

Gawler Boundaries Review

Independent Inquiry into a Boundary Change Proposal from
The Town of Gawler

April 2025

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1. Executive Summary

Background and Objective

The South Australian Local Government Boundaries Commission (the Commission) was established in 2019 under the *Local Government Act 1999* (the Act). The Commission was established as an independent body to assess council boundary change proposals and make recommendations to the Minister for Local Government on boundary change proposals.

In December 2019, the Town of Gawler referred a potential proposal to the Commission to expand its boundaries to include seven areas within the Light Regional Council, The Barossa Council and the City of Playford. The proposal also included to remove two areas from the Town of Gawler and shift them to the City of Playford. The Town of Gawler was invited by the Commission to prepare a Stage 2 general boundary change proposal and subsequently did so in December 2020.

The Commission considered the proposal and consulted with impacted councils. It decided that the proposal will proceed to an inquiry. The objective of the inquiry was to analyse the boundary change proposal as presented by the Town of Gawler and specifically to inquiry into five key matters (inquiry streams), being:

- Financial matters
- Land use and planning matters
- Council employee matters
- Representation matters
- Community and service matters.

In January 2024, BDO was engaged by the Commission to be the independent investigator to inform an inquiry in accordance with s31 of the Act. BDO's purpose as investigator was to independently seek evidence about the proposal and to investigate the identified areas across the inquiry streams. This scope included developing and implementing a Stakeholder Engagement Plan. BDO has documented the findings of its investigation and recommendations within this report to provide the Commission with information to inform the Commission's recommendations to the Minister for Local Government about the Town of Gawler's proposal.

Town of Gawler's Proposal

The Town of Gawler's proposal included boundary changes for the following areas:

1. Concordia Growth Area (currently within The Barossa Council, proposed to move to Town of Gawler).
2. Hewett (currently within Light Regional Council, proposed to move to Town of Gawler).
3. Kalbeeba (two parts), including Springwood growth area and Gawler East (currently within The Barossa Council, proposed to move to Town of Gawler).
4. Gawler Belt (part) (currently within Light Regional Council, proposed to move to Town of Gawler).
5. Evanston Park (part) (currently within City of Playford, proposed to move to Town of Gawler).
6. Reid (part) (currently within Light Regional Council, proposed to move to Town of Gawler).
7. Hillier (part) (currently within City of Playford, proposed to move to Town of Gawler).
8. Bibaringa (part) (currently within Town of Gawler, proposed to move to the City of Playford).
9. Uleybury (part) (currently within Town of Gawler, proposed to move to the City of Playford).

The proposal presented rationales for change for each of these areas. These rationales differed for areas 1-7 and areas 8 and 9.

In summary, the claimed rationales for areas 1-7 were:

- Proximity to the existing Gawler township results in these areas being natural extensions of the township
- Residents in neighbouring areas rely on Town of Gawler services and infrastructure. There are therefore unnecessary inefficiencies. Consolidation to Town of Gawler would improve service integration
- Lack of representation in local decision making
- Greater equity to Gawler Council residents who service a community larger than its rate base
- Areas 5-7 (Evanston Park, Reid, Hillier): Council boundaries are not most logical placement, with some properties in two councils resulting in inefficiencies and frustration.

In summary, the claimed rationales for areas 8 and 9 (Bibaringa and Uleybury) were:

- Boundaries were not in the most logical placement, with the majority of these areas in the City of Playford. Some properties were in two councils, leading to inefficiencies and frustration.

Observations

Changing council boundaries can be disruptive and costly, impacting both council administration and rate payers. In our opinion, changes to council boundaries should therefore have demonstrated rationales, including evidence of benefits to councils, ratepayers and communities.

In our opinion, the five streams of the inquiry provided a reasonable basis to evaluate the rationales for the change to the Town of Gawler's boundaries and to consider the evidence for the potential benefits and detriments of the proposed changes. Following evaluation of information obtained during the inquiry, BDO is of the view that there is not sufficiently compelling evidence to support a number of the claims made in the Town of Gawler's proposal and to demonstrate a case in favour of many of the proposed changes.

Natural Extensions of Gawler Township and Use of Town of Gawler Facilities

The use of Town of Gawler facilities by non-residents is a fundamental argument provided by the Town of Gawler in support of the proposed boundary change. In its proposal, the Town of Gawler notes it 'is difficult to provide data on the levels of Council funded infrastructure and services that would be attributed to the members of the community who reside beyond the current LGA boundary,' but subsequently made some assumptions from recorded data regarding the use of the Gawler Aquatic Centre and library.

The data reported by the Town of Gawler in its 2019 proposal included that approximately a third of members of the Gawler Aquatic Centre (36%) and library (33%) are visitors from outside the Town of Gawler.¹ Further, the Town of Gawler states the Gawler Aquatic Centre is at end of life, had an estimated replacement cost of \$25M in 2016.² Town of Gawler's proposal further states plans for two recreation precincts (Karbeethan Reserve and the Essex Park and Gawler Showgrounds Regional Sporting Precinct, which also includes a potential aquatic centre) are underway, with a stated intention of servicing a wider region.

We note that some Town of Gawler community infrastructure has or is receiving support from the Government of South Australia. In 2021-22, the Government of South Australia's Planning and Development Fund invested \$800,000 in the Karbeethan Reserve project.³ The State Government is also reported to be assisting with funding for the Gawler and District Netball Association Courts Redevelopment (\$4.8M).⁴

The Town of Gawler states that it considers the beneficiaries (i.e. neighbouring councils and their residents) should make a financial contribution to build and maintain ‘regional’ facilities and infrastructure. Further, the Town of Gawler stated that a wider regional engagement is required, and residents should participate in planning processes and be represented when decisions are made.⁵

During our investigation, we sought to understand if there was evidence from the council or residents of a disproportionate high use of Town of Gawler facilities by neighbouring residents (possibly along with disproportionately low use of residents’ own council facilities) and a subsequent financial burden on the ToG council and ratepayers.

We expressly requested data on usage of ToG facilities by non-residents and its cost impact to verify its claims. The investigators were provided with narrative evidence of individuals using services (largely sports facilities). Data provided during the inquiry suggests that approximately 13.6% of Aquatic Centre swim school participants are from one of the nine potentially impacted areas. Data for individual sporting and social clubs provided by the Town of Gawler had membership from residents in an area of interest of between 7% (Gawler Ranges Baseball Club, with 128 members) and 57.7% (Willaston Cricket Club, with 104 members). Data was received for other services, many of which had small numbers of use, for example the Tertiary Hub, with 64 total current and previous members.

The stakeholder engagement conducted during the investigation was designed in part as a means of obtaining additional data about residents neighbouring the Town of Gawler using council facilities. It should be noted that, by design, the engagement process was an opt-in opportunity and therefore respondents may not be representative of all residents in the potentially affected areas. Feedback from public forums suggested non-Gawler residents currently do not make significant use of Town of Gawler facilities, though many participants noted they do drive through the Town of Gawler to other destinations (for example, Adelaide CBD), mostly using state roads.

Although survey respondents were not representative of the residents of the four council areas (with nearly 70% of respondents living or paying rates in Light Regional Council), the survey did not indicate a disproportionate use of Town of Gawler council-provided facilities by residents of other councils. For example, 45% of Light Regional Council residents claim their use of community services such as libraries in Light Regional Council; only 17% use them in the Town of Gawler, similar to the 15% who use such services in The Barossa Council.

Further, we note that many of the facilities and services are fee paying (such as the swimming pool and sports club membership) and therefore usage from outside the council potentially contributes to that service’s viability. In other cases, the service may be infrequently used (for example library services) or there is a very low marginal cost of consumption (for example parks and footpaths). It could be argued that residents of the Town of Gawler are able to access better facilities because of this contribution of non-residents.

The only area where survey respondents did report a significant difference in using facilities in their own council was retail facilities. Of Light Regional Council residents, 67% reported visiting retailers in the Town of Gawler, compared to 60% in Light Regional Council. The retail data were similar for residents of The Barossa Council, with a slightly higher preference for shopping within their own council, with 67% of Barossa residents reporting visiting Gawler for retail, compared to 74% shopping within The Barossa Council.

In our opinion, the use of retail services is not a compelling reason for a boundary realignment. It could be argued that neighbouring residents shopping in Town of Gawler is a positive contribution to the community, as they are contributing to the local economy through frequenting Town of Gawler businesses. Indeed, as a regional centre, Town of Gawler residents may enjoy more and larger retail services due to non-residents patronising those services.

Representation and Communities of Interest

The Town of Gawler argues that residents in adjacent areas should be represented in local decision making and that the Town of Gawler represents the community of interest for many neighbouring residents. Through the inquiry, we sought to understand if there are demonstrated strong connections to the Town of Gawler by neighbouring residents.

Both arguments about desire for representation and communities of interest rely on residents' actions and perspective. Stakeholder engagement was therefore an important means of investigating these assertions.

From feedback at the public forums, the argument regarding representation was not a compelling one to most attendees. Residents of other councils voiced limited, if any, desire for representation within the Town of Gawler. As noted above, there was limited evidence of the disproportionate use of the Town of Gawler's facilities, which may contribute to the lack of desire for a greater voice in decision-making. In light of insufficient evidence of neighbouring residents disproportionately using Town of Gawler facilities or a desire by those residents to be represented in Gawler decision-making, the investigation did not find enough evidence to support a council boundary realignment on the basis of representation.

It was evident that there was limited self-identification of participants as belonging to a community of interest centred in the Town of Gawler. Through the engagement process, we defined a community of interest as where 'people feel a connection with a group of people or an area.' Forum participants overwhelmingly expressed that their community of interest was their suburb or locality, or their existing council. More than half of the 205 respondents who answered that question (57%) reported feeling their community of interest relevant to the inquiry is their locality or suburb.

To a lesser extent, survey respondents identified their community of interest as a sporting club (14%). It should be noted that the highest proportion of respondents who reported sporting participation reported it to be within own council area, with only 14% of Light residents and 17% of Barossa residents reporting that their organised sporting occurs within the Town of Gawler. A smaller proportion of respondents, 6%, commented on identifying as part of a religious or a school community. Again, there was no evidence suggesting this community of interest to be Town of Gawler-centric.

Further, when asked about the relative importance of the five streams of the inquiry, survey respondents ranked representation as the least important factor for considerations in the inquiry. Financial matters were ranked most important, with rates in particular of importance to survey respondents.

Given the subjective nature of community of interest and the lack of self-identification with the Town of Gawler by potentially affected residents, in our opinion, there is insufficient evidence to support the claim that the community of interest for residents of the potentially affected areas is best represented by the Town of Gawler.

Development and Its Implications

There were concerns in relation to future developments and its implications, from both elected members and the public feedback, revealing a similar root cause for much of the feedback received. Both those for and against the proposal voiced concerns about growth in the area, how it will be managed (including any cost implications for councils) and how it will impact current residents. We also consistently heard general concerns about traffic, particularly within the Gawler township and how additional residential traffic from Concordia will be managed. These concerns are valid and worthy of consideration of solutions.

The difference between those for the proposal and against appears to be the preferred solution.

Those supportive of the Town of Gawler's proposal suggest that adjustment of council boundaries will provide resources so they can manage growth and the increased traffic. They appear to assume the growth will have a negative impact unless these issues are managed by the Town of Gawler. We also heard concerns that the required infrastructure for developments, particularly Concordia, may be delayed, resulting in a temporary increase in use of Town of Gawler assets.

Those opposing the proposal, particularly in Light Regional and Barossa Councils, and residents from Hewett and Concordia/Kalbeeba areas, are also concerned about these issues. They do not believe a boundary realignment would address them and indeed suggest that they are more likely to maintain more of the character of their local area by maintaining current boundaries.

Throughout the investigation, BDO did not receive compelling evidence about why a change to council boundaries is a solution to these issues. There was no evidence of how the Town of Gawler could better address growth and traffic compared to other councils, nor how it requires additional residents or finances to manage them. In our observation, both traffic and sustainable growth issues cross into other tiers of government. In particular, the bypass was presented as a partial solution, and this has little, if any, relation to council boundaries, as it requires state and federal support. We note the potential for delays to infrastructure to support new development in areas surrounding the Town of Gawler but do not accept that this is a compelling reason for a council boundary change.

Boundaries Dividing Plots and Localities

In regard to the smaller potentially impacted areas, being portions of the localities of Reid, Evanston Park, Hillier, Bibaringa and Uleybury, the Town of Gawler's stated rationales include that current council boundaries are not the most logical placement. The Town of Gawler's proposal notes these localities are under the administration of multiple councils.

We did not receive evidence during the inquiry suggesting a locality or a suburb should be located in one council boundary. Further, we note that, alternatively, the suburb boundary could be changed. Nonetheless, we note that there was general support for the portion of Kalbeeba in Springwood Development to be included in the boundaries of the Town of Gawler given its proximity to the Town of Gawler and the road access to this area. We also note the road access to the portion of Reid is from the Town of Gawler.

For some of these areas, there are individual properties in two councils, which the Town of Gawler argues creates inefficiencies and frustration. In general, we accept the assertion that an individual residential property should not be subject to multiple local government administrations where it is possible and practicable. Where possible, rate payers for an individual property should not be subject to paying multiple sets of rates.

Other Matters

Through the investigation, BDO became aware of both general confusion about the boundary realignment inquiry process. For example, we heard concern or misunderstanding from some members of the community that the inquiry may not be sufficiently independent from the Town of Gawler or an assumption that decisions had already been made. In our opinion, neither the Town of Gawler nor any other council, organisation or individual had a disproportionate voice in the inquiry. Further, we wish to stress that at our appointment, and at no time during our engagement to date, was it suggested that any decision had been made about the proposal or any parts of it.

Recommendations

Recommendation 1—Concordia Growth Area

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for the **Concordia Growth Area (area 1)** as there is insufficient evidence to support this proposed change.

Recommendation 2—Infrastructure to Support Successful Development

It is recommended that the Commission express to the Minister for Local Government the importance of continued state government involvement in the development of Concordia and Roseworthy, particularly in ensuring the timely implementation of regional infrastructure, to support successful growth that does not negatively impact existing residents. It is recommended that particular consideration be given to future traffic solutions for both passenger vehicles and freight around the Gawler township.

Recommendation 3—Kalbeeba rural living portion

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for **Kalbeeba rural living area (area 3A)** as there is insufficient evidence to support this proposed change.

Recommendation 4—Kalbeeba Springwood Development portion

It is recommended that the Commission recommend to the Minister for Local Government that the **Kalbeeba Springwood Development portion (area 3B) move from The Barossa Council to the Town of Gawler** as proposed by the Town of Gawler, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation.

Recommendation 5—Hewett

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for **Hewett (area 2)** as there is insufficient evidence to support this proposed change.

Recommendation 6—Gawler Belt

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for a portion of **Gawler Belt (area 4)** as there is insufficient evidence to support this proposed change.

Recommendation 7—Portion of Reid

It is recommended that the Commission **recommend** to the Minister for Local Government that the **entirety of the locale of Reid be within the Town of Gawler, with the portion currently in Light Regional Council to move the Town of Gawler**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation.

Recommendation 8—Portion of Evanston Park

It is recommended that the Commission **recommend** to the Minister for Local Government that it be considered to accept the proposal to **move the proposed portion of Evanston Park (Area 5) from the City of Playford to the Town of Gawler**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation.

Recommendation 9—Portion of Hillier

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for a portion of **Hillier (area 7)** as there is insufficient evidence to support this proposed change.

Recommendation 10—Portion of Bibaringa

It is recommended that the Commission recommend to the Minister for Local Government that it be considered **to accept the proposal to move the proposed portion of Bibaringa (Area 8) from the Town of Gawler to the City of Playford**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation, noting that council rates will likely reduce for affected residents if transferred to the City of Playford.

Recommendation 11—Portion of Uleybury

It is recommended that the Commission recommend to the Minister for Local Government that it be considered **to accept the proposal to move the proposed portion of Uleybury (Area 9) from the Town of Gawler to the City of Playford**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation, noting that council rates will likely reduce for affected residents if transferred to the City of Playford.

2. Introduction

Scope

The scope of the Inquiry was set by the Commission under:

- the *Local Government Act 1999*
- the Inquiry Plan, on which the Commission consulted the affected councils
- the Commission's Guidelines, in particular 'Guideline 4 - Investigation of General Proposals Initiated by Councils' and 'Guideline 9 - Engagement and Consultation.'

In particular, we note section 31(3)(b) of the Act requires the inquiry to consider the:

- Financial implications and resource impact that the proposal is likely to have on any affected council
- Extent of support for the proposal within the affected community
- Extent of support for the proposal of any affected council
- Impact on the rights and interests of any council employees affected by the proposal.

In our opinion, the Inquiry Plan includes investigation of all of these items. Subsequently, the five areas, or streams, to be investigated during the Inquiry were:

1. Financial matters
2. Land use and planning matters
3. Council employee matters
4. Representation matters
5. Community and service matters.

The scope of BDO's work was focused on the Town of Gawler's Stage 2 proposal and did not seek to investigate other proposals, such as broader council amalgamation or consideration of where the urban boundary is or should be. Where urban growth should occur is determined by the State Government, with the recently released Greater Adelaide Regional Plan outlining priorities for strategic land use development to 2051.

Disclaimer

The assignment is a consulting engagement as outlined in the 'Framework for Assurance Engagements', issued by the *Auditing and Assurances Standards Board*, Section 17. Consulting engagements employ an assurance practitioner's technical skills, education, observations, experiences and knowledge of the consulting process. The consulting process is an analytical process that typically involves some combination of activities relating to objective-setting, fact-finding, definition of problems or opportunities, evaluation of alternatives, development of recommendations including actions, communication of results, and sometimes implementation and follow-up.

The nature and scope of work has been determined by agreement between BDO and the Local Government Boundaries Commission. This consulting engagement does not meet the definition of an assurance engagement as defined in the 'Framework for Assurance Engagements', issued by the *Auditing and Assurances Standards Board*, Section 10.

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Our work has relied upon the accuracy of information provided to us and the validity of the approaches agreed by DIT as detailed within this report. Except as otherwise noted in this report, we have not performed any testing on the information provided to confirm its completeness and accuracy.

Background

The South Australian Local Government Boundaries Commission (the Commission) was established in 2019 under the *Local Government Act 1999* (the Act). The Commission is an independent body that investigates and assesses council boundary change proposals and makes recommendations to the Minister.

In December 2019, the Town of Gawler made a proposal to the Commission to expand its boundaries to include seven areas within the Light Regional Council, The Barossa Council and the City of Playford. The proposal also included to remove two areas from the Town of Gawler and shift them to the City of Playford. The Commission considered the Stage 1 proposal and agreed that the Town of Gawler may progress to a Stage 2 proposal should it wish. In February 2020, the Commission subsequently informed the Town of Gawler and the three affected councils that the Town of Gawler may proceed to a general proposal, a 'Stage 2' proposal.

The Town of Gawler provided a Stage 2 proposal to the Commission in December 2020 and subsequently provided additional information in August 2021. In the Stage 2 proposal, the Town of Gawler proposed boundary changes for the following areas:

1. Concordia Growth Area (currently within The Barossa Council, proposed to move to Town of Gawler)
2. Hewett (currently within Light Regional Council, proposed to move to Town of Gawler)
3. Kalbeeba (two parts), including Springwood growth area and Gawler East (currently within The Barossa Council, proposed to move to Town of Gawler)
4. Gawler Belt (part) (currently within Light Regional Council, proposed to move to Town of Gawler)
5. Evanston Park (part) (currently within City of Playford, proposed to move to Town of Gawler)
6. Reid (part) (currently within Light Regional Council, proposed to move to Town of Gawler)
7. Hillier (part) (currently within City of Playford, proposed to move to Town of Gawler)
8. Bibaringa (part) (currently within Town of Gawler, proposed to move to the City of Playford)
9. Uleybury (part) (currently within Town of Gawler, proposed to move to the City of Playford).

For an overview of potentially impacted areas, see Figure 2.1 Map of Town of Gawler's on page 12 below.

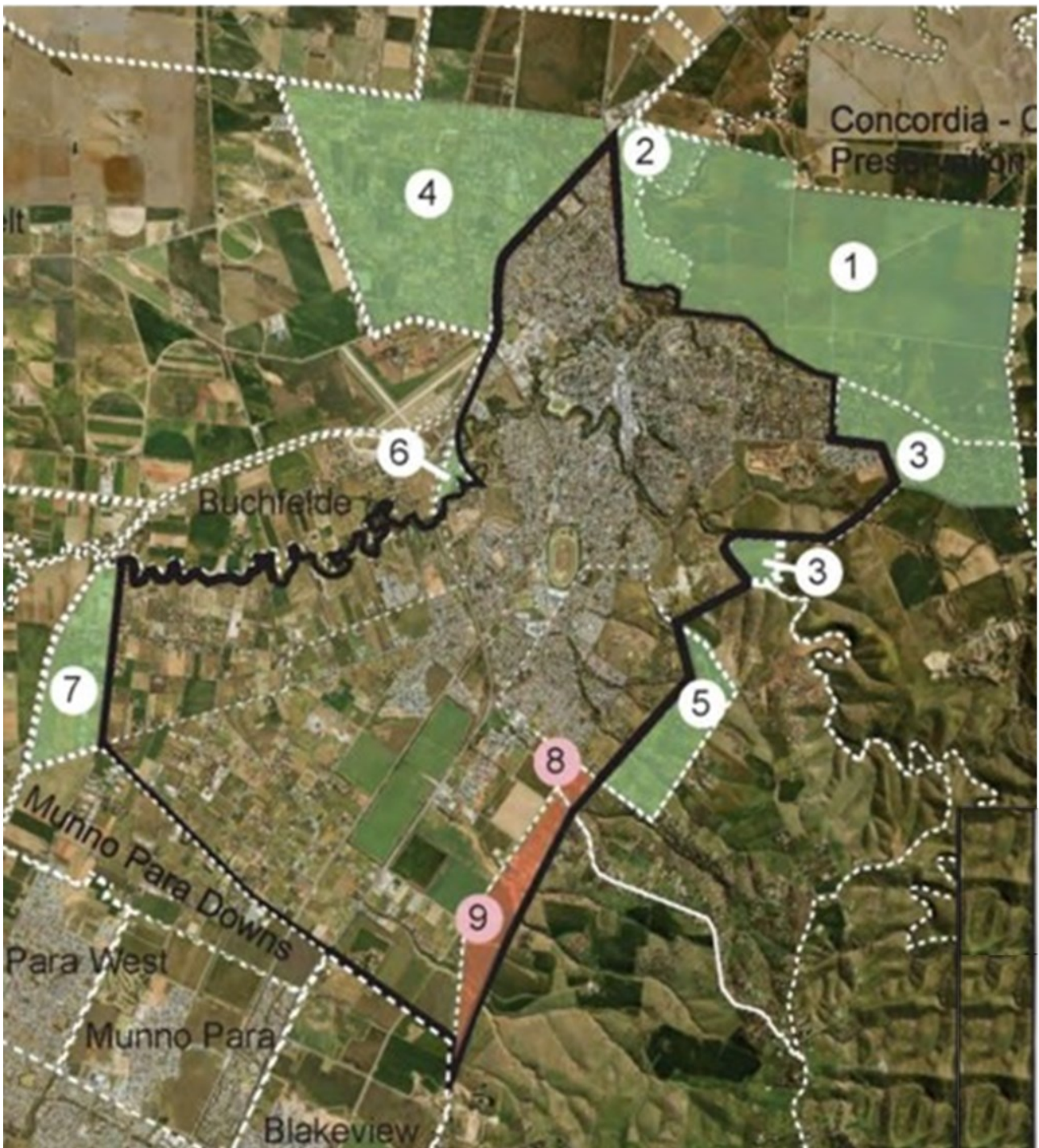
The Commission 'formed the view that the Proposal me[t] the requirements of Guideline 3 and generally aligns with the section 26 principles' and 'determined that an inquiry into the Proposal may proceed in accordance with Section 31 of the Act and [the Commission's] Guideline 4 - *Investigations of General Proposal Initiated by Councils*.'⁶ The Commission also developed a draft outline of matters to be investigated during the inquiry (the inquiry plan) and provided this draft to affected councils for comment.

During 2022, the Commission sought to develop a cost estimate for the inquiry based on the inquiry plan. Under the *Local Government Act 1999*, the Commission may charge the Town of Gawler for reasonable costs incurred for the Inquiry. The Town of Gawler agreed to pay those costs, and the investigation continued to proceed.

We note that local government elections occurred in November 2022. In 2023, the Commission conducted an open tender to appoint an investigator or investigators of the proposal.

In January 2024, BDO was appointed as the independent investigator for the proposal. BDO was tasked seeking information about the potential implications of the proposal, seeking stakeholder feedback, and reporting on its findings and recommendations to the Commission. Those findings and recommendations to the Commission, included in this report, are designed to enable the Commission to make recommendations to the Minister for Local Government on whether the council boundary changes should proceed as proposed, proceed differently than proposed, or should not proceed.

Figure 2.1 Map of Town of Gawler's Proposed Boundary Changes



The Town of Gawler states that boundary reform the Town of Gawler Local Government Area has been discussed by administrations and communities for over a decade.⁷

The subject areas lie within the Outer North Land Supply region and within the planned urban lands to 2045 and includes the future growth area of Concordia (projected 10,000 dwellings). The Outer North region dominates land supply in the Greater Adelaide Region with a projected 58,500 lots, including 14,550 development-ready (zoned for residential, 'but not always ready!').⁸ Between 2017 and 2021, 83% of dwellings in the Outer North region were built in master planned greenfield developments.⁹ Despite the quantity of residential zoned land in the Outer North, including the Roseworthy growth area north of Gawler, market analysis undertaken for the Concordia Growth Area identified a requirement for housing in Concordia from 2022 to meet demand in the region.¹⁰

The Town of Gawler is one of the fastest growing Local Government Areas in South Australia.¹¹ Long considered a centre for regional activities, the historic Town of Gawler provides services and infrastructure (funded by all levels of government) to cater to the wider region, particularly to the north of the town. It is further claimed the township currently provides community and other services for over 100,000 people.¹² The Town of Gawler argues that with new growth areas and future planned urban lands adjoining the boundary, the population to be serviced by the town will increase.

The town's urban structure is guided by the topography including river systems (the North and South Para Rivers meet to form the Gawler River), undulating elevations (north and east) and more level ground to the west and south of the Town.

The Town of Gawler proposed boundary change would increase the existing population governed by the Town of Gawler by a current population of approximately 4,500 people, with additional significant growth from the Concordia Growth Area, estimated to be 20,000-25,000 people over 25 years.

3. Approach

While the scope of the matters to be investigated was defined by the Commission prior to BDO's appointment, as investigator BDO drafted the approach to obtain relevant information on the matters to be investigated. Where appropriate, the Commission and councils were consulted on the approach.

BDO's role as investigator is but one part of the inquiry process. Figure 3.1 Inquiry Process on page 15 provides an overview of the Inquiry Process prior to BDO's appointment, our process as investigator (Stages 1-4 below) and the anticipated steps following this report.

Stage 1: Project Initiation

Following appointment as investigator, BDO focused on creating a strong foundation for an effective investigation. The process commenced with an initial kick-off workshop with the Commission, Commission supporting staff, and BDO representatives to align our understanding of scope, engagement expectations and intended outcomes. We also confirmed reporting arrangements and project governance at this stage, including key contacts at affected councils.

BDO then refined its draft project plan, which incorporated the key tasks and resources required for those tasks and confirmed the project plan with Commission staff.

BDO conducted a desktop review of information available publicly and from the Commission about the Town of Gawler's proposal to understand work to date and to refine the approach for the inquiry. This early work resulted in a draft of information to be requested of councils. Meetings were held with senior staff at each affected council to discuss and refine the initial request for information. The resulting request can be found in Attachment 6.2.

During this stage, BDO began mapping known stakeholders, their interests, and developing a preliminary Stakeholder Engagement Plan. We consulted on the Stakeholder Engagement Plan with the Commission then key staff at affected councils. BDO requested from councils a list of stakeholders they thought should be invited to engage with the investigator.

Throughout the inquiry, BDO staff communicated and consulted with the Commission to:

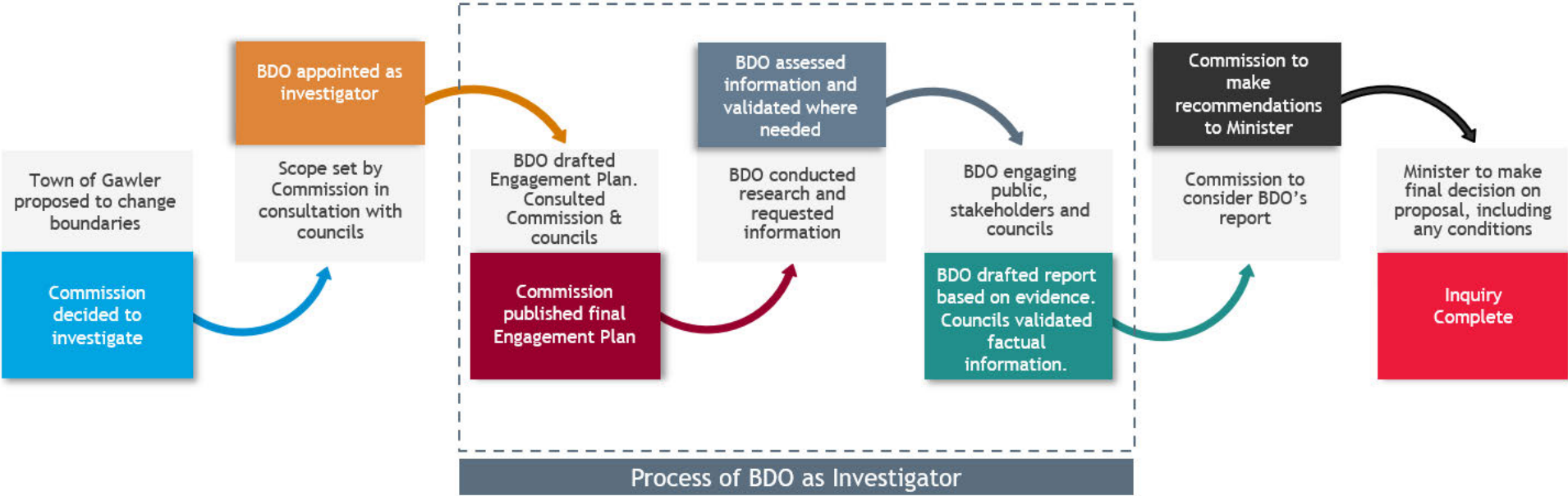
- Develop a common understanding and expectation of the approach and work program to be adopted and the output required
- Identify and communicate relevant issues as they occur
- Share relevant information which may impact on the nature of the tasks that are required
- Develop solutions to support the thoroughness of the inquiry and its objectives.

Stage 2: Research and Assessment of Information

During Stage 2, BDO sought information about the potential implications of the proposal across the defined areas of the inquiry from publicly available information and affected councils, with particular focus on financial matters, land use and planning, council employees and representation matters.

BDO continued to report on progress to the Commission throughout this stage. Updates were made to the project plan where appropriate in consultation with Commission staff. We provide a brief overview of the approach for Stages 2 and 3 by streams below; for more information, please see Attachment 2. Methodologies.

Figure 3.1 Inquiry Process



Financial Matters

In relation to the Financial Matters assessment, the investigation sought to identify and quantify the potential implications and considerations for impacted councils in relation to the following areas:

- Revenues and operating expenses
- Assets and liabilities
- Significant contracts (if relevant)
- Rating policies
- Fees and charges
- Grants
- Property-based services (e.g. community wastewater management systems)
- Service levels.

An initial request for information was sent to councils early in the assessment process based on the anticipated requirements.

A proposed methodology was developed for assessing the detailed financial impacts on different 'service' categories of revenue and operating expenses. This was provided to councils for their review and feedback. The agreed methodology resulted in some additional information being provided by councils. A template was then developed to capture the required information together with a completion guide for councils to ensure consistency of approaches and data. Further details of the assessment methodologies used for the different categories of revenue and operating expenses can be found in Attachment 6.3.1 Financial Methodology.

Throughout the assessment, we liaised with councils to seek clarifications and additional information as required. Although we have made best endeavours to identify any errors or anomalies in the data provided by councils, we have not performed any audit or formal assurance activities on the data and have relied upon the councils providing accurate information.

Due to the complexity of calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

The estimated impact on revenues and operating expenses over the next 10-year period was determined by indexing the calculated impacts using indexation information obtained from councils' Long-Term Financial Plans.

We understand that no determination has yet been made by the Boundary Commission, in relation to any potential compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils. Nevertheless, we note that *Local Government Boundary Reform Board Final Report 1998 - Appendix O* outlined some principles in relation to payments upon the transfer of assets. These are:

1. Balance sheet asset valuations should not be used for calculating financial consideration.
2. The exception to Principle 1 above should be for large infrastructure assets such as community centres or major drainage. In this case existing liabilities should be transferred.
3. Economic valuation using Present Value (PV) techniques are the most appropriate method for calculating financial consideration.
4. The annual net gain to the purchasing Council should be utilised as a basis for calculation.
5. There is no direct link to strategic or business planning time frames (that is, it is a financial issue not a strategic planning issue).
6. Payments made by the purchasing Council per annum should not exceed the annual financial advantage.
7. The Local Government Finance Authority (LGFA) borrowing rate should be utilised as the discount rate in the calculation of the present value amount.
8. The present value calculation term should be within a 7 - 10 year time frame.

While we note the principle of using present value techniques to support valuation of assets, we believe that this may require further consideration of the fact that existing councils (through ratepayer charges or debt funding) may have invested in assets which have an ongoing cost requirement to maintain. The present value approach would imply a negative asset valuation, which we do not consider reasonable.

Draft financial impact assessments were provided to each council for review. The engagement with councils allowed some refinements to be made to the assumptions used. Councils confirmed the reasonableness of the overall results of the financial impact assessments. This validation step did not include the financial assistance grant information subsequently received from the SA Local Government Grants Commission staff. For further information, refer to Attachment 6.3.1.

Please note that the estimated financial impacts for each area are shown as rounded figures to the nearest \$1,000 for each line item.

Land Use and Planning Matters

For planning and land use matters, a desktop review occurred of the relevant planning and land use documentation, as well as relevant documentation provided by councils on their specific planning processes, policies, and development controls. In addition, we requested and reviewed infrastructure deeds and any other agreements that could be impacted by the proposed boundary changes, as well as any other relevant reports or documents about planning, land use or environmental impact provided by the councils.

We note that the Town of Gawler and the potentially impacted areas are within the Greater Adelaide Region, previously guided by *The 30-Year Plan for Greater Adelaide - 2017 update* and the recently released *Greater Adelaide Regional Plan*, which considers land for population growth to 2051. Land use in South Australia is subject to the performance-based Planning and Design Code and State Planning Policies (supported by Design Standards) and governed by the *Planning, Development, and Infrastructure (PDI) Act 2016*. To the extent relevant, this context was considered in the approach to this stream.

We note the Planning and Design Code heralded consistent zones and planning policy across Local Government Areas in South Australia and the Planning, Development, and Infrastructure Act instituted infrastructure provision mechanisms. To amend land use zones in the Planning and Design Code, a Code Amendment must be undertaken and can be lodged by private landowners, the State Planning Commission, a state government agency or Local Government Areas seeking to rezone or change policy over an affected area. Therefore, we note any such changes require consultation before any changes are implemented. For the purposes of this inquiry, we note that this process is not dependent on council boundaries per se.

Council Employee Matters

The potential impact on council employees for each affected area was based on financial information provided by councils. For each cost category, councils were requested to provide a percentage split of the costs between in-house staff, contractors and other costs. The split for in-house staff was applied to the calculated cost impact to determine an in-house staff cost component.

The in-house staff cost component was converted to equivalent full time equivalent staff using average salaries and oncosts based on publicly available information about staff roles and salaries. Enterprise agreements were assessed to understand the differences between employee conditions at relevant councils.

For more detail of the methodology used to assess council employee matters, refer to Attachment 6.3.2.

Community and Service Matters

During Stage 2, desktop research was conducted in regard to community and service matters. BDO considered feedback from the Commission and councils prior to making modifications to the Stakeholder Engagement Plan. The Commission also published the final Stakeholder Engagement Plan.

Representation Matters

We assessed the potential impacts of the proposal on representation matters using:

- Numbers of councillors and number of electors by council from Electoral Commission of South Australia council enrolment data
- The numbers of affected ratable properties for each council overall and by affected area from financial data provided by councils.

Assessment of the impact on representation across the council was conducted. Where there was potential for impact on a ward structure, assessment by ward was also conducted. For more detail on the methodology to assess representation matters, refer to Attachment 2.4.

Stage 3: Stakeholder Engagement

In Stage 3, BDO engaged with stakeholders and the general public in line with the approved Stakeholder Engagement Plan. The purpose of stakeholder engagement was to provide objective information to help stakeholders understand the proposal and to obtain information and feedback.

Engagement opportunities were advertised in *The Bunyip* and the *Barossa Leader* newspapers. BDO emailed 323 stakeholder contacts (identified by BDO and from affected councils) to inform them of all engagement options and invite them to provide a submission, or, in some cases, have an interview.

Council officers were informed, and they noted that collateral, including letters to rate payers, would be prepared for them to distribute. BDO subsequently provided collateral for councils to advise ratepayers and other stakeholders of the inquiry, allow them to seek additional information, and invite input. All councils used this collateral to advertise the engagement to some extent; see Council Communications on page 134.

BDO engaged with stakeholders identified by the Commission, the investigator and councils through:

- a Gawler Boundaries Review YourSay page with information about the proposal
 - The YourSay campaign combined reach totalled more than 100,000 people:
 - more than 71,000 people were informed of the engagement opportunity through an email from YourSay, with 29,000 people opening the email
 - an organic Facebook campaign from YourSay reached more than 10,000 people
 - a paid Facebook campaign reached more than another 10,000 people
 - More than 5,900 people visited the site
- a public call for submissions from the general public and identified stakeholder organisations
 - nine stakeholder organisations provided a submission
 - 70 rate payers and residents provided a submission
- a public survey, primarily for individuals unable or not wishing to attend a public forum or prepare a submission. This survey was available online and in print
 - surveys were received from 446 people
- two in-person public forums and one online public forum
 - Approximately 138 people attended public forums
- engagement sessions with all four elected member bodies, and
- targeted invitations for interview
 - one stakeholder organisation participated in an interview.

From public forum attendees' feedback on 20 August, it was apparent that some councils had not used the collateral as we understood they would. To provide greater opportunity for public engagement, BDO immediately extended the deadline for feedback by a week, as this extension could be managed within the project timeframes approved at that stage.

The Commission subsequently determined to extend the engagement deadline by another three weeks to 30 September. We understand that during the week of 9 September, the Commission also arranged a letterbox drop of a flyer with information about the inquiry and an invitation to provide feedback.

For more detail of the stakeholder engagement methodology, refer to Attachment 6.3.23.

Stage 4: Development of Findings and Recommendations

Following conclusion of the stakeholder engagement phase, BDO considered all inputs to the inquiry, with analysis conducted of new information provided by stakeholders, principally feedback received during the three public forums, the survey, submissions, and additional documents provided by councils.

For submissions, emphasis was placed on a qualitative assessment of the views presented, particularly the stated rationales for the presented views. Quantitative analysis of the survey focused on identifying the extent to which residents of affected area support or oppose the proposal and their rationales, as well as the extent to which they report using services within their own council or in the Town of Gawler. Qualitative analysis was conducted of themes of stated rationales in free-text sections of the survey.

In light of the information received, BDO considered the rationales provided by the Town of Gawler in its proposal documents, as well as any supplemental information about its rationales gained during the investigation. Where appropriate, BDO validated information it had received from stakeholders, or sought additional information. Findings were drafted, with recommendations subsequently drafted and a draft provided for the Commission's initial consideration.

A validation process of information received from councils was subsequently undertaken. The Commission identified sections of the report with factual information from councils and publicly available information. These sections were provided to the Town of Gawler, the Barossa Council, Light Regional Council and the City of Playford to provide any correction of factual information to the investigator, BDO. Feedback was considered and, where appropriate, modifications were made to the draft report and are reflected in this document.

4. Observations

The Barossa Council

The Town of Gawler's proposal proposes moving portions of two localities from The Barossa Council to the Town of Gawler. The two areas in The Barossa Council potentially impacted by the Town of Gawler's proposal are the Concordia Growth Area and two portions of Kalbeeba.

The Barossa Council's vision is 'To create a vibrant and growing community where people support one another and come together to have fun and foster a sense of belonging, community spirit and connection to the Barossa.'¹³ Its stated mission is 'Our mission as shared custodians of the Barossa is to cultivate an identity that celebrates diversity, embraces inclusivity and promotes a prosperous future. We strive to be prepared and take a planned and thoughtful approach to building our future, one that is welcoming to all.' Its values are Pride, Courageous Leadership, Community Spirit, and Inclusiveness.

The Barossa Council has five strategic goals, being:

1. Creating a safe and connected community where people have access to sustainable services and service levels, the infrastructure they need, and feel a sense of belonging.
2. Implementing economic development strategies to support future growth opportunities and a diversified and resilient economy showcasing the Barossa rural and regional character.
3. Supporting a sustainable Barossa.
4. Our places and spaces enhance the liveability, retain rural and regional character and diversity of our communities.
5. We strive to be a leader in regional Local Government and are committed to delivering effective, efficient, and valued services to the community.

The Barossa Council embarked on 'The Big Project' (community infrastructure) in 2017.¹⁴ The Barossa Council's Local Economic Development Plan includes action on advocating for water security, recognising a circular economy, efficient use of utilities, an assessment of network capacity and opportunities for alternate energy sources, and options for affordable, diverse, efficient housing.¹⁵ The Local Economic Development Plan includes a new initiative to 'review ... the role of State Planning Policies, Regional Plan, Design Review Panels and the Planning and Design Code.'¹⁶

Township Urban Design Frameworks (new or review) are proposed and an employment land study to understand population growth, retail and commercial trends, implications for floor space and land across The Barossa Council.¹⁷ A Local Economic Development Plan action is preparing a housing strategy to understand demographic trends, housing needs (including affordability for key workers and Universal Design principles), and township consolidation potential.^{18,19} Another action is ensuring planning for Concordia offers diverse housing types.²⁰

Concordia Growth Area (Area 1)

Area Summary



Properties: 47

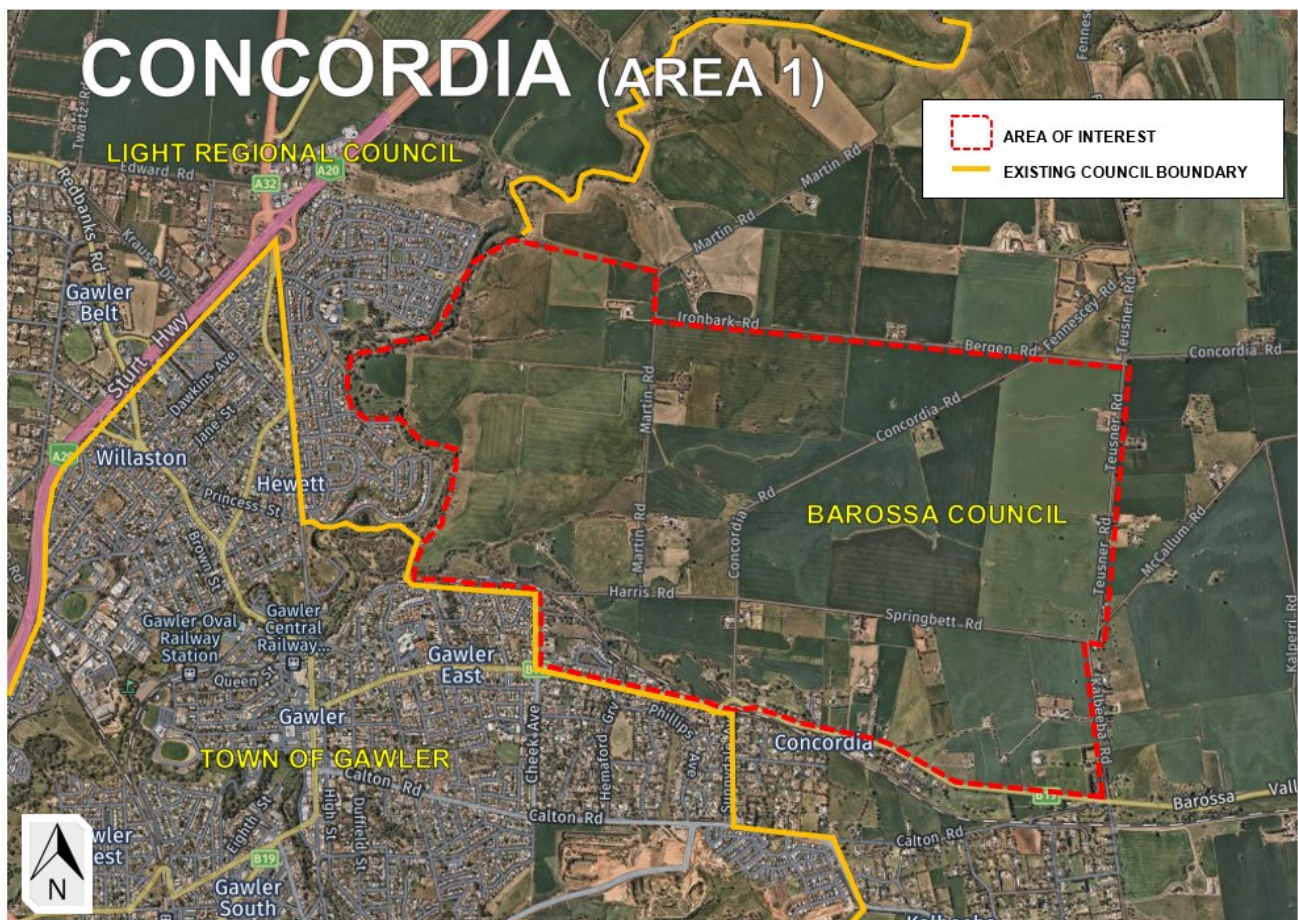


Estimated Residents: 58



Approx Size: 974ha

Figure 4.1 Map of Concordia, Area 1



The Concordia Growth Area is approximately 974ha of land currently zoned Rural and a small section of Rural Living at Kalbeeba. The subject land is adjacent to the Town of Gawler with an estimated capacity to support a projected population of 20,000-25,000 people (10,000 dwellings), currently anticipated over approximately 25 years. Investigations of land supply to northern metropolitan Adelaide and market analysis undertaken for the Concordia Growth Area identified a requirement for housing in Concordia to meet demand in the region.²¹ The investigations concluded that there was a demand for housing in the Concordia area under any of the supply and demand scenarios/assumptions considered.

