, and meaningful consultation are systemically enabled and empowered throughout the term of an elected local council and by its administrative structures.

4. Engagement with, and consultation by, the Adelaide City Council (ACC) and its Corporation (collectively, the City of Adelaide: **CoA**) is variable. It is at best cordial, respectful, and meaningful; at times productive and qualitative; and at worst hazardous, soul destroying, and superficial.

5. **Absent substantive obligations and accountability within a proposed "community engagement charter", notions of engagement, consultation, and influence remain abstractions without practical effect.** Such a "charter" and any attendant "policy" become distractions from, and undermine, effective community participation in local governance and decision making.

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[1] The comments and feedback herein are intended to contribute to public discussion and debate as critique rather than criticism *per se.* The absence of a comment about an aspect is not to be taken as condonation. The views expressed are not intended to reflect adversely on, or diminish the work or efforts of any person, entity or team concerned with, or in any way involved in, local governance or any aspect of the content, intent, structure, or purpose of a matter or draft the subject of this submission.
[2] Para 56, Report by the Local Government Act Revision Committee on Powers, Responsibilities and Organisation of Local Government in South Australia, 1970 (the 1970 Report). The City of Adelaide may also have been the first local government body to collapse due to insolvency in 1843, albeit reformed in 1852. (cf. Adelaide Park Lands and City Layout 2023, Draft Heritage Management Plan, Swanbury Penglase, October 2023, ref 22109, page 31.)

6. In addition to the definitions on the cover page, the **etymology**[3] is informative.

Charter (n.)

> "formal written instrument bestowing privileges and rights, serving as legal evidence of them," c. 1200, from Old French chartre (12c.) "charter, letter, document, covenant," from Latin chartula/cartula, literally "little paper," diminutive of charta/carta "paper, document".

Consultation (n.)

> early 15c., "a meeting of persons to consult together;" 1540s, "act of consulting," from Latin consultationem (nominative consultatio) "a mature deliberation, consideration," noun of action from past-participle stem of consultare "to consult, ask counsel of; reflect, consider maturely," frequentative of consulere "to deliberate, consider," originally probably "to call together," as in consulere senatum "to gather the senate" (to ask for advice), from assimilated form of com "with, together" (see con-) + *selere "take, gather," for a total sense of "gather (the Senate) together," from PIE *selho- "to take, seize."

Engagement (n.)

> 1620s, "formal promise," from engage + -ment. Meaning "a battle or fight between armies or fleets" is from 1660s; sense of "state of having entered into a promise of marriage" is from 1742.

Policy (n.1)

> ["way of management"], late 14c., policie, "study or practice of government; good government;" from Old French policie (14c.) "political organization, civil administration," from Late Latin politia "the state, civil administration," from Greek politeia "state, administration, government, citizenship," from politēs "citizen," from polis "city, state" (see polis).

[3] https://www.etymonline.com

COMMUNITY ENGAGEMENT

7. **To have a requisite community engagement charter and policy in place does not of itself result in qualitative behaviour or compliant conduct.** Nor does a "*public consultation policy*"[4] result in organisational or individual responsiveness. It simply requires initiation of the process and receipt of submissions without qualitative consideration or preparedness to influence an outcome; the latter too often being a feature of contemporary community engagement.

8. The objects of the *Local Government Act 1999* (LG Act) include:

   > *3(b) to encourage the participation of local communities in the affairs of local government and to provide local communities, through their councils, with sufficient autonomy to manage the local affairs of their area;*
   >
   > *3(d) to ensure the accountability of councils to the community; …*

   The notions of engagement, consultation, and responsible and responsive governance of local communities underpin those objects. **The fundamental prerequisite for each of those notions is *credibility***, which comes from the Latin *credibilis*, meaning "worthy to be believed".

9. Too often those objects are not met, or credibility is missing, for various reasons. For example, time periods are not commensurate with the nature or significance of the subject matter; a multiplicity of matters being consulted; holiday periods; consultation having no effect; presumption that no feedback means no concerns; defensive response from within the council or corporation; derision or dismissiveness; intervention of ego or irrelevant matters; lip-service or pre-determined decision; statistical failure or misapplication, and 'consultation exhaustion' (i.e. 'what's the point'; 'hitting a brick wall'; repetition).

