

ADULT ENTERTAINMENT PREMISES CODE AMENDMENT

Engagement Plan

5 March 2024

ACKNOWLEDGEMENT OF COUNTRY

The City of Adelaide acknowledges that we are located on the traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past, present and emerging.

We recognise and respect their cultural heritage, beliefs and relationship with the land. We also extend that respect to visitors of other Aboriginal Language Groups and other First Nations.

DOCUMENT PROPERTIES

Contact for enquiries and proposed changes

If you have any questions regarding this document or if you have a suggestion for improvements, please contact:

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1. BACKGROUND INFORMATION

The City of Adelaide seeks to amend the SA Planning and Design Code (the Code Amendment) by introducing policies to several zones and subzones to control the use of land for the purposes of adult entertainment premises and adult products and services premises.

The Planning and Design Code recently introduced land use definitions for 'adult entertainment premises' and 'adult products and services'.¹ These land uses are not directly referred to in the zones, subzones or overlays applying to land within the City of Adelaide.

The proposed Code Amendment relates to land within the following zones and subzones within the City of Adelaide:

- Capital City Zone
- City Living Zone, including Medium-High Intensity Subzone; North Adelaide Low Intensity Subzone; and East Terrace Subzone
- City Main Street Zone, including Gouger and Grote Street Subzone; Hindley Street Subzone, Rundle Mall Subzone; City High Street Subzone
- Melbourne Street West Subzone
- Entertainment Subzone

The purpose of the Code Amendment is to introduce robust policies to guide these land uses within the City of Adelaide, to ensure that they are sited and developed appropriately. Supporting City of Adelaide's strategic context and desire to create a vibrant city that attracts and supports a growing population through the provision of entertainment and music venues, a thriving night-time economy and high-quality residential amenity.

There are no known past engagement processes related to this Code Amendment.

2. ENGAGEMENT PURPOSE

The purpose of engagement is to ensure that individuals, businesses, organisations and communities interested in and/or affected by the proposed Code Amendment are able to provide feedback and influence particular elements of the proposed Code Amendment during the preparation stage, and prior to the finalisation of the Code Amendment.

The Code Amendment is proposed to be on engagement for 6 weeks, from June 11th to July 23rd 2024.

Specifically, the engagement is to:

- Provide the opportunity for stakeholders and community to identify issues and opportunities early, so that they can be considered in the preparation of the Code Amendment.
- Raise awareness of the proposed Code Amendment, including information on the proposal and the areas to which the change will be applied.
- Enable stakeholders and community to provide feedback on the Code Amendment prior to it being finalised and submitted to the State Planning Commission and Minister for Planning.
- Close the loop with stakeholders and community to inform them of the outcomes of the engagement process, and how they can access the final version of the Code Amendment.

¹ Through the [Miscellaneous and Technical Enhancements Code Amendment \(April 2023\)](#)

- Meet statutory requirements as they relate to engagement on a Code Amendment, including the Community Engagement Charter.

3. ENGAGEMENT OBJECTIVES

The engagement objectives are to:

- Ensure stakeholders are aware of the Code Amendment and have the opportunity to comment.
- To make information available about the Code Amendment in ways that enable ease of understanding about what a Code Amendment is, what this Code Amendment is proposing, the rationale, how the Code Amendment relates to future development of land, and how people can comment.
- Ensure engagement of community and stakeholders so as to inform the Code Amendment in its preparation.
- Encourage stakeholders to ask questions in order to understand how it might impact them.
- Provide opportunities for the general public, landowners and occupants to comment.
- Maintain constructive relationships with stakeholders and the community through timely and direct communication.
- Follow through on commitments made over the duration of the consultation process and ensure that all documentation is easily accessible to the public.
- Integrate a feedback loop and evaluation process into the engagement process.
- Ensure that engagement with stakeholders and the community is sufficiently resourced and managed to deliver high-quality results.
- Implement an engagement approach that is directed by the principles of IAP2 and the State Community Engagement Charter in accordance with the requirements of the *Planning, Development and Infrastructure Act 2016*.

4. ENGAGEMENT ACTIVITIES

Engagement activities will be designed to provide convenient and easily accessible ways for stakeholders and the community to be informed about the project and provide their feedback. The engagement period will commence on June 11th 2024.