At 10,000 dwellings, Concordia will be similar to the current number of residential properties in the entirety of the Town of Gawler, as well as that of The Barossa Council. The greenfield master planned area states that it 'will provide a series of villages' and include civil infrastructure, education, recreation, commercial and retail services within easy access to residents.²² Given its size and nature, when fully developed, Concordia will be unique from the existing developments in either council.

The proposal for a Planning and Design Code amendment acknowledges that Concordia is ‘close to existing services’ and that site features and size provide opportunities for cost saving infrastructure provision.²³ We understand significant investigations have been undertaken to develop a structure plan for the growth area, and additional investigations are proposed to support the Code Amendment.²⁴ Zones to be explored include Master Planned Neighbourhood, Local Activity Centre, Suburban Activity Centre, and more, with the existing Rural Living zone to be maintained.²⁵

We understand that the Code amendment process will determine the services and infrastructure required for the increased population and the master planning process will determine where infrastructure will be located. Available information suggests that it is planned for Concordia to support a main village centre as well as two local retail centres.²⁶ We understand that the Code Amendment process ‘will provide a hierarchy of open space from local through to district level’²⁷ a significant, regional intermodal facilities in Concordia will be investigated through the Code Amendment.²⁸

At the closest point, the Concordia Growth Area is 730m from the Gawler township and Gawler Council administrative centre and over 9km from Lyndoch, the closest service centre in The Barossa Council, and 30km from The Barossa Council offices.²⁹ The developers of the Concordia Growth Area claim that it forms a ‘logical, natural and sequential extension to the existing Gawler Township,’³⁰ and the State Government recognises it is ‘a logical urban extension of Adelaide’.³¹

Financial Matters

Concordia Growth Area - Future Development

The figures presented in this report are based upon the existing situation within the area.

We understand that the projected development is to accommodate 10,000 residential and commercial allotments, which will support a population of approximately 20,000-25,000 residents, in this area over a period of circa 25 years.

High level preliminary indicative estimates provided by Barossa Council propose that:

- Once fully developed, the area is expected to generate circa \$45 million per annum in rates and other property-related revenues and a further \$2 million per annum in other income (such as regulatory services and management, grants etc.) for council. At this time, Barossa Council estimates it will incur additional operating costs (incl. depreciation) to support and service the area of circa \$40 million resulting in an annual operating surplus of circa \$7 million
- Over the 25 year period, The Barossa Council expects to invest circa \$170 million in community infrastructure including, recreation parks, a community hub, playgrounds and equipment. Approximately \$27 million of the funding for this investment is expected to come from grants and infrastructure scheme allocations with the balance to be debt funded, with loans repaid from annual operating surpluses.

Maintained Roads and Urban Spaces

The impacted area contains 13.5 kilometres of roads, 12.4 kilometres of which are unsealed. There are no council maintained public spaces within the area.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments which are considered elsewhere in this report
- The revenue impact assessments are based on the current rates and property related charges of each council. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.1 Indicative Annual Financial Impact, Area 1

	Current Council	Proposed Council
	Barossa	Gawler
Rates and Charges	(115,000)	144,000
Other revenue	(7,000)	25,000
Total Revenue	(122,000)	169,000
Regional Landscape Levy	(3,000)	3,000
Open spaces	0	0
Roads and roadside	(12,000)	10,000
Waste Collection	(10,000)	11,000
Facility Operating Costs	0	0
Planning & Admin	(13,000)	12,000
Depreciation	(49,000)	49,000
Total Costs	(87,000)	85,000
Net Impact	(35,000)	84,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, the financial impact would not be significant. Barossa Council would expect a net overall negative impact of circa \$35,000 and the Town of Gawler a net overall benefit of circa \$84,000 for the area concerned.

An indicative Financial Impact Assessment over the next 10 years (excl. Concordia development) and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.2 Comparison of Charges by Council, Area 1

	Council	
	Barossa	Gawler
General Rates - Residential	0.00294	0.0042824
General Rates - Commercial	0.00454	0.01055
General Rates - Industrial	0.00454	0.01055
General Rates - Primary Production	0.00295	0.00428
General Rates - Vacant Land	0.00559	0.00685
General Rates - Other	0.0029400	0.0042824
General Rates - Fixed Charge	420.00	-
Minimum general rates charge		1,139.0
Regional Landscape Levy	0.0001122	0.00011293
Waste Management - Township	200.0	238.0
Waste Management - Rural	200.0	238.0
Waste Management - Commercial	200.0	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories
- Barossa Council has a fixed charge of \$420.00 per rateable property
- Town of Gawler has a minimum general rates charge of \$1,139.00 per rateable property
- The Town of Gawler charges a business development levy on commercial properties.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.3 Total Residential Rates and Levies, Area 1

Capital Value	Council		Difference vs Barossa
	Barossa	Gawler	
100,000	925.22	1,139.00	23.1%
200,000	1,230.44	1,139.00	(7.4%)
300,000	1,535.66	1,556.60	1.4%
400,000	1,840.88	1,996.13	8.4%
500,000	2,146.10	2,435.67	13.5%
600,000	2,451.32	2,875.20	17.3%
700,000	2,756.54	3,314.73	20.2%
800,000	3,061.76	3,754.26	22.6%
900,000	3,366.98	4,193.80	24.6%
1,000,000	3,672.20	4,633.33	26.2%
1,200,000	4,282.64	5,512.40	28.7%
1,400,000	4,893.08	6,391.46	30.6%

Note: over 90% of current rateable values of residential properties are between \$300,000 and \$800,000, and approx. 60% are between \$300,000 and \$500,000

We observe that:

- With the exception of the properties with a capital value around \$200,000, current rates and levies charged by the Town of Gawler are higher than those charged by Barossa Council for similar capital values
- The variance increases with higher capital values mainly due to the diminishing impact of the fixed charge component of the Barossa Council fees.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (e.g. *Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (e.g. use of community facilities)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants). We note:

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Concordia, the impact on these grants is not considered significant.

We understand The Barossa Council received \$399,746 through the Australian Government's Housing Support Program to support the recruitment of three roles 'to increase capacity and capability to deliver the Concordia development'³² We understand this funding is being received in 2024-25 and 2025-26. We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

Beyond the Housing Support Program funding mentioned in 'Grants' above, we are not aware of any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.4 Value of Assets (Land and Infrastructure), Area 1

	Area 1
Name	Concordia
Current Council	Barossa
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	2,618,416
Total Assets - Written Down Value	1,218,350
Total Annual Depreciation	48,633
Land Assets	2,500

Table 4.5 Replacement Costs of Impacted Assets (Excl. Land), Area 1

	Replacement cost
Roads	954,019
Bridges	1,628,641
Kerbs	5,842
Stormwater Drains	29,915
Total	2,618,416
% Total Council Assets	0.5%

The council assets in the area mainly relate to bridges and roads and form an insignificant proportion of total council infrastructure and property assets.

We understand that no determination has yet been made by the Boundary Commission, in relation to any potential compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management System (CWMS) in place in Concordia.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

We understand the current zoning of the area of interest will remain as is if the proposed boundary change were to be approved³³ and will be subject to Code Amendments and community engagement to change. We understand that a proposal for an amendment to the Concordia Growth Area to initiate an amendment to the Planning and Design Code is underway, seeking ‘integrated land use, transport and infrastructure planning.’³⁴ We understand that the Minister has determined that housing demand warrants the release of this land for development and a start date for public consultation is yet to be confirmed.³⁵

We understand that until services and infrastructure are established in the Concordia Growth Area, early residents could utilise the Town of Gawler’s amenities and ‘will have a strong interrelationship with the existing urban areas of Gawler.’³⁶

We also understand in most master planned communities, residential development often precedes provision of some infrastructure, retail, and services. While facilities are intended for the Concordia Growth Area, some early residents may rely on services and infrastructure provided by the Town of Gawler. There is also potential for the Concordia master planned development to take time, thus delaying critical community infrastructure. The Town of Gawler claims that due to unforeseen market health or financial circumstances, there is a risk to the Town of Gawler that it may need to support Concordia residents for decades—or permanently.³⁷

The State Planning Commission recommended the State government lead the Concordia Code Amendment and that infrastructure planning be facilitated through a cross-government approach to infrastructure, which is the intended role of the newly established Housing Infrastructure Planning and Development Unit.³⁸ We understand the State Government is negotiating with local governments, landowners, utility providers and other major parties ‘to ensure appropriate agreements are in place to facilitate coordination, funding, timing and the delivery of critical infrastructure’.³⁹ Further, we understand:

- Funding for infrastructure in the Concordia Growth Area will be equitably shared by state and local governments (i.e. currently The Barossa Council) and the landowner, and an Infrastructure Scheme may be established⁴⁰
- The Concordia Growth Area will include easements from High Pressure Gas Pipelines and buffer distances to be determined⁴¹
- The Area ‘will provide a hierarchy of open space from local through to district level.’⁴² This will be determined in the Code Amendment process and master plan.

We understand the Town of Gawler has invested \$2.4 million and the State Government \$68 million in the provision of Gawler East Link Road to support Springwood and the Concordia Growth Area.⁴³ A potential North-East Connector Road would link Concordia Growth Area via Barossa Valley Way to the Sturt Highway which will alleviate pressure on local Gawler roads.⁴⁴

The Concordia Growth Area is in proximity of the metropolitan Gawler rail line, which will potentially connect the area to the Adelaide CBD and beyond. We understand significant, regional intermodal facilities in Concordia Growth Area will be investigated through the Code Amendment. We understand that the Adelaide Regional Rail Extensions Planning Study is considering metropolitan extensions, including to Concordia,⁴⁵ and that the South Australian Government has committed to preserve a rail corridor has been toward Concordia and Roseworthy.⁴⁶ Further, we note the Town of Gawler states that Gawler station is space-constrained.⁴⁷

Until a connection is provided to Concordia Growth Area, Concordia residents may use the Gawler station, which could impact local roads and parking. Should a station and park and ride facilities operate in the Concordia Growth Area, residents of north Gawler may choose to access (depending on connectivity) the Concordia station, alleviating pressure on the Gawler station and surrounding roads. As noted elsewhere in this report, during consultation we heard existing traffic, particularly within the Gawler township, is a concern to residents; we understand management of traffic is also a concern in the potential impact of rail connections, including that of any level crossings.

Stormwater modelling has been undertaken for the Concordia Growth Area and a range of strategies and techniques including Water Sensitive Urban Design will be utilised to manage flows and prevent flooding.⁴⁸ The Gawler and Surrounds Stormwater Management Plan (SMP) recognises the potential of Water Sensitive Urban Design in the Concordia Growth Area to aid water quality and maintain natural features within the wider catchment.⁴⁹ The developers of the Concordia Growth Area will also need to consider upstream and downstream catchments in the urban design.⁵⁰

A detailed biodiversity assessment of the Concordia Growth Area was undertaken in 2016 in consultation with the Northern and Yorke Landscape Board. Another study created detailed maps of nine native vegetation associations located along the North Para River and Whitelaw Creek with four recommended as key ecological areas to be avoided. The preliminary master plan reflects the biodiversity and ecological findings.⁵¹ Further studies are being undertaken as part of the Code Amendment.

Council Employee Matters

From the financial analysis for the Concordia Growth Area potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on current ongoing employee full time equivalents, approximately 0.2FTE for The Barossa Council, in relation to this area. As noted in 'Grants' on page 25, funding has been made available for fixed-term roles or term-based consultancy in 2024-25 and 2025-26 to increase capacity to support the Concordia development. As these are temporary, grant funded resources, they have not been included in overall employee impact numbers. We also understand that The Barossa Council is undertaking workforce planning assessment to consider the impacts of Concordia and intends to scale up employees based on the timing of development sales.

Community and Service Matters

While the Concordia Growth Area currently has a small population and specific community assets or services were not identified in this area, this potentially affected area is an identified Growth Area and slated for re-zoning. This future development is a key consideration for community and service matters, with the area slated to include civil infrastructure, education, recreation, commercial and retail services within easy access.⁵²

We note that The Barossa Council has previously voiced to the Commission its opposition to ceding the Concordia Growth Area to the Town of Gawler. This was reaffirmed when we consulted with elected members. The principal rationales for this opposition voiced was that the area has a closer alignment with The Barossa Council, that the council's administration has dedicated significant time and resources to the development of Concordia, and that the development of Concordia is a key part of the council's long-term growth strategy. Evidence was presented of council's effort to support the preservation of the character of the region despite the planned growth.

The Barossa Council elected body rejected the rationales presented in the proposal that Concordia residents will disproportionately use or rely on facilities and services within the Town of Gawler; the council argued that Concordia will be its own town within the Barossa. The Barossa Council noted the importance of connecting roads, particularly the bypass for Concordia, and the importance of the state government for transport solutions.

A small number of Concordia residents did attend the public forums, with a theme from those attending suggesting that their perceived community of interest aligned with The Barossa Council. The Curdnatta forum, next to Concordia, had 30 attendees, some of whom were Concordia residents. Another theme was concern about a change in boundaries impacting existing zoning and rural amenity.

Of existing Concordia residents (estimated to be 58 people), six responded to the survey. All were strongly opposed to the proposal that the area move to the Town of Gawler. Of those who indicated they access community groups and social clubs, use recreational and sporting facilities, they report they do so in The Barossa Council. One of five reported they participate in organised sport in the Town of Gawler; the other four report doing so in The Barossa Council. Shopping and retail were split evenly between the Town of Gawler and The Barossa Council. In regard to community of interest, those who responded noted a connection with The Barossa Council. A theme among qualitative comments was maintenance of the current rural lifestyle.

Portions of Kalbeeba (Areas 3A and 3B)

Area Summary



Properties: 159



Estimated Residents: 344



Approx Size: 220ha

Figure 4.2 Map of Kalbeeba, Area 3A

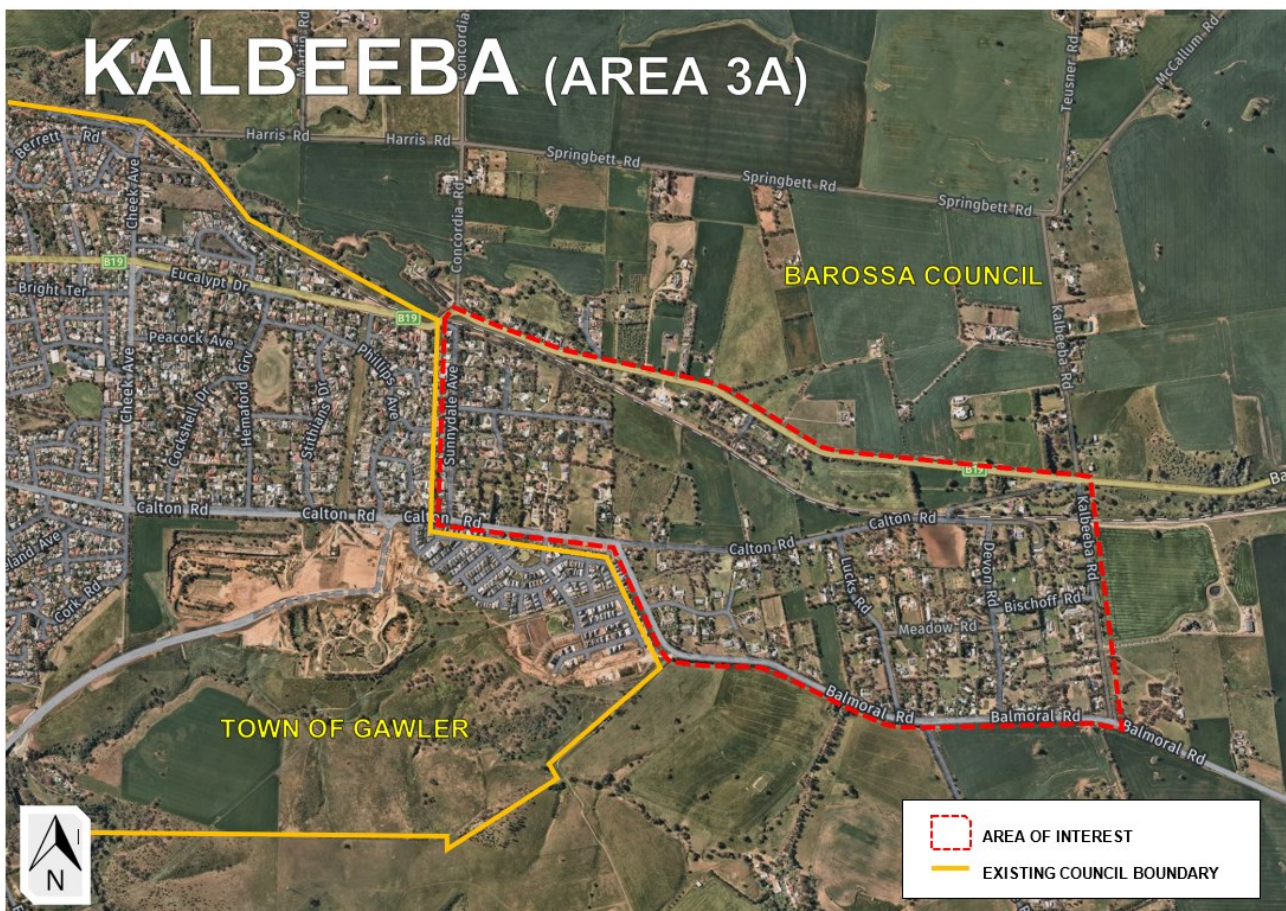
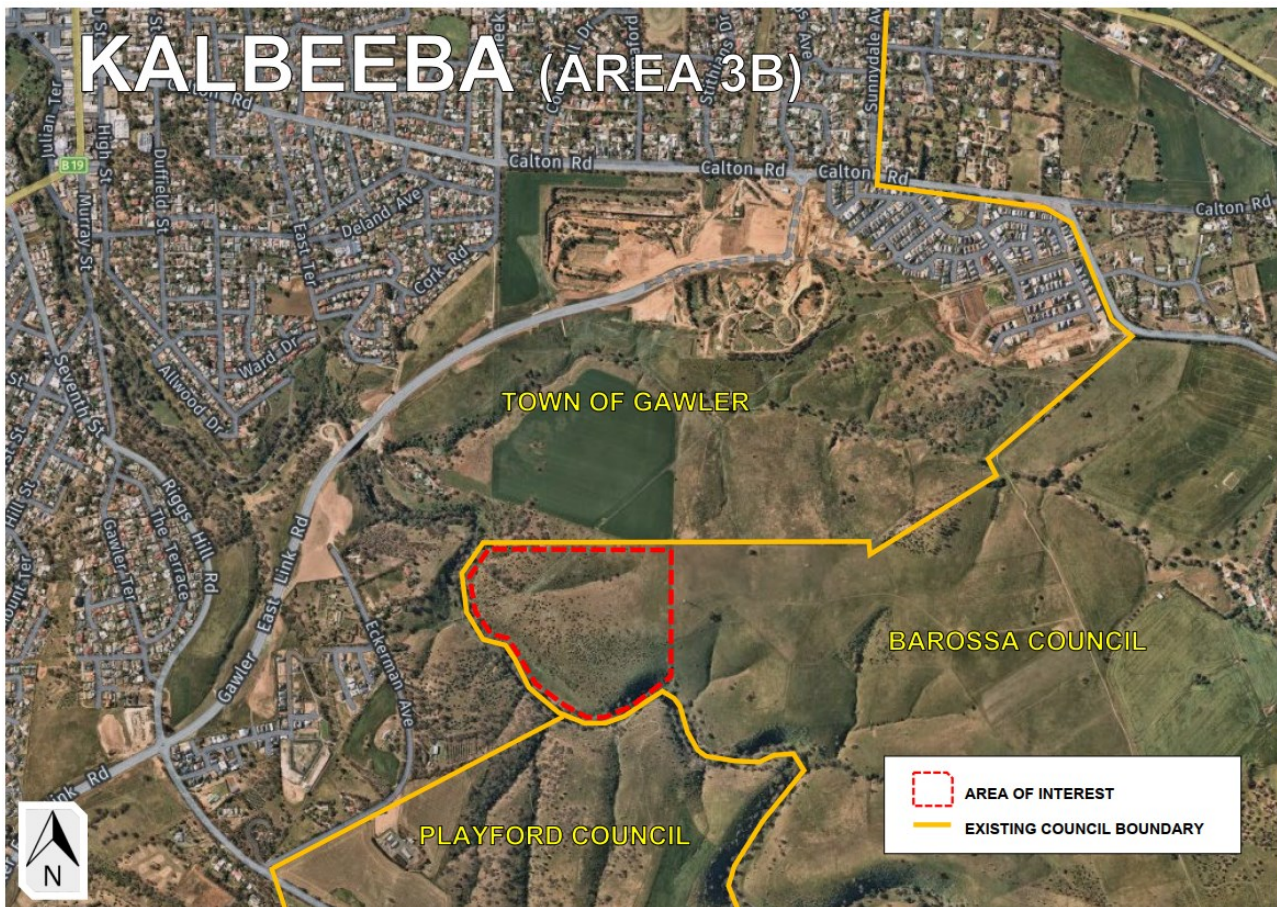


Figure 4.3 Map of Kalbeeba, Area 3B (Springwood Development)



At the closest point, Kalbeeba is less than 3km from the Town of Gawler town and administrative centre, and 25km from The Barossa Council. Kalbeeba is mostly zoned primary production, with two sections zoned rural living and residential but appears vacant. One part of the potentially affected area in Kalbeeba is within the Springwood Development. The Concordia CFS in northeast corner and the area includes part of The Barossa Trail, as well as the Kalbeeba Rail Station Platform.

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 5.5 kilometres of roads, 1.7 kilometres of which are unsealed. There is approximately 36,000 square metres of non-irrigated public spaces maintained by council within the area.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.6 Indicative Annual Financial Impact, Areas 3A and 3B

	Current Council	Proposed Council
	Barossa	Gawler
Rates and Charges	(385,000)	457,000
Other revenue	(9,000)	11,000
Total Revenue	(394,000)	468,000
Regional Landscape Levy	(11,000)	11,000
Open spaces	(10,000)	9,000
Roads and roadside	(15,000)	8,000
Waste Collection	(34,000)	36,000
Facility Operating Costs	0	0
Planning & Admin	(43,000)	38,000
Depreciation	(57,000)	57,000
Total Costs	(170,000)	159,000
Net Impact	(224,000)	309,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Barossa Council would expect a net overall negative impact for the area concerned of circa \$224,000 and the Town of Gawler a net overall benefit of circa \$309,000.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.7 Comparison of Charges by Council, Areas 3A and 3B

	Council	
	Barossa	Gawler
General Rates - Residential	0.00294	0.0042824
General Rates - Commercial	0.00454	0.01055
General Rates - Industrial	0.00454	0.01055
General Rates - Primary Production	0.00295	0.00428
General Rates - Vacant Land	0.00559	0.00685
General Rates - Other	0.0029400	0.0042824
General Rates - Fixed Charge	420.00	-
Minimum general rates charge		1,139.0
Regional Landscape Levy	0.0001122	0.00011293
Waste Management - Township	200.0	238.0
Waste Management - Rural	200.0	238.0
Waste Management - Commercial	200.0	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories
- Barossa Council has a fixed charge of \$420.00 per rateable property
- Town of Gawler has a minimum general rates charge of \$1,139.00 per rateable property
- The Town of Gawler charges a business development levy on commercial properties.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.8 Total Residential Rates and Levies, Areas 3A and 3B

Capital Value	Council		Difference vs Barossa
	Barossa	Gawler	
100,000	925.22	1,139.00	23.1%
200,000	1,230.44	1,139.00	(7.4%)
300,000	1,535.66	1,556.60	1.4%
400,000	1,840.88	1,996.13	8.4%
500,000	2,146.10	2,435.67	13.5%
600,000	2,451.32	2,875.20	17.3%
700,000	2,756.54	3,314.73	20.2%
800,000	3,061.76	3,754.26	22.6%
900,000	3,366.98	4,193.80	24.6%
1,000,000	3,672.20	4,633.33	26.2%
1,200,000	4,282.64	5,512.40	28.7%
1,400,000	4,893.08	6,391.46	30.6%

Note: over 90% of current rateable values of residential properties are between \$500,000 and \$900,000, and approx. 60% are between \$500,000 and \$700,000

We observe that:

- With the exception of the properties with a capital value around \$200,000, current rates and levies charged by the Town of Gawler are higher than those charged by Barossa Council for similar capital values
- The variance increases with higher capital values mainly due to the diminishing impact of the fixed charge component of the Barossa Council fees.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (*e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (*e.g. use of community facilities*)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Kalbeeba, the impact on these grants is not considered significant.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.9 Value of Assets (Land and Infrastructure), Areas 3A and 3B

	Area 3A and 3B
Name	Kalbeeba
Current Council	Barossa
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	4,466,849
Total Assets - Written Down Value	2,726,274
Total Annual Depreciation	57,462
Land Assets	355,900

Table 4.10 Replacement Costs of Impacted Assets (Excl. Land), Areas 3A and 3B

	Replacement cost
Roads	2,776,330
Pathways	648,992
Kerbs	595,346
Stormwater Infrastructure	227,907
Other	218,274
Total	4,466,849
% Total Council Assets	0.9%

The council assets in the area mainly relate to roads, pathways and kerbs and form an insignificant proportion of total council infrastructure and property assets.

We understand that no determination has yet been made by the Local Government Boundaries Commission in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Kalbeeba.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

Most of Kalbeeba is zoned Rural Living (The Barossa Council and part of the Concordia Growth Area) and Rural Neighbourhood (Town of Gawler). To the south an area of interest forms an extension to Gawler East in the Town of Gawler, Springwood a 220ha site zoned Master Planned Neighbourhood. We understand that, upon completion, approximately 2,000-2,500 households will be accommodated.⁵³ In 2017, The Barossa Council supported the transfer of the 15-20% of Springwood within their boundary to the Town of Gawler but not the larger part of the area of interest in Kalbeeba.⁵⁴

The Town of Gawler administration states it considers Kalbeeba residents in planning matters.⁵⁵ We note that other councils state they also consider areas surrounding but not in their administration area in land use decision making. Further, it is claimed that the proximity to the amenities of the Town of Gawler means The Barossa Council has not invested heavily on services and infrastructure for the current residents.⁵⁶ We understand that The Barossa Council's perspective is that, as noted in 'Concordia Growth Area - Future Development' on page 22 above, Barossa Council expects to invest circa \$170 million in community infrastructure over 25 years to support the adjoining Concordia development, with \$27 million expected to come from grants and infrastructure scheme allocations. In regard to infrastructure requirements, we understand the following:

- Meadow Road, Kalbeeba has been allocated \$120,000 in a Barossa Council 2023-24 capital program⁵⁷
- Springwood Development, Calton Road infrastructure upgrade was allocated \$397,000 by the Town of Gawler in 2023-24⁵⁸
- Calton Road to Hameister Court Drainage, Kalbeeba was allocated \$368,740 by The Barossa Council in capital program.⁵⁹

There are some differences in planning policies or development control over the areas of interest between the affected councils. For example, the area of interest at Kalbeeba is zoned Rural Neighbourhood in Town of Gawler and Rural Living in The Barossa Council. Both zones have a desired outcome for housing on large allotments in a rural setting.

To assist the public with planning and development controls, The Barossa Council website provides limited information to assist the public with planning policies and development processes and includes the Kalbeeba West Development Guidelines.⁶⁰

Council Employee Matters

From the financial analysis for the portions of Kalbeeba potentially impacted by the Town of Gawler's proposal, it was determined that there would be a minimal impact on current employee full time equivalents, approximately 0.4 FTE, in relation to these portions. No additional analysis of the potential impact on council employees was conducted for this area.

Community and Service Matters

In terms of infrastructure providing the community services, area 3A includes the Concordia CFS, part of The Barossa Trail, as well as the Kalbeeba Rail Station Platform. Community services were not identified in area 3B.

We understand that The Barossa Council previously proposed transferring the portion of Kalbeeba in Springwood Development (area 3B) to the Town of Gawler. Elected members confirmed their continued support for this transfer when we consulted with them. They stated that they agree with the rationale presented by the Town of Gawler for the transfer of this area.

The Barossa Council is opposed to transferring area 3A to the Town of Gawler. The principal rationales for this opposition voiced was that the area has a closer alignment with The Barossa Council as a community of interest. Elected members voiced that they see Kalbeeba area 3A as connected to area 1, with the same rationales for maintaining this area within The Barossa Council (see page 27).

A number of residents of Kalbeeba (area 3A) attended public forums. The Curdnatta forum, next to Kalbeeba, had 30 attendees, most of whom were from Kalbeeba. There was unanimous opposition to the proposal from these residents, with common themes being identification as members of a Barossa community of interest and concerns of rural living allotments and lifestyle being impacted. There was a strong theme of identifying as part of a rural community.

Of 32 Kalbeeba residents who responded to the survey (from an estimated population of 344), 26 stated they strongly oppose the proposed move to the Town of Gawler and another one said they were somewhat opposed. There were three residents who 'somewhat support' the proposal, one who strongly supported it and one who was neutral. The key theme from feedback was included concerns that boundary realignment would lead to development (subdivided parcels) within Kalbeeba and subsequently negatively impact on the current rural amenity and character.

Barossa Council: Overall Impact

From a strategic perspective, there is nothing in the Barossa Council's Vision, Mission and Values that directly relates to the proposal or that would either contribute or directly conflict with it.

Financial Matters

Table 4.11 Financial Impact Summary, Barossa Council

Area	Total Revenue	Total Operating Expenses	Total Net Budget Impact
1 - Concordia	(122,000)	(87,000)	(35,000)
3 - Kalbeeba	(394,000)	(170,000)	(224,000)
TOTAL	(516,000)	(257,000)	(259,000)

Council Employee Matters

Table 4.12 Barossa Council Overall FTE Impact

		Area 1	Area 3	TOTAL
		Concordia	Kalbeeba	
No. FTE	Open Spaces	0.0	(0.1)	(0.1)
	Roads and Roadside	(0.1)	(0.1)	(0.2)
	Waste Collection	0.0	0.0	0.0
	Sub-total	(0.1)	(0.2)	(0.3)
	Planning	(0.0)	(0.0)	(0.1)
	Administration	(0.1)	(0.2)	(0.3)
	Sub-Total	(0.1)	(0.3)	(0.3)
	Total	(0.2)	(0.4)	(0.6)
	% Total Council FTE	(0.1%)	(0.2%)	(0.3%)

The overall FTE impact on The Barossa Council is immaterial. Note totals may not sum due to rounding.

Community and Services Matters

Most data from the survey and engagement were easily disaggregated by whether respondents were residents of Concordia or Kalbeeba. One item not easily disaggregated was usage of services by council. From the survey, the 54 people who responded as rate payers in The Barossa Council, reported being 1.5x more likely on average to frequently use of recreational and sporting facilities in The Barossa Council compared to another council.

Representation Matters

In total, it is anticipated that The Barossa Council would lose approximately 275 electors of the current 19,395 electors (approximately 1%) should the proposal proceed for both the Concordia Growth Area and the portion of Kalbeeba proposed (see 'Table' below). The potential impact of the proposal on representation matters is therefore not significant. The Barossa Council does not have wards, therefore no analysis by ward area was required.

Table 4.13 Representation Impact, The Barossa Council

	Current	Proposed Change		Total	Change
		Concordia	Kalbeeba		
Councillors (ex-mayor)	11			11	-
Residential Ratable Properties	10,293	(23)	(123)	10,147	146
Electors ¹	19,395	(43)	(232)	19,120	275
Electors per Ratable Property	1.88			1.88	-
Electors per Councillor	1,763			1,738	- 25

¹Electors as at 29 February 2024

Light Regional Council

The proposal includes three areas within Light Regional Council. The Town of Gawler proposes that the entire suburb of Hewett, a portion of Gawler Belt, and a small portion of Reid move from Light Regional Council to the Town of Gawler.

The vision of Light Regional Council is 'Respecting the past, partnering with our community, and sustainably creating our future.'⁶¹ Its mission is 'To be regarded as an exemplary Council that puts the people of Light first, while creating a place that is also welcoming to visitors. Through the services we deliver, we will provide the basis for a community that can grow sustainably, but always within our environmental and financial means.' Its values are:

- Foundation values of respect, honesty, integrity and transparency
- Showing high performance leadership
- Having a constant awareness of the community we serve
- Our need to be viable in financial, environmental and human resources (through core principles of Growth, Community, Innovation and Discipline)
- Striving for quality outcomes
- A focus on achieving positive environmental, social and governance outcomes from Council's activities.

Its strategic goals are:

1. To facilitate population growth within and around the townships capitalising on the existing infrastructure, creating an economic critical mass whilst being mindful of preserving the rural character and heritage within the region.
2. To encourage economic development, tourism and cultural industries, sustainable small business and entrepreneurial initiatives in the area to create prosperity and local employment sources.
3. To maintain and deliver or cause to be delivered through the release of growth areas, the necessary quality physical infrastructure to accommodate a sustainable growing community in partnership with other spheres of government, neighbouring Councils and the private sector.
4. To facilitate, deliver or cause to be delivered the required social infrastructure to effectively service the current and future population of the region.
5. To generate sufficient capital from; rate revenue growth, the strategic use of debt, asset restructuring, Federal & State Government funding, philanthropic funding assistance, private sector infrastructure contributions and quality 'works-in-kind', in order to accommodate and manage the population growth over the next decade.
6. To capitalise on the opportunity to implement more sustainable developments going forward through more efficient use of energy, utilisation of green power alternatives, exploring opportunities associated with carbon trading, storm and wastewater reuse and efficient management of natural resources.

Hewett (Area 2)

Area Summary



Properties: 1,011

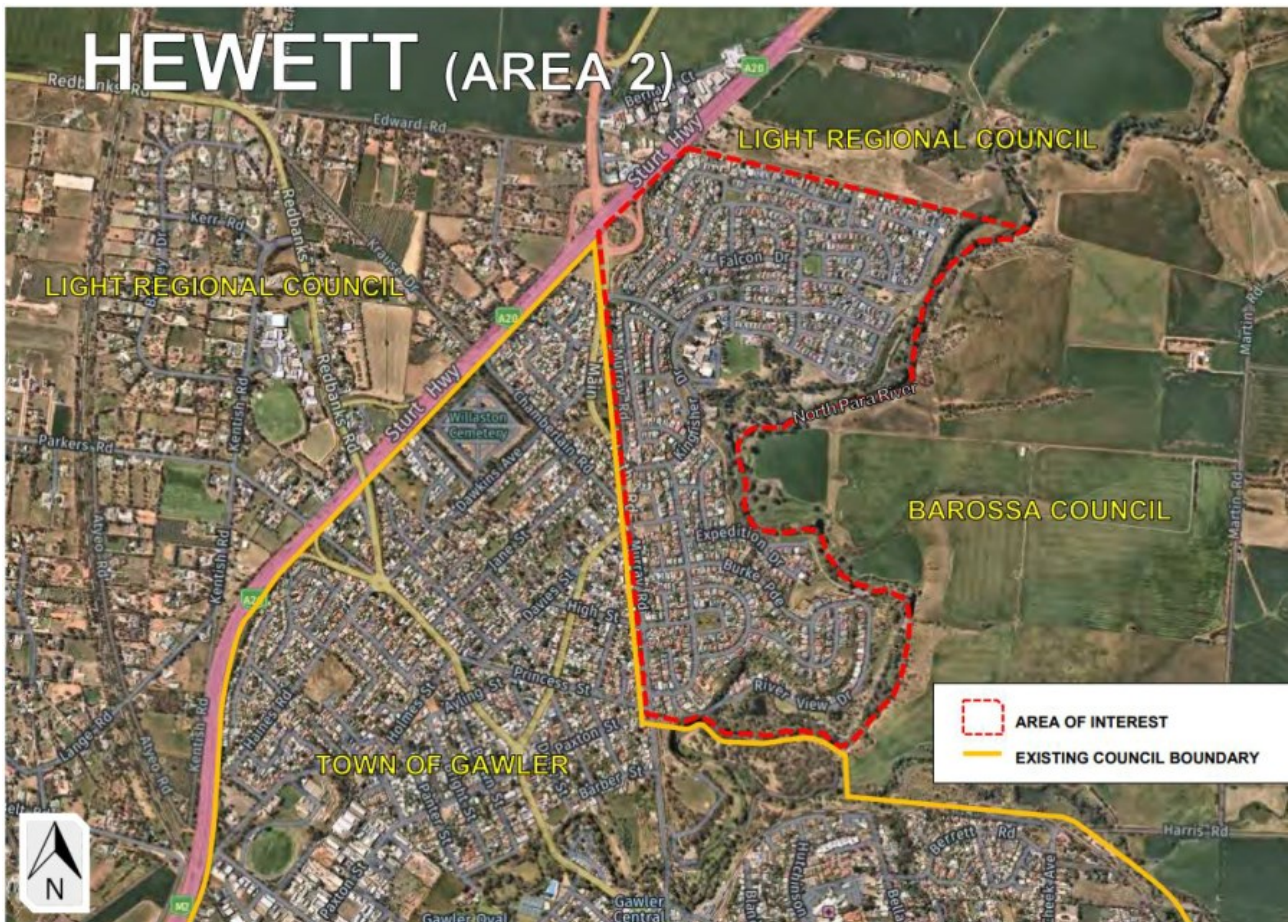


Estimated Residents: 3,133



Approx Size: 165ha

Figure 4.4 Map of Hewett, Area 2



Hewett is an early 2000s, 165ha suburban development.⁶² It is largely residential, with a school, a childcare centre, playgrounds, parks, gardens, and the Hewett Centre Community and Function Centre.

Hewett is currently zoned Neighbourhood and located adjacent the Gawler suburb of Willaston and 2km from the Town of Gawler town and administrative centre. The main administrative centre for Light Regional Council is located 30km from the residents of Hewett, and a satellite office is located 17km away.

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 19 kilometres of roads, 17.4 kilometres of which are lit urban roads, and 1.6 kilometres are unsealed. There is approximately 310,000 square metres of public spaces maintained by council within the area, of which circa 74,000 square metres are irrigated.

The area includes the Hewett Centre a function and community centre containing 4 function rooms able to accommodate up to 300 guests, outdoor space and car parking.⁶³

The area contains a public toilet and playground (Rosella Circuit).

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected area. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.14 Indicative Annual Financial Impact, Area 2

	Current Council	Proposed Council
	Light	Gawler
Rates and Charges	(2,562,000)	2,614,000
Other revenue	(348,000)	300,000
Total Revenue	(2,910,000)	2,914,000
Regional Landscape Levy	(63,000)	61,000
Open spaces	(390,000)	663,000
Roads and roadside	(607,000)	648,000
Waste Collection	(200,000)	243,000
Facility Operating Costs	(315,000)	315,000
Planning & Admin	(152,000)	229,000
Depreciation	(669,000)	669,000
Total Costs	(2,396,000)	2,828,000
Net Impact	(514,000)	86,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, Light Regional Council would expect a net overall negative impact of circa \$514,000 and the Town of Gawler a net overall benefit of circa \$86,000 for the area concerned
- It is noted that according to information provided by Light Regional Council, the Hewett Centre currently makes a negative contribution to the operating result with (circa) \$114K in revenue versus \$280K in operating costs and \$130K in depreciation.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.15 Comparison of Charges by Council, Area 2

	Council	
	Light	Gawler
General Rates - Residential	0.00400	0.0042824
General Rates - Commercial	0.00700	0.01055
General Rates - Industrial	0.00700	0.01055
General Rates - Primary Production	0.00312	0.00428
General Rates - Vacant Land	0.00700	0.00685
General Rates - Other	0.00400	0.0042824
General Rates - Fixed Charge	-	-
Minimum general rates charge	925.0	1,139.0
Regional Landscape Levy	0.00011715	0.00011293
Waste Management - Township	335.0	238.0
Waste Management - Rural	225.0	238.0
Waste Management - Commercial	335.0	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except vacant land
- Light Council has a minimum general rates charge of \$925.00 per rateable property compared to a minimum charge of \$1,139.00 for the Town of Gawler
- The Town of Gawler charges a business development levy on commercial properties
- Light Council has a higher charge than the Town of Gawler for waste management for township and commercial properties, and a lower charge for rural properties.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.16 Total Residential Rates and Levies, Area 2

Capital Value	Council		Difference vs Light
	Light	Gawler	
100,000	925.00	1,139.00	23.1%
200,000	1,048.43	1,139.00	8.6%
300,000	1,460.15	1,556.60	6.6%
400,000	1,871.86	1,996.13	6.6%
500,000	2,283.58	2,435.67	6.7%
600,000	2,695.29	2,875.20	6.7%
700,000	3,107.01	3,314.73	6.7%
800,000	3,518.72	3,754.26	6.7%
900,000	3,930.44	4,193.80	6.7%
1,000,000	4,342.15	4,633.33	6.7%
1,200,000	5,165.58	5,512.40	6.7%
1,400,000	5,989.01	6,391.46	6.7%

Note: over 90% of current rateable values of residential properties are between \$400,000 and \$700,000

We observe that:

- Current rates and levies charged by the Town of Gawler are higher than those charged by Light Council for similar capital values
- Above property values of \$200,000, the difference is circa 6.7% higher.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.)
- Some charges are usage based and not impacted by the user's residence (e.g. use of community facilities)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Hewett, the impact on these grants is estimated to result in circa \$187,000 less revenue for Light Council and circa \$139,000 additional revenue for the Town of Gawler.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.17 Value of Assets (Land and Infrastructure), Area 2

	Area 2
Name	Hewett
Current Council	Light
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	32,647,499
Total Assets - Written Down Value	22,334,800
Total Annual Depreciation	668,778
Land Assets	7,705,017

Table 4.18 Replacement Costs of the Impacted Assets (excl. land), Area 2

	Replacement cost
Hewett Centre	4,860,757
Roads	2,623,889
Pavement & Footpaths	8,319,321
Open Spaces	1,250,686
Bridges	285,536
Kerb gutters	5,111,661
Stormwater Infrastructure	9,474,689
Other	720,959
Total	32,647,499
% Total Council Assets	13.5%

There is a broad range of council assets in the area, including the Hewett Centre. Overall the assets represent a material proportion of total council infrastructure and property assets.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Hewett.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

The Town of Gawler claims it considers Hewett residents in planning matters.⁶⁴ We note that other councils state they also consider surrounding areas in land use decision making. The Town of Gawler argues that Hewett residents rely on services and infrastructure provided by the Town of Gawler,⁶⁵ and it further claims the proximity to the amenities of the Town of Gawler means the Light Regional Council has not invested heavily on services and infrastructure for the current residents.⁶⁶ Light Regional Council claims it provides and maintains roads, open spaces and the Hewitt Centre, and argue they deliver 'exceptional local government services to the Hewett community.'⁶⁷

It is claimed neighbouring councils and developers of growth areas adjacent to the Town of Gawler are considered to have 'assumed' the existing services and infrastructure would absorb and enhance their urban developments.⁶⁸ For approximately 20 years the residents of Hewett, for example, have largely relied on the Town of Gawler for day-to-day activities and requirements.⁶⁹

Infrastructure deeds and easements include the Gawler water reuse scheme (2022 - 2042) and the Hewett rear allotment drain, 3m wide easement on Council owned and maintained land.⁷⁰

Light Regional Council provided, and maintains, some parks, gardens, playgrounds and a community and function centre in Hewett. The Hewett Centre is a popular and well-used community place. It is suggested other services and infrastructure required by residents are mostly sourced from the Gawler town centre.⁷¹ A linear trail along the North Para River through Gawler and Hewett is supported by both Local Government Areas.⁷²

Stormwater infrastructure includes the Hewett Centre rainwater diversion project allocated \$170,000.⁷³

There are some differences in planning policies or development control over the areas of interest between the affected Councils. For example, most of the residential areas in Town of Gawler are zoned General Neighbourhood, whereas the adjacent area of interest, Hewitt, is zoned Neighbourhood. There are similar desired outcomes for both zones with housing located with a range of services and facilities to support convenient day-to-day living.

To assist the public with planning and development controls, Light Regional Council website provides links to the state government PlanSA website. The Light Regional Council is embarking on a township improvement program from 2024-2028.⁷⁴

Council Employee Matters

The following table details the indicative impact on staff should Hewett move from Light Regional Council to the Town of Gawler.

Table 4.19 Indicative Impact on Staff for Light Regional Council, Area 2

		Area 2
		Hewett
No. FTE	Open Spaces	(1.9)
	Roads and Roadside	(1.1)
	Waste Collection	(0.0)
	Sub-total	(3.0)
	Planning	(0.1)
	Administration	(0.7)
	Sub-Total	(0.9)
	Total	(3.9)

The employment conditions of staff in the first three categories (open spaces, roads and roadside and waste collection) are in part provided by enterprise agreements negotiated with the Australian Workers Union (AWU).^{75,76} Planning and administration staff are covered by Officers or Municipal Officers agreements.^{77,78}

Council employee roles potentially impacted by Hewett transferring to the Town of Gawler and the further detail about the relevant differences in conditions between councils' agreements are outlined in Attachments 6.3.2.

Given these findings have been based on desktop analysis and that indications are that approximately 3.9 full-time equivalents would be impacted, should any proposal to transfer Hewett proceed to the next stages, further investigation and consultation would be required.

Community and Service Matters

Community infrastructure and services in Hewett include a school, a childcare centre, playgrounds, parks, gardens, and the Hewett Centre Community and Function Centre.

Light Regional Council has indicated that it opposes a move of Hewett to the Town of Gawler. This opposition was reiterated by elected members when we met with them. The primary rationales voiced for Light Regional Council's position include the investment it has made into Hewett (for example the Hewett Centre). Light Regional Council objects to the Town of Gawler proposed boundary change and argues its long-term viability will be impacted by the reduced rate income from Hewett and Gawler Belt properties.⁷⁹

Based on the survey and public forums, the majority of Hewett residents are opposed to moving councils. Of 139 survey responses from Hewett residents (from an estimated population of 3,133), 125 (90%) were strongly opposed to the proposal and another 8 somewhat opposed. There was some support for the proposal within Hewett, with 4 respondents expressing a strong support and 1 'somewhat support'. During the public forum at Hewett, many (but not all) of the 69 community members present noted they were residents of Hewett and opposed to the proposal. Some of the rationales expressed in the qualitative, free-text included a preference for the elected body of Light Regional Council, questioning the benefit of the proposed change to residents and concerns about rates.