10. A community and community associations must be entitled to engage in local governance, its processes and discussion **without the opprobrium and indignation** of an elected member, administrator, or whomever has the 'numbers' or power, the more so absent an accountability process.[5]

11. **When *credibility* is missing**, engagement and consultation become counter-productive and injurious to people, process, policy, and community.

12. **Example**: City of Adelaide Representation Review 2021

    12.1 Consultation was legislatively required. There was an abject failure.

    12.2 The Electoral Commissioner determined (16 Dec. 2021):

    a) the Council did not adequately address the issues raised by the submissions;

    b) the Council failed to address the strong community sentiment regarding the communities of interest in the Council area; and

    c) the legislative requirements had not been satisfied.

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[4] Local Government Act 1999, Chapter 4, Part 5

[5] A right of appeal or administrative review enables dispassionate third party consideration. "*A right of appeal should be provided; but particular care should be taken to ensure that the procedure upon any appeal is informal, the decision upon it is speedy, and the costs of it are not restrictive."* para 42, Report by the Local Government Act Revision Committee on Powers, Responsibilities and Organisation of Local Government in South Australia, 1970.

12.3 There was no public admonishment of the council, elected members, corporation, or relevant officers, despite the engagement, process and decision-making ostensibly lacking credibility and authenticity; and suffering the absence of 'frank and fearless' administrative advice.

13. **Example**: 62-100 O'Connell Street

13.1 The CoA is the owner and co-developer of land located at 62-100 O'Connell Street, often referred to as "88 O'Connell Street". That land is the subject of much misinformed mythology; previous state government 'special projects' characterisation; and considerable expenditure of public monies.

13.2 The land was purchased by the CoA with the assistance of state government funds.

13.3 The then Council and its administration embarked on an extensive and intensive community consultation over about 18 months. That culminated in the then Council adopting and endorsing "design principles" that included a height limit "up to 8 storeys maximum" (despite zoned for 6 storeys).

13.4 A subsequent Council and its administration, in secret, and to much community surprise and consternation, the CoA by majority resolved to become a co-developer of three towers, the highest rising 15 storeys.

14. There are other examples, including the following.

15. **Example**: Wellington Square (Kudnartu) (the Square).

15.1 The Square is part of the Adelaide Park Lands. It is a well-used and respected parkland feature of North Adelaide.

15.2 The Square became enclosed by ring fencing without prior notice.

15.3 Significant infrastructure works commenced on Wellington Square about which there was no prior consultation or substantive information.

15.4 It became obvious there would be considerable expenditure on a well-cared for verdant public asset in good condition, yet prioritized over other public spaces, footpaths, and lighting.

15.5 The APLM for Wellington Square includes:

- The "*desired future character*" being to "*maintain the Square as an easily accessible urban space with a 'village green' community character*".
- *Retain existing spatial layout and pathway alignments which are part of the cultural heritage values of the Square, having retained its design intent and purpose as envisaged by Light in 1836 (H SD 1,4).*
- *Seek opportunities to reduce bitumen in … the Square …".*[6]

15.6 The pathways, lighting, and landscaping were well kept; in good working order; conducive to safe public use of the Square; and in better condition than other locations within North Adelaide and the CoA.

15.7 The extent of works on, and public exclusion from, a 'village green' without reasonable prior notice and substantive engagement and information is a

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[6] 2015-25, Jan. 2018

matter of local public concern and frankly, most objectionable. It was an unwelcome surprise at significant cost. Preceding the work there was no public information locally available.[7]

15.8 Had this matter been preceded by local public consultation or engagement with informative material, much public consternation and corporate reputational damage would have been avoided. Instead, local ratepayers, residents, businesses, and the public were precluded from information by local administrative decisions about a well-respected and used local landmark parkland feature. Respectfully, that is more than regrettable.

15.9 Even if there were no legal obligation to consult, the lack of engagement was at odds with the "*Community Consultation Policy, 16 July 2019*". That expressly recognises the importance of non-legislated engagement and that there are occasions when it is desirable that there be engagement with, in the current context, the local community.[8]

15.10 The YourSay webpages of the CoA failed to elucidate any accessible YourSay consultation about any proposal for the current works on Wellington Square. The OurAdelaide webpage also made no reference, nor within other "Active Projects", "Asset Management Plans", or "Urban Elements Draft Asset Management Plan". A search of "works programme" found no relevant web page.