The main engagement activities will include:

- Webpage on the Plan SA Portal – the Plan SA portal will include engagement collateral, and information on the multiple ways that feedback can be accepted.
- Community engagement page on City of Adelaide website – the City of Adelaide’s online community engagement platform will include engagement collateral, and information on the ways that feedback can be accepted.
- Letters/electronic direct mail – letters will be sent to relevant state, regional and local government agencies, members of parliament, First Nations, and local business and community groups.

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- Public notice via the Advertiser and SA Government Gazette
- Promotional channels - where appropriate, the CoA will use existing promotional channels including social media (FB, Facebook, LinkedIn, Twitter) and CoA newsletters (Your Community, City Business, CoA Engagement website, the Next Edition)
- Face to face briefings/meetings by request - providing an opportunity for face-to-face discussion is important. Dedicated briefings will be offered to key stakeholders and those most impacted to explain the Code Amendment process and ensure they understand the proposed Code Amendment.
- Online meetings by request - we offer the additional option of having an online meeting by request, so that they can be held at a time that is convenient to the stakeholder. This is considered a more genuine and fit for purpose activity rather than hosting a public meeting, that may be intimidating or inconvenient for some stakeholders.
- Phone and email enquiries – planning and engagement staff are available to receive feedback or enquiries by phone and email throughout the engagement period.
- Multiple feedback points – we will receive, count, analyse and report on feedback received in all ways, to reflect genuine engagement that is convenient to stakeholders. This includes phone conversations, meetings, emails, and written submissions.

5. STAKEHOLDER AND COMMUNITY MAPPING

Stakeholder	Level of interest in the project (i.e. high, medium or low)	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Government				
City of Adelaide -	High	Implications for development assessment, building and regulatory services, and community safety teams.	Regular conversations and updates.	Involve
City of Adelaide – Council Members	High	Broad interest in the balance of community and economic outcomes within the City of Adelaide.	Keep informed throughout progression of Code Amendment. Decision maker.	Consult
State Planning Commission	High	Interest in management of Adult Entertainment Premises and Adult Products and Services land uses across South Australia.	Keep informed throughout progression of Code Amendment. Decision maker. Actively seek feedback at key points.	Consult
PlanSA / PLUS	High	Interest in management of Adult Entertainment Premises and Adult Products and Services land uses across the state.	Keep informed throughout progression of Code Amendment. Decision maker.	Involve

Stakeholder	Level of interest in the project (i.e. high, medium or low)	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Consumer and Business Services (Minister's request)	High	Interest in interactions with liquor licensing legislation and functions. CBS also issues license for adult entertainment premises.	To work in collaboration to formulate policies and incorporate advice and recommendations into the decision-making process.	Involve
South Australia Police (Minister's request)	High	Interest in managing interactions between these land uses, general community safety and other operational interactions such as liquor licensing.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Involve
Department for Education (Minister's request)	Medium	Interest in how the proposed Code Amendment is designed to minimise impacts on the schools and childcare services.	Make aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult
Environment Protection Authority (Minister's request)	Medium	Interest in how the proposed Code Amendment is designed to minimise impacts on the environment, human health and amenity.	Make aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult
South Australian Tourism Commission (Minister's request)	Medium	Interest in how the proposed Code Amendment contributes to a healthy, vibrant and attractive tourism industry in Adelaide.	Make aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult

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Stakeholder	Level of interest in the project (i.e. high, medium or low)	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Ms Lucy Hood MP, State Members of Parliament for Adelaide (Minister's request)	Medium	Members of Parliament need to be informed of the Code Amendment and how it affects the residents in their electorates.	To be provided with available information to assist active participation in the engagement process.	Inform/Consult
Mr Steve Georganas MP, Federal Member of Parliament for Adelaide (Minister's request)	Medium	Members of Parliament need to be informed of the Code Amendment and how it affects the residents in their electorates.	To be provided with available information to assist active participation in the engagement process.	Inform/Consult
Representative bodies				
Traditional Owners	High	The Traditional Owners of the land may be interested in the change of use and amenity proposed by the Code Amendment.	They will be made aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult
Local Government Association (LGA)	Medium	Interest in the application of the land use definition for other local government areas.	Statutory requirement to inform LGA as part of engagement plan.	Inform/Consult
Hotels Association	Low	Interest in the interaction of these two land uses with the operation of hotels.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Inform/Consult