Portion of Gawler Belt (Area 4)

Area Summary



Properties: 360

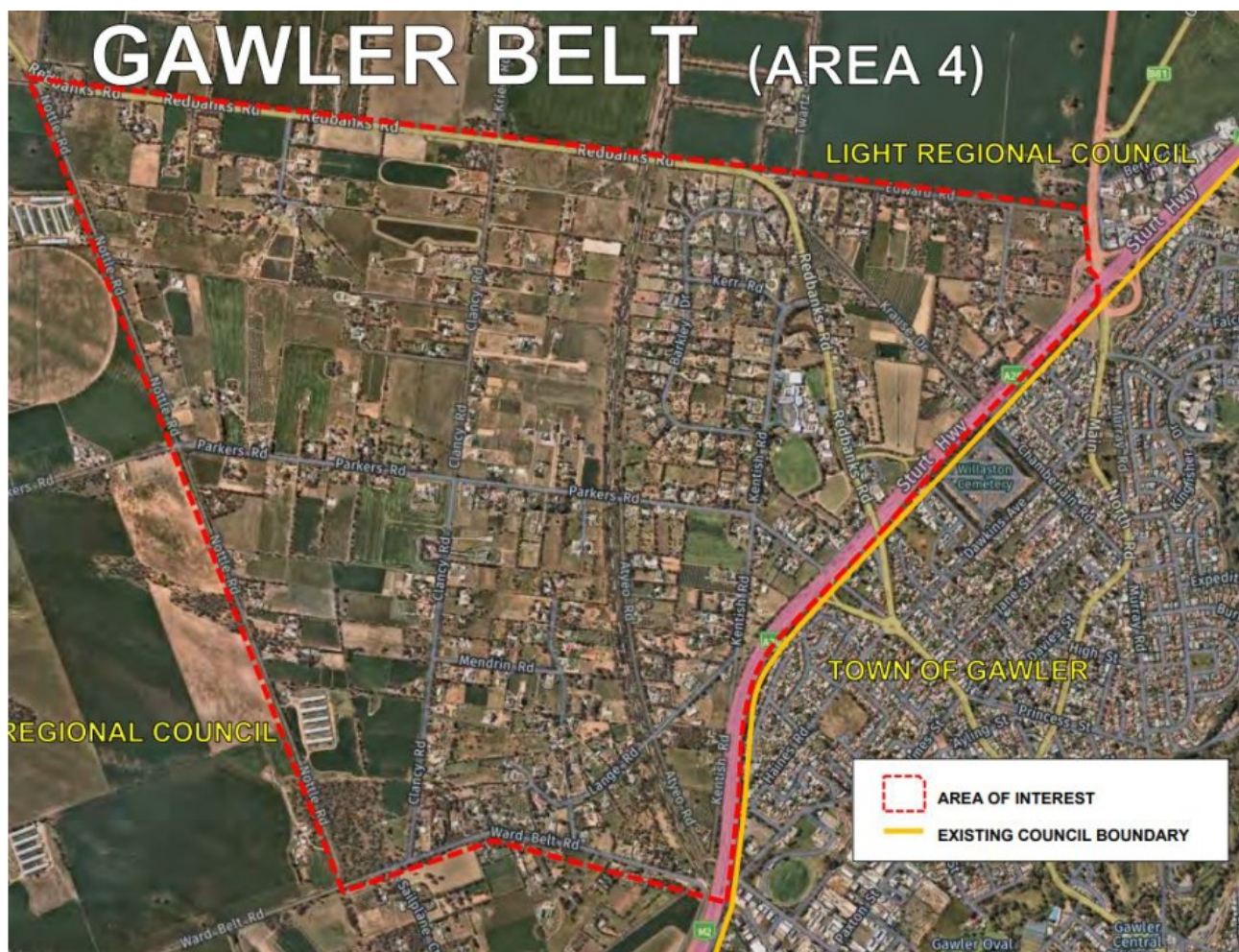


Estimated Residents: 780



Approx Size: 685ha

Figure 4.5 Map of Gawler Belt, Area 4



Gawler Belt is approximately 1,000ha of land zoned rural living. The potentially affected area is approximately 685ha and includes Xavier College, a number of small businesses, and a poultry farm.

To the north of the area is the Roseworthy Master Planned Neighbourhood and rural zones. The land is adjacent to Willaston in the Town of Gawler.⁸⁰ At the closest point, Gawler Belt residents are less than 2km from the Town of Gawler town and administrative centre, and 30km from Light Regional Council principal administration office.⁸¹

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 21.3 kilometres of roads, 15.8 kilometres of which are unlit rural roads, and 5.5 kilometres are unsealed. There are approximately 17,000 square metres of public spaces maintained by council within the area which is non-irrigated.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.20 Indicative Annual Financial Impact, Area 4

	Current Council	Proposed Council
	Light	Gawler
Rates and Charges	(1,097,000)	1,222,000
Other revenue	(30,000)	486,000
Total Revenue	(1,127,000)	1,708,000
Regional Landscape Levy	(30,000)	30,000
Open spaces	(4,000)	4,000
Roads and roadside	(44,000)	32,000
Waste Collection	(71,000)	86,000
Facility Operating Costs	0	0
Planning & Admin	(70,000)	92,000
Depreciation	(203,000)	203,000
Total Costs	(422,000)	447,000
Net Impact	(705,000)	1,261,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Light Regional Council would expect a net overall negative impact of circa \$705,000 and the Town of Gawler a net overall benefit of circa \$1,261,000 for the area concerned.

We note that, should Gawler Belt be transferred from Light Regional Council to the Town of Gawler, the Local Government Grants Commission has calculated that the grant amount that would be received by Town of Gawler is more than the amount of revenue that would be lost by Light Regional Council (reported above within 'Other Revenue'). This data is from the Local Government Grants Commission, which has confirmed its calculations. We understand that complex formulas are applied for the grants and that they consider many factors, including caps and relative rankings, which impact calculations and is reflected in 'Other Revenue' above.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.21 Comparison of Charges by Council, Area 4

	Council	
	Light	Gawler
General Rates - Residential	0.00400	0.0042824
General Rates - Commercial	0.00700	0.01055
General Rates - Industrial	0.00700	0.01055
General Rates - Primary Production	0.00312	0.00428
General Rates - Vacant Land	0.00700	0.00685
General Rates - Other	0.00400	0.0042824
General Rates - Fixed Charge	-	-
Minimum general rates charge	925.0	1,139.0
Regional Landscape Levy	0.00011715	0.00011293
Waste Management - Township	335.0	238.0
Waste Management - Rural	225.0	238.0
Waste Management - Commercial	335.0	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except vacant land
- Light Council has a minimum general rates charge of \$925.00 per rateable property compared to a minimum charge of \$1,139.00 for the Town of Gawler
- The Town of Gawler charges a business development levy on commercial properties
- Light Council has a higher charge than the Town of Gawler for waste management for township and commercial properties, and a lower charge for rural properties.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.22 Total Residential Rates and Levies, Area 4

Capital Value	Council		Difference vs Light
	Light	Gawler	
100,000	925.00	1,139.00	23.1%
200,000	1,048.43	1,139.00	8.6%
300,000	1,460.15	1,556.60	6.6%
400,000	1,871.86	1,996.13	6.6%
500,000	2,283.58	2,435.67	6.7%
600,000	2,695.29	2,875.20	6.7%
700,000	3,107.01	3,314.73	6.7%
800,000	3,518.72	3,754.26	6.7%
900,000	3,930.44	4,193.80	6.7%
1,000,000	4,342.15	4,633.33	6.7%
1,200,000	5,165.58	5,512.40	6.7%
1,400,000	5,989.01	6,391.46	6.7%

Note: over 80% of current rateable values of residential properties are between \$500,000 and \$800,000, and 10.5% are between \$300,000 and \$500,000.

We observe that:

- Current rates and levies charged by the Town of Gawler are higher than those charged by Light Council for similar capital values
- Above property values of \$200,000, the difference is circa 6.7% higher.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (*e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (*e.g. use of community facilities*)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Gawler Belt, the impact on these grants is estimated to be immaterial for Light Council and circa \$460,000 additional revenue for the Town of Gawler.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.23 Value of Assets (Land and Infrastructure), Area 4

	Area 4
Name	Gawler Belt
Current Council	Light
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	8,885,221
Total Assets - Written Down Value	5,944,478
Total Annual Depreciation	203,055
Land Assets	279,071
Assets as % of Council total	3.9%
Annual interest impact (indicative)	8,013

Table 4.24 Replacement Costs of Impacted Assets (Excl. Land), Area 4

	Replacement cost
Roads	2,540,979
Pavement & Footpaths	4,870,235
Kerb gutters	1,058,880
Stormwater Infrastructure	247,778
Other	167,348
Total	8,885,221
% Total council assets	3.7%

The council assets in the area mainly relate to roads, pavements and footpaths and form a small, but not insignificant, proportion of total Light Regional Council infrastructure and property assets.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Gawler Belt.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

The Town of Gawler claims it already considers Gawler Belt residents in planning matters.⁸² We note that other councils state they also consider surrounding areas in land use decision making.

It is claimed there are no public facilities or services provided by the Light Regional Council for their residents as they rely on services and infrastructure provided by the Town of Gawler.⁸³ We understand that within the Light Regional Council, in the St Yves master planned development in the southern section of the Roseworthy township expansion, plans include a new school, sporting facilities, and an 8000m² retail and service centre, which are suggested will provide Gawler Belt residents with options and somewhat alleviate pressure on existing retail, sport, and recreation facilities in the Town of Gawler.⁸⁴

In regard to infrastructure easements, there are 23 land management agreements (e.g. relating to stormwater infrastructure, for example small open channels and land divisions) on land in the Gawler Belt. We understand there is a significant residual flood risk and no structural mitigation measures in place.⁸⁵

To consider the needs of Gawler Belt residents, we understand Light Regional Council has imposed development conditions to ensure the rate and volume of stormwater runoff from Roseworthy will be no higher than current levels.⁸⁶ We understand that Light Regional Council has also been proactive in stormwater management in the Gawler Belt⁸⁷ and will prepare a consolidated SMP for the Roseworthy township and surrounds.⁸⁸ Further, we understand that this area is considered in the Town of Gawler's draft Gawler and Surrounds Stormwater Management Plan.

Council Employee Matters

The following table details the indicative impact on full-time equivalent staff for the Gawler Belt area on the Light Regional Council and Town of Gawler:

Table 4.25 Indicative Impact on Staff for Light Regional Council, Area 4

		Area 4
		Gawler Belt
No. FTE	Open Spaces	(0.0)
	Roads and Roadside	(0.3)
	Waste Collection	(0.0)
	Sub-total	(0.4)
	Planning	(0.2)
	Administration	(0.3)
	Sub-Total	(0.4)
	Total	(0.8)

Note totals may not sum due to rounding.

Council employee roles potentially impacted by Gawler Belt transferring to the Town of Gawler and the further detail about the relevant differences in conditions between councils' agreements are outlined in Attachment 6.3.2.

Given these findings have been based on a desktop analysis and that indications are that approximately 0.8 full-time equivalents would be impacted, should any proposal to transfer Gawler Belt proceed to the next stages, further investigation and consultation would be required. Given the similar nature of a number of considerations for the impact on employee matters for Hewett and Gawler Belt, further information can be found in Light Regional Council: Overall Impact on page 59 below.

Community and Service Matters

In terms of community services, the portion of Gawler Belt includes Xavier College.

Light Regional Council has indicated that it opposes a move of the portion of Gawler Belt to the Town of Gawler. This opposition was reiterated by elected members when we met with them.

From the public survey, 81 residents of Gawler Belt responded, from an estimated population of 780. Of these, 68 strongly opposed and one stated they were somewhat opposed (85%). There was some support voiced for the proposal, with 6 Gawler Belt residents stating they strongly supported the proposal and 4 stating they 'somewhat support' it. Principal concerns from those opposing the proposal were about rate increases, questions about the benefit of change for residents, and a preference for the elected body from those supportive of the proposal, themes included a desire for increased services, particularly infrastructure, roads and waste removal (particularly hard waste and green waste). During the public forum at Hewett, some of the 69 community members present identified as residents of Gawler Belt.

Portion of Reid (Area 6)

Area Summary



Properties: 2

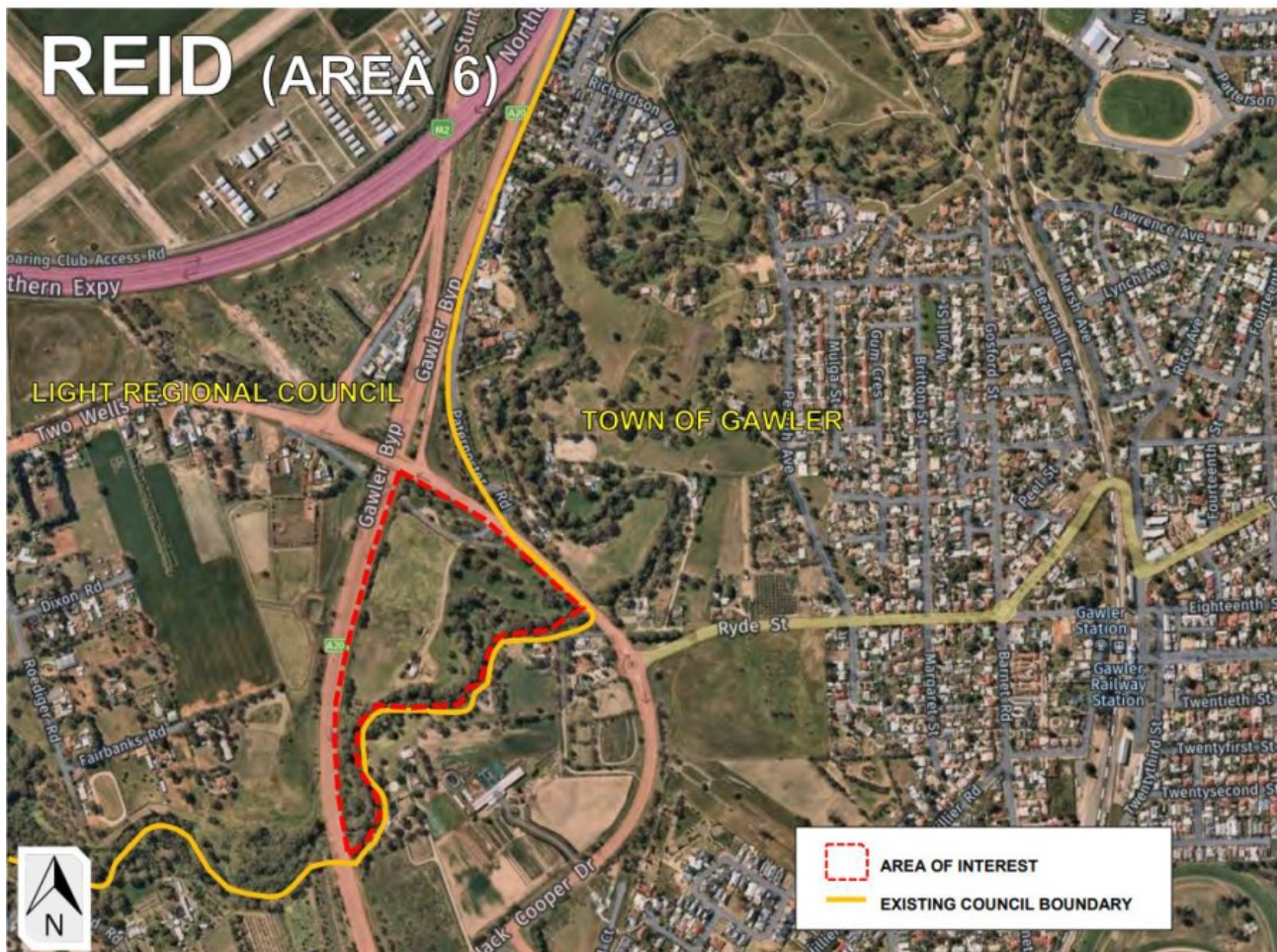


Estimated Residents: 0



Approx Size: 13ha

Figure 4.6 Map of Reid, Area 6



Reid is zoned as rural. At the closest point, the potentially affected portion of Reid is approximately 2km from the Gawler town and administrative centre, and 30km from Light Regional Council principal administration office.⁸⁹

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 200 metres of roads which is currently maintained by the Town of Gawler in agreement with Light Regional Council. There is approximately 12,000 square metres of public spaces maintained by council within the area which is non-irrigated.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.26 Indicative Annual Financial Impact, Area 6

	Current Council	Proposed Council
	Light	Gawler
Rates and Charges	(3,000)	4,000
Other revenue	0	0
Total Revenue	(3,000)	4,000
Regional Landscape Levy	0	0
Open spaces	(3,000)	3,000
Roads and roadside	0	0
Waste Collection	0	0
Facility Operating Costs	0	0
Planning & Admin	0	0
Depreciation	0	0
Total Costs	(3,000)	3,000
Net Impact	0	1,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, the financial impact would be immaterial.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.27 Comparison of Charges by Council, Area 6

	Council	
	Light	Gawler
General Rates - Residential	0.00400	0.0042824
General Rates - Commercial	0.00700	0.01055
General Rates - Industrial	0.00700	0.01055
General Rates - Primary Production	0.00312	0.00428
General Rates - Vacant Land	0.00700	0.00685
General Rates - Other	0.00400	0.0042824
General Rates - Fixed Charge	-	-
Minimum general rates charge	925.0	1,139.0
Regional Landscape Levy	0.00011715	0.00011293
Waste Management - Township	335.0	238.0
Waste Management - Rural	225.0	238.0
Waste Management - Commercial	335.0	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except vacant land
- Light Council has a minimum general rates charge of \$925.00 per rateable property compared to a minimum charge of \$1,139.00 for the Town of Gawler
- The Town of Gawler charges a business development levy on commercial properties
- Light Council has a higher charge than the Town of Gawler for waste management for township and commercial properties, and a lower charge for rural properties.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.28 Total Residential Rates and Levies, Area 6

Capital Value	Council		Difference vs Light
	Light	Gawler	
100,000	925.00	1,139.00	23.1%
200,000	1,048.43	1,139.00	8.6%
300,000	1,460.15	1,556.60	6.6%
400,000	1,871.86	1,996.13	6.6%
500,000	2,283.58	2,435.67	6.7%
600,000	2,695.29	2,875.20	6.7%
700,000	3,107.01	3,314.73	6.7%
800,000	3,518.72	3,754.26	6.7%
900,000	3,930.44	4,193.80	6.7%
1,000,000	4,342.15	4,633.33	6.7%
1,200,000	5,165.58	5,512.40	6.7%
1,400,000	5,989.01	6,391.46	6.7%
1,600,000	6,812.44	7,270.53	6.7%
1,800,000	7,635.87	8,149.59	6.7%
2,000,000	8,459.30	9,028.66	6.7%

We observe that:

- Current rates and levies charged by the Town of Gawler are higher than those charged by Light Council for similar capital values
- Above property values of \$200,000, the difference is circa 6.7% higher.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (*e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (*e.g. use of community facilities*)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Reid, the impact on these grants is estimated to be immaterial.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.29 Value of Assets (Land and Infrastructure), Area 6

	Area 6
Name	Reid
Current Council	Light
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	14,866
Total Assets - Written Down Value	8,427
Total Annual Depreciation	353
Land Assets	8,776

The assets mainly relate to roads and pavements.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Reid.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

A boundary change for the suburb of Reid (to the Gawler Bypass) will impact two properties. It is claimed the change will aid efficiencies in infrastructure maintenance of a local road that traverses Light Regional Council and Town of Gawler.

It is claimed that the Town of Gawler administration already considers residents of Reid in planning matters and as part of the Gawler community.⁹⁰ We note that other councils state they also consider surrounding areas in land use decision making.

We understand historically the Town of Gawler has maintained and upgraded the road on behalf of both Local Government Areas, often funded by landowners, and project managed by the Town of Gawler.⁹¹

Council Employee Matters

From the financial analysis for the portion of Reid potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on employee full time equivalents in relation to this area. Therefore, no additional analysis of the potential impact on council employees was conducted for this area.

Community and Service Matters

No specific community services were identified in the portion of Reid.

Light Regional Council has indicated that it opposes the entirety of the proposal for the three potentially affected areas, including the portion of Reid.

While there are no residents within the portion of Reid, a Reid rate payer responded to the survey. That rate payer indicated they are neutral to the proposal and their main concern was about rates.

Light Regional Council: Overall Impact

From a strategic perspective, there is nothing in Light Regional Council's Vision, Mission and Values that directly relates to the proposal or that would either contribute or directly conflict with it.

Financial Matters

The total impact on Light Regional Council should all proposed realignments in its council area occur would be a loss of \$1,218,000.

Table 4.30 Financial Impact Summary, Light Regional Council

Area	Total Revenue	Total Operating Expenses	Total Net Budget Impact
2 - Hewett	(2,910,000)	(2,396,000)	(514,000)
4 - Gawler Belt	(1,127,000)	(422,000)	(705,000)
6 - Reid	(3,000)	(3,000)	0
TOTAL	(4,040,000)	(2,821,000)	(1,219,000)

Council Employee Matters

The total impact on council employees across Light Regional Council should the proposal proceed for all areas as proposed by the Town of Gawler is 4.7 full-time equivalents (see table below).

Table 4.31 Light Regional Council Overall FTE Impact

		Area 2	Area 4	Area 6	TOTAL
		Hewett	Gawler Belt	Reid	
No. FTE	Open Spaces	(1.9)	(0.0)	(0.0)	(1.9)
	Roads and Roadside	(1.1)	(0.3)	(0.0)	(1.5)
	Waste Collection	(0.0)	(0.0)	0.0	(0.1)
	Sub-total	(3.0)	(0.4)	(0.0)	(3.4)
	Planning	(0.1)	(0.2)	0.0	(0.3)
	Administration	(0.7)	(0.3)	0.0	(1.0)
	Sub-Total	(0.9)	(0.4)	0.0	(1.3)
	Total	(3.9)	(0.8)	(0.0)	(4.7)
	% Total Council FTE	(3.5%)	(0.7%)	(0.0%)	(4.2%)

Given the overall FTE impact on Light Council is not negligible, should the Commission determine to recommend that areas 2 and 4 transfer to the Town of Gawler, it is recommended that potentially impacted roles be more definitely defined through consultation with human resource teams and, as per typical industrial relations practice, that subsequent consultation occur with potentially impacted employees and their representatives about existing conditions and other matters.

We note there are average pay rate differences between the Light Regional Council and the Town of Gawler agreements as of 1 July 2023, partially due to different negotiated annual increases during the life of the agreements. From desktop analysis, we note Town of Gawler staff engaged under an agreement with the AWU are remunerated approximately \$10,000pa on average more than Light Regional Council staff at the same classification. For Municipal Officers, Town of Gawler staff receive on average approximately \$5,000pa more than Light Regional Council staff at the same classification.

In addition to remuneration, we note that each council's enterprise agreement has some conditions that would be attractive and favourable to an impacted employee compared to the other. Further detailed comparative analysis of the AWU and Municipal enterprise agreements in terms of conditions of employment are summarised in Attachment 6.3.2.

Both enterprise agreements of the Light Regional Council have relevant clauses for any employee identified as being directly impacted, including outlining the role of the Enterprise Agreement Bargaining Committee, which is to 'act as the primary forum for consultation between management and employee, including where the introduction of change may result in new positions being created, employees being redeployed, or positions being made redundant'.^{92,93}

In addition, these enterprise agreements require consultation with employees 'who may be significantly affected by the introduction of change' (Clause 15.1 and Clause 14.1) and that 'Council shall consider practical ways of mitigating the adverse effects of the change on employees through discussions involving the employees.' Options may include finding other suitable work, re-training, redundancy or a negotiated Voluntary Separation Package (Clause 15.3 and Clause 14.3). The agreements specifically note that 'change' can include circumstances of amalgamation or boundary reform (Clause 15.4 and Clause 14.4). It should be noted that the agreements state 'there shall be no forced redundancies occurring as a result of any change introduced during the term of the Agreement (Clause 15.5 and Clause 14.5).

BDO also notes that the agreements provide for 'Resource Sharing,' and specifically require that employees be consulted when this is considered (Clause 37).

Community and Services Matters

Most data from the survey and engagement were easily disaggregated by whether respondents were residents of Hewett, Gawler Belt or Reid. One item not easily disaggregated was usage of services by council. From the survey, the 303 people who responded as rate payers in Light Regional Council reported being 3 times more likely to visit community services (e.g. libraries, justice of the peace) in their own council (45%), than to visit The Barossa Council (15%) the Town of Gawler (17%) for these services.

We do note that Light Regional Council residents report using retail facilities in the Town of Gawler slightly more than their own council, with 67% visiting the Town of Gawler at least once a week for retail, compared the 51% who visit The Barossa Council and 60% within their own council.

Representation Matters

In total, it is anticipated that Light Regional Council would lose approximately 2,922 of the current total 11,815 electors (24.7%) should the proposal proceed for all three proposed areas (see Table 4.32 Representation Impact, Light Regional Council below). The impact of the proposed boundary changes is estimated to result in a change in ratio of electors per councillor from 1,313 electors per councillor to 988 electors per councillor. This is a significant change.

Table 4.32 Representation Impact, Light Regional Council

	Current	Proposed Change		Total	Change
		Hewett	Gawler Belt		
Councillors (ex-mayor)	9			9	-
Residential Ratable Properties	5,010	(979)	(260)	3,771	- 1,239
Electors ¹	11,815	(2,309)	(613)	8,893	- 2,922
Electors per Ratable Property	2.36			2.36	-
Electors per Councillor	1,313			988	- 325

¹Electors as at 29 February 2024

Note: No residential properties in Reid

In addition, Light Regional Council has a ward structure. All potentially affected residential properties are within the same ward, Mudla Wirra. Analysis of representation matters by ward shows that the current ward structure would be significantly impacted, with the elector to councillor ratio of Mudla Wirra dropping to 321 electors per councillor, compared to 1,356 electors per councillor for the Dutton ward and 1,235 electors per councillor for the Light ward (see Table 4.33 Representation Impact, Light Regional Council by Ward below).

Table 4.33 Representation Impact, Light Regional Council by Ward

	Current			Proposed Change		Variation from Quota ⁴
	Electors	Councillors	Ratio	Electors	Ratio ³	
Electors--Dutton ²	4,067	3	1,356	4,067	1,356	39.69%
Electors--Light ²	3,706	3	1,235	3,706	1,235	27.32%
Electors--Mudla Wirra ²	3,884	3	1,295	962	321	-67.01%

²Electors as at June 2024

³Ratio based on current number of electors

⁴ Per Electoral Commission Elector Ratio Calculator

We understand that s12(24) of the *Local Government Act 1999* provides an option for the Electoral Commissioner to compel a council to complete an out-of-cycle review if a ward varies from the quota by more than 20%. Should the proposal proceed in its entirety, the impact on ward representation on the Light Regional Council would well exceed this 20%, with variations from quota at -67% and nearly 40%.

City of Playford

The Town of Gawler's proposal would impact the City of Playford in four areas. The Town of Gawler's proposal includes a proposed move of a portion of Evanston Park and a portion of Hillier from City of Playford to the Town of Gawler, and a proposed cession of two areas currently in the Town of Gawler to the City of Playford, being portions of Bibaringa and Uleybury.

The City of Playford's vision is that 'Playford is the City of Opportunity, supporting the community's hopes and aspirations to be vibrant, thriving and sustainable. It provides an enviable lifestyle that is connected, healthy, happy, ambitious and proud, where each individual can take advantage of the many opportunities offered, making the City prosperous, liveable and happy.'⁹⁴ Its values include Innovation, Ethics, Diversity, Partnership, Adaptability, Leadership, Equity, Good Planning, and Sustainability. The City of Playford's strategic goals are:

1. Prosperity, Through: Economic development, Community vitality, and Educating and Skills.
2. Liveability, Through: Connected communities, Sustainable and responsible community, Environmental care, Creating a vibrant CBD for the North, Village lifestyle, and Safe communities.
3. Happiness, Through: Ambitious and Proud, and Healthy living.

Portion of Evanston Park (Area 5)

Area Summary



Properties: 33



Estimated Residents: 78



Approx Size: 140ha

Figure 4.7 Map of Evanston Park, Area 5



Administration of the locality of Evanston Park is divided between the Town of Gawler and the City of Playford, with the council boundary currently dissecting nine properties. The Town of Gawler proposes the whole suburb be included within the Town of Gawler boundary.

At the closest point, the residents of the Evanston Park area of interest are 2.8km from the Gawler town and administrative centre, and 11km from the City of Playford administration office.

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 5.3 kilometre of rural roads. There are no public spaces maintained by council within the area.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.34 Indicative Annual Financial Impact, Area 5

	Current Council	Proposed Council
	Playford	Gawler
Rates and Charges	(66,000)	106,000
Other revenue	5,000	11,000
Total Revenue	(61,000)	117,000
Regional Landscape Levy	(1,000)	3,000
Open spaces	0	0
Roads and roadside	(8,000)	10,000
Waste Collection	(8,000)	8,000
Facility Operating Costs	0	0
Planning & Admin	(5,000)	8,000
Depreciation	(60,000)	60,000
Total Costs	(82,000)	89,000
Net Impact	21,000	28,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, the financial impact would not be significant.

We note that the City of Playford would gain revenue from Financial Assistance Grants should it relinquish the portion of Evanston Park, which is reflected in 'Other Revenue' above. These data are from the Local Government Grants Commission, which has confirmed its calculations. We understand that complex formulas are applied for the grants and that they consider many factors, including caps and relative rankings, which impact calculations.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.35 Comparison of Charges by Council, Area 5

	Council	
	Playford	Gawler
General Rates - Residential	0.00172745	0.0042824
General Rates - Commercial	0.01151509	0.01055
General Rates - Industrial	0.01151509	0.01055
General Rates - Primary Production	0.00172745	0.00428
General Rates - Vacant Land	0.00172745	0.00685
General Rates - Other	0.00172745	0.0042824
General Rates - Fixed Charge	1,111.90	-
Minimum general rates charge	-	1,139.0
Regional Landscape Levy	0.00006264	0.00011293
Waste Management - Township	-	238.0
Waste Management - Rural	-	238.0
Waste Management - Commercial	-	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except Commercial and Industrial
- Playford has a fixed charge of \$1,111.90 per rateable property, the Town of Gawler does not have such a charge
- Town of Gawler has a minimum general rates charge of \$1,139.00 per rateable property, Playford does not have such a minimum charge
- The Town of Gawler charges a business development levy on commercial properties
- Playford does not have a separate charge for waste management.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.36 Total Residential Rates and Levies, Area 5

Capital Value	Council		Difference vs Playford
	Playford	Gawler	
100,000	1,290.91	1,139.00	(11.8%)
200,000	1,469.92	1,139.00	(22.5%)
300,000	1,648.93	1,556.60	(5.6%)
400,000	1,827.94	1,996.13	9.2%
500,000	2,006.95	2,435.67	21.4%
600,000	2,185.95	2,875.20	31.5%
700,000	2,364.96	3,314.73	40.2%
800,000	2,543.97	3,754.26	47.6%
900,000	2,722.98	4,193.80	54.0%
1,000,000	2,901.99	4,633.33	59.7%
1,200,000	3,260.01	5,512.40	69.1%
1,400,000	3,618.03	6,391.46	76.7%

Note: over 80% of current rateable values of residential properties are between \$500,000 and \$800,000

We observe that:

- For property values below \$300,000, Playford has higher charges. Above this band, the Town of Gawler has higher charges, with the differential increasing as the capital value increases.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (*e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (*e.g. use of community facilities*)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach.
- In relation to Evanston Park, the impact on these grants is estimated to be immaterial.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.37 Value of Assets (Land and Infrastructure), Area 5

	Area 5
Name	Evanston Park
Current Council	Playford
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	4,137,084
Total Assets - Written Down Value	1,947,106
Total Annual Depreciation	60,480
Land Assets	-

Table 4.38 Replacement Costs of Impacted Assets (excl. land), Area 5

	Replacement cost
Roads	1,163,443
Pavements	2,801,152
Stormwater Infrastructure	172,489
Total	4,137,084
% Total council assets	0.2%

The council assets in the area mainly relate to roads and pavements and form an insignificant proportion of total council infrastructure and property assets.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Evanston Park.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

Most of Evanston Park is situated in the Town of Gawler and part in the City of Playford, a boundary based on local roads and not property boundaries. The Town of Gawler administration claims it already considers Evanston Park residents part of the Gawler community.⁹⁵ We note that other councils state they also consider surrounding areas in land use decision making.

Nine properties are intercepted by the current boundary and interact with two Councils, for example, properties have two separate land use zones (Hills Face in the City of Playford and Rural Living in Town of Gawler) governing what development can take place. The Town of Gawler suggests the whole suburb be included within a realigned Town of Gawler boundary.⁹⁶

Council Employee Matters

From the financial analysis for the portion of Evanston Park potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on employee full time equivalents in relation to this area. Therefore, no additional analysis of the potential impact on council employees was conducted for this area.

Community and Service Matters

No specific community services were identified within the potentially affected area in Evanston Park.

The City of Playford has not resolved a formal position on the proposal for the move of the portion of Evanston Park to the Town of Gawler.

Ten Evanston Park residents, from an estimated population of 78, responded to the survey, with three expressing opposition to the proposal (two of which appear to be a duplicate response), six expressing support for the proposal and one neutral (expressing a desire for rates to be 'reasonable'). Of those expressing opposition, there was concern about rezoning and therefore reducing the rural living character of the area and concerns about rate increases. Of those expressing support, there were comments that the services and connections they have are within Gawler and that the geography of the area leads to this connection.

Portion of Hillier (Area 7)

Area Summary



Properties: 25



Estimated Residents: 30



Approx Size: 148ha

Figure 4.8 Map of Hillier, Area 7



Administration of the locality of Hillier is divided between the Town of Gawler and the City of Playford. We do not believe the council boundary line to currently dissect any properties. The area of interest is zoned Primary Production within the City of Playford. The Town of Gawler proposes the whole suburb be included within the Town of Gawler boundary.

At the closest point, the potentially affected area is approximately 6.5km from the Gawler town and administrative centre, and approximately 9km from the Playford Civic Centre.

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 5.3 kilometre of rural roads. There are no public spaces maintained by council within the area.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.39 Indicative Annual Financial Impact, Area 7

	Current Council	Proposed Council
	Playford	Gawler
Rates and Charges	(62,000)	97,000
Other revenue	0	2,000
Total Revenue	(62,000)	99,000
Regional Landscape Levy	(1,000)	2,000
Open spaces	0	0
Roads and roadside	(2,000)	2,000
Waste Collection	(7,000)	6,000
Facility Operating Costs	0	0
Planning & Admin	(4,000)	7,000
Depreciation	(13,000)	13,000
Total Costs	(27,000)	30,000
Net Impact	(35,000)	69,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, the financial impact would not be significant.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.40 Comparison of Charges by Council, Area 7

	Council	
	Playford	Gawler
General Rates - Residential	0.00172745	0.0042824
General Rates - Commercial	0.01151509	0.01055
General Rates - Industrial	0.01151509	0.01055
General Rates - Primary Production	0.00172745	0.00428
General Rates - Vacant Land	0.00172745	0.00685
General Rates - Other	0.00172745	0.0042824
General Rates - Fixed Charge	1,111.90	-
Minimum general rates charge	-	1,139.0
Regional Landscape Levy	0.00006264	0.00011293
Waste Management - Township	-	238.0
Waste Management - Rural	-	238.0
Waste Management - Commercial	-	238.0
Business Development Levy (non-town centre)	-	0.0027696

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except Commercial and Industrial
- Playford has a fixed charge of \$1,111.90 per rateable property, the Town of Gawler does not have such a charge
- Town of Gawler has a minimum general rates charge of \$1,139.00 per rateable property, Playford does not have such a minimum charge
- The Town of Gawler charges a business development levy on commercial properties
- Playford does not have a separate charge for waste management.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.41 Total Residential Rates and Levies, Area 7

Capital Value	Council		Difference vs Playford
	Playford	Gawler	
100,000	1,290.91	1,139.00	(11.8%)
200,000	1,469.92	1,139.00	(22.5%)
300,000	1,648.93	1,556.60	(5.6%)
400,000	1,827.94	1,996.13	9.2%
500,000	2,006.95	2,435.67	21.4%
600,000	2,185.95	2,875.20	31.5%
700,000	2,364.96	3,314.73	40.2%
800,000	2,543.97	3,754.26	47.6%
900,000	2,722.98	4,193.80	54.0%
1,000,000	2,901.99	4,633.33	59.7%
1,200,000	3,260.01	5,512.40	69.1%
1,400,000	3,618.03	6,391.46	76.7%

Note: the current rateable values of residential properties in the area are spread between \$400,000 and \$1,500,000, noting that there is only a very small number of residential properties in the area.

We observe that:

- For property values below \$300,000, Playford has higher charges. Above this band, the Town of Gawler has higher charges, with the differential increasing as the capital value increases.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (e.g. *Development Regulations 2008*, *Dog and Cat Management Act 1995*, *Expiation and Offences Act 1996*, *Land & Business (Sale & Conveyancing) Regulations 2010*, *South Australia Public Health (Fees) Regulations 2018* etc.)
- Some charges are usage based and not impacted by the user's residence (e.g. use of community facilities)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Hillier, the impact on these grants is estimated to be immaterial.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.42 Value of Assets (Land and Infrastructure), Area 7

	Area 7
Name	Hillier
Current Council	Playford
Proposed Council	Gawler
Total Assets (excl. land) - Replacement Cost	335,143
Total Assets - Written Down Value	183,081
Total Annual Depreciation	13,218
Land Assets	-

Table 4.43 Replacement Cost of Impacted Assets, Area 7

	Replacement cost
Roads	144,548
Pavements	190,594
Total	335,143
% Total council assets	0.0%

The assets relate to roads and pavements.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Hillier.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

The Town of Gawler administration claim they already consider residents of Hillier part of the Gawler community.⁹⁷ The area of interest is zoned Primary Production within the City of Playford. It is primarily zoned rural in adjacent area in the Town of Gawler.

Council Employee Matters

From the financial analysis for the portion of Hillier potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on council employee full time equivalents (approximately 0.1FTE) for the City of Playford in relation to this area. Therefore, no additional analysis of the potential impact on council employees was conducted for this area.

Community and Service Matters

There is a religious site within the potentially affected area in Hillier. We understand that a sign welcoming people to The City of Playford would need to be shifted should the boundary proposal for this area proceed as proposed.

The City of Playford has not resolved a formal position on the proposal for the move of the portion of Hillier to the Town of Gawler.

As part of the open submission process, some residents of Hillier (estimated at 30 residents from 16 residential properties) provided a 'petition' in opposition to the proposal; see page 234. The petition appears to be from residents of 17 properties, though we note it appears that some individuals may have signed the petition for others. The stated rationales for opposition to the proposal include concerns about development restrictions by the Town of Gawler (which, we note, differs from residents of other areas who appear concerned about the potential for the Town of Gawler to allow additional development than their current council), a negative effect on property values and higher rates.

City of Playford: Overall Impact

From a strategic perspective, the City of Playford states it sees itself as 'creating a vibrant CBD for the North.' This could be seen as not aligning with the rural lifestyle of some of the potentially affected areas.

Financial Matters

Table 4.43 Financial Impact Summary, City of Playford

Area	Total Revenue	Total Operating Expenses	Total Net Budget Impact
5 - Evanston Park	(61,000)	(82,000)	21,000
7 - Hillier	(62,000)	(27,000)	(35,000)
8 - Bibaringa	11,000	14,000	(3,000)
9 - Uleybury	64,000	26,000	38,000
TOTAL	(48,000)	(69,000)	21,000

Council Employee Matters

From the financial analysis for the areas within the City of Playford potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on council employee full time equivalents (approximately 0.1FTE across the council).

Community and Services Matters

Most data from the survey and engagement were easily disaggregated by whether respondents were residents of a specific locality. One item not easily disaggregated was usage of services by council. There were eight residents of the City of Playford who responded to the survey.

Representation Matters

In total, it is anticipated that The City of Playford would lose approximately 44 electors of the current 71,441 electors (approximately 0.1% of electors) should the proposal proceed for all four areas proposed (see Table 4.44 Representation Impact, City of Playford below). The potential impact of the proposal on representation matters for the City of Playford is therefore negligible. Given the negligible change, no impact on ward structures is anticipated.

Table 4.44 Representation Impact, City of Playford

	Current	Proposed Change				Total	Change	
		Evanston Park	Hillier	Bibaringa	Uleybury			
Councillors (ex-mayor)	15					15	-	
Residential Ratable Properties	45,634	(30)	(24)	4	22	45,606	-	28
Electors ¹	71,441	(47)	(38)	6	34	71,397	-	44
Electors per Ratable Property	1.57					1.57	-	
Electors per Councillor	4,763					4,760	-	3

¹Electors as at 29 February 2024

Town of Gawler

In addition to the seven areas proposed to be moved to be within the Town of Gawler, the proposal includes two areas to be moved to the City of Playford, being Bibaringa and Uleybury.

The Town of Gawler's vision is that it 'is a liveable, cohesive, active, innovative and sustainable community.'⁹⁸ Its stated mission is that 'The Town of Gawler is dedicated to enhancing its liveable urban environment, capitalising on its natural beauty and strategic.' Its values are Teamwork, Integrity, Collaboration, Creativity, and Positivity. Its strategic goals are:

1. A uniquely identifiable township
2. Managed and sustainable growth
3. A healthy, active, safe, engaged community
4. To respect, protect and nurture the environment
5. Provide strategic leadership.

Portion of Bibaringa (Area 8)

Area Summary



Properties: 5



Estimated Residents: 11



Approx Size: 16ha

Figure 4.9 Map of Bibaringa, Area 8



Administration of the locality of Bibaringa is divided between the Town of Gawler and the City of Playford, with one property currently in both councils. The Town of Gawler proposes for the entirety of Bibaringa to be within the City of Playford. The portion of Bibaringa potentially impacted is currently zoned as rural.

At the closest point, the potentially affected area is approximately 4.5km from the Gawler town and administrative centre, and approximately 10km from the Playford Civic Centre.

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 740 metres of rural roads. There are no public spaces maintained by council within the area.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.45 Indicative Annual Financial Impact, Area 8

	Current Council	Proposed Council
	Gawler	Playford
Rates and Charges	(16,000)	11,000
Other revenue	0	0
Total Revenue	(16,000)	11,000
Regional Landscape Levy	0	0
Open spaces	0	0
Roads and roadside	(1,000)	1,000
Waste Collection	(1,000)	1,000
Facility Operating Costs	0	0
Planning & Admin	(1,000)	1,000
Depreciation	(11,000)	11,000
Total Costs	(14,000)	14,000
Net Impact	(2,000)	(3,000)

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, the financial impact would not be significant.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found at Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.46 Comparison of Charges by Council, Area 8

	Council	
	Gawler	Playford
General Rates - Residential	0.0042824	0.00172745
General Rates - Commercial	0.01055	0.01151509
General Rates - Industrial	0.01055	0.01151509
General Rates - Primary Production	0.00428	0.00172745
General Rates - Vacant Land	0.00685	0.00172745
General Rates - Other	0.0042824	0.00172745
General Rates - Fixed Charge	-	1,111.90
Minimum general rates charge	1,139.0	-
Regional Landscape Levy	0.00011293	0.00006264
Waste Management - Township	238.0	-
Waste Management - Rural	238.0	-
Waste Management - Commercial	238.0	-
Business Development Levy (non-town centre)	0.0027696	-

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except Commercial and Industrial
- Playford has a fixed charge of \$1,111.90 per rateable property, the Town of Gawler does not have such a charge
- Town of Gawler has a minimum general rates charge of \$1,139.00 per rateable property, Playford does not have such a minimum charge
- The Town of Gawler charges a business development levy on commercial properties
- Playford does not have a separate charge for waste management.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.47 Total Residential Rates and Levies, Area 8

Capital Value	Council		Difference vs Gawler
	Gawler	Playford	
100,000	1,139.00	1,290.91	13.3%
200,000	1,139.00	1,469.92	29.1%
300,000	1,556.60	1,648.93	5.9%
400,000	1,996.13	1,827.94	(8.4%)
500,000	2,435.67	2,006.95	(17.6%)
600,000	2,875.20	2,185.95	(24.0%)
700,000	3,314.73	2,364.96	(28.7%)
800,000	3,754.26	2,543.97	(32.2%)
900,000	4,193.80	2,722.98	(35.1%)
1,000,000	4,633.33	2,901.99	(37.4%)
1,200,000	5,512.40	3,260.01	(40.9%)
1,400,000	6,391.46	3,618.03	(43.4%)

Note: the current rateable values of residential properties in the area are spread between \$400,000 and \$1,300,000, noting that there is only a very small number of residential properties in the area.

We observe that:

- For property values below \$300,000, Playford has higher charges. Above this band, the Town of Gawler has higher charges, with the differential increasing as the capital value increases.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (*e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (*e.g. use of community facilities*)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Bibaringa, the impact on these grants is estimated to be immaterial.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.48 Value of Assets (Land and Infrastructure), Area 8

	Area 8
Name	Bibaringa
Current Council	Gawler
Proposed Council	Playford
Total Assets (excl. land) - Replacement Cost	577,283
Total Assets - Written Down Value	450,623
Total Annual Depreciation	11,081
Land Assets	-

Table 4.49 Replacement Cost of Impacted Assets, Area 8

	Replacement cost
Roads	62,082
Pavements	152,886
Stormwater Infrastructure	362,315
Total	577,283
% Total council assets	0.1%

The assets relate to roads, pavements and stormwater infrastructure.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management Systems (CWMS) in place in Bibaringa.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

Five properties in Bibaringa are within the Town of Gawler boundary. Four are residential, zoned rural, and one is zoned for agriculture. The current boundary alignment intercepts one property in Bibaringa, which interacts with two Local Government Areas. The remainder of the properties in Bibaringa are within the City of Playford and are mostly zoned Hills Face. Due to the difference in zoning, the intercepted property also has two zonings, both rural and hills face.