15.11 The expenditure was advised as being within the 2023-24 budget. That was at odds with a report in the Agenda for the City Planning, Development and Business Affairs Committee, 4 June 2024: "*Council's draft 2024/25 Annual Business Plan and Budget includes funding for a range of strategic priorities identified in the APLMS including: $500,000 for lighting and footpaths renewals in Wellington Square / Kudnartu."*[9]

15.12 The existing light poles in this Square contributed to its distinctive character and the historical layout of the pathways. Eventually a web page said: "*existing lighting poles ... will be renewed*". The light poles were not "renewed", they were *replaced* with ordinary street light poles lacking any parklands character.

16. **Example**: O'Connell Street

16.1 The O'Connell Street Project (https://ouradelaide.sa.gov.au/oconnell-street), seeks to "*enhance one of North Adelaide's key main streets ... while preserving the street's heritage*". That is a laudable objective.

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[7] The "City Works Guide Works in the Public Realm" includes: "*This guide provides information in relation to standards of working in the City of Adelaide and the requirements for installation and maintenance of … footpath occupations, compounds, pedestrian raceways and … To conduct these activities from the public realm, you must … Notification and/or consultation with impacted stakeholders*." The "City Works Guide Works Impacting City of Adelaide Assets" includes: "*Wherever practicable, impacts to local stakeholders, … and infrastructure must be mitigated by either altering the proposed time/day of works, or the way in which the site is set up*." In respect of each "Guide", residents and businesses within the wider locality, and users, are "impacted stakeholders".

[8] "*Council recognises: • the importance of non-legislated engagement which is not covered by this Policy • there are occasions where community engagement may be desirable, but there is no statutory requirement to undertake the same. …*" https://d31atr86jnqrq2.cloudfront.net/docs/policy-public-communication-consultation.pdf

[9] Item 7.3 Draft Adelaide Park Lands Management Strategy (APLMS) – Towards 2036

16.2 The issue of pavers within a local main street may seem relatively minor. Nonetheless, it is instructive in a ‘local sense’. Footpaths are what are most often used by people living and visiting and thus are of local importance.

16.3 The consultation webpage about a "Paver Design Trial", includes "Help us choose a paver design". It then only gave a choice between two "grey pavers" both of which are shades of grey cement aggregate, one of which has a barely discernible colouration.

16.4 Rather than an engagement that is open and balanced, a respondent to the proffered consultation was 'pushed' to choose between grey pavers with no other choice, a response that presupposes support for grey cement aggregate pavers. To proceed beyond the first webpage, one had to choose one or other. Frankly, this was a form of 'push-polling' given the absence of a third choice, namely, neither of the proffered pavers with an opportunity for comment or reasons. One might question whether this was a council acting in unseemly haste given its beneficial interest in the landholding contiguous to where a time-sensitive new footpath surface was to be laid.

16.5 In any circumstance, a 'push-poll' or faux consultation or engagement process (i.e., one must take one or the other; not neither) undermines local governance and engagement irrespective of the intent or content of policy documents.

17. These incredulous examples **demonstrate a culture of practical community *disengagement*** by an administration.[10] That undermines the credibility of local governance.

18. The draft ‘**charter’** laudably states “transparency and trust”, yet that is **undermined without the inclusion of a process for accountability**, which undermines credibility.

Local Government Act 1999 (LG Act)

19. The objects of the *Local Government Act 1999* (the **LG Act**) include:

> (b) to *encourage the participation of local communities in the affairs of local government* and to provide local communities, through their councils, with sufficient autonomy to manage the local affairs of their area; and
>
> (d) to *ensure the accountability* of councils *to the community*; … .

20. However, section 50, LG Act, limits the obligation of the local government entity to “*cases where this Act requires that a council must follow its public consultation policy*” (s50(2)(a)). That is, “*participation*” is not encouraged, rather, it is confined to what the “*Act requires*”.

21. **Too often** the administration of the CoA will:

- not *engage* when not required by the LG Act (s. 50(2)(a)) even when circumstances indicate to the contrary, i.e., disdainful behaviour;
- engage having made a decision that limits the engagement to produce a preferred outcome, i.e., a ‘push-poll’; and

[10] This is not to suggest that individual elected representatives, and individual or senior administrative officers do not from time to time demonstrate a welcome preparedness to engage or consult.

- engage without an objective preparedness for the decision or matter to be influenced by the engagement, i.e. pre-ordained result.

Government's Proposed Charter (May 2025)

22. The YourSay webpage of the State Government during its consultation process included:

"Here's what we heard from you:

There's strong awareness that councils are legally required to engage with their communities.