Stakeholder	Level of interest in the project (i.e. high, medium or low)	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Property Council	Low	Interest in effect of these land uses on property values and rental viability.	They will be made aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult
Australian Sex Workers Association – Scarlet Alliance	Medium	Interest in the impact on their members.	They will be made aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult
Sex Industry Network (SIN), South Australia	Medium	Interest in the impact on their members.	They will be made aware of the proposal, have an opportunity to participate, influence the outcome and be kept informed.	Inform/Consult
Businesses and Residents				
Adult Entertainment Premises and Adult Products and Services premises owners, employees and patrons	High	Interest in economic outcomes, safety and management of interface with neighbouring land uses/public realm.	Keep informed throughout progression of Code Amendment, actively seek feedback	Inform/Consult
Property/ business owners within the Affected Areas	Medium	Interest in whether these land uses are anticipated to occur near their properties.	Keep informed to enable a response if needed.	Inform/Consult

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Stakeholder	Level of interest in the project (i.e. high, medium or low)	Nature of interest in the project and/or the potential impact of the project	Stakeholder needs/expectations for engagement in the project	Level of engagement (i.e. inform, consult, involve, collaborate)
Main Street Groups/East End Association/West End Association	High	Interest in managing public realm impacts associated with Adult Entertainment Premises and/or Adult Products and Services Premises.	Keep informed throughout progression of Code Amendment, actively seek feedback.	Inform/Consult
Broader Community	Low	General interest in whether and/or where these land uses could be enabled.	Keep informed to enable a response if needed.	Inform
Media	Medium	Depending on the level of interest from community groups and elected representatives, the media may in turn have an interest in covering views on this Code Amendment	That information is readily available	Inform

6. APPLYING THE CHARTER PRINCIPLES

Stakeholder	Engagement need or technique
Consumer and Business Services.	Pre-consultation meetings/workshops Written invitation for comment Offer to brief Public consultation on the CoA Engagement website

Stakeholder	Engagement need or technique
South Australia Police.	Pre-consultation meetings/workshops Written invitation for comment Offer to brief
Department for Education.	Written invitation for pre-consultation meetings/workshops Written invitation for comment Offer to brief
Environment Protection Authority.	Written invitation for pre-consultation meetings/workshops Written invitation for comment Offer to brief
South Australian Tourism Commission.	Written invitation for pre-consultation meetings/workshops Written invitation for comment Offer to brief
Ms Lucy Hood MP, State Member of Parliament for Adelaide	Written invitation for comment Offer to brief
Mr Steve Georganas MP, Federal Member of Parliament for Adelaide	Written invitation for comment Offer to brief
Adult Entertainment Premises and Adult Products and Services business owners within the City of Adelaide	Written invitation for comment Offer to brief Public consultation on CoA Engagement website during consultation period Notice on SA Planning Portal

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Stakeholder	Engagement need or technique
Australian Sex Workers Association – Scarlet Alliance	Written invitation for comment Offer to brief Public consultation on CoA Engagement website during consultation period Notice on SA Planning Portal
Sex Industry Network (SIN), South Australia	Written invitation for comment Offer to brief Public consultation on CoA Engagement website during consultation period Notice on SA Planning Portal
Property/ business owners within the Affected Areas	Public notices via media and Council newsletters Notice on SA Planning Portal Public consultation on CoA Engagement website during consultation period
Residents of the City of Adelaide	Public notices via media and Council newsletters Notice on SA Planning Portal Public consultation on CoA Engagement website during consultation period
Traditional Owners	Written invitation for pre-consultation meetings/workshops Written invitation for comment Offer to brief Public consultation on CoA Engagement website during consultation period
Local Government Association (LGA)	Written invitation for pre-consultation meetings/workshops Written invitation for comment Offer to brief
Media	Public consultation on CoA Engagement website during consultation period

7. STAGING THE ENGAGEMENT

Stage	Objective	Stakeholders	Level of engagement	By when
1. Early Engagement	Seek feedback on proposed amendments and policy wording	PLUS SA Police CBS	Involve Involve Involve	As soon as possible following Minister's approval of Proposal to Initiate
2. Engagement	Interested parties have the opportunity to provide input into the proposed amendment.	All	Inform/Consult	When the investigations are complete and the Code Amendment is prepared, consult for six weeks.
3. Engagement review	To review and summarise consultation feedback and prepare an engagement report and instructions for Ministerial decision	Stakeholders who provided feedback	Inform	As soon as practical following Stage 2 Engagement
4. Closing the loop	Inform stakeholders and the community about the impact of the engagement and outcome of the proposal	All	Inform	As soon as practical following a final decision being made on the proposed Code Amendment