There are some differences in planning policies or development control over the potentially affected area between the affected councils. The portion of Bibaringa is zoned rural within the Town of Gawler and some properties within the City of Playford are zoned Hills Face and Rural Horticulture.

Council Employee Matters

From the financial analysis for the portion of Bibaringa potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on employee full time equivalents in relation to this area. Therefore, no additional analysis of the potential impact on council employees was conducted for this area.

Community and Service Matters

No specific community services were identified within the potentially affected area in Bibaringa.

The City of Playford has not resolved a formal position on the proposal for the move of the portion of Bibaringa to be within its boundaries.

There are an estimated 11 residents in the portion of Bibaringa in the potentially affected area. Of these residents, two responded to the survey, one somewhat opposed and one strongly supportive of the proposal.

Portion of Uleybury (Area 9)

Area Summary



Properties: 25

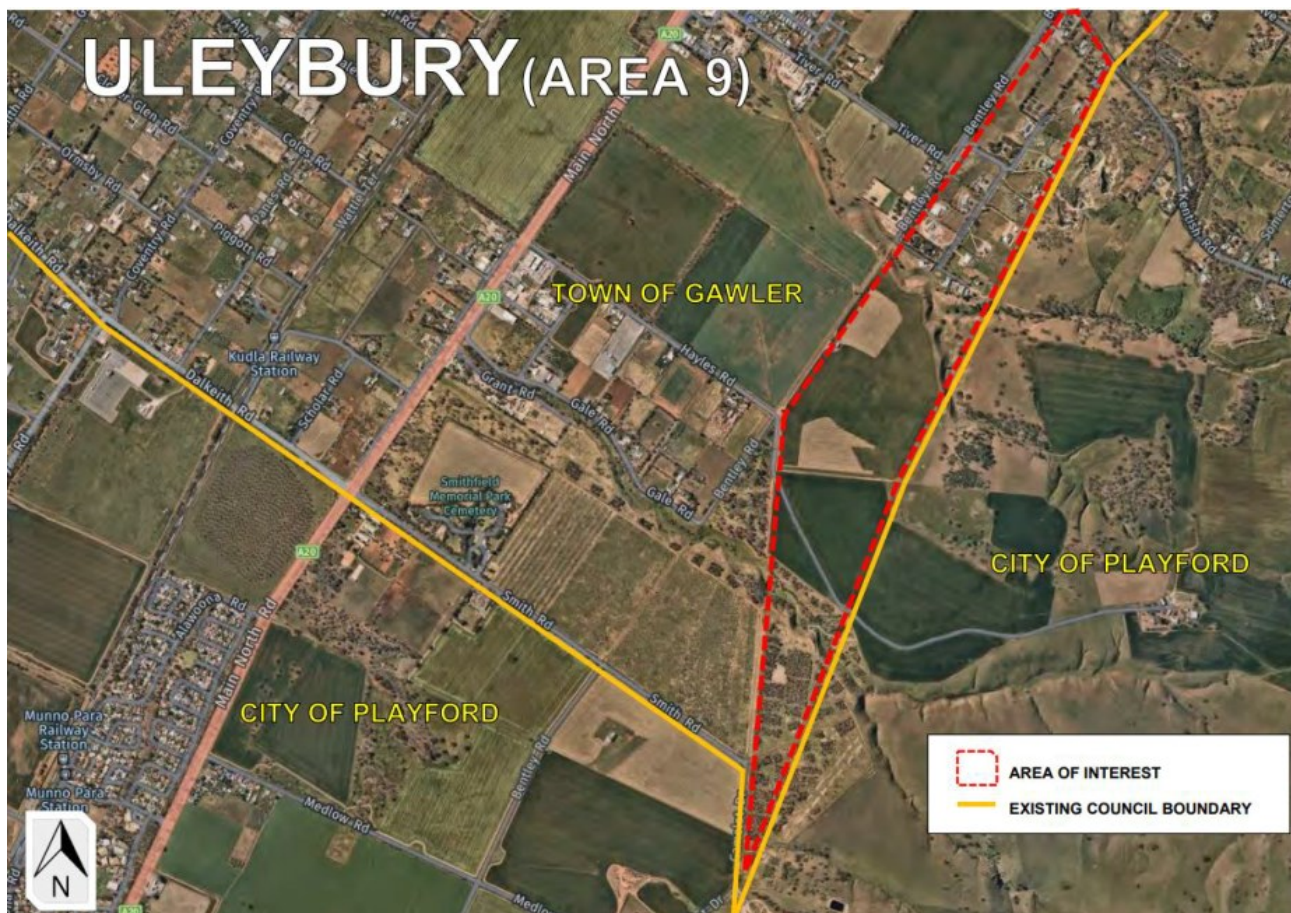


Estimated Residents: 66



Approx Size: 120ha

Figure 4.10 Map of Uleybury, Area 9



Administration of the locality of Uleybury is divided between the Town of Gawler and the City of Playford. The Town of Gawler proposes for the entirety of Uleybury to be within the City of Playford.

At the closest point, the potentially affected area is approximately 5km from the Gawler town and administrative centre, and approximately 7km from the Playford Civic Centre.

Financial Matters

Maintained Roads and Urban Spaces

The impacted area contains 2.2 kilometres of roads of which 0.6 kilometres are unsealed. There is approximately 8,500 square metres of non-irrigated public space maintained by council within the area.

Revenues and Operating Expenses

The following table shows the estimated high-level impact on revenues and operating expenses for each council in the impacted area.

- This is based on the existing scope of properties, facilities and amenities in the potentially affected areas. It does not include impacts arising from future developments
- The revenue impact assessments are based on the current rates and property related charges of each council for the area concerned. The table does not consider whether such charges would change as a result of any boundary realignment.

Table 4.49 Indicative Annual Financial Impact, Area 9

	Current Council	Proposed Council
	Gawler	Playford
Rates and Charges	(92,000)	63,000
Other revenue	(1,000)	1,000
Total Revenue	(93,000)	64,000
Regional Landscape Levy	(2,000)	1,000
Open spaces	(2,000)	2,000
Roads and roadside	(3,000)	3,000
Waste Collection	(6,000)	7,000
Facility Operating Costs	0	0
Planning & Admin	(7,000)	4,000
Depreciation	(15,000)	15,000
Total Costs	(35,000)	32,000
Net Impact	(58,000)	32,000

We observe that, should the boundary be adjusted as proposed, and in relation to the current profile of properties and services in the area:

- Based upon the current profile, the financial impact would not be significant.

An indicative Financial Impact Assessment over the next 10 years and associated assumptions can be found in Attachment 6.4.

Rates and Property Charges

The following table provides a comparison of the rates in the \$ and property-related charges of the impacted councils for financial year 2023-24:

Table 4.50 Comparison of Charges by Council, Area 9

	Council	
	Gawler	Playford
General Rates - Residential	0.0042824	0.00172745
General Rates - Commercial	0.01055	0.01151509
General Rates - Industrial	0.01055	0.01151509
General Rates - Primary Production	0.00428	0.00172745
General Rates - Vacant Land	0.00685	0.00172745
General Rates - Other	0.0042824	0.00172745
General Rates - Fixed Charge	-	1,111.90
Minimum general rates charge	1,139.0	-
Regional Landscape Levy	0.00011293	0.00006264
Waste Management - Township	238.0	-
Waste Management - Rural	238.0	-
Waste Management - Commercial	238.0	-
Business Development Levy (non-town centre)	0.0027696	-

We observe the following key differences in charges and approaches:

- Town of Gawler has a higher rate in the \$ for General Rates across all categories except Commercial and Industrial
- Playford has a fixed charge of \$1,111.90 per rateable property, the Town of Gawler does not have such a charge
- Town of Gawler has a minimum general rates charge of \$1,139.00 per rateable property, Playford does not have such a minimum charge
- The Town of Gawler charges a business development levy on commercial properties
- Playford does not have a separate charge for waste management.

The following table shows the calculated total residential rates and levies that would be charged by the different councils according to different property capital values (based on current rates and levies):

Table 4.51 Total Residential Rates and Levies, Area 9

Capital Value	Council		Difference vs Gawler
	Gawler	Playford	
100,000	1,139.00	1,290.91	13.3%
200,000	1,139.00	1,469.92	29.1%
300,000	1,556.60	1,648.93	5.9%
400,000	1,996.13	1,827.94	(8.4%)
500,000	2,435.67	2,006.95	(17.6%)
600,000	2,875.20	2,185.95	(24.0%)
700,000	3,314.73	2,364.96	(28.7%)
800,000	3,754.26	2,543.97	(32.2%)
900,000	4,193.80	2,722.98	(35.1%)
1,000,000	4,633.33	2,901.99	(37.4%)
1,200,000	5,512.40	3,260.01	(40.9%)
1,400,000	6,391.46	3,618.03	(43.4%)
1,600,000	7,270.53	3,976.04	(45.3%)
1,800,000	8,149.59	4,334.06	(46.8%)
2,000,000	9,028.66	4,692.08	(48.0%)

Note: 75% of current rateable values of residential properties are between \$800,000 and \$1,100,000

We observe that:

- For property values below \$300,000, Playford has higher charges. Above this band, the Town of Gawler has higher charges, with the differential increasing as the capital value increases.

Fees and Charges

Our review of the fees and charges charged by councils concluded the proposed boundary changes would have immaterial impact. This is based on the following observations:

- Many fees and charges are regulated by legislation and therefore consistent across the councils (*e.g. Development Regulations 2008, Dog and Cat Management Act 1995, Expiation and Offences Act 1996, Land & Business (Sale & Conveyancing) Regulations 2010, South Australia Public Health (Fees) Regulations 2018 etc.*)
- Some charges are usage based and not impacted by the user's residence (*e.g. use of community facilities*)
- Annual revenues from other fees and charges are not significant.

Grants

Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants).

- These estimated impacts have been included within the revenue calculations of the financial impact assessments for each area/council (refer Section 'Revenues and Operating Expenses')
- It should be highlighted that these grants are influenced by many variables and caps, including how a council's situation is ranked relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- In relation to Uleybury, the impact on these grants is estimated to be immaterial.

We have not identified any other specific relevant grants directly impacted by the boundary change proposal.

Key Contracts

We have not identified any contracts that would be materially impacted by the proposed boundary changes.

Assets and Liabilities

The following table shows the value of assets (land and infrastructure) located in the impacted areas, together with the associated depreciation charges:

Table 4.52 Value of Assets (Land and Infrastructure), Area 9

	Area 9
Name	Uleybury
Current Council	Gawler
Proposed Council	Playford
Total Assets (excl. land) - Replacement Cost	533,560
Total Assets - Written Down Value	302,943
Total Annual Depreciation	14,788
Land Assets	103,000

Table 4.53 Replacement Cost of Impacted Assets, Area 9

	Replacement cost
Roads	88,650
Pavements	433,860
Stormwater Infrastructure	11,050
Total	533,560
% Total council assets	0.1%

The assets relate to roads, pavements and stormwater infrastructure.

We understand that no determination has yet been made by the Boundary Commission, in relation to any compensation payable for the transfer of assets between councils, should the boundary reform proposal proceed. As such, we have not identified the financial impacts of this on the respective councils.

Property-Based Services

We have not identified any property-based services that would be materially impacted by the proposed boundary changes. We note that there is currently no Community Wastewater Management System (CWMS) in place in Uleybury.

Service Levels

No material differences were identified in council service levels in relation to the impacted area.

Land Use and Planning Matters

Twenty-three properties in Uleybury are zoned Rural and within the Town of Gawler boundary and the remainder of the properties are within the City of Playford and mostly zoned Hills Face. The current alignment intercepts three properties in Uleybury who interact with two Local Government Areas.

There are some differences in planning policies or development control over the potentially affected area between the affected councils. The portion of Uleybury is zoned rural within the Town of Gawler and some properties within the City of Playford are zoned Hills Face and Rural Horticulture.

Council Employee Matters

From the financial analysis for the portion of Uleybury potentially impacted by the Town of Gawler's proposal, it was determined that there would be a negligible impact on employee full time equivalents in relation to this area. Therefore, no additional analysis of the potential impact on council employees was conducted.

Community and Service Matters

No specific community services were identified within the potentially affected area in Uleybury.

The City of Playford has not resolved a formal position on the proposal for the move of the portion of Uleybury to be within its boundaries.

One person at the online public forum had questions about implications of the proposal for Uleybury, suggesting they may be a rate payer in this area; they did not express a position about the proposal during the forum. Five people from Uleybury responded to the survey; this is from an estimated population of 66 in the affected area. Three were opposed to the proposal as they report using services in the Town of Gawler. One supported the change as they noted rates are lower in City of Playford; one was somewhat opposed as they concerned their rates could increase. Per Table 4.51 Total Residential Rates and Levies, Area 9 on page 86, rates would decrease for most residents should the proposal proceed.

Town of Gawler: Overall Impact

Some of the Town of Gawler's stated rationales for its proposal align with its strategic goals, such as sustainable growth and an engaged community. There is nothing within its strategy which specifically conflicts with the proposal.

Financial Matters

Table 4.54 Financial Impact Summary, Town of Gawler

Area	Total Revenue	Total Operating Expenses	Total Net Budget Impact
1 - Concordia	169,000	85,000	84,000
2 - Hewett	2,914,000	2,828,000	86,000
3 - Kalbeeba	468,000	159,000	309,000
4 - Gawler Belt	1,708,000	447,000	1,261,000
5 - Evanston Park	117,000	89,000	28,000
6 - Reid	4,000	3,000	1,000
7 - Hillier	99,000	30,000	69,000
8 - Bibaringa	(16,000)	(14,000)	(2,000)
9 - Uleybury	(93,000)	(33,000)	(58,000)
TOTAL	5,370,000	3,591,000	1,779,000

Land Use and Planning Matters

Stormwater

With a riverine environment, the Town of Gawler has collaborated with Light Regional Council and The Barossa Council to develop the Gawler and Surrounds Stormwater Management Plan (SMP).⁹⁹ The SMP covers the areas of Town of Gawler, Gawler Belt, Gawler East, Kalbeeba, Evanston Park, Bibaringa and Sandy Creek, and includes the Concordia Growth Area and the Springwood development in Gawler East. It notes the health of the aquatic ecosystem within the receiving waters is generally poor, mainly due to human interference.¹⁰⁰ The priority strategies for stormwater management require approximately \$1.2 - \$1.6M per year for a 10-year capital works plan.¹⁰¹ The Town of Gawler will be responsible for implementation of most of the recommendations of the SMP, which is associated with the larger contributing catchment area.¹⁰²

Regardless of the outcome of the boundary review, all local government areas should adopt agreed assumptions to ensure the recommended changes to the Planning and Design Code of the Gawler and Surrounds SMP are implemented, including the protection of ecosystems within rural tributaries.¹⁰³

Stormwater infrastructure includes the Gawler Southern Urban Growth Area proposed harvesting and reuse scheme.¹⁰⁴ Other potential priority stormwater management strategies include:

- Gawler Racecourse flood control basin and wetland
- Trinity Collage upgrades, Evanston Oval dual pipe and Evanston Park flood control basin
- Use of flood mapping data when assessing new development applications
- Undertake an SMP for Roseworthy and surrounds
- Corey Street flood control basin optimisation
- Raingardens and infiltration systems
- Public education to proactively manage potential flood impacts.¹⁰⁵

Environmental Matters

A high-level assessment of terrestrial and aquatic habitats of the tributary watercourses of the North and South Para Rivers noted existing erosion, stock crossing points, areas of weeds (including species of national significance), and small areas of indigenous vegetation of ecological and conservation value to be protected.¹⁰⁶

Regional partnerships include the Gawler River Flood Plain Management Authority which coordinates flood mitigation infrastructure for the Gawler River.¹⁰⁷

The Town of Gawler has a Biodiversity Management Plan 2017-27 to manage ‘high value’ sites, revegetate and ‘enhance.’¹⁰⁸

To assist the public with planning and development controls, the Town of Gawler website provides development, planning and building guidance for the public and land use professionals, including documents produced internally and links to legislation and other state government strategies. Recognising the dwelling and population growth surrounding (Roseworthy, Concordia), and within the Town of Gawler, the Council’s 2023-24 Annual Business Plan includes developing a Growth Framework 2046 and an Integrated Transport Strategy. The plans will identify land use, transport and infrastructure requirements and location to support population growth.¹⁰⁹ The plans will identify all growth areas adjoining the current Town of Gawler boundary.¹¹⁰

Representation Matters

In total, it is anticipated that the Town of Gawler would gain approximately 3,241 additional electors should the proposal proceed for all nine proposed areas (Table 4.55 Representation Impact, Town of Gawler below). The impact of the proposed boundary changes is estimated to result in a change of a ratio of electors per councillor from 2,020 electors per councillor to 2,344 electors per councillor. A change of this magnitude, should it proceed, may warrant consultation with the Electoral Commission of South Australia.

Table 4.55 Representation Impact, Town of Gawler

	Current	Proposed Change			Total	Change
		Barossa	LRC	Playford		
Councillors (ex-mayor)	10				10	-
Residential Ratable Properties	11,100	146	1,239	28	12,513	1,413
Electors ¹	20,200	275	2,922	44	23,441	3,241
Electors per Ratable Property	1.82				1.87	0.05
Electors per Councillor	2,020				2,344	324

¹Electors as at 29 February 2024

The Town of Gawler does not have wards, so no analysis by ward area was required.

Council Employee Matters**Table 4.56 Town of Gawler Overall FTE Impacts**

		Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Area 9	TOTAL ¹
		Concordia	Hewett	Kalbeeba	Gawler Belt	Evanston Park	Reid	Hillier	Bibaringa	Uleybury	
No. FTE	Open Spaces	0.0	3.6	0.0	0.0	0.0	0.0	0.0	0.0	(0.0)	3.6
	Roads and Roadside	0.0	0.9	0.0	0.1	0.0	0.0	0.0	(0.0)	(0.0)	1.2
	Waste Collection	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Sub-total	0.0	4.5	0.1	0.2	0.0	0.0	0.0	(0.0)	(0.0)	4.8
	Planning	0.0	0.1	0.1	0.1	0.0	0.0	0.0	0.0	(0.0)	0.3
	Administration	0.0	0.9	0.1	0.3	0.0	0.0	0.0	(0.0)	(0.0)	1.4
	Sub-Total	0.1	1.0	0.2	0.4	0.0	0.0	0.0	(0.0)	(0.0)	1.7
	Total	0.1	5.5	0.3	0.6	0.1	0.0	0.0	(0.0)	(0.1)	6.5
	% Total Council FTE	0.1%	3.8%	0.2%	0.4%	0.1%	0.0%	0.0%	(0.0%)	(0.0%)	4.6%

The overall FTE impact on Gawler Council is not very significant and is mainly driven by the impact from Area 2 Hewett.

Community and Service Matters

As noted above, The City of Playford has not resolved a formal position on the proposal.

BDO consulted with elected members from the Town of Gawler. From this engagement, we noted that the Town of Gawler council appears to include a variety of views about the proposal and the best options to support the future of the region.

¹ Due to differences in cost structures and efficiency of operations, the FTE impact calculated for the Town of Gawler may vary from the FTE impact calculated for the councils currently governing potentially impacted areas. See Attachments 6.3.1 and 6.3.2 for methodology. Note totals may not sum due to rounding.

There was a common theme from most elected members about concern about development in the region as well as traffic, particularly within the Gawler township. While some council members suggested that most communities have an interdependence with other communities, other council members wished to stress concern that development in the area may not have appropriate infrastructure in the short to medium term and that this may have a disproportionate impact on the Town of Gawler in the meantime. Some elected members voiced that they see the proposed boundary changes as a way for the Town of Gawler to manage (and presumably therefore reduce) the impacts of housing development, particularly Concordia, on the Town of Gawler.

Some residents of the Town of Gawler outside of the affected areas provided feedback to the inquiry through the survey and submissions. Three submissions received from Town of Gawler residents were in support of the proposal, with themes primarily focusing on the community use of Gawler facilities as well as there being a fiscal impact on the Town of Gawler because of this use.

5. Conclusions and Recommendations

Evidence to Support Rationales for Change

Changing council boundaries can be disruptive and costly, impacting both council administration and rate payers. In our opinion, changes to council boundaries should therefore have demonstrated rationales, including evidence of benefits to councils, ratepayers and communities. Our conclusions focus on the extent to which the Town of Gawler's rationales for change as articulated in its proposal have been evidenced during the inquiry. Further, our recommendations for each affected area consider the evidence for the rationales change, as well as the extent to which benefits to councils, ratepayers and communities are evident across the matters investigated, namely:

- Financial matters
- Land use and planning matters
- Council employee matters
- Representation matters
- Community and service matters.

Natural Extensions to Gawler Township

As a larger regional centre, from the evidence reviewed, it is plausible that the Town of Gawler supports a wider catchment than the Local Government Area boundary. Indeed, we note that the Greater Adelaide Regional Plan lists Gawler as a 'District' Centre Type activity centre, a category servicing 'from sub-regional to broader,' meaning by its nature it is not servicing a localised catchment.¹¹¹ Further, we note that the Greater Adelaide Regional Plan includes other growth in other northern areas outside of the potentially impacted areas, including Concordia.

Regardless of council boundaries, Basic Infrastructure Schemes for regional stormwater management, for example, can create community benefit from broader areas. Should they wish to do so, councils are able to work together to reducing differences between zones, land use policy, or streamlining Concept Plans and Overlays (e.g. heritage, flood hazard) through Code Amendment(s), which would, by necessity, include community engagement on any proposed changes.

To fully realise the potential of the living locally concept guiding the draft Greater Adelaide Region Plan, integrated land use, infrastructure and transport requires alignment between local, state and federal governments. The proposed boundary change as it is presented would continue to require involvement from multiple councils in addition to the other tiers of government.

A structure plan for Gawler and surrounds (including Roseworthy) would determine infrastructure needs, sequencing, and contributions, without duplication and ensure environmental matters are enhanced and promoted in design, including Water Sensitive Urban Design. A structure plan would assist integration of existing communities with master planned development to the benefit of established and new communities, and help realise social, cultural, economic, and environmental outcomes.

Use of Services and Infrastructure and Efficiencies

BDO accepts that the delivery of services and provision and maintenance of infrastructure provided by the Town of Gawler and their rate payers is shared, at least to some extent, with a wider regional community and nearby developments.

We note the argument put forth in the proposal that boundary realignment is required to support for equity for Gawler Council rate payers, with the assumption that those paying rates in the Town of Gawler are unfairly burdened by supporting residents of other councils.

The evidence presented during the inquiry of the potential usage of Town of Gawler resources by residents of other councils, and any subsequent financial impact, is not sufficient to suggest that these are compelling rationales for boundary change. We have not been provided evidence of an inequitable use of community infrastructure or services from the Town of Gawler, other councils, stakeholders or ratepayers. During the inquiry, we received limited anecdotal evidence that residents of affected areas, particularly Hewett, Kalbeeba and Gawler Belt, use services within the Town of Gawler. Although requested, councils were not able to provide data on the extent to which non-rate payers use their services. The survey indicated that residents are more likely to use services in their own council, including community services and recreational and sporting facilities. The exception to this was retail services, where respondents reported visiting the Town of Gawler at a similar rate to retail services in their own council.

Further, we note that many of the facilities and services that are supported or managed by council are user-pays (such as swimming pool) and therefore that usage by residents and rate payers outside the Town of Gawler may potentially contribute to that service's viability. In other cases, the service may be infrequently used (for example library services) or there is a very low marginal cost of consumption (for example parks and footpaths). There is nothing within the evidence we have been provided that suggests that there is an undue financial burden on the Town of Gawler or its rate payers due to non-residents using council facilities. As such, the issue of 'undue financial burden' on the Town of Gawler has not in itself been demonstrated as a basis for changing the proposed boundary alignments.

From residents' perspectives, we note that nearly a quarter of survey respondents were concerned that the services they receive from councils would be negatively impacted should the proposal proceed.

We acknowledge the Town of Gawler's argument that the proposed boundary change would create greater efficiencies through economies of scale through one entity servicing a larger area. For the purposes of this inquiry, an amalgamation was not what is proposed, so potential duplication (if that is the case) would continue to exist through maintenance of four councils.

In the case of amalgamations, we suggest an argument about economies of scale is well worth consideration. BDO understands that the concept of amalgamation or other significant boundary change has been discussed at various stages in the region's history. As trajectories of residential growth in the region become clearer, there may be value in further consideration of alternative proposals, such as amalgamation. We stress that amalgamation was not within the scope of the assessment conducted to date and that thorough consideration of a number of factors would be required.

Representation in Local Decision-Making

In its proposal, the Town of Gawler lists as a rationale for boundary change that residents in the adjacent areas should have representation in local decision making as the use the Town of Gawler's services and infrastructure.

We accept that, to some extent, areas neighbouring the Town of Gawler may use council-associated facilities without, or with minor, input to decision making. Further, we note the rationale put forth by the Town of Gawler that boundary realignment could provide residents with better representation in local decision making and community engagement processes on matters affecting them. Using current council engagement processes, Hewett residents and future Concordia residents may not be included in Town of Gawler community engagement processes and decision making, and vice versa, Gawler residents may not have representation during community engagement processes in Concordia on issues that may affect them. We also note that a desire for representation in Town of Gawler local decision-making was not expressed by potentially impacted residents.

Communities of Interest

The principles for consideration of boundary proposals within the Act include that '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.'

We note that community engagement within a Local Government Area boundary, such as that of the Town of Gawler, may not reflect wider ‘communities of interest’. The Town of Gawler’s proposal argues that its proposed changes will support boundaries better reflecting existing communities of interest.

There was insufficient evidence of existing council boundaries not reflecting residents’ and rate payers’ community of interests. When asked about their own community of interest, defined as where ‘people feel a connection with a group of people or an area’ through the survey, more than half of the 205 respondents who answered that question (57%) reported feeling their community of interest relevant to the inquiry is their locality or suburb. Of those who indicated a place-based community of interest, there were few respondents who indicated they felt their community did not align to their current locality. The second most common community mentioned was a club, with 14% of respondents stating their community of interest is a club, primarily sporting clubs. A small portion of respondents, 6%, indicated they saw their religious community as their primary community of interest. There was no mention of identification of being part of an economic community of interest in the survey, though some consultation session participants noted that they work outside their council, for example in the Adelaide CBD.

During the consultation sessions, we also received anecdotal evidence from some participants about choosing to shop, access services and participate in community life in a town or locality in their council of residence as opposed to traveling to the Gawler township, even if this required travelling a further distance. Frequently mentioned anecdotal rationales included that they identified as a member of that town/locality and due to traffic and parking in the Gawler township.

Properties in Multiple Councils

The Town of Gawler’s proposal notes that there are localities under the administration of multiple councils, and in some cases, individual properties divided by council boundaries. We do not see a compelling reason for a locality or a suburb to be located in one council boundary, as that suburb boundary could also be changed. Nonetheless, where it is possible and practicable, it is, in our opinion, strongly preferable for an individual property to not be dissected by a council boundary. Where possible, rate payers for an individual property should not be subject to paying multiple sets of rates.

Other Considerations

As stated above, it is outside of the scope of this inquiry to consider where the Adelaide metropolitan urban boundary should be.

Zoning and Growth

A number of stakeholders and others who provided evidence to the inquiry have suggested that the boundary changes would lead to changes to zoning, increasing the density of housing and reducing rural-living conditions, such as environmental and waste management practices. Concerns about residential growth were a key rationale for opposition to the proposal for a number of residents, with 33 survey respondents mentioning this as a driver for their opposition to the proposal. There is an apparent concern that the proposed boundary changes are, in essence, a means to change zoning of rural living areas.

Firstly, we note that a change in zoning is not directly related to council boundaries. Secondly, through the investigation, we have not seen any evidence of plans for future growth, either presented formally or through consultation with councils, that is not already in the public realm. There has been no suggestion of a desire by any parties to change existing zoning beyond what is planned.

On the contrary, there is ample evidence of significant, approved growth for areas in Light Regional Council and The Barossa Council, particularly around Roseworthy and within Concordia. It should be noted that this growth (and associated plans for rezoning) is in many senses already underway. Indeed, evidence was presented from some ratepayers during the public forums of changes over the years in ‘rural living’ lifestyle.

We also note the planned residential developments in the region will have an impact on existing residents, particularly in Light Regional Council, The Barossa Council and to some extent those within the Town of Gawler. We have sought evidence to consider whether one council or another is clearly more aligned and resourced to meet unique development and land use policy and management needs of an area. We understand The Barossa Council, and to a lesser extent Light Regional Council, are seeking to prepare for significant growth within existing boundaries, for example by ramping up internal capacity, with The Barossa Council recently funded to recruit three staff members (a senior strategic planner, a senior policy officer and a development engineer) to support housing growth.

Well-managed clustering around a large established town, particularly well-timed regional traffic solutions to support growth areas, will be critical to the success of new developments in the greater Gawler area, particularly Concordia. We accept in good faith the Town of Gawler's argument that its proposal seeks to support appropriate management of this growth as genuine and well-intentioned. We also accept that the Gawler township could be disproportionately, negatively impacted by increased traffic, at least in the interim, should the Concordia development proceed in any significant way without an appropriate bypass.

From the evidence presented, we accept that residents' and councils' desire for appropriate management of growth are not only genuine but also valid and worthy of consideration and response. Nonetheless, no evidence has been presented that the proposed changes in council boundaries will in any meaningful way improve or even change the management of planned residential growth and its associated impacts. Issues related to significant residential growth, particularly regional infrastructure, public transport and roadways, require collaboration with and investment by state and federal governments.

Capacity of the affected councils to manage significant future growth areas

Both Light Regional Council and The Barossa Council are associated with mining, agriculture and viticulture and Town of Gawler is recognised as an urban and regional centre. As mentioned above, Light Regional Council has enabled the Roseworthy township expansion and continues to coordinate and stage infrastructure provision, including a Public-Private Partnership for a water reuse scheme and reviewing open space and community infrastructure requirements.

The Town of Gawler states it is already undertaking strategic planning for a wider growth area to determine infrastructure and housing requirements. For any growth area, planning staff will be required for development approvals and ongoing policy refinement and strategic planning. For the Commission's information, we note that a number of residents reported in the survey a personal or financial concern (36 of 393 respondents who clearly articulated a rationale) about the Town of Gawler's capacity but we did not evaluate further evidence on this matter during the course of the investigation beyond that listed above.

The only significant proposed future growth area in the potentially affected areas is Concordia. With approximately 10,000 residences, we understand that Concordia itself will be similar in size to the Town of Gawler (approximately 11,100 residential properties) and The Barossa Council (approximately 10,300 residential properties). Given the extent of the planned development for Concordia, regardless of the council serving the growth area, increased capacity will be needed to service the increased population. As noted above, we understand that The Barossa Council has expanded its staff with temporary staff members to support growth; we are informed by elected members that significant effort has been put into assessing and planning for future growth and we understand that additional workforce planning is underway. We are not aware of another council planning on hiring resources to manage residential growth. Further, we did not see evidence of excess capacity to manage this planned growth, nor would we expect for councils to have the required capacity until needed.

We anticipate the growth areas will be serviced and planned in accordance with land use zoning (current and proposed when appropriate). We note Concordia will be a master planned urban settlement, regardless of which local government area it is located, and the other potentially affected areas will remain as currently zoned until a Code Amendment with community consultation is undertaken—if it is necessary to change zoning.

Recommendations

Concordia Growth Area (Area 1)

In considering the proposal to move the Concordia Growth Area (area 1) from the Barossa Council to the Town of Gawler, our findings as outlined above include that:

- In relation to the current profile of properties and services in the area, the financial impact of the Concordia area is not significant. Barossa Council would expect a net overall negative impact of circa \$35,000 and the Town of Gawler a net overall benefit of circa \$84,000 for the area. Current general residential rates are higher in the Town of Gawler than The Barossa Council.
- There would be a negligible impact on current employee full time equivalents in relation to this area, approximately -0.1FTE for The Barossa Council and +0.1FTE for the Town of Gawler.
- The current number of electors, approximately 43 or less than 1% of Barossa Council electors, is not significant enough to trigger a representation review.
- While the Concordia Growth Area currently has a small population, it is an identified Growth Area and slated for re-zoning. This future development is a key consideration for community and service matters. The area has an estimated capacity to support a projected population of 20,000-25,000 people, currently anticipated over approximately 25 years. When developed, it is planned for Concordia to support a main village centre as well as two local retail centres.
- The Barossa Council is opposed to ceding the Concordia Growth Area to the Town of Gawler. There is a small number of current Concordia residents, with those who attended a public forum suggesting that their perceived communities of interest align with The Barossa Council. Six Concordia residents responded to the survey; all were strongly opposed to the proposal that the area move to the Town of Gawler. An impact on rates is a concern to nearly 40% of Barossa residents who responded to the survey.

These findings do not provide compelling evidence for boundary change for the Town of Gawler or the Barossa Council, rate payers nor communities.

The key issue with Concordia is its planned future growth. At 10,000 dwellings, Concordia will be similar to the current number of residential properties in the entirety of the Town of Gawler, as well as that of The Barossa Council. Given its size and nature, when fully developed, Concordia will be unique from the existing developments in either council.

Financially for a local government administration, preliminary indicative estimates provided by The Barossa Council propose that:

- The area will result in an annual operating surplus of circa \$7 million
- Over the 25 year period, circa \$170 million is expected to be invested in community infrastructure, approximately \$27 million of which is expected to come from grants and infrastructure scheme allocations. The balance of approximately \$143 million is proposed to be debt-funded, with loans repaid from annual operating surpluses.

In relation to the claimed rationales for a realignment of Area 1, as outlined in Evidence to Support Rationales for Change, commencing page 93 above, while it may be plausible to consider that services in the Town of Gawler support, to some extent, residents of a wider catchment area than Town of Gawler council boundaries, there is insufficient evidence to suggest there is an inequitable use of community infrastructure or services by Concordia ratepayers. Further, there is no evidence of an undue financial burden on the Town of Gawler due to non-residents using facilities in the Town of Gawler, indeed usage by non-residents may contribute to service viability for services that attract a fee (such as the swimming pool). By extension, it is plausible that future residents of Concordia may use also services and facilities in the Town of Gawler. It is not possible to estimate the extent to which future residents may prefer to use services in the Concordia village centre and retail centres or in other locations.

We are not able to suggest what future residents may wish by way of representation, but we did not receive evidence from the existing rate payers of a desire for representation in Town of Gawler decision-making.

Recommendation 1—Concordia Growth Area

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for the **Concordia Growth Area (area 1)** as there is insufficient evidence to support this proposed change.

Recommendation 2—Infrastructure to Support Successful Development

It is recommended that the Commission express to the Minister for Local Government the importance of continued state government involvement in the development of Concordia and Roseworthy, particularly in ensuring the timely implementation of regional infrastructure, to support successful growth that does not negatively impact existing residents. It is recommended that particular consideration be given to future traffic solutions for both passenger vehicles and freight around the Gawler township.

Kalbeeba (Areas 3A and 3B)

In considering the proposal to move Kalbeeba (areas 3A and 3B) from the Barossa Council to the Town of Gawler, our findings as outlined above include that:

- Barossa Council would expect a net overall negative impact for the area concerned of circa \$224,000 and the Town of Gawler a net overall benefit of circa \$309,000. Current general residential rates are higher in the Town of Gawler than The Barossa Council
- There would be a minimal impact on current employee full time equivalents, approximately -0.4FTE for Light Regional Council and +0.3FTE for the Town of Gawler, in relation to these portions
- The current number of electors, approximately 232 or approximately 1.2% of Barossa Council electors, is not significant enough to trigger a representation review
- Most of Kalbeeba is zoned Rural Living, including Area 3A. Area 3B is zoned Master Planned Neighbourhood and is within the Springwood Development
- The Barossa Council supports ceding the portion of Kalbeeba in the Springwood development (Area 3B) to the Town of Gawler but opposes ceding other parts of Kalbeeba. A number of current Kalbeeba (area 3A) residents attended a public forum, with those who attended suggesting that their perceived communities of interest align with The Barossa Council. Of the 32 Kalbeeba residents that responded to the survey, 27 were opposed to the proposal that the area move to the Town of Gawler.

These findings do not provide compelling evidence for boundary change for Kalbeeba Area 3A for the Town of Gawler or the Barossa Council, rate payers nor communities. We note that there are plans for residential growth for Kalbeeba Area 3B and give importance to the fact that both councils have expressed a desire for this area to be administered by the Town of Gawler.

In relation to the claimed rationales for a realignment of these areas, as outlined in Evidence to Support Rationales for Change, commencing page 93 above, while it may be plausible to consider that the Town of Gawler supports, to some extent, a wider catchment area than its boundaries, including Area 3A, there is insufficient evidence to suggest there is an inequitable use of community infrastructure or services by Kalbeeba ratepayers or an undue financial burden on the Town of Gawler due to non-residents using council facilities. Kalbeeba (Area 3A) residents did not express a desire for representation in Town of Gawler decision-making.

We are not able to suggest what future residents may wish by way of representation, but it is plausible that Springbank residents, including those in the future development area of area 3B, may collectively identify as a community of interest.

We note that the Springbank Development is currently split by current council boundaries. A realignment of Kalbeeba area 3B would consolidate the Springwood Development within one local government administration. Further, it is plausible that this community may align closer to the Town of Gawler due to location and road access.

Recommendation 3—Kalbeeba rural living portion

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for **Kalbeeba rural living area (area 3A)** as there is insufficient evidence to support this proposed change.

Recommendation 4—Kalbeeba Springwood Development portion

It is recommended that the Commission **recommend** to the Minister for Local Government that the **Kalbeeba Springwood Development portion (area 3B) move from The Barossa Council to the Town of Gawler** as proposed by the Town of Gawler, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation.

Hewett (Area 2)

In considering the proposal to move Hewett (area 2) from Light Regional Council to the Town of Gawler, our findings as outlined above include that:

- Light Regional Council would expect a net overall negative impact for the area concerned circa \$514,000 and the Town of Gawler a net overall benefit of circa \$86,000 for the area concerned. Current general residential rates are higher in the Town of Gawler than Light Regional Council
- There would be an impact to employee full time equivalents in relation to a boundary change of this area, being -3.9 FTE for Light Regional Council and +5.5 FTE for the Town of Gawler
- The current number of electors in Hewett, approximately 2,309 or approximately 19.5% of Light Regional Council electors, is significant, and all these electors are in the Mudla Wirra ward. Should the proposal proceed in its entirety, the impact on ward representation in the Light Regional Council would exceed the 20% variation from quota that would trigger an out of cycle representation review
- Hewett is an early 2000s suburban development zoned Neighbourhood
- Light Regional Council opposes ceding Hewett to the Town of Gawler. Based on the survey and public forums, the majority of Hewett residents are opposed to moving councils and identify as belonging to communities of interest associated with Light Regional Council.

These findings do not provide compelling evidence for boundary change for the Light Regional Council or the Town of Gawler, rate payers, nor communities. It is apparent that there would be a negative financial impact to Light Regional Council of ceding Hewett that exceeds that of the positive financial impact to the Town of Gawler.

In relation to the claimed rationales for a realignment of these areas, as outlined in Evidence to Support Rationales for Change, commencing page 93 above, while it may be plausible that the Town of Gawler supports, to some extent, a wider catchment area than its boundaries, including Hewett, there is insufficient evidence to suggest there is an inequitable use of community infrastructure or services by Hewett ratepayers or an undue financial burden on the Town of Gawler due to non-residents using council facilities.

Recommendation 5—Hewett

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for **Hewett (area 2)** as there is insufficient evidence to support this proposed change.

Gawler Belt (Area 4)

In considering the proposal to move a portion of Gawler Belt (area 4) from Light Regional Council to the Town of Gawler, our findings as outlined above include that:

- Light Regional Council would expect a net overall negative impact of circa \$705,000 and the Town of Gawler a net overall benefit of circa \$1,261,000. Current general residential rates are higher in the Town of Gawler than Light Regional Council
- There would be a negligible impact on current employee full time equivalents, approximately -0.8 FTE for Light Regional Council and +0.6 FTE for the Town of Gawler, in relation to this area
- The current number of electors, approximately 613 or approximately 5.2% of Light Regional Council electors, is not insignificant, and all these electors are in the Mudla Wirra ward. Should the proposal proceed in its entirety, the impact on ward representation in the Light Regional Council would exceed the 20% variation from quota that would trigger an out of cycle representation review
- Gawler Belt is zoned rural living
- Light Regional Council is opposed to ceding Gawler Belt to the Town of Gawler. Of Gawler Belt residents who responded to the survey, 85% were opposed to the proposal.

These findings do not provide compelling evidence for boundary change for the Town of Gawler, Light Regional Council, rate payers nor communities.

In relation to the claimed rationales for a realignment of these areas, as outlined in Evidence to Support Rationales for Change, commencing page 93 above, while it may be plausible that the Town of Gawler supports, to some extent, a wider catchment area than its boundaries, including Gawler Belt, there is insufficient evidence to suggest there is an inequitable use of community infrastructure or services by Gawler Belt ratepayers or an undue financial burden on the Town of Gawler due to non-residents using council facilities.

Recommendation 6—Gawler Belt

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for a portion of **Gawler Belt (area 4)** as there is insufficient evidence to support this proposed change.

Reid (Area 6)

In considering the proposal to move a portion of Reid (area 6) from Light Regional Council to the Town of Gawler, our findings as outlined above include that:

- In relation to the current profile of properties and services in the area, the financial impact of Reid is not significant
- There would be a negligible impact on current employee full time equivalents in relation to this area
- There would be a negligible impact on representation associated with this area
- The area is zoned rural
- Light Regional Council has indicated that it opposes the entirety of the proposal for the three potentially affected areas, including the portion of Reid. The one rate payer from Reid who responded to the survey was neutral to the proposal.

These findings in and of themselves do not provide compelling evidence for boundary change for the Town of Gawler or the City of Playford, rate payers nor communities.

BDO notes that a small portion of Reid is east of the Gawler Bypass (bound by the Gawler Bypass, Paternoster Road, and Two Wells Roads), is currently within the Light Regional Council, whereas the rest of the locality is within the Town of Gawler. In regards to the rationales for boundary change, BDO agrees with the assessment that the potentially affected area, consisting of two properties (one primary production, one vacant) within Town of Gawler's proposed area 6, as well as the portion of council-maintained land north of the proposed area, may create unnecessary administrative burden and complexity for maintenance by Light Regional Council given the location of the Bypass. In our opinion, it is more logical for the Town of Gawler to maintain this area due to access.

Recommendation 7—Portion of Reid

It is recommended that the Commission **recommend** to the Minister for Local Government that the **entirety of the locale of Reid be within the Town of Gawler, with the portion currently in Light Regional Council to move the Town of Gawler**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation.

Evanston Park (Area 5)

In considering the proposal to move a portion of Evanston Park (area 5) from the City of Playford to the Town of Gawler, our findings as outlined above include that:

- In relation to the current profile of properties and services in the area, the financial impact of Evanston Park is not significant. Current general residential rates are higher in the Town of Gawler than City of Playford
- There would be a negligible impact on current employee full time equivalents in relation to this area
- There would be a negligible impact on representation associated with this area
- The area is zoned rural
- The City of Playford has not resolved a formal position on the proposal, including the portion of Evanston Park. A small number of rate payers from Evanston Park responded to the survey, with opinions mixed (three expressing opposition, six expressing support, one neutral).

These findings in and of themselves do not provide compelling evidence for boundary change for the Town of Gawler or the City of Playford, rate payers nor communities.

In regards to the rationales for boundary change, BDO notes that administration of Evanston Park is divided between the Town of Gawler and the City of Playford, with nine properties currently in both councils. In the view of BDO, the administration of one property by two councils, where it can be avoided, is not in the interest of the rate payer.

Recommendation 8—Portion of Evanston Park

It is recommended that the Commission **recommend** to the Minister for Local Government that it be considered to accept the proposal to **move the proposed portion of Evanston Park (Area 5) from the City of Playford to the Town of Gawler**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation.

Hillier (Area 7)

In considering the proposal to move a portion of Hillier (area 7) from the City of Playford to the Town of Gawler, our findings as outlined above include that:

- In relation to the current profile of properties and services in the area, the financial impact of Hillier is not significant. Current general residential rates are higher in the Town of Gawler than City of Playford
- There would be a negligible impact on current employee full time equivalents in relation to this area
- There would be a negligible impact on representation associated with this area
- The area is zoned primary production
- The City of Playford has not resolved a formal position on the proposal, including the portion of Hillier. Some rate payers from Hillier participated in the engagement, with all indicating they were opposed to the proposal.

These findings do not provide compelling evidence for boundary change for the Town of Gawler or the City of Playford, rate payers nor communities.

In regards to the rationales for boundary change, no additional compelling evidence to support the proposal was presented.

Recommendation 9—Portion of Hillier

It is recommended that the Commission **not accept** the proposal for changing the local government boundaries for a portion of **Hillier (area 7)** as there is insufficient evidence to support this proposed change.

Bibaringa (Area 8)

In considering the proposal to move a portion of Bibaringa (area 8) from the Town of Gawler to the City of Playford, our findings as outlined above include that:

- In relation to the current profile of properties and services in the area, the financial impact of Bibaringa is not significant. Current general residential rates are higher in the Town of Gawler than City of Playford
- There would be a negligible impact on current employee full time equivalents in relation to this area
- There would be a negligible impact on representation associated with this area
- The area is zoned rural residential
- The City of Playford has not resolved a formal position on the proposal, including the portion of Bibaringa. Two rate payers from Bibaringa participated in the engagement, one somewhat opposed and one strongly supportive of the proposal.

These findings do not provide compelling evidence for boundary change for the Town of Gawler or the City of Playford or communities.

In regards to the rationales for boundary change, BDO notes that administration of Bibaringa is divided between the Town of Gawler and the City of Playford, with one property currently in both councils. In the view of BDO, the administration of one property by two councils, where it can be avoided, is not in the interest of the rate payer. Further, we note that rate payers in the affected area are subject to higher rates than neighbours in the City of Playford portion of Bibaringa.

Recommendation 10—Portion of Bibaringa

It is recommended that the Commission recommend to the Minister for Local Government that it be considered **to accept the proposal to move the proposed portion of Bibaringa (Area 8) from the Town of Gawler to the City of Playford**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation, noting that council rates will likely reduce for affected residents if transferred to the City of Playford.