Most people agree that councils do share information about major decisions and make reasonable efforts to inform and consult the public, especially on annual business plans.

Opinions were mixed on whether councils should have full control over how they engage with their communities.

Many people supported the idea that legislation should give clearer direction on how councils should engage.

Based on your feedback, the new Charter will:

include different categories of consultation;

set mandatory requirements for each category;

give councils flexibility in how they meet those requirements; and

place greater emphasis on consultation for more significant decisions."

23. The government website (May 2025) included the "Community Engagement Charter" proposed by the Office of Local Government as establishing "*four categories of engagement*". It then lists five categories:
    - *Significant — annual business plan and rating policy*
    - *Significant*
    - *Standard*
    - *Local*
    - *Inform.*

24. However, **a charter without substance and an accountability process is an 'empty vessel'** that reiterates current paradigms of 'tick-box', 'push-polling', and 'lip-service' local community engagement without substance.

25. The government's draft charter (May, 2025):

25.1 does not meet the definition of a "charter": "*a formal statement of the rights of a country's people, or of an organization or a particular social group, that is agreed by or demanded from a ruler or government*".[11]

25.2 does not resemble a "charter" as applies to other contexts. For example:

a) https://plan.sa.gov.au/resources/planning/community_engagement_charter

b) https://gcyp.sa.gov.au/wordpress/wp-content/uploads/2021/04/Charter-of-Rights-FULL.pdf
https://childrensa.sa.gov.au/charter-ambassador-program/what-is-the-charter/

[11] https://dictionary.cambridge.org/dictionary/english/

c) https://www.safetyandquality.gov.au/our-work/partnering-consumers/australian-charter-healthcare-rights
https://www.safetyandquality.gov.au/sites/default/files/2024-10/Australian-Charter-of-Healthcare-Rights-second-edition-A4-Accessible.pdf

d) https://www.agedcarequality.gov.au/sites/default/files/media/acqsc_charter_of_rights_poster_a3_v7_lr.pdf

25.3 does not meet the "IAP Core Values" of the "International Association for Public Participation" ("Engagement Institute").[12]

IAP2 Core Values[13]

Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.

Public participation includes the promise that the public's contribution will influence the decision.

Public participation promotes sustainable decisions by recognising and communicating the needs and interests of all participants, including decision makers.

Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.

Public participation seeks input from participants in designing how they participate.

Public participation provides participants with the information they need to participate in a meaningful way.

Public participation communicates to participants how their input affected the decision.

DISCUSSION

26. If there is a singular process within local government that most exhausts communities and diminishes any local participation or consistent credibility in local government, it is that **too often the content and qualitative contribution provided during participation is not heard, diminished, or denigrated irrespective of its soundness or reasoning**. That is a behavioural issue that cannot be addressed by a "charter" that has no substantive obligations, clarity of values, and an accountability process.

27. There **ought to be** a commonality of definition and authenticity of what is "community engagement", "consultation", and how a "charter" is structured and expressed to operate in accord with the meaning of those expressions.

27.1 That would promote commonality of public understanding and expectation as between those who initiate the conduct and consider the product of a community engagement process (i.e., to listen and hear), and those who engage and produce a response or contribution during such process (i.e., to convey and be heard).

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[12] https://engagementinstitute.org.au/
[13] https://engagementinstitute.org.au/resources/iap2-core-values/

27.2 Difference ought to be confined to the relative importance of the issue at the applicable level of governance; the amplitude and diversity of the relevant audience or communities;[14] and the exigencies, timing and sensitivity of the subject of such process.

27.3 Consistency of approach engenders participation, credibility, and genuineness on the part of the initiator/s and participant/s in the interests of productive engagement, consultation, and purposeful outcomes in the public interest.

28. A **charter ought to** be based on principle, have substantive obligations, be simply expressed with clarity of purpose and requisite behaviours, and exemplify its application by reference to criteria or circumstances as may assist in the application of the charter.

29. The government's proposed charter is not a charter *per se*. It is unduly complex (i.e. not readily understood) and fails the 'keep it simple' test. For an example of an engagement matrix that can be more readily understood, together with explanatory material, see at https://www.boddington.wa.gov.au/profiles/boddington/assets/clientdata/community_engagement_charter_2023.pdf.