8. PLANNING THE ENGAGEMENT APPROACH

Stage	Engagement activity	Stakeholders / target audience	Engagement level and objective of activity	Timing	Who is responsible?	Resources required	Budget
Early engagement	Early feedback on proposed Code Amendment	PLUS SAPol CBS	Inform of the Code Amendment and consult on engagement delivery, the Code Amendment process and early issues and opportunities	Pre-public engagement	CoA staff	Key Messages Code Amendment and investigations Stakeholder database Engagement plan	
Engagement	Letter and offer of briefing	Dept. Education EPA SA Tourism Commission State Member of Parliament for Adelaide	Inform of the Code Amendment, engagement opportunities and seek feedback	Start of public engagement	CoA staff		

Stage	Engagement activity	Stakeholders / target audience	Engagement level and objective of activity	Timing	Who is responsible?	Resources required	Budget
Engagement	Written invitation to comment on the proposed Code Amendment	Government Local Business Groups in Affected Areas Representative bodies Adult Entertainment Premises and Adult Products and Services premises owners and operators	Inform of the Code Amendment, engagement opportunities and seek feedback	Start of public engagement	CoA staff	Emails Key Messages Code Amendment and investigations Stakeholder database	Nil
Engagement	SA Planning Portal notice	Landowners, businesses and residents Local Groups General public	Inform of the Code Amendment, engagement opportunities and seek feedback	Start of public engagement	CoA staff	Key Messages Code Amendment and investigations	Nil
Engagement	Public consultation on CoA Engagement website	Landowners, businesses and residents Local Groups General public	Inform of the Code Amendment, engagement opportunities and seek feedback	Start of public engagement	CoA staff	Key Messages Code Amendment and investigations	Nil

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Stage	Engagement activity	Stakeholders / target audience	Engagement level and objective of activity	Timing	Who is responsible?	Resources required	Budget
Engagement review	Seek feedback on the engagement process	CBS SAPOL PLUS People who made submissions	Evaluate engagement process	Conclusion of public engagement	CoA staff	Key Messages Code Amendment and investigations	Nil
Closing the loop	Email engagement report and summary	People who made submissions	Close the loop with people who made submissions to enable them to understand the decision and how their input has influenced the decision.	Conclusion of public engagement	CoA staff	Engagement Report Engagement Summary Updated Web Page Letters/Emails to Submitters Submitters Database	Nil
Closing the loop	Update SA Planning Portal notice	All	Inform of the Code Amendment and report back on engagement activities and outcomes.	Conclusion of public engagement	CoA staff to make request to PLUS	Key Messages Code Amendment and investigations Engagement Report	Nil

9. APPLYING THE CHARTER PRINCIPLES IN PRACTICE

Charter principle	How does your engagement approach / activities reflect this principle in action?
Engagement is genuine	Variety of opportunities to engage seek to foster: <ul style="list-style-type: none"> • awareness of the Code Amendment across the variety of stakeholders • understanding about what is proposed • opportunity to provide input, which can be analysed in order to inform the finalisation of the Code Amendment
Engagement is inclusive and respectful	Engagement activities tailored to different target groups. Information aimed to be provided in Plain English
Engagement is fit for purpose	Engagement activities are tailored to different groups, with an identified contact for further assistance, information and advice.
Engagement is informed and transparent	Information about the Code Amendment to be readily available and provided in Plain English. Details of the Code Amendment are available on the Plan SA portal and the CoA Engagement website.
Engagement is reviewed and improved	Success indicators are defined and measured at the completion of the engagement. The outcomes will be documented in the Engagement Report

10. MEASURING SUCCESS

At the completion of the engagement, all participants will be invited to assess the success of the engagement against performance criteria one to four, below. The Designated Entity will assess the success of the engagement against criteria five to nine. This evaluation will be included in the statutory report required to be prepared by the Designated Entity under section 73(7) of PDI Act (the Engagement Report). The Engagement Report provides details and analysis of engagement activities undertaken for the Code Amendment, and is provided to the Minister for Planning and Local Government. This Engagement Report will also be referenced in the State Planning Commission’s Parliamentary Report under section 74(3)(b) of the Act, which is issued to the Environment Resources and Development Committee of Parliament following adoption of a Code Amendment.