Uleybury (Area 9)

In considering the proposal to move a portion of Uleybury (area 9) from the Town of Gawler to the City of Playford, our findings as outlined above include that:

- In relation to the current profile of properties and services in the area, the financial impact of Uleybury is not significant. Current general residential rates are higher in the Town of Gawler than City of Playford
- There would be a negligible impact on current employee full time equivalents in relation to this area
- There would be a negligible impact on representation associated with this area
- The area is zoned rural
- The City of Playford has not resolved a formal position on the proposal, including the portion of Uleybury. Five residents of Uleybury participated in the engagement, three opposed to the proposal, one supportive and one somewhat opposed due to concern about rates.

These findings do not provide compelling evidence for boundary change for the Town of Gawler or the City of Playford or communities.

BDO notes that administration of Uleybury is divided between the Town of Gawler and the City of Playford, with three properties currently in both councils. In the view of BDO, the administration of one property by two councils, where it can be avoided, is not in the interest of the rate payer. Further, we note that rate payers in the affected area are subject to higher rates than neighbours in the City of Playford portion of Uleybury.

Recommendation 11—Portion of Uleybury

It is recommended that the Commission recommend to the Minister for Local Government that it be considered to **accept the proposal to move the proposed portion of Uleybury (Area 9) from the Town of Gawler to the City of Playford**, subject to a prescribed limitation on increase in rates for the impacted properties for the maximum period allowed by the applicable legislation, noting that council rates will likely reduce for affected residents if transferred to the City of Playford.

6. Attachments

6.1. Key Data about Potentially Impacted Councils

Key Data about Potential Impacted Councils				
Item	Town of Gawler	City of Playford	The Barossa Council	The Light Regional Council
Area (ha) ¹¹²	4,113.80	34,520.40	89,354.10	127,684.50
Current Population (2023)	24,998	110,001	23,558	15,792
Forecast Population (2041) ¹¹³	36,201	166,334	36,259	23,348
Revenue (\$000s)	38,794 ¹¹⁴	141,961 ¹¹⁵	46,154 ¹¹⁶	27,019 ¹¹⁷
Operating ratio %	105.3	93.5	101.0	106.5
Net Financial Liabilities Ratio %	79.08	79.57	48.04	58.25
Infrastructure Asset value (\$000s)	426,462	1,742,877	428,275	241,608
Borrowings (\$000s)	861 ²	99,893 ²	16,805 ²	10,430 ³

² Borrowings from councils' 2024-25 Final Annual Budget and Business Plans; figures do not include provisions or cash advances.

³ Borrowings from council's 2024-35 Long Term Financial Plan; figures does not include Trade & Other Payables or Provisions.

6.2. Information Requested from Councils

Information Requested
1. Financial Information (areas of interest and for the whole council)
1.1. 2023-24 property rating data for rateable properties in each proposed boundary change area, including: <ul style="list-style-type: none"> 1.1.1. assessment number 1.1.2. postal address 1.1.3. capital value assessment 1.1.4. land use code 1.1.5. rates charged, including any: levies, waste charges, rebates or rate cap
1.2. Breakdown of actual operating/capital revenue (fees and charges) and costs for FY23 and detailed budget for FY24
1.3. Information on property-based services offered, e.g.: <ul style="list-style-type: none"> 1.3.1. waste and recycling (bin type data etc) 1.3.2. street cleaning 1.3.3. street lighting 1.3.4. community transport services 1.3.5. wastewater
1.4. Schedule of all current fees and charges
1.5. Council Asset Information for assets in each proposed boundary change area, including: <ul style="list-style-type: none"> 1.5.1. type of asset 1.5.2. asset valuation 1.5.3. asset conditions reports 1.5.4. planned upgrades 1.5.5. maintenance schedules 1.5.6. depreciation 1.5.7. any lease or management agreement with third parties
1.6. Council Grant revenue with financial and non-financial concerns for each proposed boundary change area, including: <ul style="list-style-type: none"> 1.6.1. General Purpose grants 1.6.2. Commonwealth, such as Road Funding 1.6.3. Other grants
1.7. Rating Policy and 2023-24 Rating Flyers provided to rate payers (flyer explaining the rates)
1.8. Breakdown of actual operating/capital revenue and costs for future financial periods (10 years)
1.9. Population estimates: Number of residents and profile (adult/child) for council overall and within each proposed boundary change area. <i>Note: also relevant to other streams</i>
1.10. Rebate policy
1.11. Information on separate services charges not included in rates, such as: <ul style="list-style-type: none"> 1.11.1. Waste management charge 1.11.2. Bill collection 1.11.3. Waste water management charge
1.12. Grant agreements or applications which impact any proposed boundary change area
1.13. Copies of all significant contracts held by the councils that may be impacted by the proposal (by proposed boundary change area)

Information Requested

1.14. List of any current outstanding ratepayer debtors affected by each proposed boundary change area

1.15. Council Service levels

1.16. GIS Local Government Road lengths within each proposed boundary change area

2. Land Use and Planning Information

2.1 Council-specific planning processes and policies

2.2 Council-specific planning development controls

2.3 Council business plan

2.4 Infrastructure deeds or other agreements that may be affected by any of the proposed boundary changes

2.5 Any relevant reports or documents (planning, land use, environmental) not in the public domain

3. Council Employee Information

3.1 Enterprise Bargaining Agreements for all staff

3.2 Organisational charts, including staff numbers

3.3 List of internal representative committees, such as WH&S, staff representatives, consultation committees, including staff representatives

3.4 Industrial body key contacts (to inform about investigation and staff survey)

3.5 Documents outlining key activities by division, such as directorate/departmental/division business plans

3.6 Most recent reports relating to staff engagement, such as staff survey reports

3.7 Methods by which your council currently communicates with staff (for example toolbox sessions, town hall meetings, emails, etc)

4. Representation Information

4.1 Final report from most recent representation review

4.2 Any relevant reports or documents about representation that are not in the public domain

5. Community and Services Information

5.1 Information on the following within each proposed boundary change area:

5.1.1 Parks, gardens and playgrounds

5.1.2 Libraries

5.1.3 Community centres

5.1.4 Walking and bike paths

5.1.5 Sporting and recreation facilities

5.1.6 Clubs

5.1.7 Known local businesses or business groups

5.1.8 Other facilities (for example historic sites)

5.2 Data on the use of community facilities and infrastructure, including footfall, postcode data, etc

5.3 Community hubs you are aware of, both physical and virtual

Information Requested

5.4 Council policies or programs relevant to local businesses

5.5 Known local community, sporting and business groups that may be impacted

5.6 How do you communicate with:

5.6.1 Resident communities

5.6.2 Community and sporting groups

5.6.3 Other groups, such as street traders, business groups, etc

5.7 Any information about 'communities of interest' relevant to the inquiry that your council has defined

5.8 Any relevant reports or documents about:

5.8.1 community and services, such as plans for community, walking and cycling, social infrastructure, sport and recreation and environment

5.8.2 previous engagement with residents or subgroups about the proposed boundary changes

6.3. Methodologies

6.3.1. Financial Methodology

Revenue Impacts

Rates and property-based charges/levies

- This includes General Rates (fixed and variable), Regional Landscape levies, Business Development levies and waste management levies
- Each Council provided the current 2023/24 rates data for each area, including:
 - Assessment number/VG number, ratepayer including address
 - VG - rateable value 2023/24
 - Information on non-rateable properties
 - Local Government land use code
 - Landscape Levy charge
 - Waste and Recycle Service and Bin charge
 - Total rates for each property and rating policy
- A recalculation of each property rates was undertaken according to the proposed new council for each area as per (LG Act S150 Basis of Rating General Principles)
 - Using the above rateable property data above
 - Each property's rates were recalculated using the proposed councils 2023/24 declaration of General rates according to land use
 - Applied applicable 2023/24 fixed charge (only applies to areas 8 and 9)
 - Applied the proposed Councils Waste Levied (only applies to areas 1 to 7) and Regional Landscape Levy rate
 - Calculated the Town of Gawler Business Development and Marketing levy or Commercial and Industrial Properties (based on Local Government land use code)
 - Applied existing rebate for 1 Church, all other existing rebates have been removed
- Other Assumptions
 - Applied Gawler's adopted minimum rates as per (Section 158 LG Act)
 - Business Development Levy assumed non-township rate only
 - Gawler Waste charges applied to sites which currently have waste/recycle collection
 - Additional bin charges not included.

Cat and Dog Registrations

- If a council has identified the revenue generated from the impacted properties, this has been used for the current revenue. In other cases, the current revenue has been estimated using an average revenue per residential property for the current council area
- Revenue impact in the proposed council area is aligned with the revenue impact in the current council.

Planning and Development

- If a council has identified the revenue generated from the impacted properties, this has been used for the current revenue. In other cases, current revenue has been estimated using an average revenue per property for the current council area
- Revenue impact in the proposed council area is aligned with the revenue impact in the current council.

Facilities Revenue

- Current revenue generated from facilities has been provided by the current council
- Revenue impact in the proposed council area is aligned with the revenue impact in the current council.

Grants

- Due to the complexity of the calculations, support was provided by the SA Local Government Grants Commission in relation to the assessment of the estimated impacts on general financial assistance grants (such as General Purpose Grants, Identified Local Roads Grants and Supplementary Local Roads Grants)
 - It should be highlighted that these grants are influenced by many variables and caps, including how a council ranks relative to other councils. The usual approach is for all councils across the State to be reassessed annually at the same time. As such, the estimated impacts are indicative based on the most recent calculation approach
- We have not identified any other relevant grants directly impacted by the boundary change proposal.

Other Fees and Charges

- We obtained the schedules of fees and charges for each council and details of the annual revenue generated for each of the charges
- According to our analyses, no material impact on fees and charges is anticipated.

Cost Impacts

Maintenance of Open Spaces

- This includes the cost of maintaining parks, reserves and other similar public spaces (mowing, weed control, irrigation)
- Councils were requested to provide the annual cost per square metre (total council) and the number of square metres of open spaces in the proposed realigned area. Due to the different associated cost and service levels, this data was split between irrigated and non-irrigated space
- The cost impact for each council is calculated by multiplying the number of square metres of open space in the relevant area by the cost per metre of the respective council.

Maintenance of Roads and Roadsides

- This includes costs associated with:
 - Road maintenance (re-surfacing, pothole repair, line marking etc.)
 - Roadside maintenance (weed spraying, mowing, slashing, tree maintenance etc.)
 - Street cleaning
 - Stormwater maintenance (clearing culverts etc)
- Councils were requested to provide the annual cost per metre of road (total council) and the number of road metres in the proposed realigned area. Due to the different associated cost and service levels, this data was split between urban, rural and unsealed roads
- The cost impact for each council is calculated by multiplying the number of road metres in the relevant area by the cost per metre of the respective council.

Street Lighting

- Existing councils have provided the annual cost of the street lighting and the cost impact in the proposed council area is aligned with the cost in the current council.

Waste Collection

- Current cost has been estimated using an average cost per property for the current council
- Cost impact in the proposed has been estimated using an average cost per property in the proposed council.

Facility Operating Costs

- Current costs of operating facilities have been provided by the current council
- Cost impact in the proposed council area is aligned with the cost in the current council.

Planning and Development

- The cost impact of providing planning and development services to each area has been estimated using an average cost per property for each council (i.e. total council planning and development costs divided by the number of properties in the council area)
- It is assumed that 65% of each council's internal costs for Planning and Development are fixed and will not vary with changes in the number of properties in the council area. As such, the planning and development costs used in the above calculation are only 35% of the council's total internal costs
- An exception to this was used in relation to Area 2: Hewett. In discussion with Light, it was determined that the revenues and costs using this methodology overstated the impacts in the context that Hewett is an area which is already largely developed. Actual planning revenue for the area was provided by Light and Light estimated that planning costs were typically 120% of the planning revenue. As such, the planning and development costs for Hewett were set at 120% of the revenue. The associated impact on Gawler was aligned with Light.

Administration (back-office)

- This includes functions such as: Customer Service, Finance, HR, IT, Rates Administration, Communications and Marketing, Corporate Governance, Economic Development etc
- The cost impact of providing such administrative services to each area has been estimated using an average cost per property for each council (i.e. total council administrative (back-office) costs divided by the number of properties in the council area)
- It is assumed that 65% of the Administrative (back-office) costs of each council are fixed and will not vary with changes in the number of properties in the council area. As such, Administration (back-office) costs used in the above calculation are only 35% of the total costs. The exception to this is in relation to Light Council, due its smaller size relative to other councils, in consultation with Light it was determined that the fixed cost component of 80% would be more appropriate.

Administration (other)

- This includes items such as transactional bank charges, property valuations expense, rate notice printing and postage, dog and cat management board etc
- The cost impact of providing such administrative services to each area has been estimated using an average cost per property for each council (i.e. total council administrative (other) costs divided by the number of properties in the council area).

Depreciation

- Asset schedules for each area provided by each council (incl. replacement cost, written down value and annual depreciation).

Forward Looking Estimates

- Once the annual impacts had been assessed using the methodology outlined above, the estimated impacts over the next 10 years were determined using indexation rates identified in the council's Long Term Financial Plans. The rates used were provided to councils for review
- It is assumed that depreciation charges will remain constant over the period. This is because the underlying assets are generally long-life assets (such as roads, pavements, bridges etc.) and the asset life will be prolonged by maintenance costs included in the assumed cost base.

Service Levels

Councils were requested to provide service level information across the following areas:

Table 6.1 Service Levels

Service	Service Description	Information Required on Service Standard
Domestic waste collection	Domestic waste collection (incl. waste, recycling, green etc.)	Frequency of collection by bin type
Grass maintenance	Mowing of parks, roadsides, and nature strips	Standard of service (e.g. frequency of mowing (by season/area type))
Reserve Maintenance	Watering of reserves	Watering frequency by type of reserve/season
Trees	Investigate tree maintenance, issues, or concerns	Service Standard response time
Maintenance of Public Toilets	Cleaning, reprovisioning and inspection	Cleaning, reprovisioning and inspection frequency
Street cleaning	Regular cleaning of roads and pavements	Cleaning frequency

FTE Impacts

For each cost category, councils were requested to provide a % split of the costs between in-house staff, contractors and other costs. The % split for in-house staff was applied to the calculated cost impact to determine an in-house staff cost component.

The in-house staff cost component was converted to equivalent FTEs using average salaries (+ oncosts) as estimated by using council organisation charts and salary registers.

6.3.2. Employee Matters Methodology

Table 6.2 Potentially Impacted Staff Resource below details the assumptions and formulae that have been applied to calculate the staff resources (FTE) required to service the Hewett and Gawler Belt Areas in relation to the following functions:

- Open Space, Roads and Roadside and Waste Management
- Planning and Development
- Administration (defined as Regulatory Services, Corporate Services, Administrative Services, Community Services including Community Development)

Table 6.2 Potentially Impacted Staff Resource Costs

		Area 2	Area 4	Area 6
	Name	Hewett	Gawler	Reid
	Current Council	Light	Light	Light
	Proposed Council	Gawler	Gawler	Gawler
Total Cost Impact (Current Council)	Open Spaces	(390,000)	(4,000)	(3,000)
	Roads and Roadside	(171,000)	(44,000)	(1,000)
	Waste Collection	(200,000)	(71,000)	0
	Planning	(18,000)	(22,000)	0
	Administration (back-office)	(113,000)	(40,000)	0
% Cost In-House Staff	Open Spaces	40%	40%	40%
	Roads and Roadside	55%	63%	50%
	Waste Collection	2%	5%	2%
	Planning	75%	75%	75%
	Administration	65%	65%	65%
Average Employment Cost (salary + oncosts)	Open Spaces	84,000		
	Roads and Roadside	84,000		
	Waste Collection	84,000		
	Planning	96,000		
	Administration	103,200		

Following the calculation of the quantum of potentially impacted FTE, a desktop analysis was conducted of organisation charts, enterprise agreements (AWU and Municipal Officers') and salary registers for both LRC and ToG.

Potentially affected LRC roles were identified through this analysis (see Table 6.4).

Enterprise Agreements provided information highlighting the difference in pay rates between LRC and ToG for potentially affected roles. (see Table 6.5).

Table 6.3. Staff Resources--FTE Summary Impact on LRC

		Area 2 Hewett	Area 4: Gawler Belt	Area 6: Reid	TOTAL
No. FTE	Open Spaces	(1.9)	(0.0)	(0.0)	(1.9)
	Roads and Roadside	(1.1)	(0.3)	(0.0)	(1.5)
	Waste Collection	(0.0)	(0.0)	0.0	(0.1)
	Sub-total	(3.0)	(0.4)	(0.0)	(3.4)
	Planning	(0.1)	(0.2)	0.0	(0.3)
	Administration	(0.7)	(0.3)	0.0	(1.0)
	Sub-Total	(0.9)	(0.4)	0.0	(1.3)
	Total	(3.9)	(0.8)	(0.0)	(4.7)

Further enterprise agreement comparative analysis was conducted to ascertain differences in employment conditions from one council to the other. (see Table 6.7 and Table 6.8 below).

Employee Matters Detailed Information

Table 6.4 Light Regional Council Operations Staff Potentially Impacted by Hewett and Gawler Belt

Position	FTE	Level	Salary (full-time)
Construction Supervisor	1	6 (Municipal) #	\$97k-\$103k
Project Officer, Capital Projects	1	4 (Municipal)	\$82k-\$88k
TL, Roads and Construction	1	8 (AWU)	\$69k-\$71k
TM, Roads and Construction	3	6 (AWU)	\$66k-\$68k
Coordinator, Civil Construction	1	6 (Municipal)	\$97k-\$103k
TL, Civil Construction	1	8 (AWU)	\$69k-\$71k
TM, Civil Construction	2	6 (AWU)	\$66k-\$68k
TM, Grading Mtce	2	7 (AWU)	\$68k-\$69k
Coordinator, Mtce, Civil and Hort	1	6 (Municipal)	\$96k-\$103k
TL, Civil Mtce	1	5 (AWU)	\$64k-\$66k
TM, Civil Mtce	2	5 (AWU)	\$64k-\$66k
TL, Hort/Trees	1	7 (AWU)	\$68k-\$69k
TM, Hort/Trees	3	6 (AWU)	\$66k-\$68k
TL, Hort (weeds)	1	7 (AWU)	\$68k-\$69k
TM, Hort (weeds)	1	5 (AWU)	\$64k-\$66k
TL, Hort	1	7 (AWU)	\$68k-\$69k
TM, Hort	3	6 (AWU)	\$66k-\$68k
Admin Officers (I&E)	2	2 (Municipal)	\$66k-\$72k

Table 6.5 Light Regional Council Planning & Development Staff Potentially Impacted by Hewett and Gawler Belt

Position	FTE	Level	Salary (full-time)
Planning Coordinator	1	SO2	\$113,127
Coordinator, Building Surveyor	1	6-7	\$113,127
Senior Development Planner	2	6	\$103,330
Development Planner	1	5	\$93,530
Compliance Officer	1	4	\$87,650
Admin Officers	3	3	\$79,787
Development Officer (Building)	1	3	\$79,787
Building Admin Officer	1	3	\$79,787
Senior Development Engineer	0.94	7	\$113,127
Graduate Development Engineer	1	3-5	\$93,530

Table 6.6 Light Regional Council Administration Staff Potentially Impacted by Hewett and Gawler Belt

Position	FTE	Level (Municipal)	Salary (full-time)
Compliance Coordinator	0.84	6	\$96k-\$103k
Environmental Health Officer	1	5	\$90k-\$93k
Admin Officer	3	3	\$74k-\$80k
Community Inspector	1	3	\$74k-\$80k
Community Development Officer	1	5	\$89k-\$93k
Community Development Support Officer	1	3	\$74k-\$80k
Customer Service Officers	2.54	2	\$66k-\$72k
Economic Development Project Manager	1	8	\$117k-\$125k
Economic Dev Officer	1	3	\$74k-\$80k
WHS Coordinator	1	6	\$96k-\$103k
Payroll and Risk Coordinator	1	5	\$90k-\$93k
Business Support Officer - WHS	0.63	3	\$74k-\$80k
HR & Payroll Officer	0.63	4	\$82k-\$87k
Records Management Coordinator	0.42	4	\$82k-\$87k
Info Mgt Analyst	1	3-5	\$74k-\$93k
Info Mgt Officer	0.63	2	\$66k-\$72k
Info Support Services Officer	2	2	\$66k-\$72k
IT Officer	1	3	\$74k-\$80k
Financial Controller	1	6	\$96k-\$103k
Financial Analyst	1	5	\$90k-\$93k
Accountant	1	4	\$82k-\$87k
Senior Rates Officer	1	5	\$90k-\$93k
Finance Officer	1	3	\$74k-\$80k
Finance Support Officer	0.72	3	\$74k-\$80k

Table 6.7 Light Regional Council & Town of Gawler Enterprise Agreement Review (AWU - Outside Staff)

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Potential Staff Perception of Transfer from LRC to ToG
Salary Level 5; 3 rd year as at 1/7/23	\$76,332	\$66,118	6	Var \$10k pa per employee	
Salary Level 6; 3 rd year as at 1/7/23	\$77,716	\$67,741	11	‘ ‘ ‘ ‘	
Salary Level 7; 3 rd year as at 1/7/23	\$79,099	\$69,388	4	‘ ‘ ‘ ‘	
Salary Level 8; 3 rd year as at 1/7/23	\$80,363	\$70,923	3	‘ ‘ ‘ ‘	
Salary Increases - Year 1/Year2/Year3	Clause 12 - 2% + 4.75% (CPI) + 7.9% (CPI)	Clause 39 - 2% + 2% + 2% (+\$300)		The CPI increases for ToG in years 2 and 3 contributed significantly to the difference in current pay rates.	
Ordinary Hours / fortnight	Clause 19 - 76 hours over 9 days; 6 am to 7pm with 30 min unpaid lunch break.	Clause 11 - Up to max of 100 hours/fortnight.			
Clean up time	Clause 19.2 - Employees to not return to Depot more than 15 minutes before scheduled knock-off time.	Clause 10.7 - aim to leave Depot within 15 minutes of nominated start time and return no sooner than 15 minutes from nominated finish time.		No difference in intent.	
RDO's	Clause 19.4 and 19.5 - Mon or Fri; 48 hours' notice given to change; limit of 5 days accrued	Clause 10.4 - Schedule approved by 31 May.			
Inclement Weather	Clause 19.6 - TOIL to be accrued to max of 17 hours in the first 20 weeks of fin year; Time lost - 50% funded by employee time, 50% Council	Clause 10.6 - 10 hours credited per employee at start of fin year.		ToG policy is more generous.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Potential Staff Perception of Transfer from LRC to ToG
Flexible hours	Clause 19 - Normal hours - 6am to 7pm (Mon-Fri) and not exceed 10 hours/day and 100 hours over 2 weeks. Overtime for hours outside of Ordinary Hours.	Clause 11 - Normal hours - 7am to 4pm for Nov-Feb. 7.30 am 4.30 pm for all other months. Clause 10.3 - Minimum payment period for overtime of 3 hours			
Standby and Callouts	-	Clause 10.2 - payments for being on the roster for weekends and public holidays		Not mentioned in ToG EA.	
TOIL	Clause 19.10 - Min 17 hours and max of 38 hours	Clause 11 - Max 114 hours. 30 hours can be carried forward to new fin yr.			
Lunch and Tea Breaks	Clause 19.9 - not to return to the Depot.	Same implied by Clause 10.7			
Annual Leave loading	Clause 20.2 - Accruals paid in first pay period in December	-		Not mentioned in LRC EA.	
Sick Leave	Clause 20.3 - absence of 2 or more working days may require a medical certificate.	Clause 18 - medical certificate maybe required.		ToG has a slightly more detailed Sick Leave clause.	
Compassionate/ Bereavement Leave	Clause 20.4 - 2 days max	Clause 22 - 2 days max			
Employer Funded Parental Leave	Clause 20.4 - 6 weeks paid leave; 24 months to qualify	Clause 20 - Tiered based on years of continuous service.		LRC more generous provision.	
Paid Partner Leave	Clause 20.4 - 2 weeks	Clause 21 - 2 weeks			
Super contributions	Clause 20.4 - Council will pay whilst on Fed Gov Paid Parental Leave Scheme. Salary Sacrifice available on super contributions.	Clause 29 - Salary sacrifice available on super contributions.			
Family and Domestic Violence Leave	Clause 20.5 - 2 days paid + 3 days unpaid in 12-month period.			Not mentioned in LRC EA.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Potential Staff Perception of Transfer from LRC to ToG
Long Service Leave	Clause 20.5 - LSL accrued in first 10 years must be taken by completion of 13 years' service. Minimum 1 week in a continuous period.	-		Not mentioned in LRC EA.	
Christmas/New Year Period	Clause 20.6 - Rosters communicated no later than 30 November. Can access any accrued time if required to take leave.	- Clause 10.2 - if On Standby or Call-Out during this period additional payments will apply.		LRC more generous if you work in this period.	
Special Leave Without Pay	Clause 20.7 - 3 months' notice required.	Clause 19 - 3 years continuous service required. Min 3 months and max 12 months.		LRC Clause is more definitive.	
Defence Force Reservist Leave	-	Clause 23 - 2 weeks if Council chooses to pay.		Not mentioned in ToG EA.	
Blood Donor Leave	-	Clause 14 - 1 hour paid time off up to 5 times a year		Not mentioned in ToG EA.	
Jury Service	Clause 20.9	-		Not mentioned in LRC EA.	
Volunteer Leave	-	Clause 24 - 1 day paid		Not mentioned in ToG EA.	
Study Assistance	Clause 21.2 - 4 hours paid per fortnight			Not mentioned in LRC EA.	
Travel Time to Conferences/Training	Clause 21.5 - Paid	-		Not mentioned in LRC EA.	
Approved Training Courses	Clause 21.6 - Max 7.6 hours per day paid	-		Not mentioned in LRC EA.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Potential Staff Perception of Transfer from LRC to ToG
Special Allowances	Clause 13.2 - First Aid Attendant Removal of Dead Animals Toxic Substances Tool Allowance Motor Vehicle Allowance Meal Allowance (will not apply to overtime planned with at least 24 hours' notice)	Clause 31 - First Aid Motor Vehicles Meal Allowance		ToG more generous provision.	
Introduction of Change	Clause 9 - Consultation required. No forced redundancies. VSP may be negotiated. Clause 10.6 'Resource Sharing' - working for other LG bodies.	Clause 15 - Consultation required (includes 'boundary reform') No forced redundancies. May seek VSP Clause 37 - Resource Sharing			
Annual Leave Cash Out	-	Clause 17 - Available if a balance of 4 weeks is maintained		Not mentioned in ToG EA.	
Planned Retirement Contracts	Clause 10.9	-		Opportunity to reduce ToG numbers through attrition.	
Municipal Employee Grade 9	Clause 11 - Site Supervisor qualifications and competencies stated	-		Opportunity for redeployed LRC employees.	
Income Protection	Clause 15 - Whilst on Income Protection LSL accrues but not AL or PSL.	Clause 38 - No leave entitlements will accrue whilst on Income Protection.		ToG provision more favourable.	
Journey Accident Insurance	Clause 16 - 24 hours journey accident insurance.	-		Not mentioned in LRC EA.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Potential Staff Perception of Transfer from LRC to ToG
Driver's Licence	Clause 17 - Required. Loss of licence may result in termination. Special licence (over and above standard) will be reimbursed.	-		Not mentioned in LRC EA.	
EAP	Clause 18 - 3 visits in one calendar year	-		Not mentioned in LRC EA.	
Secondment	Clause 21.3 - By agreement.			Not mentioned in LRC EA.	
Reclassification	Clause 21.7 - detailed process.	-		Not mentioned in LRC EA.	
Level Increase	-	Clause 34 - 12 months at Level 4 will progress to Level 5.		Not mentioned in ToG EA.	
Fixed Term Contracts	-	Clause 16 - allowed by mutual agreement but not for permanent employees.		Not mentioned in ToG EA.	
Multi Skilling and Higher Duties	Clause 21.8	-		Not mentioned in LRC EA.	
Surveillance and GPS	Clause 22	-		Not mentioned in LRC EA.	
Grievance/Dispute Resolution	Clause 24	Clause 30		Similar detailed procedures outlined.	

Table 6.8 Light Regional Council & Town of Gawler Enterprise Agreement Review (Inside Staff)

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Staff Perception of Transfer from LRC to ToG
Salary Grade 3; Step 4 as at 1/7/23	\$84,572	\$79,787		Var approx. \$5k per employee	
Salary Grade 4; Step 4 as at 1/7/23	\$92,279	\$87,650		‘ ‘ ‘ ‘	
Salary Grade 5; Step 3 as at 1/7/23	\$98,049	\$93,530		‘ ‘ ‘ ‘	
Salary Grade 6; Step 3 as at 1/7/23	\$107,672	\$103,329		Var approx. \$4k per employee	
Salary Grade 7; Step 3 as at 1/7/23	\$117,038	\$113,127		‘ ‘ ‘ ‘	
Salary Grade 8; Step 3 as at 1/7/23	\$128,795	\$124,889		‘ ‘ ‘ ‘	
Salary Increases - Year 1/Year2/Year3	Clause - 2% + 4.7% (CPI) + 7.9% (CPI)	Clause - +\$300 + 2% + 2% + 2%		The CPI increases for ToG in years 2 and 3 contributed significantly to the difference in current pay rates.	
Ordinary Hours / fortnight	Clause 21 - 76 hours per fortnight. 7am to 8 pm Mon-Fri. Clause 21.4 Casual employee up to 1300 hours pa	Clause 11 - 152 hours worked over 19 days of a four week period between 7.30 am and 7.30pm Mon-Fri.			
RDO's	-	Clause 11.5 - Deferred days must be taken by 30 June each year.			
Flexible hours	Clause 22 - Flexitime allowed (can vary start times by negotiation) Can work up to 10 hours per day before penalty rates.	Clause 11.6 - can work up to 10 hours between 7.30am and 7.30pm without attracting penalty rates.			

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Staff Perception of Transfer from LRC to ToG
TOIL/Overtime	Clause 23 - overtime penalty rates will only apply under certain conditions (see Clause 23.2)	Clause 11.7 - Time beyond 76 hours in a fortnight accrued as TOIL and taken at mutually agreed time.			
Lunch and Tea Breaks	Clause 21.1 - minimum 30 mins away from the workstation after 6 hours continuous work.	Clause 11.3 Minimum 30 mins taken between 12 and 2pm.			
Annual Leave	Clause 25.2 - through mutual agreement may carry forward 2 weeks. May take single day AL.	-		LRC silent on.	
Annual Leave loading	Clause 25.2.1 - paid as per the Award. Indicative annual leave request form required.	Clause 16 - paid as per the Award. Paid as it is taken.			
Sick Leave	Clause 25.3 - medical certificate may be required. Very detailed clause.	Clause 18 - medical certificate maybe required.			
Compassionate/Bereavement Leave	Clause 25.6 - 2 days and can be supplemented by PSL or AL up to 5 days.	-		Not mentioned in LRC EA.	
Employer Funded Parental Leave	Clause 25.4.1 - 6 weeks paid	Clause 20 - Tiered based on years of continuous service.		LRC more generous provision.	
Paid Partner Leave	Clause 25.4.2 - 2 weeks	Clause 21 - 2 weeks			
Super contributions	Clause 13.2 - Salary sacrifice available on super contributions.	Clause 29 - Salary sacrifice available on super contributions.			
Family and Domestic Violence Leave	Clause 25.5 - 2 days paid + 3 days unpaid in 12 month period.	-		Not mentioned in LRC EA.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Staff Perception of Transfer from LRC to ToG
Long Service Leave	Clause 25.7 - LSL accrued in first 10 years must be taken by completion of 13 years service. Minimum 1 week in a continuous period.	-		Not mentioned in LRC EA.	
Christmas/New Year Period	Clause 25.8 - Rosters communicated no later than 30 November. Can access any accrued time if required to take leave.	Clause 11.5 - 3 x RDOs may be taken during a Christmas period closure.			
Special Leave Without Pay	Clause 20.7 - 3 months notice where possible.	Clause 19 - 3 years continuous service required. Min 3 months and max 12 months.		LRC Clause is more definitive.	
Defence Force Reservist Leave	-	Clause 23 - 2 weeks if Council chooses to pay.		Not mentioned in ToG EA.	
Blood Donor Leave	Clause 25.10 - 2 hours paid leave up to twice a year.	Clause 13 - 1 hour paid time off up to 5 times a year			
Jury Service	Clause 25.11	-		Not mentioned in LRC EA.	
Volunteer Leave	-	Clause 24 - 1 day paid		Not mentioned in ToG EA.	
Study Assistance	Clause 26.5 - 4 hours paid per week to attend lectures (including travel time). 4 hours time of paid per fortnight for completing assignments	Clause 22 - up to 5 hours paid per week (equal course time required)		ToG more generous.	
Travel Time to Conferences/Training	Clause 26.6 - Paid	-		Not mentioned in LRC EA.	
Approved Training Courses	Clause 26.7 - Max 7.6 hours per day paid	-		Not mentioned in LRC EA.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Staff Perception of Transfer from LRC to ToG
Introduction of Change	Clauses 9 and 10 - Consultation required. No forced redundancies. VSP may be negotiated. Clause 10.3 'Resource Sharing' - working for other LG bodies. Assigned to lower classification with salary frozen for 2 years.	Clause 14 - Consultation required (includes 'boundary reform') No forced redundancies. May seek VSP. Assigned to lower classification until salary catches up.			
Voluntary Separation Package	10 weeks plus 3 weeks for each year of service plus \$3,000	12 weeks plus 4 weeks for each year of service (up to 52 weeks) plus \$3,000.		LRC more generous	
Annual Leave Cash Out	Clause 25.2.4 - available if a balance of 8 weeks is maintained.	Clause 17 - Available if a balance of 4 weeks is maintained		LRC is more favourable.	
Higher Duties	Clause 26.2 - 5 days or more; paid at higher level	-		Not mentioned in LRC EA.	
Secondment	Clause 26.3 - By agreement.	-		Not mentioned in LRC EA.	
Reclassification	Clause 14 - requests for reclass to be determined within 3 months	-		Not mentioned in LRC EA.	
Fixed Term Contracts	-	Clause 15 - allowed but silent on permanent employees' right to return.		Not mentioned in ToG EA.	
Driver's Licence	Clause 18 - depending on position requirements. If required loss of licence may result in termination. Special licence required over standard will be reimbursed.	-		Not mentioned in LRC EA.	
Grievance/Dispute Resolution	Clause 28	Clause 30		Similar detailed procedures outlined.	

Employment Condition/Benefit	Town of Gawler	Light Regional Council	No. of employees in LRC potentially impacted	Comment on Differences	Staff Perception of Transfer from LRC to ToG
Special Arrangements - Recreation and Community Services (includes Aquatic Centre)	Appendix 1 Clause 2 Span of hours extended. Loading for public holidays. Overtime Clause 5 weeks AL and 20% leave loading.			ToG 'special arrangements' will likely to be perceived positively by applicable staff transferring to ToG.	
Special Arrangements - Community Safety (Regulatory)	Appendix Clause 3 Weekend work. Callouts Overtime Clause				
Special Arrangements - Civic Centre Operations	Span of hours extended. Overtime and Flexi-time clauses. 5 weeks AL.				

For comparison, we note that remuneration rates can vary by council by level. See below.

Table 6.9. Comparison of a Sample of Remuneration Rates by Council, Select Levels

	MO/ASU Level 5	MO/ASU Level 6	AWU Level 5	AWU Level 6
Mt Barker ¹¹⁸	\$99k-\$104k	\$107k-\$113k	-	\$79k
Prospect ¹¹⁹	\$90k-\$94k	\$97k-\$104k	-	-
Murray Bridge ¹²⁰	\$93k-\$98k	\$101k-\$108k	\$77k-\$79k	\$79k-\$81k
Mid Murray ¹²¹	N/A	N/A	\$67k-\$69k	\$69k-\$71k
Southern Mallee ¹²²	N/A	N/A	\$69k-\$71k	\$71k-\$73k
Gawler ^{123, 124}	\$94k-\$98k	\$101k-\$108k	\$75k-\$76k	\$77k-\$78k
Light ^{125, 126}	\$90k-\$94k	\$97k-\$103k	\$65k-\$66k	\$66k-\$68k

6.3.3. Stakeholder Engagement Methodology

Planning for Engagement

The purpose of stakeholder engagement during the inquiry was to provide stakeholders with objective information to help them understand the proposal and to obtain information and feedback from stakeholders and the general public. The engagement was not designed as a plebiscite or vote, but rather to obtain information not available through desktop research or councils to feed into the independent investigation.

BDO drafted a Stakeholder Engagement Plan and provided it to Commission staff for feedback on 5 February 2024. Additional drafts were provided to the Commission on 8 February and 19 February.

All affected councils received a draft of the Stakeholder Engagement Plan for their feedback on 27 February. Following feedback from councils and the Commission, BDO finalised its draft of the Stakeholder Engagement Plan on 13 April 2024. The Commission made final changes to the Stakeholder Engagement plan and published it on 2 May 2024.

The engagement approach was three staged:

1. **Setting the Stage:** BDO conducted initial meetings with councils' leadership teams in late February 2024 to inform them of the process, request provision of initial input/documentation, outline the proposed stakeholder engagement methodology, and request a list of stakeholders to engage (particularly community and sporting groups, any business/private sector stakeholders).
2. **Seeking Information and Feedback:** Engagement with stakeholders identified by the Commission, the investigator and councils through:
 - a webpage with information about the proposal
 - two in-person public forums and one online public forum
 - a public call for submissions to the inquiry from the general public and identified stakeholder organisations
 - a public survey, primarily for individuals unable or not wishing to attend a public forum or prepare a submission
 - engagement sessions with elected member bodies, and
 - targeted invitations for interview.
3. **Validation:** BDO confirmed its understanding and use of information received from stakeholders where there was any ambiguity or lack of clarity.

While at the outset of the investigation BDO had considered engaging council staff to understand the implications of the impact of a change in boundaries on their employment conditions, through the financial analysis we determined that there would be minimal impact on staff. Engagement of council staff was therefore not required and, in agreement with the Commission, assessment of staff impacts for the inquiry was conducted through desktop analysis only.

Advertising Engagement Opportunities

BDO provided to the Commission's staff in the Department for Infrastructure and Transport (DIT) content for collateral to advertise the stakeholder engagement options, particularly the public forums and website. DIT subsequently used to content to design:

- Government of South Australia's YourSAy (www.yoursay.sa.gov.au) Gawler Boundaries Review webpage, including an overview of the proposal, maps of affected areas and frequently asked questions
- Survey questions
- Letter to potentially impacted rate payers
- Content for general advertising (newspaper, flyers and council websites).

BDO also provided to the Commission the content for BDO's emails to stakeholders to be invited to engage.

Newspaper Advertisements

Based on BDO content, Commission staff arranged for notices of the inquiry and engagement opportunities in *The Bunyip* and the *Barossa Leader* newspapers.

BDO Communications

BDO opened an inbox, GawlerBoundaryReview@bdo.com.au, to receive public inquiries. BDO also managed inquiries via telephone and via post. BDO managed RSVPs to the public forums.

As part of the initial request of information from councils, BDO requested from councils a list of stakeholders they thought should be invited to engage with the investigator. All councils subsequently provided input to the list of stakeholders to be engaged. Contact details could not be found or were incorrect for a small number of stakeholders (primarily small businesses) provided by councils. The Commission was provided for its information with a list of stakeholders to be contacted.

Based on stakeholders identified by BDO and affected councils, BDO emailed 323 stakeholder contacts to inform them of all engagement options and invite them to provide a submission, or, in some cases, have an interview.

Council Communications

Council officers were informed and they noted that collateral, including letters to rate payers, would be prepared for them to distribute.

BDO subsequently provided collateral to council contacts to advise ratepayers and other stakeholders of the inquiry, allow them to seek additional information, and invite input. Councils were provided with:

- Letters from BDO to provide to provide all potentially impacted ratepayers, including a flyer with engagement options and the survey
- Information to direct people to the YourSAy.sa.gov.au engagement page
- A printable flyer
- A survey that could be printed or completed digitally
- A printable flyer with frequently asked questions, including information about potentially affected areas
- Social media assets, including tiles with multiple messages ('Have your say', 'Register to attend, 'Proposed change to Town of Gawler's boundaries' and 'Last chance to have your say') and sizes suitable for Facebook, Instagram and LinkedIn.

During the public forums, we and Commission staff came to understand that the collateral had not been used consistently across councils. We undertook desktop research at that stage and asked council contacts verbally; in preparing this report, we validated with each council how it used the provided collateral.

We understand that affected councils used the provided collateral and advertised the engagement opportunities as follows:

Barossa Council

- Included information about the inquiry in Council's full-page advertisement in The Leader newspaper in August and September
- Included information about the inquiry on its website as a news item
- Included information about the inquiry in its monthly e-newsletter in August and September
- Displayed collateral provided by BDO and provided hard copies of survey at all five customer service points
- Paid Facebook advertising
- On its Facebook page on 31/7, 5/8, 12/8, 19/8, 27/8, and 5/9.

We understand that while the Barossa Council uploaded the pro forma of the letters from BDO on its website, it did not complete the rate payers' mailing information and mail or letter drop them.

Town of Gawler

- Postal mailout to rate payers in affected areas
- Email to people who registered interest in the Boundaries Reform, as well as a second email notifying of an extension to the consultation timeframe
- Email to people who registered to receive email from the ToG 'Your Voice Consultation Platform' on ToG website, as well as a second email notifying of an extension to the consultation timeframe
- On the ToG website as a news item from 25/7
- Featured as a consultation opportunity on ToG's consultation platform 'Your Voice' from 24/7-30/9
- On its Facebook page 9 times (25/7, 31/7, 7/8, 14/8, 23/8, 28/8, 4/9, 13/9, 25/9)
- On its LinkedIn profile 7 times (25/7, 31/7, 7/8, 14/8, 23/8, 4/9, 13/9)
- On its X (Twitter) on 25/7
- Promoted in the Bunyip newspaper as a part of ToG's Council update page on 7/8
- Displayed collateral provided by BDO and provided hard copies of survey at all four customer service points (administration centre, sports centre and libraries)
- Displayed collateral provided by BDO and provided hard copies of survey at the ToG stand at the Gawler Agricultural Show held on 24 and 25 August 2023.

Light Regional Council

- On its website as a banner (on the top of every page) and a news item
- Staff email signature banner for a 5-week period
- On its Facebook page six times (16/8, 11/8, 5/8, 4/8, 30/7, 29/7)
- Flyers placed and surveys made available at all council offices, libraries and the Visitor Information Centre
- Flyers placed at council owned assets: Hewett Centre, FARM Centre, Wasleys Institute, Roseworthy Tennis Clubrooms, etc

While we understand that Light Regional Council did not distribute the letters from BDO to potentially affected residents prior to the engagement sessions, we understand it conducted a mail out of supplied collateral to all council residents during the week of 16 September 2024 (excluding the potentially affected residents in Hewett, Gawler Belt and Reid, as they received the letter box drop coordinated by the Commission).

City of Playford

We are informed that the City of Playford distributed the letters from BDO to potentially affected residents on 6 August 2024.

YourSAy

We understand that, when it was launched on 24 July, the Gawler Boundaries Review YourSAy page would have been sent to individuals who previously signed up to be informed about new engagement opportunities. A report from YourSAy provided by Commission staff states that this email was sent to 71,320 individuals and opened by 29,273 of them.¹²⁷ Organic Facebook and Twitter campaigns were run by YourSAy, reaching 10,235 and 144 people respectively. In addition, the YourSAy report states that the YourSAy campaign included a paid Facebook ad campaign which reached 10,048 individuals.

Engagement Opportunities

YourSAy

The Gawler Boundary Review YourSAy webpage was designed as a hub for the public to become informed about the proposal, with maps, FAQs and full information about engagement opportunities.

A public survey was available on the YourSAy Gawler Boundaries Review page from 24 July to 30 September. In that time, there were more than 6,500 visits from nearly 6,000 people and more than 16,000 page views. Approximately 2/3 of these visitors visited the page within the original engagement timeframes, with the rest visiting during the extension.

We note that YourSAy requires visitors to register to provide feedback, including for the Gawler Boundaries Review survey, including providing their email address and phone number.

We are aware of a limited number of concerns suggesting YourSAy registration was a deterrent to completing the survey or that an individual could create multiple YourSAy accounts in an attempt to increase their influence on the process. BDO does not share these concerns because:

- For those unwilling or unable to complete the YourSAy registration, surveys and submissions could be emailed directly to BDO or mailed in hard copy
- The potential for inappropriate influence on the survey by an individual was negligible, as the engagement process was not a plebiscite or vote. Information provided by stakeholders was primarily considered for its content, such as the stated rationales for views, not simply numbers. In addition, although we did not conduct an audit of user data, there is no easily apparent evidence in the traffic source data behind the survey data of user fraud.

Elected Member Forums

BDO conducted sessions for each impacted council's elected member body in late August 2024. At each of these sessions, BDO provided draft information tailored to that council on the potential impact of the proposal on council's staffing, its financials, and any particular issues prominent for that council. Councillors were invited to provide any additional information they thought may be relevant, as well as feedback, which was then considered by the investigation team.

Public Forums

In August 2024, BDO facilitated three public forums, being at Curdnatta Recreation Park (Sandy Creek), the Hewett Centre (Hewett) and online. These forums were open to the general public and advertised as noted in 'Advertising Engagement Opportunities' above. Registering for attendance was strongly encouraged but not required, other than for the online forum (so attendees could be provided to link to attend).

Attendees were encouraged to record their attendance at the in-person forums but not required to do so. Attendance numbers are estimated based on headcounts at the forums.

Table 6.10 Estimated Attendance at Public Forums

Forum	Community Members	Observers (Staff)	Identified Councillors	Total
Curdnatta	30	6	3	39
Online	4	4	1	9
Hewett	69	12	9	90
Total	103	22	13	138

Submissions

BDO received submissions via email and in hardcopy. BDO also received a small number of submissions that were incorrectly sent to the Commission.

Nine stakeholder organisations provided a written submission. From the general public, 70 submissions were received. All submissions were reviewed and considered, with analysis focusing on whether the submission supported or opposed the proposal and why.