Council's draft "Community Engagement Charter"

30. The CoA's draft "Community Engagement Charter" resembles a "charter" and is a markedly more useful draft than the government's.

31. However, **to be a "charter" in the proper sense of that description, it needs to be elevated above mere "guiding principles"**.

A "charter" is meant to be a statement of what will be done and can be expected (i.e. rights) to meet articulated purposes and behaviour (i.e. values). It **ought** also to **include** a process for **accountability**, otherwise it remains an 'empty vessel'.

32. The proposed **charter ought to** address:

a) IAP2 Core Values for public engagement;

b) Substantive definitions and obligations that apply in other governance contexts (see above at 24), especially having regard to those within the state government and 'best practice' local governance;

c) Requirement for professionalism, objectivity, political impartiality, and transparency on the part of executives, distinct from the role of an elected member;[15]

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[14] The "***City of Adelaide community*** *includes all people who live, work, study or conduct business in, or who visit, use or enjoy the services, facilities and public places of, the City of Adelaide*". While that is amorphous, it does not preclude more specific consideration. *The City of Adelaide Act 1998* includes a requirement that: "*The Council must, in the performance of its roles and functions— … (b) be sensitive to the needs, interests and aspirations of individuals and groups within the City of Adelaide community; … (g) manage its operations and affairs in a manner that emphasises the importance of service to the community; …*".

[15] Although a Council Corporation is a corporate sole, its functions are akin to state government administrative units. Nonetheless, the expected behaviours of an administration within local government ought to be no less than applies to a state government administrative unit. The point of differentiation is that a local government administrative entity ought to exhibit behaviours and a functional operation that demonstrate a closer *local* and *grass roots* understanding and relationship with people within the local area. This is a behavioural issue most often connected with an individual and is not necessarily assuaged by a Charter of a Policy, but its expression can underline the fundamental importance of behaviour in giving effect to the spirit and content of a policy.

d) Explanatory material to exhibit the intended operation and to exemplify the manner of implementation;

e) Enable engagement commensurate with the nature, importance and strategic/practical effect of the subject matter to its local communities;

f) Recognise the diversity of the City of Adelaide community and the diverse interests and aspirations of individuals/groups/communities therein;

g) An accountability process, such as enabling a presiding member of the council or its sub-committee to permit an oral deputation about: (i) a perceived or demonstrable failure or omission to meet the requirements of the 'charter'; and (ii) about a perceived administrative misapprehension about an engagement submission or its intended effect.

33. Within that context and the generally amendable terms of the draft charter, following are some additional **specific comments**.[16]

33.1 Rather than "guiding principles", the **charter should state**: This Charter sets out the commitment of the CoA about how we will engage with the community about matters, decisions, plans, and projects that affect them or their local neighbourhood, precinct, or business, commercial or cultural activities within the city centre.

33.2 Key expressions used **should be defined**, i.e. in this Charter, [expression] means [definition]. For example, engagement includes consultation, listening and hearing; community includes individuals and groups; transparency includes honesty and openness; trust includes respectfulness, reliance, and accountability; local includes precinct and neighbourhoods; precinct includes an area of commonalities of interest; neighbourhood includes an area of adjacency of common land uses.

33.3 The **key notions** of "community concentric", "accessible and inclusive", and "transparency & trust" are **supported, subject to** applicable substantive supporting content, and the inclusion of an accountability process within the latter.

33.4 Seeking feedback is an important aspect. So too are **how the feedback is sought**; the objectivity of, and statistical basis for, the questions asked and how responses are assessed or evaluated; the avoidance of vacuous quantitative data, such as how often a webpage is accessed or a document is downloaded; the distinction between qualitative vs quantitative consideration; distinguishing areas of interest, i.e., self-interest vs local interest vs public interest vs state interest vs political interest vs special/specific interest.

33.5 Rather than "strengthen existing partnerships", which connotes the exclusion of others, the charter **should** state: Develop mutually credible relationships with local groups and enable respectful participation in local matters and decision making.

[16] The absence of a comment is not to be taken as condonation of a matter within the draft..

33.6 Manner of, and timing for, engagement and feedback may be variable and should be **equitable** having regard to the individuals, groups, or communities from whom feedback is sought and the matter the subject of the engagement.

33.7 **Consultation fatigue is a real phenomenon**; too little and too much; topic / process repetition and boredom; feedback sought but not heard; quantitative suborning qualitative; volume vs reasoning; lip-service and derision vs substantive and respectful; engagement vs administrative discretion; and targeted and affected vs everyone all the time; process vs purposeful, are equally emblematic, problematic and causative.