#	Charter criteria	Charter performance outcomes	Respondent	Indicator ²	Evaluation tool ³ Exit survey / follow-up survey	Measuring success of project engagement
1	Principle 1: Engagement is genuine	People had faith and confidence in the engagement process.	Community	I feel the engagement genuinely sought my input to help shape the proposal	Likert scale - strongly disagree to strongly agree	Per cent from each response.
2	Principle 2: Engagement is inclusive and respectful	Affected and interested people had the opportunity to participate and be heard.	Community	I am confident my views were heard during the engagement	Likert scale - strongly disagree to strongly agree	Per cent from each response.

#	Charter criteria	Charter performance outcomes	Respondent	Indicator ²	Evaluation tool ³ Exit survey / follow-up survey	Measuring success of project engagement
			Project Lead	The engagement reached those identified as community of interest.	Representatives from most community groups participated in the engagement Representatives from some community groups participated in the engagement There was little representation of the community groups in engagement	Per cent from each response.
3	Principle 3: Engagement is fit for purpose	People were effectively engaged and satisfied with the process. People were clear about the proposed change and how it would affect them.	Community	I was given sufficient information so that I could take an informed view.	Likert scale - strongly disagree to strongly agree	Per cent from each response.
				I was given an adequate opportunity to be heard	Likert scale - strongly disagree to strongly agree	Per cent from each response.

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#	Charter criteria	Charter performance outcomes	Respondent	Indicator ²	Evaluation tool ³ Exit survey / follow-up survey	Measuring success of project engagement
4	Principle 4: Engagement is informed and transparent	All relevant information was made available and people could access it. People understood how their views were considered, the reasons for the outcomes and the final decision that was made.	Community	I felt informed about why I was being asked for my view, and the way it would be considered.	Likert scale - strongly disagree to strongly agree	Per cent from each response.
5	Principle 5: Engagement processes are reviewed and improved	The engagement was reviewed and improvements recommended.	Project Lead	Engagement was reviewed throughout the process and improvements put in place, or recommended for future engagement	Reviewed and recommendations made Reviewed but no system for making recommendations Not reviewed	Per cent from each response.

#	Charter criteria	Charter performance outcomes	Respondent	Indicator ²	Evaluation tool ³ Exit survey / follow-up survey	Measuring success of project engagement
6	Engagement occurs early	Engagement occurred before or during the drafting of the planning policy, strategy or scheme when there was an opportunity for influence.	Project Lead	Engagement occurred early enough for feedback to genuinely influence the planning policy, strategy or scheme	Engaged when there was opportunity for input into scoping Engaged when there was opportunity for input into first draft Engaged when there was opportunity for minor edits to final draft Engaged when there was no real opportunity for input to be considered	Per cent from each response.
7	Engagement feedback was considered in the development of planning policy, strategy or scheme.	Engagement contributed to the substance of a plan or resulted in changes to a draft.	Project Lead	Engagement contributed to the substance of the final plan	In a significant way In a moderate way In a minor way Not at all	Per cent from each response.
8	Engagement includes 'closing the loop'	Engagement included activities that 'closed the loop' by providing feedback to participants/ community about outcomes of engagement	Project Lead	Engagement provided feedback to community about outcomes of engagement	Formally (report or public forum) Informally (closing summaries) No feedback provided	Per cent from each response.

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#	Charter criteria	Charter performance outcomes	Respondent	Indicator ²	Evaluation tool ³ Exit survey / follow-up survey	Measuring success of project engagement
9	Charter is valued and useful	Engagement is facilitated and valued by planners	Project Lead	Identify key strength of the Charter and Guide Identify key challenge of the charter and Guide	Short answer responses to both questions	Summary of written responses

11. CLOSING THE LOOP AND REPORTING BACK

How will you respond to participants?	Who is responsible?	When will you report back?
Acknowledgement of feedback received - we will send an email and/or letter acknowledging that stakeholder feedback has been received and is being considered. This will be accompanied by a brief description of the process moving forward and timelines around when the feedback analysis will be available	City of Adelaide	Within 5 days of receiving the feedback
Provide analysis to feedback received by stakeholders and identifying key themes. This will be included in the engagement report, which will be available on the Plan SA Portal	City of Adelaide	As soon as practicable following the close of the consultation period.
Issue an evaluation survey to participants who were involved in the consultation process and provided feedback	City of Adelaide	As soon as practicable following the close of the consultation period.
Final letter – we will send out a notification to stakeholders, by email and/or mail, detailing the outcome of the code amendment	City of Adelaide	As soon as practicable following a decision being made on the proposed Code Amendment