While limited quantitative analysis was prepared for whether the submission supported or opposed the proposal, given the sample of submissions is not a representative sample of residents and ratepayers, limited weight is given to the qualitative data, as it cannot be assumed to be representative of the relative populations' views. Greater emphasis was placed on a qualitative assessment of the views presented, particularly the rationales for the presented views.

Interview

None of the stakeholders invited for interview accepted that invitation. Nonetheless, BDO pursued an interview with the Electoral Commission.

Revised Engagement Timeframes

At launch of the advertising of the engagement opportunities on 24 July, the deadline for feedback was 30 August 2024, providing more than five weeks for feedback.

From public forum attendees' feedback on 20 August, it became apparent to BDO and Commission staff that some councils had not used the collateral as we understood they would. To provide greater opportunity for public engagement, BDO immediately extended the deadline for feedback by a week, as this extension could be managed within the existing, approved project timeframes.

The Commission subsequently determined to extend the engagement deadline by another three weeks to 30 September. We understand that during the week of 9 September, the Commission also arranged a letterbox drop of a flyer with information about the inquiry and an invitation to provide feedback.

Councils were provided with revised social media assets on 21 August 2023 reflecting a changed in the engagement closing date.

6.3.4. Representation Matters Methodology

BDO used two principal sources for its review of the potential impacts of the proposal on representation matters:

- Numbers of councillors and number of electors by council from Electoral Commission of South Australia council enrolment data¹²⁸ dated 29 February 2024
- Numbers of ratable properties for each council and by affected area from financial data provided by councils.

From this data, BDO calculated for each council:

- The current elector to councillor ratio for the council (current electors / current councillors)
- An estimated number of electors per ratable property in that council area (current electors / current residential ratable properties)
- The change in residential ratable properties in the council should the proposal proceed for all areas in that council (current residential ratable properties - ratable properties in the affected areas in that council) and subsequently the total number of residential ratable properties in that council should the proposal proceed
- The change in estimated electors in the council should the proposal proceed (current estimated electors - estimated electors in the affected areas in that council) and subsequently the estimated number of electors in that council should the proposal proceed
- The estimated elector to councillor ratio for the council (estimated electors should the proposal proceed / current councillors).

Light Regional Council has a ward structure, with all potentially affected properties located within one ward (Mudla Wirra). BDO sought and received from Light Regional Council data on the number of electors per ward; this data was dated June 2024. From this data, the following was calculated:

- The current elector to councillor ratio for each ward (current electors per ward / current councillors for that ward)
- The change in estimated electors in each ward should the proposal proceed for all areas in LRC (current estimated electors per ward - estimated electors in the affected areas in that ward) and subsequently the estimated number of electors per ward should the proposal proceed
- The estimated elector to councillor ratio for each ward (estimated electors per ward should the proposal proceed / current councillors for that ward).

6.4. Indicative Financial Impact Assessment by Council and Area Over the Next 10 Years

Table 6.11 Financial Impact Forecast Assumptions

	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Gawler									
General Rates	5.00%	6.00%	5.70%	5.70%	5.70%	2.90%	2.90%	2.90%	2.50%
Other revenue	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Employee Costs	3.00%	3.30%	3.00%	3.00%	3.00%	2.50%	2.50%	2.50%	2.50%
Contracts and Materials (Waste)	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Contracts and Materials (Other)	3.00%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%
Source: LTFP assumptions advised by Executive Manager - Finance & Corporate Governance (email 10/07/2024 and 23/07/24)									
Average indexation applied to all costs	3.00%	2.93%	2.83%	2.83%	2.83%	2.67%	2.67%	2.67%	2.67%
Barossa									
General Rates (excl. growth)	4.00%	4.00%	3.50%	2.50%	2.50%	2.50%	2.00%	2.00%	2.00%
Waste Management (revenue)	3.75%	3.75%	3.75%	3.75%	2.75%	2.50%	2.50%	2.50%	2.50%
Other Revenue	3.00%	3.00%	3.00%	3.00%	2.00%	2.00%	2.00%	2.00%	2.00%
Employee Costs	3.40%	3.10%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%
Contracts, Material & Other Costs	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%	3.50%
Source: LTFP Q2 2023-24 Revision									
Average indexation applied to Other Revenue	3.15%	3.15%	3.15%	3.15%	2.15%	2.10%	2.10%	2.10%	2.10%
Average indexation applied to all costs	3.45%	3.30%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%

	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Light									
General Rates	4.30%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Refuse Collection (revenue)	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Other revenues	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Employee Costs	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Materials, Contracts & Other Costs	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Source: LTFP in the 2023-24 Annual Business Plan									
Average indexation applied to all costs	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
Playford									
General Rates	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%
Employee Costs (1)	5.00%	3.58%	2.98%	3.02%	3.11%	3.14%	3.15%	3.13%	3.15%
Other Costs (2)	2.58%	2.50%	2.50%	2.41%	2.27%	2.27%	2.39%	2.48%	2.48%
Source: LTFP 2024-25									
(1) Years 2-10 are based on the WPI from the Deloitte Forecast Economics December 2023 Release of between 3.0% and 3.2% per annum.									
(2) 'Years 2-10 are based on the Deloitte Forecast Economics December 2023 Release with CPI reverting to more historic values of between 2.3% and 2.6% for the remainder of the plan									
Average indexation applied to all costs	3.79%	3.04%	2.74%	2.72%	2.69%	2.71%	2.77%	2.81%	2.82%

Table 6.12 Financial Impact Forecast Assumptions –Town of Gawler

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 1 - Concordia										
Rates Revenue	144,000	151,200	160,272	169,408	179,064	189,270	194,759	200,407	206,219	211,375
Other Revenue	25,000	25,750	26,523	27,318	28,138	28,982	29,851	30,747	31,669	32,619
Total Revenue	169,000	176,950	186,795	196,726	207,201	218,252	224,611	231,154	237,888	243,994
Regional Landscape Levy	3,000	3,150	3,339	3,529	3,730	3,943	4,057	4,175	4,296	4,404
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	10,000	10,300	10,602	10,903	11,211	11,529	11,837	12,152	12,476	12,809
Waste Collection	11,000	11,330	11,662	11,993	12,333	12,682	13,020	13,367	13,724	14,090
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	12,000	12,360	12,723	13,083	13,454	13,835	14,204	14,583	14,971	15,371
Depreciation	49,000	49,000	49,000	49,000	49,000	49,000	49,000	49,000	49,000	49,000
Total Costs	85,000	86,140	87,326	88,508	89,728	90,989	92,118	93,277	94,468	95,673
Net Impact	84,000	90,810	99,468	108,218	117,473	127,263	132,492	137,877	143,420	148,321

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 2 - Hewett										
Rates Revenue	2,614,000	2,744,700	2,909,382	3,075,217	3,250,504	3,435,783	3,535,421	3,637,948	3,743,448	3,837,034
Other Revenue	300,000	309,000	318,270	327,818	337,653	347,782	358,216	368,962	380,031	391,432
Total Revenue	2,914,000	3,053,700	3,227,652	3,403,035	3,588,157	3,783,565	3,893,636	4,006,910	4,123,479	4,228,466
Regional Landscape Levy	60,666	63,699	67,521	71,370	75,438	79,738	82,051	84,430	86,879	89,050
Open spaces	663,000	682,890	702,921	722,838	743,318	764,379	784,762	805,689	827,174	849,232
Roads and roadside	648,000	667,440	687,018	706,484	726,501	747,085	767,007	787,461	808,460	830,019
Waste Collection	243,000	250,290	257,632	264,931	272,438	280,157	287,628	295,298	303,172	311,257
Facility Operating Costs	315,000	324,450	333,967	343,430	353,160	363,166	372,851	382,793	393,001	403,481
Planning & Admin	229,000	235,870	242,789	249,668	256,742	264,016	271,057	278,285	285,706	293,324
Depreciation	669,000	669,000	669,000	669,000	669,000	669,000	669,000	669,000	669,000	669,000
Total Costs	2,827,666	2,893,639	2,960,849	3,027,720	3,096,597	3,167,541	3,234,355	3,302,956	3,373,392	3,445,364
Net Impact	86,334	160,061	266,803	375,315	491,560	616,024	659,281	703,954	750,088	783,102

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 3 - Kalbeeba										
Rates Revenue	457,000	479,850	508,641	537,634	568,279	600,671	618,090	636,015	654,459	670,820
Other Revenue	11,000	11,330	11,670	12,020	12,381	12,752	13,135	13,529	13,934	14,353
Total Revenue	468,000	491,180	520,311	549,654	580,659	613,423	631,225	649,543	668,393	685,173
Regional Landscape Levy	11,000	11,550	12,243	12,941	13,678	14,458	14,877	15,309	15,753	16,147
Open spaces	9,000	9,270	9,542	9,812	10,090	10,376	10,653	10,937	11,229	11,528
Roads and roadside	8,000	8,240	8,482	8,722	8,969	9,223	9,469	9,722	9,981	10,247
Waste Collection	36,000	37,080	38,168	39,249	40,361	41,505	42,612	43,748	44,914	46,112
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	38,000	39,140	40,288	41,430	42,603	43,811	44,979	46,178	47,410	48,674
Depreciation	57,000	57,000	57,000	57,000	57,000	57,000	57,000	57,000	57,000	57,000
Total Costs	159,000	162,280	165,722	169,154	172,703	176,373	179,590	182,894	186,287	189,708
Net Impact	309,000	328,900	354,588	380,500	407,957	437,050	451,635	466,650	482,107	495,465

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 4 - Gawler Belt										
Rates Revenue	1,222,000	1,283,100	1,360,086	1,437,611	1,519,555	1,606,169	1,652,748	1,700,678	1,749,998	1,793,748
Other Revenue	486,000	500,580	515,597	531,065	546,997	563,407	580,309	597,719	615,650	634,120
Total Revenue	1,708,000	1,783,680	1,875,683	1,968,676	2,066,552	2,169,577	2,233,058	2,298,397	2,365,648	2,427,867
Regional Landscape Levy	30,035	31,536	33,429	35,334	37,348	39,477	40,622	41,800	43,012	44,087
Open spaces	4,000	4,120	4,241	4,361	4,485	4,612	4,735	4,861	4,990	5,124
Roads and roadside	32,000	32,960	33,927	34,888	35,877	36,893	37,877	38,887	39,924	40,989
Waste Collection	86,000	88,580	91,178	93,762	96,418	99,150	101,794	104,509	107,296	110,157
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	92,000	94,760	97,540	100,303	103,145	106,068	108,896	111,800	114,781	117,842
Depreciation	203,000	203,000	203,000	203,000	203,000	203,000	203,000	203,000	203,000	203,000
Total Costs	447,035	454,956	463,314	471,648	480,273	489,199	496,923	504,856	513,003	521,198
Net Impact	1,260,965	1,328,724	1,412,369	1,497,028	1,586,279	1,680,377	1,736,134	1,793,540	1,852,645	1,906,669

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 5 - Evanston Park										
Rates Revenue	106,000	111,300	117,978	124,703	131,811	139,324	143,364	147,522	151,800	155,595
Other Revenue	11,000	11,330	11,670	12,020	12,381	12,752	13,135	13,529	13,934	14,353
Total Revenue	117,000	122,630	129,648	136,723	144,191	152,076	156,499	161,051	165,735	169,948
Regional Landscape Levy	2,533	2,660	2,819	2,980	3,150	3,329	3,426	3,525	3,627	3,718
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	10,000	10,300	10,602	10,903	11,211	11,529	11,837	12,152	12,476	12,809
Waste Collection	8,000	8,240	8,482	8,722	8,969	9,223	9,469	9,722	9,981	10,247
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	8,000	8,240	8,482	8,722	8,969	9,223	9,469	9,722	9,981	10,247
Depreciation	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000	60,000
Total Costs	88,533	89,440	90,385	91,327	92,300	93,305	94,201	95,121	96,066	97,021
Net Impact	28,467	33,190	39,263	45,396	51,892	58,771	62,298	65,930	69,669	72,926

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 6 - Reid										
Rates Revenue	4,000	4,200	4,452	4,706	4,974	5,258	5,410	5,567	5,728	5,872
Other Revenue	0	0	0	0	0	0	0	0	0	0
Total Revenue	4,000	4,200	4,452	4,706	4,974	5,258	5,410	5,567	5,728	5,872
Regional Landscape Levy	0	0	0	0	0	0	0	0	0	0
Open spaces	3,000	3,090	3,181	3,271	3,363	3,459	3,551	3,646	3,743	3,843
Roads and roadside	0	0	0	0	0	0	0	0	0	0
Waste Collection	0	0	0	0	0	0	0	0	0	0
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	0	0	0	0	0	0	0	0	0	0
Depreciation	0	0	0	0	0	0	0	0	0	0
Total Costs	3,000	3,090	3,181	3,271	3,363	3,459	3,551	3,646	3,743	3,843
Net Impact	1,000	1,110	1,271	1,435	1,611	1,799	1,859	1,921	1,985	2,029

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 7 - Hillier										
Rates Revenue	97,000	101,850	107,961	114,115	120,619	127,495	131,192	134,997	138,911	142,384
Other Revenue	2,000	2,060	2,122	2,185	2,251	2,319	2,388	2,460	2,534	2,610
Total Revenue	99,000	103,910	110,083	116,300	122,870	129,813	133,580	137,456	141,445	144,994
Regional Landscape Levy	2,426	2,547	2,700	2,854	3,016	3,188	3,281	3,376	3,474	3,561
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	2,000	2,060	2,120	2,181	2,242	2,306	2,367	2,430	2,495	2,562
Waste Collection	6,000	6,180	6,361	6,542	6,727	6,917	7,102	7,291	7,486	7,685
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	7,000	7,210	7,421	7,632	7,848	8,070	8,286	8,507	8,733	8,966
Depreciation	13,000	13,000	13,000	13,000	13,000	13,000	13,000	13,000	13,000	13,000
Total Costs	30,426	30,997	31,603	32,208	32,834	33,482	34,036	34,604	35,188	35,774
Net Impact	68,574	72,913	78,480	84,093	90,037	96,331	99,544	102,852	106,257	109,220

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 8 - Bibaringa										
Rates Revenue	(16,000)	(16,800)	(17,808)	(18,823)	(19,896)	(21,030)	(21,640)	(22,267)	(22,913)	(23,486)
Other Revenue	0	0	0	0	0	0	0	0	0	0
Total Revenue	(16,000)	(16,800)	(17,808)	(18,823)	(19,896)	(21,030)	(21,640)	(22,267)	(22,913)	(23,486)
Regional Landscape Levy	0	0	0	0	0	0	0	0	0	0
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	(1,000)	(1,030)	(1,060)	(1,090)	(1,121)	(1,153)	(1,184)	(1,215)	(1,248)	(1,281)
Waste Collection	(1,000)	(1,030)	(1,060)	(1,090)	(1,121)	(1,153)	(1,184)	(1,215)	(1,248)	(1,281)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(1,000)	(1,030)	(1,060)	(1,090)	(1,121)	(1,153)	(1,184)	(1,215)	(1,248)	(1,281)
Depreciation	(11,000)	(11,000)	(11,000)	(11,000)	(11,000)	(11,000)	(11,000)	(11,000)	(11,000)	(11,000)
Total Costs	(14,000)	(14,090)	(14,181)	(14,271)	(14,363)	(14,459)	(14,551)	(14,646)	(14,743)	(14,843)
Net Impact	(2,000)	(2,710)	(3,627)	(4,552)	(5,533)	(6,571)	(7,089)	(7,622)	(8,170)	(8,643)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 9 - Uleybury										
Rates Revenue	(92,000)	(96,600)	(102,396)	(108,233)	(114,402)	(120,923)	(124,429)	(128,038)	(131,751)	(135,045)
Other Revenue	(1,000)	(1,030)	(1,061)	(1,093)	(1,126)	(1,159)	(1,194)	(1,230)	(1,267)	(1,305)
Total Revenue	(93,000)	(97,630)	(103,457)	(109,325)	(115,527)	(122,082)	(125,624)	(129,268)	(133,018)	(136,350)
Regional Landscape Levy	(2,241)	(2,353)	(2,494)	(2,636)	(2,786)	(2,945)	(3,030)	(3,118)	(3,209)	(3,289)
Open spaces	(2,000)	(2,060)	(2,120)	(2,181)	(2,242)	(2,306)	(2,367)	(2,430)	(2,495)	(2,562)
Roads and roadside	(3,000)	(3,090)	(3,181)	(3,271)	(3,363)	(3,459)	(3,551)	(3,646)	(3,743)	(3,843)
Waste Collection	(6,000)	(6,180)	(6,361)	(6,542)	(6,727)	(6,917)	(7,102)	(7,291)	(7,486)	(7,685)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(7,000)	(7,210)	(7,421)	(7,632)	(7,848)	(8,070)	(8,286)	(8,507)	(8,733)	(8,966)
Depreciation	(15,000)	(15,000)	(15,000)	(15,000)	(15,000)	(15,000)	(15,000)	(15,000)	(15,000)	(15,000)
Total Costs	(35,241)	(35,893)	(36,578)	(37,260)	(37,967)	(38,697)	(39,336)	(39,992)	(40,666)	(41,345)
Net Impact	(57,759)	(61,737)	(66,879)	(72,065)	(77,561)	(83,385)	(86,287)	(89,276)	(92,352)	(95,005)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
TOTAL										
Rates Revenue	4,536,000	4,762,800	5,048,568	5,336,336	5,640,508	5,962,016	6,134,915	6,312,827	6,495,899	6,658,297
Other Revenue	834,000	859,020	884,791	911,334	938,674	966,835	995,840	1,025,715	1,056,486	1,088,181
Total Revenue	5,370,000	5,621,820	5,933,359	6,247,671	6,579,182	6,928,851	7,130,755	7,338,542	7,552,386	7,746,478
Regional Landscape Levy	107,419	112,790	119,557	126,372	133,575	141,189	145,283	149,497	153,832	157,678
Open spaces	677,000	697,310	717,764	738,101	759,014	780,519	801,333	822,702	844,641	867,165
Roads and roadside	706,000	727,180	748,511	769,718	791,527	813,954	835,659	857,943	880,822	904,310
Waste Collection	383,000	394,490	406,062	417,567	429,398	441,564	453,339	465,428	477,840	490,582
Facility Operating Costs	315,000	324,450	333,967	343,430	353,160	363,166	372,851	382,793	393,001	403,481
Planning & Admin	378,000	389,340	400,761	412,116	423,792	435,800	447,421	459,352	471,602	484,178
Depreciation	1,025,000	1,025,000	1,025,000	1,025,000	1,025,000	1,025,000	1,025,000	1,025,000	1,025,000	1,025,000
Total Costs	3,591,419	3,670,560	3,751,622	3,832,303	3,915,466	4,001,192	4,080,887	4,162,716	4,246,737	4,332,394
Net Impact	1,778,581	1,951,260	2,181,737	2,415,367	2,663,716	2,927,659	3,049,868	3,175,826	3,305,649	3,414,084

Table 6.13 Financial Impact Forecast Assumptions –The Barossa Council

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 1 - Concordia										
Rates Revenue	(115,000)	(119,600)	(124,384)	(128,737)	(131,956)	(135,255)	(138,636)	(141,409)	(144,237)	(147,122)
Other Revenue	(7,000)	(7,221)	(7,448)	(7,683)	(7,925)	(8,095)	(8,265)	(8,438)	(8,616)	(8,797)
Total Revenue	(122,000)	(126,821)	(131,832)	(136,420)	(139,880)	(143,350)	(146,901)	(149,847)	(152,853)	(155,918)
Regional Landscape Levy	(3,000)	(3,120)	(3,245)	(3,358)	(3,442)	(3,528)	(3,617)	(3,689)	(3,763)	(3,838)
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	(12,000)	(12,414)	(12,824)	(13,208)	(13,605)	(14,013)	(14,433)	(14,866)	(15,312)	(15,771)
Waste Collection	(10,000)	(10,345)	(10,686)	(11,007)	(11,337)	(11,677)	(12,028)	(12,388)	(12,760)	(13,143)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(13,000)	(13,449)	(13,892)	(14,309)	(14,738)	(15,180)	(15,636)	(16,105)	(16,588)	(17,086)
Depreciation	(49,000)	(49,000)	(49,000)	(49,000)	(49,000)	(49,000)	(49,000)	(49,000)	(49,000)	(49,000)
Total Costs	(87,000)	(88,328)	(89,647)	(90,883)	(92,122)	(93,399)	(94,713)	(96,048)	(97,423)	(98,838)
Net Impact	(35,000)	(38,493)	(42,185)	(45,537)	(47,758)	(49,951)	(52,188)	(53,799)	(55,430)	(57,080)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 3 - Kalbeeba										
Rates Revenue	(385,000)	(400,400)	(416,416)	(430,991)	(441,765)	(452,809)	(464,130)	(473,412)	(482,881)	(492,538)
Other Revenue	(9,000)	(9,284)	(9,576)	(9,878)	(10,189)	(10,408)	(10,626)	(10,849)	(11,077)	(11,310)
Total Revenue	(394,000)	(409,684)	(425,992)	(440,868)	(451,954)	(463,217)	(474,756)	(484,262)	(493,958)	(503,848)
Regional Landscape Levy	(11,000)	(11,440)	(11,898)	(12,314)	(12,622)	(12,937)	(13,261)	(13,526)	(13,797)	(14,073)
Open spaces	(10,000)	(10,345)	(10,686)	(11,007)	(11,337)	(11,677)	(12,028)	(12,388)	(12,760)	(13,143)
Roads and roadside	(15,000)	(15,518)	(16,030)	(16,510)	(17,006)	(17,516)	(18,041)	(18,583)	(19,140)	(19,714)
Waste Collection	(34,000)	(35,173)	(36,334)	(37,424)	(38,546)	(39,703)	(40,894)	(42,121)	(43,384)	(44,686)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(43,000)	(44,484)	(45,951)	(47,330)	(48,750)	(50,212)	(51,719)	(53,270)	(54,868)	(56,514)
Depreciation	(57,000)	(57,000)	(57,000)	(57,000)	(57,000)	(57,000)	(57,000)	(57,000)	(57,000)	(57,000)
Total Costs	(170,000)	(173,959)	(177,899)	(181,585)	(185,261)	(189,046)	(192,943)	(196,888)	(200,950)	(205,130)
Net Impact	(224,000)	(235,725)	(248,093)	(259,283)	(266,693)	(274,171)	(281,813)	(287,374)	(293,008)	(298,718)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
TOTAL										
Rates Revenue	(500,000)	(520,000)	(540,800)	(559,728)	(573,721)	(588,064)	(602,766)	(614,821)	(627,118)	(639,660)
Other Revenue	(16,000)	(16,504)	(17,024)	(17,560)	(18,113)	(18,503)	(18,891)	(19,288)	(19,693)	(20,107)
Total Revenue	(516,000)	(536,504)	(557,824)	(577,288)	(591,834)	(606,567)	(621,657)	(634,109)	(646,811)	(659,767)
Regional Landscape Levy	(14,000)	(14,560)	(15,142)	(15,672)	(16,064)	(16,466)	(16,877)	(17,215)	(17,559)	(17,910)
Open spaces	(10,000)	(10,345)	(10,686)	(11,007)	(11,337)	(11,677)	(12,028)	(12,388)	(12,760)	(13,143)
Roads and roadside	(27,000)	(27,932)	(28,853)	(29,719)	(30,610)	(31,529)	(32,475)	(33,449)	(34,452)	(35,486)
Waste Collection	(44,000)	(45,518)	(47,020)	(48,431)	(49,884)	(51,380)	(52,922)	(54,509)	(56,144)	(57,829)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(56,000)	(57,932)	(59,844)	(61,639)	(63,488)	(65,393)	(67,355)	(69,375)	(71,457)	(73,600)
Depreciation	(106,000)	(106,000)	(106,000)	(106,000)	(106,000)	(106,000)	(106,000)	(106,000)	(106,000)	(106,000)
Total Costs	(257,000)	(262,287)	(267,546)	(272,468)	(277,384)	(282,445)	(287,656)	(292,937)	(298,373)	(303,968)
Net Impact	(259,000)	(274,218)	(290,278)	(304,820)	(314,451)	(324,122)	(334,001)	(341,172)	(348,438)	(355,798)

Table 6.14 Financial Impact Forecast Assumptions –Light Regional Council

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 2 - Hewett										
Rates Revenue	(2,562,000)	(2,672,166)	(2,752,331)	(2,834,901)	(2,919,948)	(3,007,546)	(3,097,773)	(3,190,706)	(3,286,427)	(3,385,020)
Other Revenue	(348,000)	(358,440)	(369,193)	(380,269)	(391,677)	(403,427)	(415,530)	(427,996)	(440,836)	(454,061)
Total Revenue	(2,910,000)	(3,030,606)	(3,121,524)	(3,215,170)	(3,311,625)	(3,410,974)	(3,513,303)	(3,618,702)	(3,727,263)	(3,839,081)
Regional Landscape Levy	(62,934)	(65,640)	(67,609)	(69,637)	(71,727)	(73,878)	(76,095)	(78,377)	(80,729)	(83,151)
Open spaces	(390,000)	(401,700)	(413,751)	(426,164)	(438,948)	(452,117)	(465,680)	(479,651)	(494,040)	(508,862)
Roads and roadside	(607,000)	(625,210)	(643,966)	(663,285)	(683,184)	(703,679)	(724,790)	(746,533)	(768,929)	(791,997)
Waste Collection	(200,000)	(206,000)	(212,180)	(218,545)	(225,102)	(231,855)	(238,810)	(245,975)	(253,354)	(260,955)
Facility Operating Costs	(315,000)	(324,450)	(334,184)	(344,209)	(354,535)	(365,171)	(376,126)	(387,410)	(399,033)	(411,004)
Planning & Admin	(152,000)	(156,560)	(161,257)	(166,095)	(171,077)	(176,210)	(181,496)	(186,941)	(192,549)	(198,326)
Depreciation	(669,000)	(669,000)	(669,000)	(669,000)	(669,000)	(669,000)	(669,000)	(669,000)	(669,000)	(669,000)
Total Costs	(2,395,934)	(2,448,560)	(2,501,947)	(2,556,935)	(2,613,573)	(2,671,910)	(2,731,998)	(2,793,888)	(2,857,634)	(2,923,293)
Net Impact	(514,066)	(582,046)	(619,577)	(658,235)	(698,052)	(739,063)	(781,305)	(824,814)	(869,629)	(915,788)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 4 - Gawler Belt										
Rates Revenue	(1,097,000)	(1,144,171)	(1,178,496)	(1,213,851)	(1,250,267)	(1,287,775)	(1,326,408)	(1,366,200)	(1,407,186)	(1,449,402)
Other Revenue	(30,000)	(30,900)	(31,827)	(32,782)	(33,765)	(34,778)	(35,822)	(36,896)	(38,003)	(39,143)
Total Revenue	(1,127,000)	(1,175,071)	(1,210,323)	(1,246,633)	(1,284,032)	(1,322,553)	(1,362,229)	(1,403,096)	(1,445,189)	(1,488,545)
Regional Landscape Levy	(30,035)	(31,326)	(32,266)	(33,234)	(34,231)	(35,258)	(36,316)	(37,405)	(38,527)	(39,683)
Open spaces	(4,000)	(4,120)	(4,244)	(4,371)	(4,502)	(4,637)	(4,776)	(4,919)	(5,067)	(5,219)
Roads and roadside	(44,000)	(45,320)	(46,680)	(48,080)	(49,522)	(51,008)	(52,538)	(54,114)	(55,738)	(57,410)
Waste Collection	(71,000)	(73,130)	(75,324)	(77,584)	(79,911)	(82,308)	(84,778)	(87,321)	(89,941)	(92,639)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(70,000)	(72,100)	(74,263)	(76,491)	(78,786)	(81,149)	(83,584)	(86,091)	(88,674)	(91,334)
Depreciation	(203,000)	(203,000)	(203,000)	(203,000)	(203,000)	(203,000)	(203,000)	(203,000)	(203,000)	(203,000)
Total Costs	(422,035)	(428,996)	(435,776)	(442,759)	(449,952)	(457,361)	(464,991)	(472,851)	(480,947)	(489,285)
Net Impact	(704,965)	(746,075)	(774,547)	(803,874)	(834,080)	(865,192)	(897,238)	(930,245)	(964,242)	(999,260)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 6 - Reid										
Rates Revenue	(3,000)	(3,129)	(3,223)	(3,320)	(3,419)	(3,522)	(3,627)	(3,736)	(3,848)	(3,964)
Other Revenue	0	0	0	0	0	0	0	0	0	0
Total Revenue	(3,000)	(3,129)	(3,223)	(3,320)	(3,419)	(3,522)	(3,627)	(3,736)	(3,848)	(3,964)
Regional Landscape Levy	0	0	0	0	0	0	0	0	0	0
Open spaces	(3,000)	(3,090)	(3,183)	(3,278)	(3,377)	(3,478)	(3,582)	(3,690)	(3,800)	(3,914)
Roads and roadside	0	0	0	0	0	0	0	0	0	0
Waste Collection	0	0	0	0	0	0	0	0	0	0
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	0	0	0	0	0	0	0	0	0	0
Depreciation	0	0	0	0	0	0	0	0	0	0
Total Costs	(3,000)	(3,090)	(3,183)	(3,278)	(3,377)	(3,478)	(3,582)	(3,690)	(3,800)	(3,914)
Net Impact	0	(39)	(40)	(41)	(43)	(44)	(45)	(47)	(48)	(49)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
TOTAL										
Rates Revenue	(3,662,000)	(3,819,466)	(3,934,050)	(4,052,071)	(4,173,634)	(4,298,843)	(4,427,808)	(4,560,642)	(4,697,461)	(4,838,385)
Other Revenue	(378,000)	(389,340)	(401,020)	(413,051)	(425,442)	(438,206)	(451,352)	(464,892)	(478,839)	(493,204)
Total Revenue	(4,040,000)	(4,208,806)	(4,335,070)	(4,465,122)	(4,599,076)	(4,737,048)	(4,879,160)	(5,025,534)	(5,176,301)	(5,331,590)
Regional Landscape Levy	(92,968)	(96,966)	(99,875)	(102,871)	(105,957)	(109,136)	(112,410)	(115,783)	(119,256)	(122,834)
Open spaces	(397,000)	(408,910)	(421,177)	(433,813)	(446,827)	(460,232)	(474,039)	(488,260)	(502,908)	(517,995)
Roads and roadside	(651,000)	(670,530)	(690,646)	(711,365)	(732,706)	(754,687)	(777,328)	(800,648)	(824,667)	(849,407)
Waste Collection	(271,000)	(279,130)	(287,504)	(296,129)	(305,013)	(314,163)	(323,588)	(333,296)	(343,295)	(353,594)
Facility Operating Costs	(315,000)	(324,450)	(334,184)	(344,209)	(354,535)	(365,171)	(376,126)	(387,410)	(399,033)	(411,004)
Planning & Admin	(222,000)	(228,660)	(235,520)	(242,585)	(249,863)	(257,359)	(265,080)	(273,032)	(281,223)	(289,660)
Depreciation	(872,000)	(872,000)	(872,000)	(872,000)	(872,000)	(872,000)	(872,000)	(872,000)	(872,000)	(872,000)
Total Costs	(2,820,968)	(2,880,646)	(2,940,905)	(3,002,973)	(3,066,902)	(3,132,749)	(3,200,571)	(3,270,428)	(3,342,381)	(3,416,493)
Net Impact	(1,219,032)	(1,328,160)	(1,394,165)	(1,462,150)	(1,532,174)	(1,604,299)	(1,678,588)	(1,755,106)	(1,833,919)	(1,915,097)

Table 6.15 Financial Impact Forecast Assumptions –City of Playford

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 5 - Evanston Park										
Rates Revenue	(66,000)	(67,584)	(69,206)	(70,867)	(72,568)	(74,309)	(76,093)	(77,919)	(79,789)	(81,704)
Other Revenue	5,000	5,129	5,257	5,389	5,519	5,644	5,772	5,910	6,056	6,207
Total Revenue	(61,000)	(62,455)	(63,949)	(65,478)	(67,049)	(68,666)	(70,321)	(72,009)	(73,733)	(75,497)
Regional Landscape Levy	(1,404)	(1,438)	(1,472)	(1,508)	(1,544)	(1,581)	(1,619)	(1,658)	(1,698)	(1,738)
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	(8,000)	(8,303)	(8,556)	(8,790)	(9,029)	(9,272)	(9,522)	(9,786)	(10,061)	(10,344)
Waste Collection	(8,000)	(8,303)	(8,556)	(8,790)	(9,029)	(9,272)	(9,522)	(9,786)	(10,061)	(10,344)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(5,000)	(5,190)	(5,347)	(5,494)	(5,643)	(5,795)	(5,951)	(6,116)	(6,288)	(6,465)
Depreciation	(60,000)	(60,000)	(60,000)	(60,000)	(60,000)	(60,000)	(60,000)	(60,000)	(60,000)	(60,000)
Total Costs	(82,404)	(83,234)	(83,931)	(84,582)	(85,244)	(85,919)	(86,615)	(87,346)	(88,107)	(88,891)
Net Impact	21,404	20,779	19,982	19,103	18,195	17,253	16,294	15,337	14,374	13,394

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 7 - Hillier										
Rates Revenue	(62,000)	(63,488)	(65,012)	(66,572)	(68,170)	(69,806)	(71,481)	(73,197)	(74,953)	(76,752)
Other Revenue	0	0	0	0	0	0	0	0	0	0
Total Revenue	(62,000)	(63,488)	(65,012)	(66,572)	(68,170)	(69,806)	(71,481)	(73,197)	(74,953)	(76,752)
Regional Landscape Levy	(1,300)	(1,331)	(1,363)	(1,396)	(1,429)	(1,464)	(1,499)	(1,535)	(1,572)	(1,609)
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	(2,000)	(2,076)	(2,139)	(2,198)	(2,257)	(2,318)	(2,381)	(2,447)	(2,515)	(2,586)
Waste Collection	(7,000)	(7,265)	(7,486)	(7,691)	(7,900)	(8,113)	(8,332)	(8,563)	(8,803)	(9,051)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(4,000)	(4,152)	(4,278)	(4,395)	(4,514)	(4,636)	(4,761)	(4,893)	(5,030)	(5,172)
Depreciation	(13,000)	(13,000)	(13,000)	(13,000)	(13,000)	(13,000)	(13,000)	(13,000)	(13,000)	(13,000)
Total Costs	(27,300)	(27,824)	(28,266)	(28,680)	(29,101)	(29,530)	(29,973)	(30,437)	(30,920)	(31,418)
Net Impact	(34,700)	(35,664)	(36,746)	(37,892)	(39,069)	(40,276)	(41,508)	(42,759)	(44,033)	(45,334)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 8 - Bibaringa										
Rates Revenue	11,000	11,264	11,534	11,811	12,095	12,385	12,682	12,987	13,298	13,617
Other Revenue	0	0	0	0	0	0	0	0	0	0
Total Revenue	11,000	11,264	11,534	11,811	12,095	12,385	12,682	12,987	13,298	13,617
Regional Landscape Levy	0	0	0	0	0	0	0	0	0	0
Open spaces	0	0	0	0	0	0	0	0	0	0
Roads and roadside	1,000	1,038	1,069	1,099	1,129	1,159	1,190	1,223	1,258	1,293
Waste Collection	1,000	1,038	1,069	1,099	1,129	1,159	1,190	1,223	1,258	1,293
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	1,000	1,038	1,069	1,099	1,129	1,159	1,190	1,223	1,258	1,293
Depreciation	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
Total Costs	14,000	14,114	14,208	14,296	14,386	14,477	14,571	14,670	14,773	14,879
Net Impact	(3,000)	(2,850)	(2,674)	(2,485)	(2,291)	(2,092)	(1,889)	(1,683)	(1,475)	(1,262)

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
Area 9 - Uleybury										
Rates Revenue	63,000	64,512	66,060	67,646	69,269	70,932	72,634	74,377	76,162	77,990
Other Revenue	1,000	1,026	1,051	1,078	1,104	1,129	1,154	1,182	1,211	1,241
Total Revenue	64,000	65,538	67,112	68,723	70,373	72,060	73,788	75,559	77,374	79,232
Regional Landscape Levy	1,242	1,272	1,302	1,333	1,365	1,398	1,432	1,466	1,501	1,537
Open spaces	2,000	2,076	2,139	2,198	2,257	2,318	2,381	2,447	2,515	2,586
Roads and roadside	3,000	3,114	3,208	3,296	3,386	3,477	3,571	3,670	3,773	3,879
Waste Collection	7,000	7,265	7,486	7,691	7,900	8,113	8,332	8,563	8,803	9,051
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	4,000	4,152	4,278	4,395	4,514	4,636	4,761	4,893	5,030	5,172
Depreciation	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000	15,000
Total Costs	32,242	32,878	33,413	33,913	34,423	34,941	35,476	36,038	36,623	37,225
Net Impact	31,758	32,660	33,698	34,810	35,950	37,119	38,312	39,521	40,751	42,007

	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33
TOTAL										
Rates Revenue	(54,000)	(55,296)	(56,623)	(57,982)	(59,374)	(60,799)	(62,258)	(63,752)	(65,282)	(66,849)
Other Revenue	6,000	6,155	6,309	6,466	6,622	6,773	6,926	7,092	7,268	7,448
Total Revenue	(48,000)	(49,141)	(50,314)	(51,516)	(52,751)	(54,026)	(55,331)	(56,660)	(58,014)	(59,401)
Regional Landscape Levy	(1,463)	(1,498)	(1,534)	(1,570)	(1,608)	(1,647)	(1,686)	(1,727)	(1,768)	(1,811)
Open spaces	2,000	2,076	2,139	2,198	2,257	2,318	2,381	2,447	2,515	2,586
Roads and roadside	(6,000)	(6,227)	(6,417)	(6,593)	(6,772)	(6,954)	(7,142)	(7,340)	(7,545)	(7,758)
Waste Collection	(7,000)	(7,265)	(7,486)	(7,691)	(7,900)	(8,113)	(8,332)	(8,563)	(8,803)	(9,051)
Facility Operating Costs	0	0	0	0	0	0	0	0	0	0
Planning & Admin	(4,000)	(4,152)	(4,278)	(4,395)	(4,514)	(4,636)	(4,761)	(4,893)	(5,030)	(5,172)
Depreciation	(47,000)	(47,000)	(47,000)	(47,000)	(47,000)	(47,000)	(47,000)	(47,000)	(47,000)	(47,000)
Total Costs	(63,463)	(64,066)	(64,575)	(65,052)	(65,537)	(66,031)	(66,541)	(67,076)	(67,632)	(68,205)
Net Impact	15,463	14,925	14,261	13,536	12,785	12,005	11,209	10,416	9,617	8,804

6.5. Comparison of General Rates and Property-Related Charges Policies of Potentially Impacted Councils

The following table summarises the key elements of the general rates and property-related charges policies of the impacted councils:

	Council			
	Gawler	Barossa	Light	Playford
General Rates - Residential	0.0042824	0.00294	0.00400	0.00172745
General Rates - Commercial	0.01055	0.00454	0.00700	0.01151509
General Rates - Industrial	0.01055	0.00454	0.00700	0.01151509
General Rates - Primary Production	0.00428	0.00295	0.00312	0.00172745
General Rates - Vacant Land	0.00685	0.00559	0.00700	0.00172745
General Rates - Other	0.0042824	0.0029400	0.00400	0.00172745
General Rates - Fixed Charge	-	420.00	-	1,111.90
Minimum general rates charge	1,139.0		925.0	-
Regional Landscape Levy	0.00011293	0.0001122	0.00011715	0.00006264
Waste Management - Township	238.0	200.0	335.0	-
Waste Management - Rural	238.0	200.0	225.0	-
Waste Management - Commercial	238.0	200.0	335.0	-
Business Development Levy (non town centre)	0.0027696	-	-	-

6.6. Submissions from Organisations

Summary of submissions received from organisations:

Number of responses	Support Proposal	Oppose Proposal	Neutral
██████████		Oppose in entirety Capability and capacity of receiving council	
██████████		Oppose areas 2 & 4 Concern about LRC needing to increase rates	
Conservation Council of SA	Support in entirety subject to extensions of Urban Tree Canopy and Regulated and Significant Tree overlays		
Country Fire Service and Metropolitan Fire Service			Note potential administrative implications
Department for Infrastructure and Transport			Note administrative implications for Areas 1, 2, 3A, 4, 6, 7
Green Adelaide			Note administrative implications for areas 5, 7, 8 and 9
Northern and Yorke Landscape Board			Suggest increased engagement by councils in development of 2025-2031 Regional Landscape Plan
██████████		Oppose area 1 Capability of receiving council	
██████████		Oppose areas 1 & 3 Disruption to planning/housing	

Statements that no submission would be made were received from: the Department of Environment and Water, Electoral Commission of South Australia, the Office for Recreation, Sport and Racing, and the State Planning Commission.

[REDACTED]

27th August 2024

[REDACTED]

BDO Services
Attn: Kyffin Thompson
Level 7, 420 King William Street
Adelaide, SA. 5001

Dear Kyffin

Re: Gawler Boundary Review.

I write in response to the enquiry being conducted by the SA Local Government Boundaries Commission into the boundary change proposal being pursued by the Town of Gawler.

My professional involvement with the Town of Gawler extends back to my earlier career in property development related roles at Delfin Lend Lease and since 2012 in my current role as [REDACTED]. Since 2012 I have been involved in specific dealings with Gawler Council across delivery of the Woodvale development located in Gawler South. During that time I have also had involvement with other projects in the adjoining Council areas of Barossa, Light and Playford.

On face value I do not support the proposed local government boundary changes being put forward by Gawler Council. While there are arguments of economic rationalisation and benefits by amalgamating adjoining growth areas into the Town of Gawler, I believe these can be argued both way depending on which local government hat you wear. Gawler is already one of the largest growth area councils in the state and by amalgamating additional significant growth areas such as Concordia and Hewett into Gawler, this would have a significant negative impact on the economic viability and prosperity of adjoining local government areas.

It could be argued that this far-reaching amalgamation could be seen as nothing more than a “rates grab” without any real, demonstrated tangible benefits. Local government areas all across metropolitan Adelaide share boundaries with their LGA partners and the shared use of services and facilities across “invisible” Council boundaries is commonplace every day. The use of such facilities can be sensibly balanced and managed between Councils.

I believe another major impact of the proposed boundary changes would be placing a significant resource and management load on Gawler Council which is already

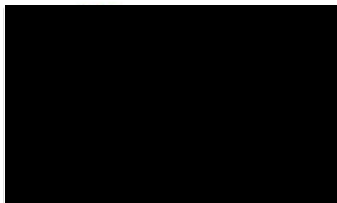
[REDACTED]

struggling to deliver key strategies and services associated with managed urban growth. Through my time involved initially with the Springwood development (from 2008) through to the Woodvale development (2012 to the present), the absence of critical strategic policies and strategies around things such as a Council wide approach to stormwater management have been clearly lacking. More recent discussions with current Council staff have indicated a change in attitude and recognition of the importance of such work, as evidenced by the 2022 Draft Stormwater Asset Management Plan. However strategic gaps such as this indicate that historically Council has not had the capacity to recognise the importance of strategic planning and infrastructure matters necessary to deal with substantial growth. The inclusion of additional substantial growth areas to the Town of Gawler would in my view exacerbate the problem.

In addition, Council delayed the delivery of the Gawler East Link Road by a number of years by undertaking a public consultation process on alternative alignments that were in my view flawed from the outset. This cost considerable time and money and created uncertainty and lost opportunity cost to land owners and developers.

The management of numerous strategic growth areas requires demonstrated skill and capacity across a range of complex disciplines. I believe that the proposed boundary change being pursued by the Town of Gawler will not produce demonstrated tangible benefits that would warrant such a change.

Yours sincerely



Director.



To Whom It May Concern

As a business with multiple rates - from owned and leased land - within the Light Regional Council we would oppose the Gawler Councils acquisition of areas currently within Light Council.

If Light Council was to loose all those rate payers their only real means of recuperating that loss is to have huge rate rises. No-one wants to agree to that!

The loss of rate payers would have a detrimental impact on the operations of Light Council.

Yours sincerely

[REDACTED]
[REDACTED]

Dear Mr Thompson

Please find attached a submission from the Conservation Council of SA, South Australia's peak body for the environment representing 50 of South Australia's environment and conservation organisations and their 90,000 members.

The Conservation Council SA recommends that the boundary change proceed, subject to:

1. The extension of the Urban Tree Canopy Overlay to all urban areas of Gawler (both the existing urban areas and proposed additions), noting there are currently some very substantial and inexplicable gaps.
2. The extension of the Regulated and Significant Tree Overlay to all of the proposed expansions of the Town of Gawler Council area
3. No change in the Native Vegetation Overlay.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Conservation Council of SA

M: [REDACTED] E: [REDACTED]

[REDACTED]



c/o Mr Kyffin Thompson
BDO Advisory
Level 7, 420 King William Street
Adelaide SA, 5001
By email: GawlerBoundaryReview@bdo.com.au

29 August 2024

Dear Mr Thompson,

Submission to the Town of Gawler Boundary Change Inquiry

The Conservation Council SA welcomes the opportunity to provide a submission to the Town of Gawler Boundary Change Inquiry.

The Conservation Council SA is an independent, non-profit, and strictly non-party political organisation representing approximately 60 of South Australia's environment and conservation organisations and their 90,000 members.

The Conservation Council SA kindly requests that this submission be published in full and made accessible to the public.

Context

Alongside the climate crisis, the nature crisis is upon us. As the Commonwealth State of the Environment 2021 puts it bluntly and seriously:

Overall, the state and trend of the environment of Australia are poor and deteriorating as a result of increasing pressures from climate change, habitat loss, invasive species, pollution and resource extraction... Multiple pressures create cumulative impacts that amplify threats to our environment, and abrupt changes in ecological systems have been recorded in the past 5 years.¹

A key finding of the most recent (2018) South Australian State of the Environment Report puts it even more succinctly:

Our native plants and animals are in serious trouble with many in decline and likely to become extinct.²

It is not sufficiently appreciated how crucial Australia's natural environment is in underpinning our economic and social prosperity. The World Economic Forum estimated that approximately half of global gross domestic product (GDP) is moderately to heavily dependent upon nature³, and an

¹ <https://soe.dcceew.gov.au/overview/key-findings>

² p6, <https://www.epa.sa.gov.au/soe-2018>

³ <https://www.weforum.org/publications/nature-risk-rising-why-the-crisis-engulfing-nature-matters-for-business-and-the-economy/>

Australian study using the same methodology found that 49% of Australia's GDP has a moderate to very high dependence upon nature⁴.