33.8 There is a **qualitative difference** between the way an **administration** assesses or evaluates the product of a process of engagement and applies that to its internal exercise of discretion or power, or to advice about decision options; and that of an **elected** representative whose decision making is subject to political and other influences that are not necessarily part of the process of engagement. The former is a controllable vis a vis output consequent on engagement; the latter is not.

Council's draft "Community Engagement Policy"

34. The draft oddly refers to a "parent document". Is the "policy" a 'child' of the "charter"? Presumably that should refer to the charter as the "primary document", with the policy being the second-level document, just as any explanatory document may be a third-level document (i.e., supportive material).

35. The **policy should articulate** its context; purpose; statement (i.e. responsibilities); and operational ambit as follows, which includes content from the draft documents.

36. **Context**, which can be expressed as:.

> The City of Adelaide community includes all people who live, work, study or conduct business in, or who visit, use or enjoy the services, facilities and public places of, the City of Adelaide. The Council, in the performance of its roles and functions, must also be sensitive to the needs, interests and aspirations of individuals and groups within the City of Adelaide community, and manage its operations and affairs in a manner that emphasises the importance of service to the community.

37. **Purpose**, which can be expressed as:

> This policy gives effect to:
>
> a) the obligation under the *Local Government Act 1999* to adopt a public consultation policy that sets out the responsibilities of Council;[17] and
>
> b) the commitment of the City of Adelaide in its "Community Engagement Charter"[18] to involve the community about matters, decisions, plans, and projects that affect them or their local neighbourhood, precinct, or business, commercial or cultural activities within the city centre.

[17] Section 50, *Local Government Act 1999* (SA),
[18] Adopted by the City of Adelaide on [applicable date & document reference number].

Public consultation under other applicable legislation will be undertaken in accordance with that legislation if there is inconsistency with this policy.

38. **Statement** (i.e., responsibilities), which can be expressed as:

In discharging its legislative obligations, roles, and responsibilities, the City of Adelaide **WILL**:

a) Engage and consult in accordance with its legislative obligations under the *Local Government Act* and other applicable legislation.
b) Give effect to commitments in the Community Engagement Charter.
c) Ensure that engagement activities are community centric, accessible and inclusive, and undertaken in a transparent and genuine manner to support informed administration and council decision making for ~~and build~~ contemporary communities and a city positioned for the future.
d) Be accountable for the qualitative, quantitative, and (as applicable) statistical evaluation of feedback from its community engagement; and how it is applied to the subject matter and influences the decision.
e) Be fair and respectful in its consideration of feedback arising from a process of engagement or consultation.
f) Make use of engagement methods appropriate the circumstances, including:
    - "Our Adelaide" Website
    - Publication in a regular newsletter
    - Letters to residents and other stakeholders
    - Other direct mail publications or letterbox drops, as appropriate
    - Advertising in media outlets as deemed appropriate
    - Media releases to appropriate media outlets and community groups
    - Community forums and stakeholder meetings
    - Direct consultation with community representative groups
    - Active and passive use of Council's website and social media
    - Use of a community email database
    - ~~Customer~~ Surveys (statistically sound)
    - Fixed displays, e.g. community notice boards
    - Community group representations to Council workshops
    - Deputations to the council or its committees.

39. **Operational** ambit, which can be expressed as:

Legislative engagement includes:

a) Annual Business Plan (Adopting Annual Business Plan) – Section 123
b) Basis of rating (Change to Basis of Rating Report) – Section 151
c) Basis of differential rates (Altering the basis of differential rates) – Section 156
d) Classification (Excluding land from classification as community land) – Section 193
e) Revocation of classification of land as community land (Revoking the classification as community land) – Section 194