What this means for urban local governments like the Town of Gawler Council is that we must take steps to protect what little biodiversity remains, such as through strengthening urban tree protections, and not clearing the land of what little remains of our remnant native vegetation.

The Conservation Council SA has published a six-part series of reports that details at length the importance of urban tree protections; those reports are available online at: https://www.conservation.sa.gov.au/tree_resources.

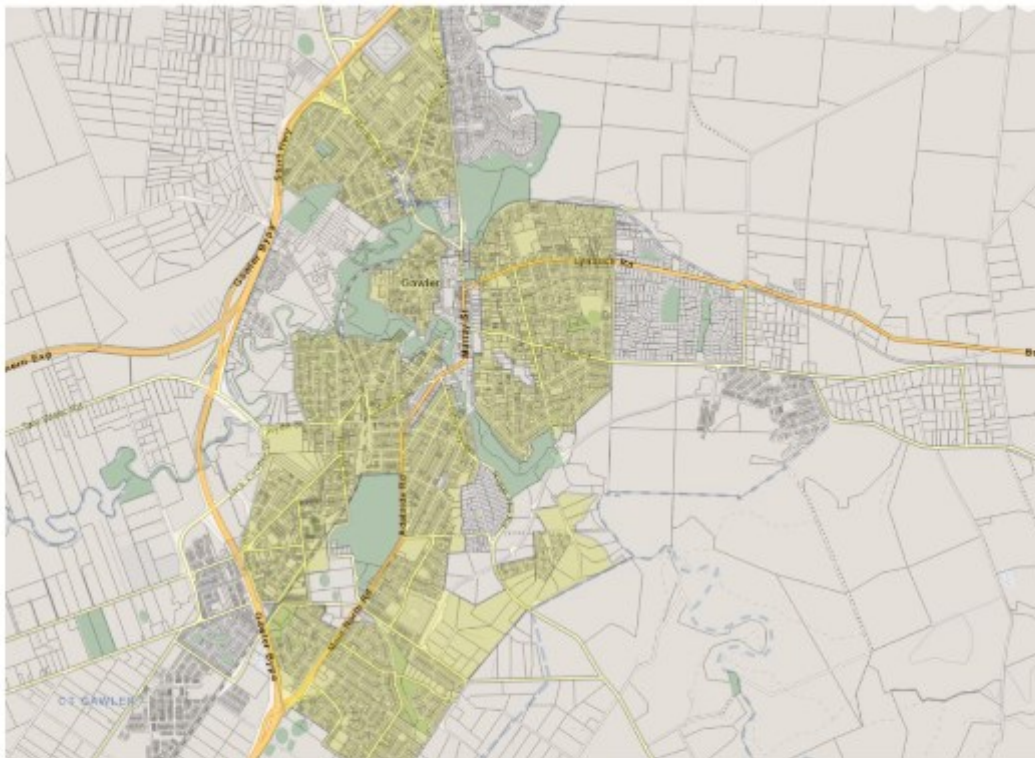
In this vein, the Conservation Council SA supports the boundary change as an opportunity to finally remedy some inexplicable gaps in the Planning Code's Urban Tree Canopy Overlay within the Town of Gawler, as well as gaps in the proposed additions to the Town.

Ensuring these anomalies are addressed as part of any boundary change would align with the policy intent of the State Government's tree reforms (as outlined in a media release from the Premier⁵, the SA Planning Commission⁶, and welcomed by Conservation Council SA⁷).

Recommendations

The Conservation Council SA recommends that the boundary change proceed, subject to:

1. The extension of the Urban Tree Canopy Overlay to all urban areas of Gawler (both the existing urban areas and proposed additions), noting there are currently some very substantial and inexplicable gaps. The current overlay is in yellow below:



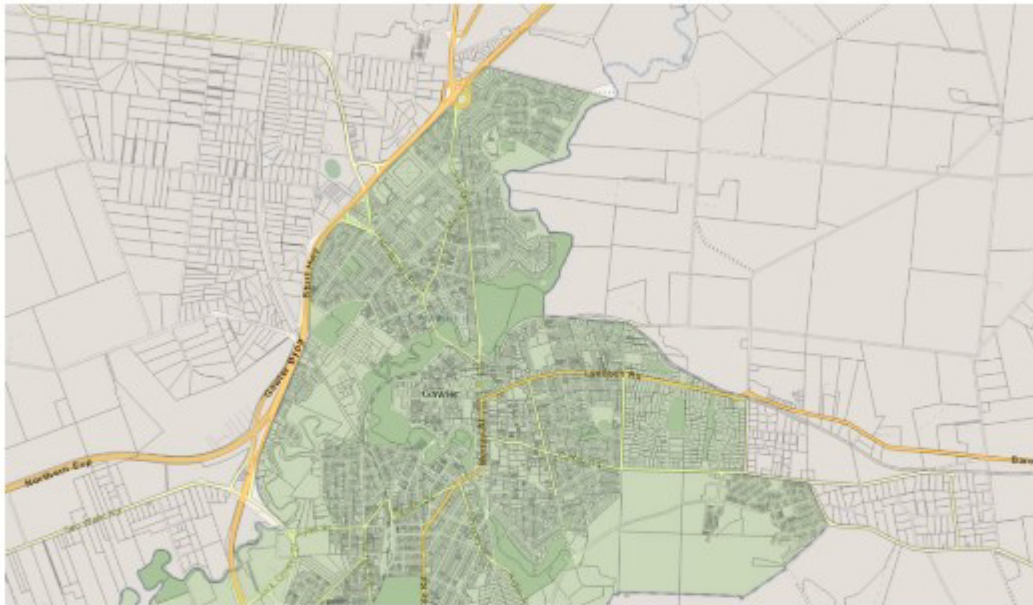
⁴ <https://www.acf.org.au/how-australias-prosperity-depends-on-nature>

⁵ <https://www.premier.sa.gov.au/media-releases/news-items/new-rules-to-protect-adelaides-tree-canopy-coming-into-effect-immediately>

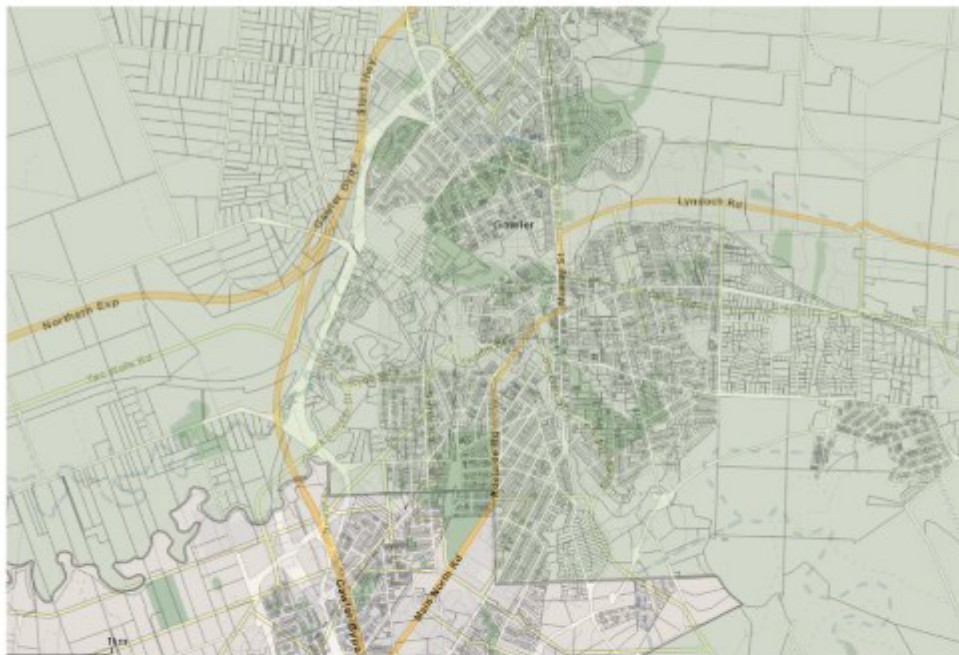
⁶ See: <https://plan.sa.gov.au/news/article/2024/new-rules-to-protect-adelaides-tree-canopy-coming-into-effect-immediately>; and https://plan.sa.gov.au/data/assets/pdf_file/0010/1366336/FAQ-Regulated-and-significant-tree-reforms.pdf

⁷ <https://www.conservation.sa.gov.au/stronger-tree-protections-announced-for-south-australia>

2. The extension of the Regulated and Significant Tree Overlay to all of the proposed expansions of the Town of Gawler Council area. The current overlay is in green below:

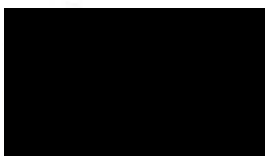


3. No change in the Native Vegetation Overlay. The current overlay is shown in Green below:



Thank you again for the opportunity to provide a submission to the Town of Gawler Boundary Change Inquiry. The Conservation Council SA is happy to discuss this submission further with the BDO; if you require further information, do not hesitate to contact me at ChiefExecutive@conservationsa.org.au.

Yours sincerely,





South Australian
**Country
Fire Service**

OFFICIAL

cfs.sa.gov.au

Our
Reference: ESS-24-3858 [REDACTED]

02 October 2024

Mr Kyffin Thompson
Partner, Advisory
BDO Australia - Adelaide
kyffin.thompson@bdo.com.au

Dear Mr Thompson

Thank you for the opportunity to provide feedback to the inquiry into the Town of Gawler Boundary Review.

Currently, there is insufficient information for the South Australian Country Fire Service (CFS) and the Metropolitan Fire Service (MFS) to provide a considered response. However, both agencies would be interested to see a proposed map overlay of CFS/MFS gazetted boundaries with that of the proposed Town of Gawler boundary change as there is no correlation between local government boundaries and CFS/MFS response boundaries.

As it is anticipated the proposed change will result in more development opportunities and urban infill for the Town of Gawler, the Sector Boundary Review Committee may be required to meet and consider (not limited to) population and infrastructure growth in alignment with the Emergency Services Sector agreed emergency response principle: 'Closest, Fastest, Most Appropriate'.

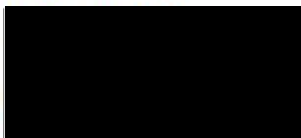
If the predicted population growth and city development is considered significant, MFS will be required to reconsider its own response capability, capacity, and resilience within the Town of Gawler, and determine if there is a need for increased MFS services commensurate with the likely increased risk.

If the proposed boundaries result in the Town of Gawler tipping into CFS area, the CFS will be required to have representation on their Building Fire Safety Committee, which the CFS currently does not.

An increase in services in the area and increased administrative workload on staff would require a detailed review and consultation, coupled with an appropriate 'future proofed' business plan and funding.

The CFS and MFS would welcome the opportunity to understand in more detail the scale of the proposed development areas, and likely inclusions to enable accurately forecasting community demand for services.

Yours sincerely



South Australian Country Fire Service



Office 37 Richmond Road, Keswick SA 5035 Phone (08) 8115 3300 Fax (08) 8115 3301
Post GPO Box 2468, Adelaide SA 5001 Email CFS.Enquiries@sa.gov.au ABN 97 677 077 835

OFFICIAL

In reply please quote #97412

Mr Kyffin Thompson
Partner, Advisory
BDO
Level 7, 420 King William Street
Adelaide SA 5000
GawlerBoundaryReview@bdo.com.au

Dear Mr Thompson

RE: Gawler Boundary Review



**TRANSPORT
STRATEGY AND
PLANNING**

Level 7 83 Pirie Street
Adelaide SA 5000
Karna Country

GPO Box 1533
Adelaide SA 5001
DX 171

T 1300 872 677
W dit.sa.gov.au

ABN 92 366 288 135

**Build. Move.
Connect.**

Thank you for your email dated 26 July 2024. The Department has reviewed the proposed boundary changes and notes that some of the areas identified contain roads under the care, control and management of the Commissioner of Highways. This includes portions of the Northern Expressway, Sturt Highway, Barossa Valley Way, Main North Road, Angle Vale Road, Redbanks Road, Two Wells Road and Gawler Bypass.

For a number of these roads, the maintenance responsibility is divided between Council and the Commissioner in accordance with Operational Instruction 20.1. In the event that the Council area containing these roads changes, new notices are likely to be required under Section 26 of the *Highways Act* to identify Council responsibilities under the Act. A copy of Operational Instruction 20.1 can be viewed at www.dit.sa.gov.au/?a=71793.

It is noted that Areas 1 and 3A include the Concordia Urban Growth Area and that this change would result in the Growth Area becoming a contiguous extension of the Town of Gawler. Whilst the Department does not object to this, it will be necessary for Council to consider how integrating this area will impact on the provision of Council infrastructure and services in the area. Similarly, Area 2 would also be a contiguous extension and would simplify the management of Main North Road which is the common boundary of the Town of Gawler and Light Regional Council in several locations.

Area 4 abuts and is contiguous with the Roseworthy Growth Area. It is understood that the Greater Adelaide Regional Plan Discussion Paper identifies the potential for future urban growth within the Roseworthy area, consequently it is considered that the area should be within the same Council area as the Roseworthy Growth Area to ensure that the interfaces and impacts, both in terms of land use and infrastructure are managed by one Council.

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The intent of Area 6 appears to relocate the Council boundary from the Gawler River to the Gawler Bypass. Whilst this is not objected to, the maps appear to show portion of the Gawler Bypass interchange and Two Wells Road being left in Light Regional Council. If the boundaries in this locality are to be adjusted, it would be better for it to run along Gawler Bypass, therefore providing a clear and logical boundary.

Area 7 shows the relocation of the Council boundary from Wingate Road to adjacent the Northern Expressway and Angle Vale Road. This would result in consolidation of the rural land to the east of the Northern Expressway to be within one council area. However, the affected area of Angle Vale Road is subject to the Playford North Extension Road Infrastructure Deed which the City of Playford is a party to. Whilst one of the interventions identified within the Deed affects the intersection of Angle Vale Road and Wingate Road, the change will result in the need for future upgrades to Angle Vale Road requiring input from two Councils as opposed to one at present. This may result in two Councils having to contribute to infrastructure works in this area.

The Department owns several parcels of land within the identified areas, including Allotment 514 in DP 84176, Allotment 517 in DP 84177 and Allotment 298 in DP 21012, however, it is unclear as to the impact of any Council boundary change on these. Additionally, there are a number of rail corridors within the identified areas that are owned by the Minister for Infrastructure and Transport and leased to Aurizon Bulk Central. Whilst these corridors are currently inactive, Council will need to be aware of its obligations under the Rail Safety National Law for level crossings in these areas.

The Department has no comment on Areas 3B, 5, 8 and 9 as these do not interface with any departmental assets.

Should you wish to discuss the above further, please contact Mr Marc Hryciuk, Manager, Transport Assessment on the above details.

Yours sincerely



Transport Strategy and Planning Division

30 August 2024



21 August 2024

SA Local Government Boundaries Commission (the Commission)

Email: boundaries.commission@sa.gov.au

81-95 Waymouth St
Adelaide SA 5000
GPO Box 1047
Adelaide SA 5001 Australia

P: +61 (08) 7424 5760
E:
dev.greenadelaide@sa.gov.au

www.greenadelaide.sa.gov.au

Feedback to the Town of Gawler boundary change proposal

I write in response to your email of the 29 July 2024, inviting comment from the Chair of Green Adelaide Professor Chris Daniels, on the Town of Gawler's proposal for local government boundary changes. Professor Daniels has asked that I respond on his behalf.

I understand the Town of Gawler has proposed to include within its boundaries seven areas currently in Light Regional Council, The Barossa Council, and the City of Playford and that the South Australian Local Government Boundaries Commission is responsible for investigating this proposal and will make its recommendations to the Minister for Local Government.

Currently, the existing Town of Gawler boundary also forms the boundary between Green Adelaide and the Northern and Yorke Landscape region.

Green Adelaide's interest lies in those areas that would be moving in or out of the Green Adelaide Region. These are: Evanston Park, Hillier, Bibaringa and Uleybury.

These areas lie between council areas (City of Playford and Town of Gawler) and therefore between the relevant landscape regions (Green Adelaide and Northern and Yorke regions).

As the property numbers are well under 100 for the total of these four areas there is no significant monetary effect for the Green Adelaide Board in terms of its regional landscape levy. In addition, there is no effect on the management of the natural resources of the area and the environmental programs that would continue to be managed in partnership with the City of Playford and the Northern and Yorke Board.

However, Green Adelaide recommends that you consider any consequential implications of administrative arrangements for the Town of Gawler for the collection of the landscape levy and any possible related actions under the *Landscape South Australia Act 2019* because of proposed council boundary changes.

A possible consequence is that a small portion of the Town of Gawler would be included within the Green Adelaide region and the Council must then collect a regional landscape levy for Green Adelaide for that portion. This would be an administrative task for the Town of Gawler to undertake, in addition to collecting a regional landscape levy for the Northern and Yorke Landscape Board. Affected ratepayers would need to be notified of any changes to their levy. This may have administrative implications for the Town of Gawler and is not the preferred option for Green Adelaide in terms of its administrative complexity.

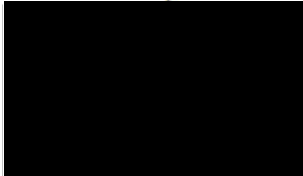


Another potential consequence of the Town of Gawler's proposal is that regional landscape boundaries could be amended. In this case the more complex administrative arrangements for the Town of Gawler in its collection of the regional landscape levy for Green Adelaide would be avoided. Any changes to landscape boundaries would be carried out by the Department for Environment and Water under the *Landscape South Australia Act 2019* and must be approved by the relevant Minister and the Governor.

Also note that the Town of Gawler has had informal discussions with Green Adelaide, with a proposal that the whole of the Council area be moved to the Green Adelaide region. This would mean that the boundaries of the Green Adelaide and Northern and Yorke landscape regions would likely be amended. Consideration should be given to the timing and processes for any boundary changes under the current proposal for the Town of Gawler and the informal proposal under discussion for the whole of the Town of Gawler to be included in the Green Adelaide region.

We look forward to ongoing collaboration and discussion on this proposal and if you have any queries, please contact me on [REDACTED]

Yours sincerely





**Northern and Yorke
Landscape Board**

Natural Resource Centre
155 Main North Road
Clare SA 5451

Tel 08 8841 3444

ABN 63 450 552 896

NY.landscapeboard@sa.gov.au
www.landscape.sa.gov.au/ny

Reference: RH20240830

2 September 2024

BDO Advisory
C/ Kyffin Thompson
Level 7, 420 King William St
ADELAIDE SA 5001

Dear Kyffin

Re: Town of Gawler Boundary Change Inquiry

I write in response to the invitation to comment on the boundary reform proposed by the Town of Gawler. Firstly, I take this opportunity to thank you for inviting comment from the Northern and Yorke Landscape Board.

The Northern and Yorke Landscape Board (Board) was formed post the ascent of the *Landscape Act 2019*, with the new region incorporating councils which had previously been part of the Adelaide and Mount Lofty Ranges Natural Resource Management region. Since 2020, the Board has established valuable and collaborative relationships with all councils, including those affected in the proposed boundary realignment.

The realignment of council boundaries within the Northern and Yorke Landscape region would not adversely impact the Board and therefore the Board has no objections to the proposal, however the Board encourages and would strongly support increased engagement with affected councils in the formulation of the 2026-2031 Regional Landscape Plan. The Regional Landscape Plan is our strategic document that outlines our priorities as a Board and guides investment over a five-year period. We will shortly be commencing development of the next regional landscape plan and seek to actively work with the councils to ensure that their needs are met, and the values and desires of their communities are captured within our strategic vision.

For any information regarding the Board, our Regional Landscape Plan or operations, please contact

[Redacted contact information]

Yours sincerely

[Redacted signature]

www.landscape.sa.gov.au/ny

22 August 2024

BDO Services
c/o Kyffin Thompson
Level 7, 420 King William Street
ADELAIDE SA 5001

Dear Mr Thompson,

Gawler Boundary Review

We write in regard to the SA Local Government Boundaries Commission inquiry into the boundary change proposal being pursued by the Town of Gawler. As the [REDACTED] largest single landowner affected by the proposal to move this area from Barossa Council to the Town of Gawler, we have a keen interest in the matter and wish to state that we do not support the proposal for the boundary change.

The Concordia Growth Area is located within the Barossa Geographical Indication Zone and will provide a gateway to the Barossa Valley and an opportunity for growth for the region while protecting the valley floor. Although located within the Barossa Council area, we have always acknowledged that Concordia has an inter-relationship with the Town of Gawler given its geographical location and, have undertaken our planning accordingly.

The Trust has undertaken extensive investigations and had ongoing discussions with the Barossa Council, the Town of Gawler and the State Government over several years to ensure the growth area will be developed in a coordinated way that benefits the region as a whole. As of 28 April 2023, the entirety of the Concordia Growth Area is the subject of a Code Amendment being led by the Chief Executive, Department of Housing and Urban Development to ensure that planning and delivery of the future community at Concordia continues to be managed in a co-ordinated manner involving all key stakeholders.

The Concordia Growth Area is a key part of the Barossa Council's growth strategy for the provision of a diverse range of housing over the next 20-30 years. The Council is very focused on the project. They have established a team to manage the planning and delivery of Concordia and have recently won funding to employ additional staff specifically to support the project. We note in the Draft Gawler Framework Land Use Plan currently on public exhibition, that Town of Gawler's focus is on a number of development fronts in the south and east of the Council area, and that they consider Concordia a lesser priority. As such, we feel Barossa Council is better placed to support the delivery of much needed housing in a timely manner.

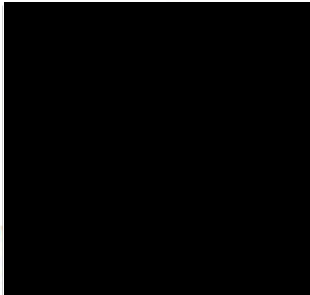
Once completed the Concordia Growth Area will accommodate approximately 25,000 residents which is similar to the number of residents currently residing in the Town of Gawler. Therefore, the Concordia development will provide a large range of contemporary services and facilities to support its residents and the broader regional community. On that basis, the Concordia Growth Area is likely to service residents from the Town of Gawler as

well as from the Barossa Council area and, the broader region irrespective of the council boundaries. Which on the face of it would appear no different from the surrounding areas utilising services within the Town of Gawler, or amongst most metropolitan councils where access to recreation, community, education and retail facilities outside of the residents own Council area is commonplace.

While the historical boundaries of local government areas in the region do not always reflect contemporary development patterns, ad hoc realignment of Council boundaries is not a sustainable approach to local government management into the future. The Trust is confident that through establishing partnerships with all key stakeholders we will be able to deliver high quality project outcomes and to build a community that has links across the region to both Gawler and Barossa. There are many examples of effective and efficient delivery of services and functions of local government on a regional basis (e.g. waste management, procurement, health, and flood management), and do not see that there would be any reason why this cannot occur at Concordia.

We note that a key focus of the reforms is about being more efficient and facilitating greater investment and jobs for the region, which we would certainly welcome. However, we also believe that the objectives set forward for the reform could be achieved through greater regional collaboration. Therefore, we do not see the necessity of a boundary change that would bring Concordia into the Town of Gawler, and do not see that it would provide any specific benefit to the current or future residents of Concordia.

Yours sincerely,



[REDACTED]
Dear Kyffin,

Thank you for the opportunity for [REDACTED] to comment on Gawler's proposed boundary reform. We understand that changes to State government legislation means that Council can propose boundary realignments to better meet the needs of the community.

The Town of Gawler is proposing the inclusion of the Concordia Growth Area within its boundaries. Council has argued that this will allow Gawler Council to:

'plan and grow in a logical and managed way so that infrastructure and services will be delivered more effectively and efficiently'

Council argues that a boundary realignment will provide economies of scale for the provision of services by Gawler. While this may be true, it seems that the opposite may be the case for the Barossa or Light Council areas where population growth is being removed.

The Barossa Council strongly opposes the removal of Concordia from its boundary. Concordia is one of the only significant growth opportunities for the Barossa Council. Changing this boundary seems to clearly benefit Gawler over Barossa, an outcome which appears incongruent with the principles of boundary reform.

We understand that it has been argued that residents of Concordia will utilise facilities within Gawler. While this may be the case, residents are likely to use services across the region, with residents employed throughout the Barossa. The Concordia Growth Area will also include significant investment in physical infrastructure and social services to support over 10,000 new residents. Detailed planning is being coordinated by the Housing Infrastructure Planning and Development Unit which will result in a clear structure for infrastructure planning and delivery. Therefore addressing Council's infrastructure coordination challenges.

We note that the Barossa Council has recently been successful in receiving Commonwealth funding under the Growing Regions Program. Council has proven to be highly progressive in setting up a team that can support such a critical development.

A change of Council at this time, is likely to be disruptive and an unnecessary distraction to the planning of Concordia. We believe it is critical that the Barossa Council has the opportunity to focus on planning for the future and put all the necessary structures in place to ensure it is successful, without this uncertainty of Council boundaries. Council needs to be able to plan for its investment, and cost recovery through rates revenue with certainty of process.

We are at a time of significant housing demand along with significant uncertainty on land supply and servicing infrastructure within this region. As a land developer and home builder, and as a land owner within Kalbeeba with supporting interests in Concordia, we support the focus of the State Government and Council on delivering the key issues of land supply and servicing infrastructure to ensure we can help to solve this housing crisis.

Should you wish to discuss please feel free to contact me.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6.7. Resident and General Public Submissions

Stated Location of Resident/Ratepayer	Neutral	Opposed	Support	Total
Town of Gawler Total		1	3	4
The Barossa Council Total	1	11		12
Concordia (area 1)		1		1
Kalbeeba (area 3)	1	9		10
Other		1		1
Light Regional Council Total	1	40	3	44
Hewett (area 2)	1	11		12
Gawler Belt (area 4)		10	1	11
Other		19	2	21
City of Playford Total		2		2
Hillier (area 7)		2		2
Not Stated Total		6	2	8
All Areas Total	2	60	8	70

Note: Resident and General Public Submissions - Only those respondents who provided permission have their submissions published below.

From: [REDACTED]
Sent: Monday, 26 August 2024 1:21 PM
To: Gawler Boundary Review
Subject: A big NO to Gawler Councils land grab!

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

Gawler Boundary Review submission-‘A big NO to Gawler Councils land grab!’

If you obtain Mayor Karen Redman’s media release immediately following the 2018 Council elections, you will see that she makes this statement:-

‘While the Civic Center redevelopment was the center piece of my first term as Mayor, I want Boundary Reform to be the center piece of my second term.’

Mayor Redman made this statement despite making no mention of Boundary Reform at any point during her first term and at no point whatsoever during the 2018 council elections!

I have lived in Gawler since 1979 and was an elected member of Gawler Council from 2014-2021, Deputy Mayor in 2015, 2017, and 2018, and the call for Boundary Reform has not ever been on the radar for the Gawler community!

There was no call for Boundary Reform from the community and no campaigning on Boundary Reform in the 2014 nor in the 2018 council elections and yet, with no prior warning, Mayor Redman tabled a motion on notice calling for Boundary Reform at a council meeting in early 2019!

Proposals with such massive implications as Boundary Reform have NEVER been introduced to elected members/council via a mere motion on notice!

Proposals with such massive implications as Boundary Reform have only ever been tabled at a council meeting after extensive consultation and via a detailed officers recommendation and officers report...a report containing pages upon pages of detailed research, data, financial and social impacts, and justification!

Mayor Redman’s motion on notice contained nothing more than the wording of her motion...there was no rationale, no costings, no survey data, no community consultation, no persuasive argument...nothing!

The community had not been consulted!

Elected members had not been consulted!

Mayor Redman simply said that **she** wanted Boundary Reform to be the center piece of her second term and stating that because Barossa and Light Council’s had built communities on Gawler’s boundary that these communities should now be claimed by Gawler!

Mayor Redman's motion on notice to that council meeting in early 2019 was not approved unanimously by elected members and only passed because of the blind support of her Team Redman Faction of councillors!

Not a single motion related to Boundary Reform since and including that motion on notice in early 2019 has ever passed unanimously, not one, with most only ever passing with a bare majority and at times only on the casting vote of Mayor Redman!

To this day there has never been any survey nor any consultation with the community/rate payers of Gawler regarding Boundary Reform....NOTHING!

Square Holes Consulting were engaged by Gawler Council to run two 'Communities of Interest' public consultations in 2020, and I attended both!

Huge numbers attended these meetings from the Barossa, from Light, from Hewett, from Gawler Belt etc...including the Mayor and Councillors from the Barossa and councillors from Light!

There were only a relatively small number of people from Gawler who attended!

The overwhelming message from these two Square Holes community consultations was that people DID NOT want a bar of Boundary Reform!

When the Square Holes consultants presented their report on these two Communities of Interest Consultations to the Gawler Council meeting in November 2020 they admitted that, based on directions from Mayor Redman and CEO Inat, that they REMOVED from their report all negative and dissenting comment and opinion from anyone at the two meetings who were opposed to the Boundary Reform proposal!

Note-i can send you the link to the video record of the consultants making this admission on the public record!

Councillor Nathan Shanks from Gawler, in partnership with Councillor Simon Zeller from Light Council, conducted a joint door to door survey of 100 residents of Hewett to gauge interest in Boundary Reform.

They found that 76% were strongly opposed, 18% were ambivalent, and 6% were happy to become part of Gawler!

I attended the two recent public consultations conducted by BDO on 20 August 2024 in Sandy Creek and on 21 August 2024 in Hewett and at both meetings the overwhelming majority of the large numbers in attendance were strongly opposed to the land grab boundary extension by Gawler Council...stating loud and emphatically that they are opposed to ToG's Boundary Reform proposal!

All community consultations conducted by Square Holes and by BDO have resulted in an overwhelming NO VOTE for boundary reform!

Gawler Council has NEVER unanimously voted in support of Mayor Redman's ego driven boundary reform proposal!

The people of Gawler have NEVER been consulted and have NEVER given their stamp of approval for Mayor Redman's ego driven boundary reform proposal!

██████████

██████████

████████████████████

Gawler Boundary Reform Submission August 2024.

Submitted to BDO Australia

Submitted By ██████████

As a ratepayer of Light Regional Council (LRC), the Playford Council and the Town of Gawler (TOG) I am opposed to the Boundary Reform Proposal by the TOG.

As a longtime resident of Gawler Belt, this submission focusses on issues pertaining to Gawler Belt regarding the Boundary Reform Proposal by the TOG. In summary:

- **Number of Affected Properties:** The number of affected properties in Gawler Belt has been stated to be 360. This is significantly greater than the actual number that potentially affects the validity of an analysis completed by any stakeholder.
- **Town of Gawler Survey 2021:** The validity of this survey is clearly questionable with the TOG publicly admitting it was not an independent survey. As the respondents cannot be identified it is unknown if they were even stakeholders.
- **Use of TOG Facilities:** Provision of TOG facilities provided by the TOG is overstated with private businesses providing a significant percentage of the facilities within the TOG. Gawler Belt residents do not utilize TOG provided facilities to the extent as suggested by the TOG.
- **Proximity of Gawler Belt to the TOG's Offices:** moot (mute) point as electronic communication replaces face to face contact or verbal contact by telephone.
- **TOG's Proposal for Part of Gawler Belt:** Illogical placement of Boundary when considering stormwater, bushfire management and the Buchfelde / Wards Belt areas.

Analysis

(1) Number of Affected Properties.

The number of affected residents of Gawler Belt as displayed on the BDO power point presentation given at the community meeting on the 21st August 2024 was 360. This is the figure also given yourSay website (yourSay 2024). The affected area was estimated to be 685 hectares according to BDO power point presentation. A trial of green waste collection was undertaken within Gawler Belt from approximately early 2022 to May 2024. At the LRC Council meeting on the 23rd January 2024, a decision was made to conclude the trial. The significance of this is that as part of the trial, a total of 360 bins were rolled out across Gawler Belt including the residents north of Redbanks Road, and to parts of Wards Belt. Wards Belt and the properties north of Redbanks Road are not part of Gawler Belt that, the TOG is proposing to take over. A simple mathematic calculation of dividing the area 685 hectares by the number of affected residents gives a figure of 1.92 hectares. Now this calculation does not take into effect the land utilized for the road network. The overall majority of the allotments in the affected area are over 2.5 hectares and this further indicates the that number of affected residents is not 360. Although the author has not completed a detail count of the affected properties, the LRC in 2013 (Light 2013) published for consultation an analysis of the Rural Living Plan that included the proposed development for the affected area of Gawler Belt. From this the *"Theoretical Maximum Allotment Number"* for the area bounded by Redbanks Road, Nottle Road, Ward Belt Road and the railway line was 193 allotments. It was noted that the maximum theoretical number may not be achieved for various reasons. Using this figure 193 and the figure given for 360 affected properties, that equates that there are potentially 167 affected properties east of the disused railway line. This is clearly incorrect and further brings into account the validity of 360 affected properties.

The incorrect data (360 properties) is a significant error, that also flows onto the estimated population. The concern is the validity of an analysis completed by any stakeholder for the TOG Boundary Expansion. This includes the financial aspects as well as infrastructure requirements.

(2) Town of Gawler Survey 2021

TOG engaged the market research company Square Holes to conduct a survey (Square Holes 2020) as part of the consultation process within the community. In a letter dated the 21 January 2021 from the Mayor of Gawler MS Karen Redmond (TOG 2021) to consultation participants, the results indicated:

- Respondents from the TOG Local Government area were 68% in favor of boundary reform.
- respondents from outside TOG were more likely to be opposed to the Proposal. 74% of respondents from the Barossa Council and 69% of respondents from Light Regional Council (LRC) areas were opposed and
- the majority (55%) of all respondents to the survey most associated themselves with the Gawler Community

In the letter MS Redmond advises that due to the support for the proposal shown within Gawler, TOG will proceed to finalize a Stage Two General Proposal for Boundary Change. The statistics from the Square Holes survey have since been continually used as an indication of support by the TOG for Boundary Reform. The report by Square Holes was presented to the TOG Special Council meeting on the 2 November 2020. Square Holes representative Linley Bertram was present by Video link. As reported in the Bunyip (Bunyip 2020A) ██████████ (the Author) made a presentation to the council at this meeting. The integrity of the report was statistically questioned by the Author as Square Holes

- Could not identify who the respondents were. The only information was that barring 2 responses all responses were from different IP address,
- could not identify if the respondents were indeed stakeholders and
- the validity of the survey statistics and the potential use of aliases is questioned.

In further discussion by Councilors at this meeting, under questioning by then Councilor Ian Tooley, Square Holes admitted the released report of the findings was not the original report submitted to the TOG. On receiving the originally report TOG requested changes to be made to the findings. In defending TOG actions MS Redman explained that the data collected was not changed but the focus was. This change was from focusing on the total sample to a focus only on the TOG and was requested by TOG staff. The rationale was for the TOG to understand what the residents of the TOG thought and whether they supported the proposal. The Barossa Council also raised concerns about this survey at their Council meeting held on the 15th September 2020 (Bunyip 2020B). The concern raised was that the survey was disjointed and had the potential to produce skewed results. Tolley in discussing the findings during the

meeting made the comment quoting the American Author Mark Twain “*Lies, Lies and damn Statistics*”. Rejecting the initial report by Square Holes and asking for a revision based on the TOG’s agenda amounts to biasing by the TOG.

The small sample size of the TOG Survey was also raised at the TOG council meeting by then councilor Nathan Shanks. The number of responses was:

158 completed; 44 partially completed a total of 202.

In Statistics the capital letter “N” is used to represent the total number of observations. Therefore “N” is 202. In looking at the report by square holes in evaluation responses to individual questions N (total) ranges from:

N= 187 - areas for activities Grocery and other food shopping to

N = 67 - areas for activities religious observation (e.g. church temple Etc.)

If a respondent answered N/A, their response was not counted. *Areas For Activities Religious Observation* with a sample size of only 67, indicates that 135 responses were not made to this question.

It brings into question how many actually completed surveys was there? In adding up the responses to the question “*Areas for Inclusion*” the total sample size is 186. In adding up the individual responses;

Town Of Gawler	84
The Barossa Council	30
Light Regional Council	65
City of Playford	5
total	184

Although this is only small discrepancy of 2, it is clearly bringing into question what other issues are there with this survey?

Therefore, the report

- Is not an independent report, as the original report was changed as requested by the TOG,
- cannot identify the respondents and if they are stakeholders, that is part of the Barossa, LRC & TOG communities,
- the number of responses to the questions vary significantly in size and
- therefor the validity of the survey is highly questionable.

It is also worth mentioning the 2 other surveys conducted at the time. One on the Gawler Belt Facebook page showed 88% against the expansion proposal. A survey of Hewitt residents conducted by then LRC Councilor Simon Zeller and TOG Councilor Nathan Shanks showed only 1 in 10 Hewitt residents supported TOG Boundary Proposal. A Consultation Meeting was held by BDO, the company appointed by the Boundaries Commission to independently investigate TOG's proposal at the Hewitt Centre on the 21 August 2024. The unofficial consensus at this meeting was strong opposition to the proposal.

The survey results from the yoursay Survey 2024 were not available at the time of this submission.

(3) Use of TOG Facilities

The Square Holes survey in the section "*Areas for Activities*" state:

"Grocery and other food shopping as well as general medical services are the two activities most commonly undertaken in the Town of Gawler"

These two reasons relate to services not provided by the TOG but by private businesses. Brick & Motor businesses rely on customers to spend money in the TOG. This also applies to the "*Leisure / entertainment (e.g. cinema, pub, etc.)*" sector. The "*Area for Activities*" graph lists 9 activities most commonly undertaken in the TOG. 5 of these activities are not provided by the TOG. (It is acknowledged that the TOG has an immunization clinic a service that is also provided by numerous private providers within the TOG). There are numerous vacant shops along Murray Street, that indicates the low desirability of Murray Street as a retail precinct. Accessing the main shopping areas of Gawler from Gawler Belt during the daytime on week days is an issue due to the bottlenecking traffic. The planning of the RTE includes a shopping Centre. It is argued that accessing this Centre will be easier for Gawler Belt residents than accessing the Gawler Town Centre. Online shopping is increasing significantly, that does not need physical presents in a Brick & Mortar business. This is demonstrated with Australia Posts increased parcel delivery (Rowland, 2023) and the increase in online shopping as reported by the Coles Supermarkets Group (Coles 2024). Anecdotally the need to access Brick & Mortar businesses is declining.

(4) Proximity of Gawler Belt to the TOG's Offices

The TOG highlights that the Gawler Belt community, at its closest point is located less than 2 kms from the Gawler Town Centre, as opposed to over 30km from Light Regional Council's principal office in Kapunda. In highlighting this TOG fails to mention that LRC has a branch office in Freeling approximately 17Kms by road from Gawler Belt. In checking google maps the closest point by road from Gawler Belt to the TOG's

Principal office is 3.6KMs so TOG in presumably stating 2 KMS is the direct physical distance. However, this is a moot (mute) point. Increasingly at all levels of Australian government, business and so forth, the move is to conduct business online. This can be demonstrated by the decline in Australia Post's letter delivery volumes reducing by 66% since 2008 while parcel delivery has boomed (Rowland, 2023). Both the LRC & TOG have websites that ratepayers and other stakeholders can conduct most dealings with the council online. Council meetings may be viewed, live on line using teams or can be watched later on YouTube. With planning and development now resting with PlanSA, this function of council is not primarily a responsibility of TOG or any other local council. It is increasingly of little relevance in 2024 and going forward the physical location of a council's principal office.

TOG in their proposal argues that due to Gawler Belt's proximity to Gawler, the LRC has not needed to heavily invest in services and infrastructure for the Gawler Belt community. Anecdotally Gawler Belt Rural living area due to lower population density does not require the infrastructure that an urban residential requires.

(5) TOG's Proposal for Part of Gawler Belt.

The proposal is for the TOG to only take one portion of Gawler Belt. This results in a pocket leaving to the:

- North LRC - RTE and primary production
- West LRC - Primary production, broadacre &
- South (immediately) LRC Wards Belt Rural living area, the airfield and then Buchfelde.

The Author sent a query to the TOG, asking why Buchfelde was not of interest to TOG. The response given by the TOG was that the Buchfelde area was considered large broad acre farming that in the TOG opinion fits more appropriately with LRC. It was also noted that Gawler Belt is more densely populated, with smaller urban lifestyle allotments sizes than Buchfelde. For this reason, the expectation for service levels for Gawler Belt is more of an urban built-up environment (TOG 2020 B).

This brings into question the approximately 22 properties in Wards Belt south of Wards Belt Road and in Sailplane Court, Wards Belt. The TOG Proposal leaves these 22 properties in LRC sandwiched between Gawler Belt and the airfield. This area was developed by LRC as part of a Rural Living Zone as updated in the LRC Development Plan 2016 (LRC 2016). This plan incorporated parts of both Gawler Belt and Wards Belt. The North eastern part of Wards Belt is commonly thought as being part of Gawler Belt.

Real Estate Agents often advertise these properties as being Gawler Belt (Wards Belt). Wards Belt Road is not a logical placement of a boundary. Logical placement of boundaries is a key aspect of the TOG Proposal to remove a small portion of Bilbaringa and Uleybury from the TOG.

Further to logical boundaries in creating the proposed pocket of Gawler Belt by TOG by extending into LRC raises other issues.

- Fire Ban District,
- Environment and Food Production Area (EFPA) and
- the Stormwater issues.

(5.1) Fire Ban District.

- TOG is in District 1 - Mount Lofty Ranges
- LRC is in District 2 - Mid North.

The South Australian Country Fire Services Chief Fire officer declares the dates for the Fire Danger Season annually. These dates are flexible and are determined yearly depending on the risk of fires due to seasonal conditions. Typically, the Fire season starts earlier in the Mid North as compared to the Mount Lofty Ranges. The start dates for 2023 were 1 November for the mid North and the 15th November for the Mount Lofty Ranges (SACFS 2024). The Fire Danger Ratings are issued daily with the common situation that a Total Fire Ban may be issued for the Mid North and not the Mount Lofty Ranges. With Gawler Belt potentially being a small pocket extending into LRC this will lead to potentially unnecessary confusion.

(5.2) Environment and Food Production Area (EFPA)

The Rural area of Gawler Belt is within EFPA. The EFPA does not extend into the TOG. Therefore, the rural living is of Gawler Belt is more aligned to LRC than the TOG on this basis.

(5.3) Stormwater Management.

The consulting company Tonkin was engaged to complete a study in 2019 the *“Gawler & Surrounds Stormwater Management Plan”* to investigate and make recommendations into stormwater management. This was on behalf of the Barossa Council, LRC and the TOG. TOG led this study. TOG in their proposal notes due to proximity, Gawler Belt has been included and incorporated into the *“Draft Gawler and Surrounds Stormwater Management Plan”*, further demonstrating Gawler Belt’s link to the TOG. This is not a further demonstration of a link as discussed below. To date a search of the websites for LRC and TOG was unable to locate an issue of the plan for approval. To my knowledge this plan has not been approved by either LRC or the TOG. To date there has been no implementation of any flood mitigating strategies detailed in the report. This clearly demonstrates the complexity of the issue.

In the south-western corner of Gawler Belt there is a large 40-hectare depression which acts as a drainage basin for the surrounding catchments. Total catchment area draining to the depression is just under 2,500 hectares. The catchment extends to a point 3 km north of Roseworthy (Tonkin 2019). A significant amount of development is being currently being undertaken and is proposed in this catchment. This includes the Roseworthy Town Expansion (RTE). The RTE development has a series of detention and retention basins for stormwater management (LRC 2019). As the RTE development progresses, stormwater runoff from RTE will be retained on-site to pre-development levels. Upstream catchment stormwater flows will pass through the RTE and flow downstream to Gawler Belt as it has historically done so (LRC 2024). The last proposed retention basin of the RTE is proposed is situated in Gawler Belt adjacent to Redbank's Road and the disused railway line and is outside the proposed area. Although there is not indicated flow path for the overflow, it will flow through the proposed area of Gawler Belt to the depression.

As previously discussed, inflows into the depression are from the north (LRC) and are contained within the depression by natural and "*Man Made*" topographical features. Stormwater will not flow from Gawler Belt into the TOG therefore this is another example of this link not existing. The Author in a written submission in the consultation phase questioned the feasibility of the recommendations in the report to mitigate the flood risk.

LRC held a consultation session in February 2022, where the recommendations regarding Gawler Belt were strongly rejected by the meeting. A representative of Tonkin was present and made a presentation. The Author suggested to the meeting that the recommendations by Tonkin were not feasible and to my knowledge this has not been publicly challenged.

The management of this stormwater presents an issue to both LRC and the TOG. The stormwater needs to be dealt with at the source. With the proposed Boundary Reform Gawler Belt would be faced with a significant issue with regards to stormwater management. The TOG has recognized that it's capital works program may face emerging challenges with the proposed expansion. This in fact may be further exacerbated by the potential need for capital investment in flood mitigation infrastructure within the Gawler Belt area (TOG 2019) as there is a lack of flood mitigation infrastructure within Gawler Belt Rural Living Area. Under the reform, stormwater would flow from LRC into Gawler Belt, with the potential flooding managed by TOG. The unknown risks due to infrastructure delivery backlogs in rural areas such as Gawler Belt is also noted by the TOG in the attachments for the council meeting held on the 27 July 2021 (TOG 2021). One of the reasons, given by the TOG of these unknown risks was the lack of information regarding stormwater and road infrastructure in areas such as Gawler Belt. Tonkin in their report clearly

detailed the lack of stormwater infrastructure within Gawler Belt. As the TOG led the Tonkin study, TOG is well aware of the risks that stormwater management presents in Gawler Belt.