f) Public consultation on proposed management plan (Adopting, amending or revoking a management plan for community land) – Section 197
g) Alienation of community land by lease or licence (Alienating of community land where the management plan does not allow it) – Section 202
h) Control of work on roads – public consultation (Granting of authorisation or issue of permit - alienating roads/control of work on roads) – Section 223
i) Trees (Planting vegetation where it will have a significant impact on residents, the proprietors or nearby residents) – Section 232
j) Composition and wards (carrying out representation reviews) - Section 12
k) Status of a council or change of various names (Considering a change of status of Council or name change) - Section 13
l) Principal office (Determining the manner, places and times of its principal office) – Section 45
m) Prudential requirements for certain activities (Carrying out commercial activities - Prudential Arrangements) – Section 48
n) Public consultation policies (Adopting or varying a public consultation policy) – Section 50
o) Access to meetings and documents—code of practice (Altering the Code of Practice relating to the principles, policies and procedures that Council will apply to enable public access to Council and Committee Meetings, their minutes and release of documents) – Section 50
p) Strategic Management Plans (adopting Strategic Management Plan) – Section 122
q) Amendment or revocation of management plan (Amending or revoking a management plan for community land) – Section 198
r) Passing by-laws (Making Bylaws) – Section 249
s) Councils to develop policies (Making Orders) – Section 259

Other engagement, which can be expressed as including:

a) Matters determined, delegated, or referred by council or a committee;
b) Matters referred by a delegate to a process of engagement;
c) Matters determined by the Lord Mayor or Chief Executive Officer from time to time.

Meanings

a) Unless defined herein, expressions in the policy document will have the same meaning as in the Charter or the applicable Act.
b) Explanatory material applicable to this policy may be regarded as relevant to understanding the operation of this policy.

Additional considerations

40. The use of the IAP2 “Spectrum of Public Participation” standard[19] would be a **useful insertion** in the charter or the policy, to exemplify the manner, scope and purpose of a particular public engagement process.

41. The draft policy **appears to omit a key element** of the current “*Community Consultation Policy, 16 July 2019*” to the effect that absent a legal obligation to consult the importance of non-legislated engagement is expressly recognised because there are occasions when it is desirable that there be public or community engagement.[20] It would be most regrettable for that key element to not be reflected in the charter or policy.

42. **Closure** day and time.

    42.1 Many submissions are now sought or lodged electronically.

    42.2 Plan SA has a practice of requiring lodgement of a representation by 11:59pm on the applicable date.

    42.3 Sometimes, submissions are sought by 5pm on a Friday. For a community group such as ours wholly reliant on voluntary work and personal or family time, a Friday closure precludes the valuable weekend period.

    42.4 The closure date and time for this submission is 5pm, Sunday 5 Oct. 25. That seems odd: (i) it is a Sunday; and (ii) Monday is a public holiday. Presumably, the CoA does not ordinarily expect its officers to be working on a weekend and it would be unusual for a recipient to be ‘busting’ to read submissions during the weekend, on a Sunday night, or on a public holiday.

    42.5 ***Suggestion****:* Where a consultation period would end on a Friday, the closure day and time should be no earlier than Noon (or 11:59pm if that were to be a ‘standard’) on the first ordinary business working day of the following week, and otherwise an invitation for a submission or representation should have a standard closing time of 11:59pm for electronic lodgements.

    That would likely be a more conducive and facilitative option for individuals and for volunteer community groups.

[19] www.iap2.org/resource/resmgr/communications/11x17_p2_pillars_brochure_20.pdf
[20] “*Council recognises: • the importance of non-legislated engagement which is not covered by this Policy • there are occasions where community engagement may be desirable, but there is no statutory requirement to undertake the same. …*”
https://d31atr86jnqrq2.cloudfront.net/docs/policy-public-communication-consultation.pdf

COMMENT

43. Within a community's experience of western democratic governance at a local and other levels, ***bona fide* credible and accountable community engagement and consultation ought to be regarded as an essential participatory element and be given that behavioural effect**.

    That is the more so at the local 'grass roots' level, which is said to be the mainstay of local government irrespective that the City of Adelaide is a 'capital city council'.

44. TNAS **would welcome** that and wishes to participate and contribute to that within the diversity of opinions, perspectives and influences of neighbourhoods, precincts and communities.

45. **Fundamentally**, TNAS would welcome engagement and consultation, and its consequential evaluation and manner of influence, in a way that is rational, civil, purposeful, and worthwhile for all concerned, founded in legislative, charter and policy expression and with respectful behavioural effect.

TNAS appreciates the opportunity to comment and remains available to contribute or clarify any aspect of this submission.

The North Adelaide Society Inc. (est. 1970)

per: Elbert Brooks BA LLB GDLP MBA, Chairperson

Sunday, 5 October 2025

The North Adelaide Society Inc. is a community based association with a diverse membership (>200). Its objects include "*encouraging the interest of residents in civic affairs*". It has a history of advocacy about current and future matters that impact local communities and communities of interest within the City of Adelaide; and links with community associations concerning local, state and federal governance.

Written Submission 2

Elizabeth Rushbrook

Community Consultation
Community Engagement – Policy and Charter
GPO Box 2252, Adelaide SA 5001

Email ouradelaide@cityofadelaide.com.au

Date 4 October 2025

Dear Simone Lavelle,

Thank you for taking the time to speak and share views on the Community Engagement Charter at the North Adelaide Community Centre on September 23. As you are aware, I am a resident of the City of Adelaide.

Priorities

Although our conversation ranged over many subjects, when considering the draft Community Engagement Charter, I feel that the areas that require further consideration are:

- Community Centric – *Strengthen existing partnerships with local groups and enable participation in decision-making*.
- Transparency and Trust – *Report back to the community on how their feedback informed outcomes by 'closing the gap'* and
- *Allow ample time for the community to consider the relevant information and respond*.

Context

It was noticeable that there have been improvements in community engagement by the City of Adelaide. This includes, but is not exclusive to, the following:

- The separation of the items for consultation from the state government and the local government through the establishment of *Our Adelaide*.
- Written information provided by council officers on items on Council or committee agendas on which past consultations have been held or submissions have been made. While this has occurred on an ad hoc basis, it has been very useful in alerting others to the Council decision-making timetable.
- Longer periods for responding to consultations and face-to-face meetings located in the known community centres with appropriate staff or consultants (Hutt Street revitalisation). This longer period requires tabling the matter at a residents committee meeting and then formulating a response, often with comments being sought from other members.
- Publication of the results of the community engagement in relevant Council reports.

I commend these activities.

Definitional issue

The Charter has difficulties as a stand-alone document, as it does not contain a definition of community. The supporting policy document indicates that a wide definition is used to include communication with not only those who live, work, study, or conduct business in the City, but also with those who are recipients of its services, facilities, and public places. Therefore, the Community Engagement Charter may need to tailor its community engagement activities to specific sectors. An example is seen in Hutt Street, where consultations about the revitalisation activities required specific approaches to business in the Roundtable phase.

The implementation of the Community Engagement Charter needs to recognise the diversity of audiences. Not only does the diversity of audiences within the City of Adelaide need to be recognised, but there is also a range of differing nationalities that require recognition in the implementation of the Charter.

It appears that the concept of 'community' is often understood to have a more limited meaning and is equated with residents. The residents of the City of Adelaide may support the aim of the Charter Engagement Charter and Policy, which is to involve the community in decision-making and projects that impact upon them or their local area. This perception may be due to residents' length of stay, their skills and commitment to the local area, their varied contributions, and the impact of the City of Adelaide's activities on them, as well as the value of local liveability. These attributes make them an important component of a city's population.

Next Steps

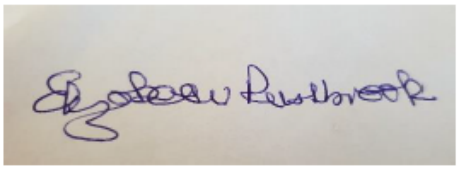
- Of particular interest is the follow-up piece of work, influenced by the Community Engagement Charter and Policy, that outlines how each of these principles will be met by setting targets (ie when, where, and how). It is at this stage of the task that most people engage, as exemplified by the Planning and Design Code during its development. These tasks could be established and reviewed annually, making the document responsive and timely.
- Secondly, not every one of the five neighbourhoods has a resident focus, which is usually expressed through a formal organisation. I note that the (SWCRA) South West City Residents Association has disbanded and is in the process of being regenerated by the South West Activation Group with the assistance of a local councillor. Likewise, the SECRA (South East City Residents Association Inc) is struggling to fill committee positions. While renewal is important, the lack of financial support given to residents' organisations may hinder the implementation of Community Engagement in these areas.

  This differs from the support given to the City of Adelaide's seven trader organisations, which results in the 'strengthening of existing partnerships with local groups and enabling participation in decision-making' can be seen as being both selective and one-sided.

- Thirdly, this imbalance affects the transparency and trust policy when residents' voices appear not to be formally valued or sought through the city of Adelaide's processes, making the recent improvements essential.

I hope that these comments assist in the development of the Community Engagement Charter and the associated Community Engagement Policy.

Yours sincerely



Elizabeth Rushbrook

[redacted]