Management of the stormwater flows through the proposed area would by TOG is not seen as best practice and in the interest of the ratepayers of Gawler Belt and TOG. As detailed above;

- The stormwater issue needs to be dealt with at the source,
- water inflows are from the LRC into Gawler Belt,
- water does not flow from Gawler Belt into the TOG
- lack of flood mitigation infrastructure within the proposed area of Gawler Belt and
- the potential need for flood mitigation infrastructure (Capital Expenditure) with Gawler Belt

References

- Bunyip 2020A; *Boundary Survey Results Reviewed The Bunyip Newspaper* online available <https://www.bunyippress.com.au/news/boundary-survey-results-reviewed>, available 24/08/2024
- Bunyip 2020B; *Barossa Responds to Gawler's Boundary "survey" published Wednesday September 30 2020, The Bunyip Newspaper*
- Coles 2024 <https://www.Coles FY24 Earning Call highlights Online marketindex.com.au/news/coles-fy24-arnings-call-highlights> Available 28/8/2024
- Light 2013 *Light Regional Council Rural Living Development Plan Amendment August 2013 Explanatory Statement and Analysis For Consultation*
- LRC 2024 *Roseworthy Township* Online <https://www.light.sa.gov.au/discover/our-region/roseworthy>. Available 26/08/2024
- Rowland, 2023, *Ensuring Australia Post Can deliver more for Australians* online <https://minister.infrastructure.gov.au/rowland/media-release/ensuring-australia-post-can-deliver-more-australians>
- SACFS 2024, *Incidents and Warnings* Online <https://cfs.gov.au/warnings-restrictions/warnings/incidents-warnings> Available 24/08/2024
- Square Holes 2020, *Boundary Reform Review Town of Gawler* Online available <https://dit.sa.gov.au/local-government/documents/office-of-local-government/boundaries/tog/tog-stage2-boundary-change-proposal-attachment4.pdf> available 23/08 2024
- TOG 2019; *Attachments Ordinary Council Meeting 27 July 2021 11.2 Boundary Reform Update* Online https://www.gawler.sa.gov.au/_data/assets/pdf_file/0031/937633/27-07-2021-Council-Attachments-Pt-1-items-11.1-to-11.4-Att-2-pt.pdf available 27/08/2024
- TOG 2021, *Letter from The Office of the Mayor – Re Town of Gawler Boundary Proposal Consultation RefKRkd CC16772*.
- Tonkin 2019 *Gawler and Surrounds Stormwater Management Plan (Rev B) Town of Gawler, Light Regional Council & Barossa Council* online https://www.gawler.sa.gov.au/_data/assets/pdf_file/0024/218760/gawler-and-surrounds-smp-stormwater-management-plan-draft-pages-1-to-33.pdf.pdf available 26/01/2020
- yoursay 2024; *property, the assets and facilities available in each of the affected areas* On line, yoursay.sa.gov.au/gawler-boundary-review available 27/08/2024

BDO Advisory
C/o Kyffin Thompson
Level 7, 420 King William Street
ADELAIDE SA 5001

400

29 September 2024

Re: Submission Gawler Boundary Review

Dear Kyffin

I am writing to provide feedback in the form of a submission towards the Gawler Boundary Review.

I am AGAINST the moving of seven areas currently in Light Regional Council, The Barossa Council, and the City of Playford into the Town of Gawler.

My family and I live in the Light Regional Council, in the town of Wasleys, 5400. We are not close to the boundaries in question but we are in a Council that will be dramatically affect if the area 2 - Hewett and area 4 - Gawler Belt are located in the Town of Gawler.

The proposal will affect us and the community of Wasleys. Hewitt area has 1000 properties and the Gawler belt area has 360 properties that will potentially move to the neighbouring council.

The rates that will not be part of the Light Regional Council Budget is a large figure. Not having this income will impact the services and continuing upgrades to Wasleys. The Budget will have to be cut on items that can not be delivered because there are no funds to cover them. Eg. Outreach Library Services, resurfacing of the many roads in and around Wasleys and the Community Funds that all the towns in the Light Regional Council can apply for to deliver projects to their communities.

The 2024/2025 Budget outlines the 4-year program that will occur on the maintenance of roads. Wasleys is down for the 2026/2027 financial year. Wasleys has been waiting for a long time for this to take place and now it may be pushed back for years. Allocated funding will have to be scaled back if there is a substantial loss to the incoming funds.

The areas that the Town of Gawler are claiming, have been developed, have houses, roads and other infrastructure in place. The council have not done anything and are now wanting these areas. It is the Town of Gawler's problem that they do not have anymore land to develop. They do not have to now take other councils' areas.

Why doesn't the SA Local Government Boundary Commission split the Town of Gawler into thirds and give the area to the surrounding councils.

Government agencies have chosen to have offices in Gawler so that they cover regional areas. Light Regional Council (LRC) is majority rural. The towns in the LRC have to travel to Gawler to visit ServiceSA, Services Australia, Department for Child Protection, Major Hospital - Gawler Health Service, Supermarkets and businesses. Having the Town of Gawler stating in the past that they require to have Hewett and Gawler Belt in their boundary as these people use Gawler's services and they are located in another council area. I don't think the family-owned businesses will be pleased if the Town of Gawler is telling potential customers to go elsewhere.

With the reduction in the LRC area there will be a loss of jobs in the employ of the Light Regional Council. The reduction of council revenue will see the cutting of funds to employ a team of employees to adequately service the area. There will be a reduction in Councillors who represent ward ratepayers.

Community should matter in the outcome of this review. The volunteers and Community groups should still have representation and a working relationship with the council. The community are the eyes and ears of the council. We need all ratepayers represented. If the funds are collected by the Town of Gawler from the areas in question, all of the above are the losers, and confidence in the council that they can deliver will be lost.

In conclusion I am saying NO to the Town of Gawler receiving seven areas from the Light Regional Council, The Barossa Council and the City of Playford.

Yours sincerely,



Resident of Light Regional Council

[REDACTED]

From: [REDACTED]
Sent: Sunday, 25 August 2024 10:28 PM
To: Gawler Boundary Review
Subject: Boundaries reform

Follow Up Flag: Follow up
Flag Status: Completed

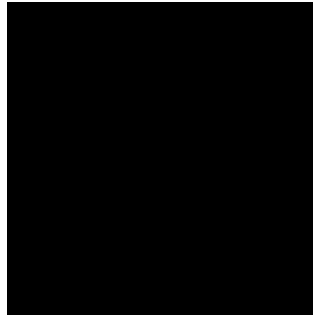
Categories: Yellow Category

[REDACTED]

[REDACTED]

I [REDACTED] of Gawlerbelt and been one for 30 years object whole heartedly to this and want to remain in the district of light for my council ...I do not agree to this I want to remain with light regional council...

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[Redacted]
[Redacted]
[Redacted]

Submission on the potential Boundary Realignment The Town of Gawler 2024

[Redacted], Hillier, SA 5116

I write as a long term resident of Gawler's community of interest, [Redacted]
[Redacted] and returned to Gawler to live [Redacted]
[Redacted]
[Redacted]

I have served as the [Redacted]
and panel member for some years and was the founding [Redacted]
[Redacted] I coordinate the [Redacted]
[Redacted]
[Redacted]

It is as true now as it was in 1967, that residents and businesses of our region treat Gawler as their main town for the full range of community services. Gawler is a mature town, not just a suburb of Adelaide and is the natural regional centre for the North. It's electric train and northern expressway connection to the city and linkages to vast rural areas; its proximity to an airfield, home for emergency services and excellent health and nursing services; its role as the hub of one of the Southern hemisphere's largest schools all point to a major service role. William Light saw a big future for Gawler and gave it a generous road system that will enable it to function smoothly in that role into the future, (with minor upgrades).

Providing the Town of Gawler with a rateable base that can support a modern Local Government with suitably multiskilled specialist staff, will benefit the large (and growing) population of Gawler's communities of interest. Boundary reform has been

called-for many times and it is increasingly urgent that the matter be resolved with the growth of Greater Adelaide shifting north.

As a frequent user of The town of Gawler's planning and engineering teams I see the immense pressure they are under and the lack of capacity/funds to employ suitably diverse specialists to run a sophisticated service centre and facilitate the planning and development that need to be done. I am also aware of the massive responsibility of Council to look after its three river catchments and associated park areas that provide for climate change amelioration, passive transport, recreation, flood resilience and the bridge network with its associated shared path network.

The Council has adopted excellent, forward-looking policies in areas of environmental management, social inclusion, community management, recreation and transport but does not have a proportionate income to support the services that are required to look after its communities of interest.

'A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently'

Gawler has been a focal point for communities of interest for 187 years and the number grows annually, whether it be groups of poultry fanciers, educators, musicians, artists, service clubs, sportspeople, youth groups, farming and horticulture communities, environmentalists, cycling enthusiasts, aged groups etc. What binds them together is Gawler's heritage, balance, diversity and maturity. With its own newspaper and radio station, its excellent schools and nearby university campus, it is not something that can be replicated elsewhere in the foreseeable future.

The proposed (modest) Boundary Realignment will help to rectify the Gawler's financial balance and enable it to improve its services to its own ratepayers and the region.

Often glossed-over in planning are the jewels that attract people to an area, whether as a resident a tourist or a business leader. Gawler's heritage is unique in SA. It has greater density of built heritage than any other SA town AND it values that heritage, as evidenced by the actions of the National Trust, Council, local newspaper, local heritage association. Its natural heritage is also unique, with the meeting of three rivers, memorials to explorers, interpretive signage explaining human and natural history and active community groups restoring the ecology of the rivers. Tourism has enormous potential in the area.

Gawler has a range of employment areas apart from the main shopping area; these 'production areas' need to be supplemented and the proposal for a Gawler Food Bowl to increase Adelaide's food resilience using Southern Gawler's excellent soils, transport and existing and potential irrigation water access will provide both climate change stability and employment. Southern Gawler is happy to be home to utilities such as

waste water processing. However more land, as foreshadowed in the Boundary Reform documents, should be developed to provide goods and services to the growing North. Gawler's role as a dormitory town for city-based jobs should be balance by more local jobs.

The Town of Gawler was one of Australia's earliest recognisers of the Climate Emergency we face. It has a significant policy which is guiding development appropriately. This policy will apply to a larger community with boundary change.

Gawler has been largely overlooked by state planners and **told** what will happen to it. This iteration of the GARP will make or break Gawler. Really good master-planning and limited state investment can create a strong climate-resilient, efficient, beautiful, food secure, regional centre with a balanced, highly educated population with flexibility , capacity and heart .

The new communities joining Gawler must be nurtured to create new representation from their number and the residents should receive adequate and fair representation within the Council system; they should be actively consulted at the earliest feasible time in the development of new lands. Gawler has been a consistent user of consultations but has tempered its decisions with good advice from consultants.

Gawler could probably do better in terms of collaborating with Playford in terms of use nearby facilities, particularly if there was more reciprocation. On the other hand, Playford has recently hosted DEW staff who have produced a guide for the Restoration of the Gawler River in a remarkably harmonised effort. A critical part of the Green Belt between The Adelaide suburbs and Gawler is part of the City of Playford.

I am very happy to be further consulted on this issue as a rural land owner and member of a 'community of interest' member.

[REDACTED]

[REDACTED]

6/9/24

From: [REDACTED]
Sent: Thursday, 25 July 2024 6:44 PM
To: Gawler Boundary Review
Subject: Boundary Reform
Categories: Yellow Category

Hello,

I strongly oppose the boundary reform Gawler council has proposed to include the Gawler Belt inclusion.

It is my belief that our suburb of Gawler Belt will not benefit in anyway from this action. In fact, when comparing the rate in the dollars for both councils it's very obvious residents will be at least \$300 per year worse off, and the minimum rate also is considerably higher In Gawler schedule of rates. Where is the benefit for us? How many rural-living zones do Gawler currently manage?

Gawler council is a small zone, perhaps this is why their rate in the dollar is one of the highest in the state? More to the point, it would seem they need to charge residents more to deliver the same services compared to other zones surrounding them.

Previously there have been other councils merge such as Port Adelaide Enfield and I believe this would make the most sense economically going forward. Sustainability of CEO and other salary's would be far better should the council be absorbed by one or more of the local councils. Operational costs will be spread aver a larger rate base providing better affordability for residents, and a range of improvements as seen below.

Merging two or more council zones can lead to several significant gains:

1. Economies of Scale:

- Larger merged councils can operate more efficiently, reducing costs per unit of service. This can lead to savings in administration, procurement, and service delivery.

2. Improved Resource Allocation:

- Combining resources from multiple zones can lead to better allocation and utilization of assets, such as equipment, facilities, and personnel. This can enhance service quality and coverage.

3. Enhanced Planning and Development:

- Unified planning and development strategies can lead to more coherent and effective regional development, infrastructure projects, and land use planning, benefiting the broader community.

4. Streamlined Services:

- Merging zones can streamline and standardize services, making it easier for residents to access services and reducing duplication of efforts.

5. Increased Bargaining Power:

- A larger council entity can have more bargaining power when negotiating with suppliers, contractors, and government bodies, potentially securing better deals and funding.

6. Improved Governance:

- Mergers can lead to stronger governance structures with enhanced oversight, accountability, and strategic vision, ensuring better decision-making and service delivery.

7. Broader Community Programs:

- Larger councils can offer more comprehensive community programs and services, leveraging diverse resources and expertise to address community needs more effectively.

8. Enhanced Technological Integration:

- Merging councils can facilitate the adoption of advanced technology and data management systems, improving efficiency, transparency, and service delivery.

9. Greater Political Influence:

- A larger, unified council can have a stronger voice and greater influence in regional, state, and national political arenas, advocating more effectively for the community's interests.

10. Cultural and Social Benefits:

- Merging zones can foster a more diverse and inclusive community, promoting social cohesion and cultural exchange.

These gains can contribute to a more effective, efficient, and responsive local government, ultimately enhancing the quality of life for residents in the merged council zones.

In my opinion, going ahead with the proposed boundary reform in its current proposed format will not provide any significant gains to the Gawler Belt community.

██████████
██████████

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 24 September 2024 2:32 PM
To: Gawler Boundary Review
Subject: Change to Gawler's Boundaries

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

The Minister for Local Government.

My husband and I both do not want our suburb of Hewett included in Town of Gawler's change of boundaries. We want to stay in the Light Council.
We think this proposal is just a greedy move to get more money into Gawler Council. We are very happy with the Light Council; they keep Hewett well looked after and keep the council rates realistic.
Gawler Council seem to take forever to do any alterations or upgrades to roads etc. How long has the barrier been around the wall at Pioneer Park? Those shops at the bottom of Murray street are disgusting, old, empty, broken glass, what do visitors think when they are strolling along the road?
As to the traffic in the main street, something should have been done about that years ago, how about one way traffic!!
We both feel strongly about this proposal and hope it never happens.

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]

From:

Sent:Thursday, 12 September 2024 7:59 PM

To:Gawler Boundary Review

Subject:Council proposal

Follow Up Flag:Follow up

Flag Status:Completed

Categories:Yellow Category

After living in Gawler Belt rural living for 25 years and seeing the area grow and change this is surely just a cash grab. Rezoning ? We purchased in this area so we could have room for us and our animals. Light Regional Council have done the right thing by the rate payers and now the value of all properties are of interest to the neighbouring council. Obviously rates will go through the roof, rules and allowances for stock would change then what? Basically moving to the city? Without moving. I totally disagree with the idea/ proposal. Seems like a push to rezone so developers can push people off small acreage and rezone as new estates with 50 houses per acre wouldn't that increase the revenue for the Gawler Council.What next glider club sold to be the new Parafield airport? Totally against it. Leave the zone for Gawler Belt alone.

Regards

Gawler Belt

[REDACTED]

From: [REDACTED]
Sent: Thursday, 12 September 2024 7:14 PM
To: Gawler Boundary Review
Subject: [REDACTED] Home Owner in Gawler District.

Follow Up Flag: Follow up
Flag Status: Completed

[REDACTED]

Dear Gawler boundary review panel,

I have Received an email This Evening.
(& its the 1st email I have received in regards to this).

I have registered with YourSAy to then submit a registration to attend the Public Forum. Extremely upset and disappointed to read that RSVP's are now Closed. As stated I have only just been made aware of this 'proposal' = have not been notified in a timely manner.

Can you please confirm if there will be a space for myself to attend.

Thank you.
Kind regards

[REDACTED]

[REDACTED]

From: DIT:Boundaries Commission <DIT.BoundariesCommission@sa.gov.au>
Sent: Thursday, 25 July 2024 11:23 AM
To: Gawler Boundary Review
Subject: FW: Gawler Belt merge from Light to Gawler Council

Categories: Yellow Category

[REDACTED]

[REDACTED]

OFFICIAL

Hi [REDACTED]

Please see below. Received in the Boundaries Commission mailbox.

I've provided a direct acknowledgement of the email to the sender.

[REDACTED]

From: [REDACTED]
Sent: Wednesday, July 24, 2024 3:59 PM
To: DIT:Boundaries Commission <boundaries.commission@sa.gov.au>
Subject: Gawler Belt merge from Light to Gawler Council

You don't often get email from [REDACTED] [Learn why this is important](#)

I do not want to become part of Gawler.

I do want better roads in the belt. Street lighting. A postal service. More recreational parks and a community centre.

[REDACTED]
[REDACTED] Gawler Belt

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Petition to Reject the Proposed Boundary Change from Playford Council to Gawler Council

To whom it may concern

Subject: Petition Against the Proposed Town of Gawler Boundary Change

We, the undersigned residents and ratepayers of the Playford Council area, hereby express our strong opposition to the proposed boundary change that seeks to transfer our area to the Gawler Council.

Reasons for Opposition:

1. **Possible Development Restrictions:** Gawler Council has a history of opposing development and restricting property improvements, which contrasts with Playford Council's more progressive approach.
2. **Negative Impact on Property Values:** Past experiences with boundary changes from Playford to Gawler have resulted in diminished property values and reduced opportunities for property utilisation.
3. **Adverse Effects on Ratepayers:** Transitioning to Gawler Council could disadvantage ratepayers in the area, particularly as northern developments continue to expand.

We respectfully request that the council reconsider this proposal in light of these concerns and prioritise the interests of the affected residents and ratepayers.

Signatures:

Name	Address	Signature
	Hillier Rd, Hillier	
	Hillier Rd, Hillier	
	HILLIER Rd. HILLIER	
	HILLIER Rd. Hillier	
	HILLIER Rd Hillier	
	Wingate Rd Hillier	
	HILLIER Rd HILLIER	
	Miller Rd Muller	
	Wingate Rd Hillier	
	Wingate Rd Hillier	

Petition to Reject the Proposed Boundary Change from Playford Council to Gawler Council

	HILLIER RD HILLIER ST 5116	
	HILLIER RD HILLIER 5116	
	Wingate rd, Hillier 5116	
	Wingate rd, Hillier 5116	
	WINGATE ROAD HILLIER ^{S.A.} 5116	
	Wingate Rd Hillier 5116	
	Wingate Rd, Hillier 5116	
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	HILLIER RD HILLIER	

[REDACTED]

From: [REDACTED]
Sent: Saturday, 24 August 2024 11:38 AM
To: Gawler Boundary Review
Subject: Gawler Boundary Proposal

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

In 1997 while surrounding councils were undertaking amalgamations, Gawler stood alone and merged with no other council.

An article printed in The Bunyip on 12th March 1997 contained the statement 'the general community feeling is that Gawler should remain largely as it is with the incorporation of outlying areas such as Hewett, Kalbeeba, Gawler Blocks and maybe even a few outer settlements further afield.'

Since that time Gawler has made several attempts to move its boundaries into adjoining council areas.

Each time it has met with opposition.

The Kalbeeba community has always insisted on staying as part of the Barossa.

Since Gawler lodged the proposal to extend its boundaries with the Boundary Commission the Barossa and Light Regional Councils objected to the proposal. The communities of Hewett and Kalbeeba have also shown strong opposition to becoming part of Gawler.

These affected areas would gain nothing by being moved into the Gawler council area, but would face a significant increase in their rates bill. (My rates would be \$400 dearer if the property was in Gawler's area)

Gawler has met strong opposition each time it has tried to extend its boundaries into neighbouring council areas.

It is easy to make the assumption that with this current proposal, despite the vehement opposition, Gawler is hoping the Commission and Minister will support it and force the adjoining communities to move into their area.

At a community forum in Sept 2020, Mayor Redman, expressed her opinion that a larger council, rather than a collection of smaller councils across a region would provide more efficient services. There are many residents who believe that instead of trying to extend its boundaries into areas that clearly do not want to be part of Gawler, the council should look at merging with one of its neighbours.

Yours etc

[REDACTED]
Kalbeeba

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 4 September 2024 9:32 PM
To: Gawler Boundary Review
Subject: Gawler boundary reform

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

Hi there,

I hope this isn't too late to add into the Gawler council review to take over land from other councils. I live in Kalbeeba, in an area under the spotlight of Gawler Council trying to take from the Barossa Council.

I would like to raise: why the border of Kalbeeba Rd that Gawler council seeks to take over...why not up to Kalperri Rd, or even right up to Davies Rd, Sandy Creek?

If Gawler council is successful in taking over the smaller portion of Kalbeeba, up to Kalbeeba Rd, then what's to stop them seeking to continuing their expansion to Sandy Creek in 10 years' time, once this current deal is all done & dusted? The arguments will still be the same: "people living near Sandy Creek and Kalperri Rd might still be using services and shops in the Gawler council region, as it is a closer proximity than Barossa supermarkets and services".

Please don't succumb to this argument as most people DO shop, work in and access services outside of the council area they live in.

Thank you for your time and consideration.

Regards,

[REDACTED]
[REDACTED] Kalbeeba

Sent from my Galaxy

[REDACTED]

From: [REDACTED]
Sent: Monday, 23 September 2024 12:55 PM
To: Gawler Boundary Review
Subject: Gawler Boundary Review - Response

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

Dear Sir/Madam

The Town of Gawler Council has a long history in relation to boundary reviews, which until recently (the last 10 years or so) have all been virulent against any such idea, and some of the reports which ended up in the public domain have shown the depth of bile this council and its predecessors has shown to its neighbours.

In that time a number of developments have been built on its borders - Hewett, Roseworthy, William Lake, the growth of Angle Vale and the proposed Concordia have widened its eyes - and its envy has grown as those developments have enriched its neighbours..

The Gawler Town Council has shown in the recent past that it is not capable of working to a balanced budget, with borrowing in the millions. It has spent rate payers (and taxpayers) money on experiments that will never return a dollar, and caused much resentment. The waste is amplified by the exposure of these flights of fancy to public view. I refer to the fingernails on the south and the left hand rising from the ground at Pioneer Park (The left hand being the one more than half the human population on earth use to wipe their bums.)

The council itself has spent thousands fighting legal battles against the public and its own members, the Mayor has been forced to make a public apology for her uncalled for statements about a member, and the CEO has been moved on using refusal of his proposed salary as an excuse.

This council cannot be trusted with the millions gained if they take over Hewett, parts of Kalbeeba and Concordia.

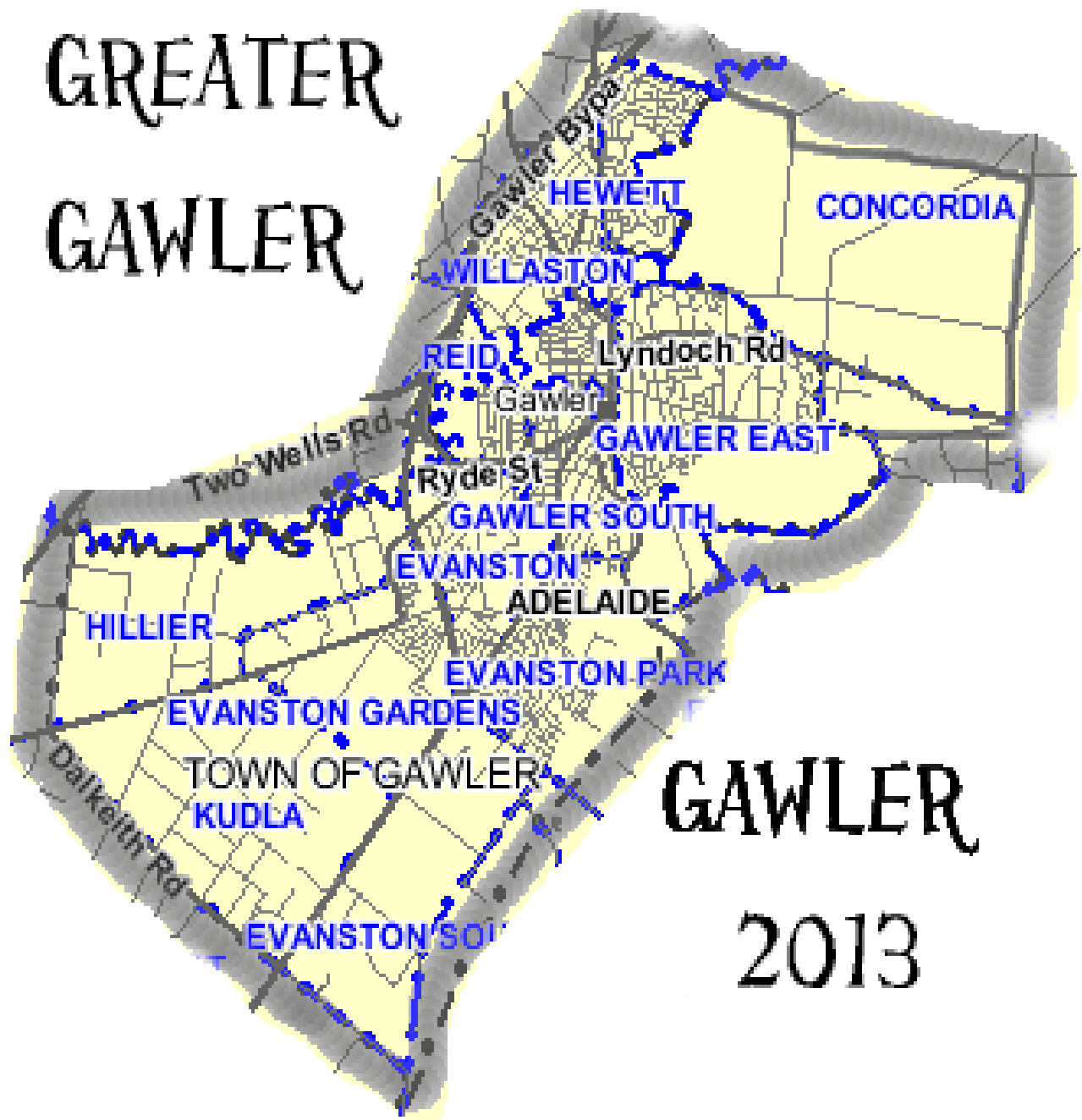
It is incapable of maintaining the amenities it has forced on developers - parks and playgrounds in particular. I refer to the park at the entrance to Copperfield estate and others in the Evanston area. lawns left to die and be infested with Caltrop.

I refer to the poor souls in Kudla who are trapped with land they cannot use by the bastardry of this council.

The council made its bed 30 years ago when amalgamations were sought to create regional councils. This council did not want to play, and is now reaping its reward for the bad blood it created long ago.

[REDACTED]
Freeling

GREATER GAWLER



GAWLER 2013

A Proposal that
the external boundary of The Town of Gawler be altered
to include Hewett and (part of) Concordia

Note:

I do assert copyright but give specific consent for circulation to all Gawler Council members and employees and for circulation for the purpose of their original drawing. - but not to cutting and pasting for the purpose of creation of new or amended documents nor to members of the public who may wish to make their own submissions either to Gawler or to other Councils.

[REDACTED]

**A Proposal that
the external boundary of The Town of Gawler be altered
to include Hewett and (part of) Concordia**

The objective of this document is to persuade the Town of Gawler Council that it should support a submission to The Boundary Adjustment Facilitation Panel that the external boundary of The Town of Gawler be altered to include Hewett and (part of) Concordia

Two submissions to The Boundary Adjustment Facilitation Panel are required as there are two adjacent Councils that are affected.

The submissions should be submitted concurrently with a request to the Boundary Adjustment Facilitation Panel (BAFP) that they be inquired into and heard together.

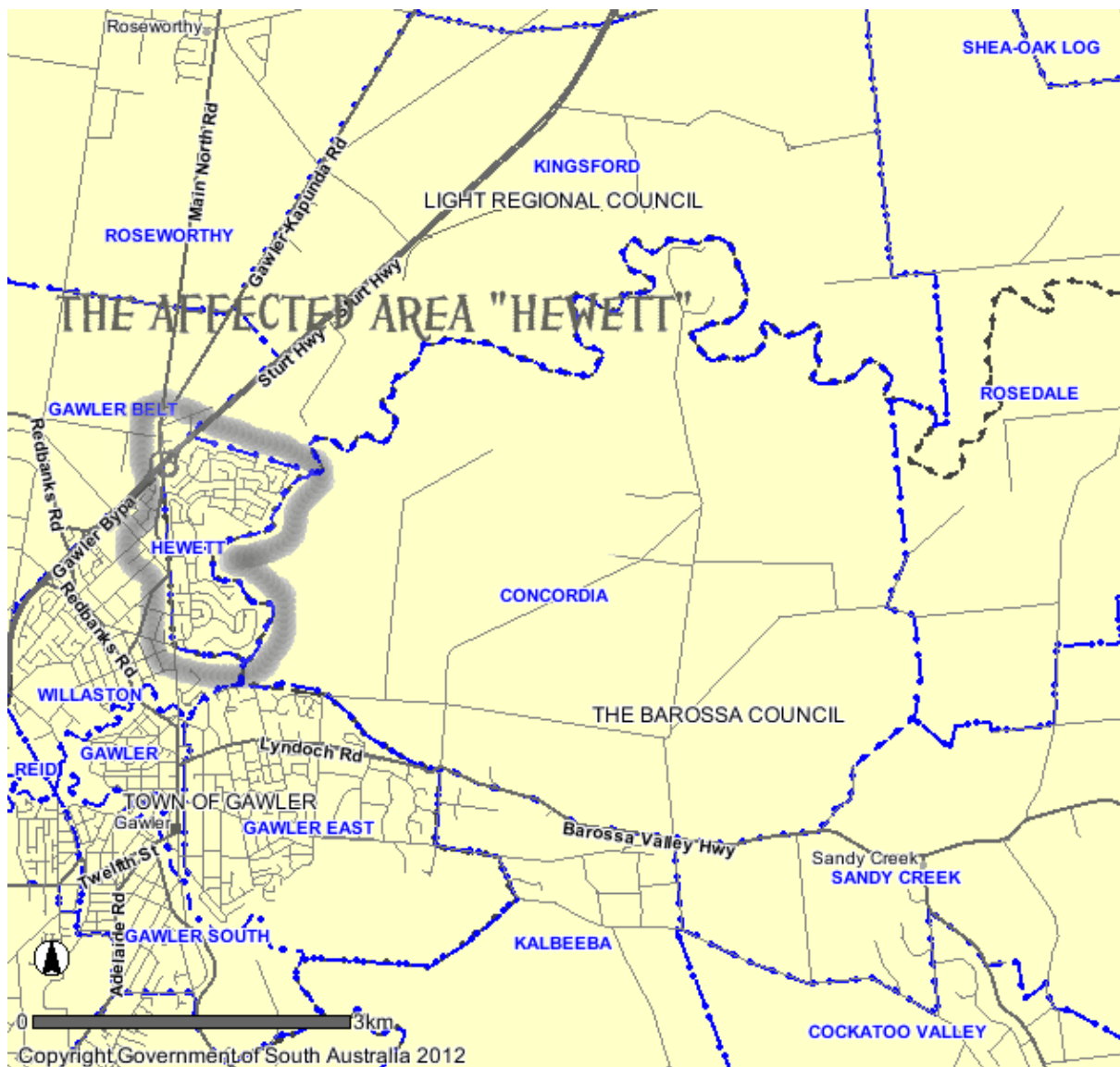
The areas are identified in the maps attached. The cover map shows the new Greater Gawler boundary of the Town of Gawler. The enclosed maps show the two affected areas.

Each of the submissions to the BAFP are drafted and attached. They need only to be completed with 20 electors names and addresses which should include 5 electors from each of the affected areas.

All that Council needs to do is to support the proposal.

1. The 30 year plan for Greater Adelaide, identifies Gawler as including both of the affected areas of Concordia and Hewett identically to this proposal.
2. Therefore, this proposal should not unduly spoil relationships between the Gawler Council and the relinquishing Councils because this is not Council's idea. It is a ratepayer proposal for something already included in the State's Plan.
3. A Local Government is not able to make an application for a boundary adjustment unless the all affected Councils agree. It seems from press reports that agreement is unlikely.
4. Ratepayers may make a submission to the Boundary Assessment Panel, in this case the application is for no more than a commencement of the implementation of the 30 year plan to include Hewett and part of Concordia in Gawler local government area.

5. The Town of Gawler has a deficit of rates relative to the population that it services. Gawler provides for residents of Hewett, Gawler Belt and Concordia but receives no rates from them.
6. The Town of Gawler has had to accept developments on its outskirts without having any planning powers relative to those developments.
7. The Town of Gawler, by necessity provides much of the social and town infrastructure for those adjacent populated areas.
8. The 30 year plan identifies further areas for urban growth at Concordia, adjacent to Gawler but in the Barossa Council.
9. The area of Hewett is now an integral part of Gawler in every aspect except being in the Town of Gawler for local government.
10. If Hewett and the 30 year plan development area of Concordia are included in the Town of Gawler Council area then Gawler can target an integrated plan for development and management which will benefit the Town and the Region.



Some aspects of the submissions

These applications are not complaints against the relinquishing Councils . Statements are made for the purpose of supporting the submission that the objects of the Local Government Act and the designated functions of Local Government will be best achieved for the affected area, and the region, if the proposals are achieved.

The electors in the affected areas will be closer geographically to their centre of local government the administration offices of which are more closely associated with their centres of business, social, recreational, educational and health providers rather than the relinquishing councils centres from which they are geographically, topographically and socially separated by many kilometres, watercourses, hills and non-settled areas which intrinsically separate the communities associated with Gawler from those of the Light and the Barossa

On any observable measure or method of analysis the affected area of Hewett is indistinguishable from Gawler. It is associated strongly with Gawler by its geography, it is on the same side of the North Para River as Gawler's Willaston area, It is on the same side of the Sturt Highway as Gawler, a major national route as which is a very ready barrier between Gawler/Hewett and the District of Light. Social support organisations, are with rare exceptions, sought by Hewett residents within Gawler, not Kapunda Light.

The affected community already turns to Gawler for senior schooling, library facilities, sporting clubs, swimming pool, recreation centres and leisure and restaurants, shopping, police station and patrol services and the provision of business and services, mechanical repairs and so on. It can be reasonably asserted that the Town of Gawler already offers the community of the affected area a reasonable range of infrastructure and will most likely be able to efficiently expand its services to the area.

In addition it will provide the town of Gawler with the income rate base from the development that it will, in any event, be providing the infrastructure for.

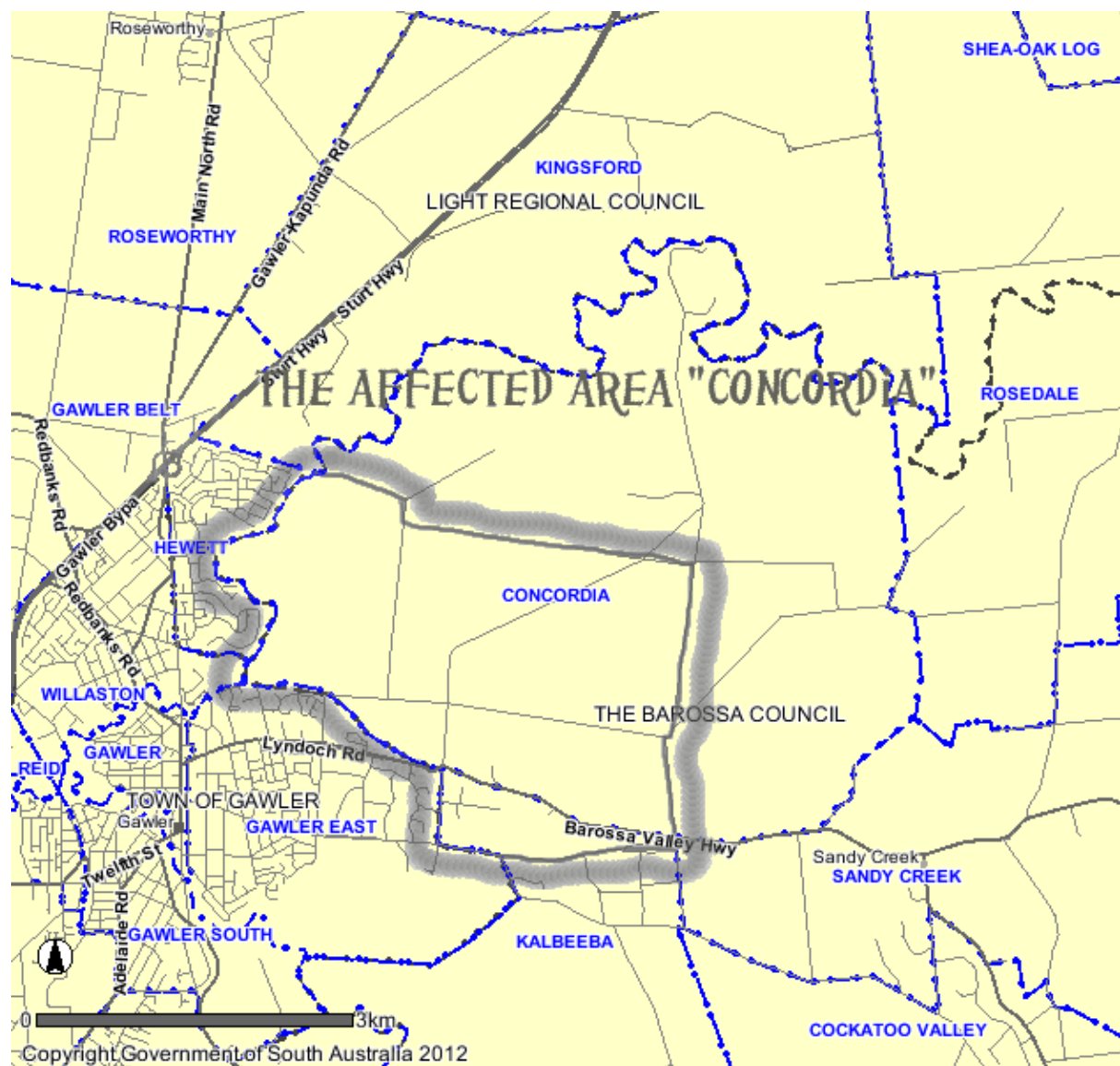
The affected area of Concordia is already identified in the 30 year plan as part of the urbanised area of Gawler. **If Gawler is inevitably to have adjacent development as set out in the 30 year plan then it should not be urban sprawl**, by which the writer means generally un-co-ordinated ad-hoc expansion of urbanisation..

There is a real risk of urban sprawl around Gawler as the area to be urbanised while actually an extension of Gawler is currently in three separate local government areas.

This proposal will provide that **the development areas already marked out in the 30 year plan by the State Government Planners will be brought in to the planning sphere of the Town of Gawler. It is much more likely that a single Council as planning authority will avoid urban sprawl and develop a more coherent and well planned urbanisation of greater Gawler.**

The “freezing” of development under the Barossa Valley Protection Area of the balance of the Concordia area means that there will be no further expansion to the east, towards the Barossa Urban Areas.

This must have the effect of further isolating the affected area from any association with the Barossa Council and substantially increasing its association with Gawler



The town of Gawler is already expanding eastwards. Early inclusion of the Concordia development area will assist coherent development. Under this proposal the receiving Council will become the planning authority for the already identified urban development area .

Local Government Act 1999

PUBLIC INITIATED STRUCTURAL REFORM PROPOSAL

FOR

The alteration of boundaries of Council areas between the

TOWN OF GAWLER

AND

THE BAROSSA COUNCIL

Submission is made to the

THE TOWN OF GAWLER

AND

THE BAROSSA COUNCIL

for consideration and response

and to

The Boundary Adjustment Facilitation Panel

On theday of.....2012

Ten weeks hence being

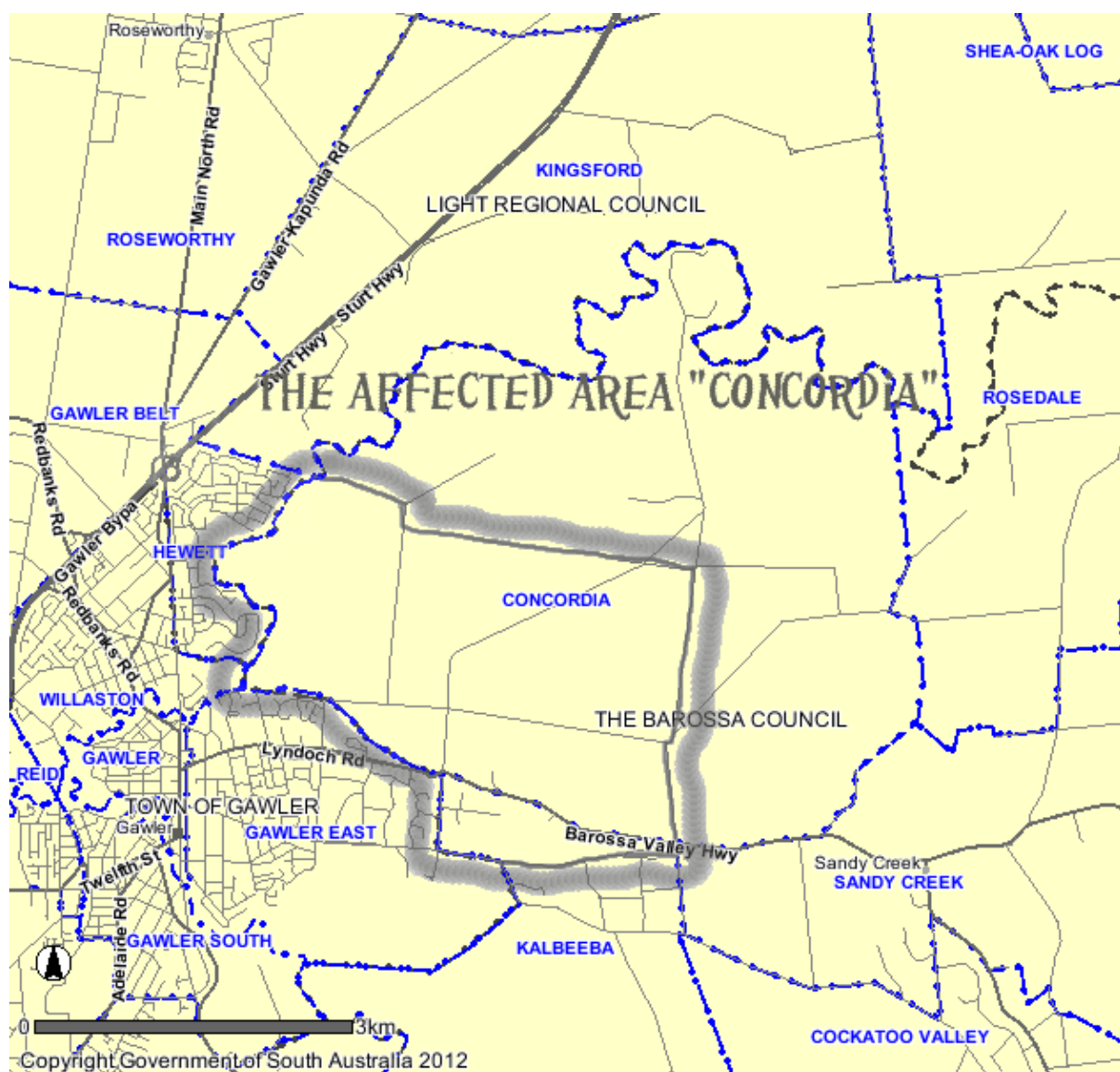
Theday of.....2012

An outline of the submission

It is proposed that an area of about 20 square kilometres used for limited agricultural activities and rural living as described and delineated in the projected urban development under the State's 30 year plan for the Town of Gawler and contiguous thereto be relinquished by the Barossa council to the Town of Gawler.

The “affected area” is as set out in the map below marked “the affected area CONCORDIA” and is described as.

An area of 20 square kilometres used for limited agricultural activities and rural living as described and delineated in the projected urban development under the State's 30 year plan for the Town of Gawler and contiguous thereto.



The “receiving Council” is the Town of Gawler.

The “relinquishing Council” is the Barossa Council.

This “public initiated submission” to alter the external boundaries of the said Councils is made by not less than “20 eligible electors” whose names are set out in the schedule attached hereto each of whom have completed and signed the prescribed declaration.

The five people nominated in this submission to represent the interests of those who would be directly affected by any proposal in this submission are electors from the affected area and set out in the schedule attached hereto and headed “Nominated Representatives”

Grounds for making the submission

The objects of the *Local Government Act 1999* are—

- (a) *to promote the continuance of a system of local government in South Australia under which elected local government bodies are constituted for the better governance of the State in a manner that is consistent with the provisions of Part 2A of the Constitution Act 1934; and*

In pursuit of that objective the proposal will mean that:

the electors in the affected area will be closer geographically to their centre of local government the administration offices of which are more closely associated with their centres of business, social, recreational, educational and health providers.

the area set aside by the State Government for urban development which is contiguous to Gawler urban areas will be included in the Town of Gawler for planning purposes, rather than Barossa Council from which it is geographically, topographically and socially separated by many kilometres, watercourses, hills and non-settled areas which intrinsically separate the communities associated with Gawler from those of the Barossa.

- (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*

In furtherance of that objective this proposal will mean that:

the electors in the affected area will be encouraged to participate in the affairs of the local government which is closer to them in geographical distance, fewer natural topographic inhibitors and the continuity of greater social and community connection with the receiving council than the relinquishing council

- (c) *to provide a legislative framework for an effective, efficient and accountable system of local government in South Australia; and*

- (d) *to ensure the accountability of councils to the community; and*

In pursuit of that objective this proposal will mean that:

due to the substantial distance between the meeting places and council chambers of the relinquishing council there are natural communication barriers and inhibitors for electors in the affected area to attend frequently at council meetings or to attend in person to pursue their interests or to ensure accountability from the Barossa Council. The administration offices of the receiving Council are relatively much closer to the affected area and are in the Gawler township which is the urban area containing most of the social infrastructure utilised by the affected area community. This will promote a natural tendency to have greater involvement with and ensure greater accountability from the receiving council.

- (e) *to improve the capacity of the local government system to plan for, develop and manage local areas and to enhance the capacity of councils to act within their local areas as participants in the Australian system of representative government; and*

The proposal will achieve this objective because:

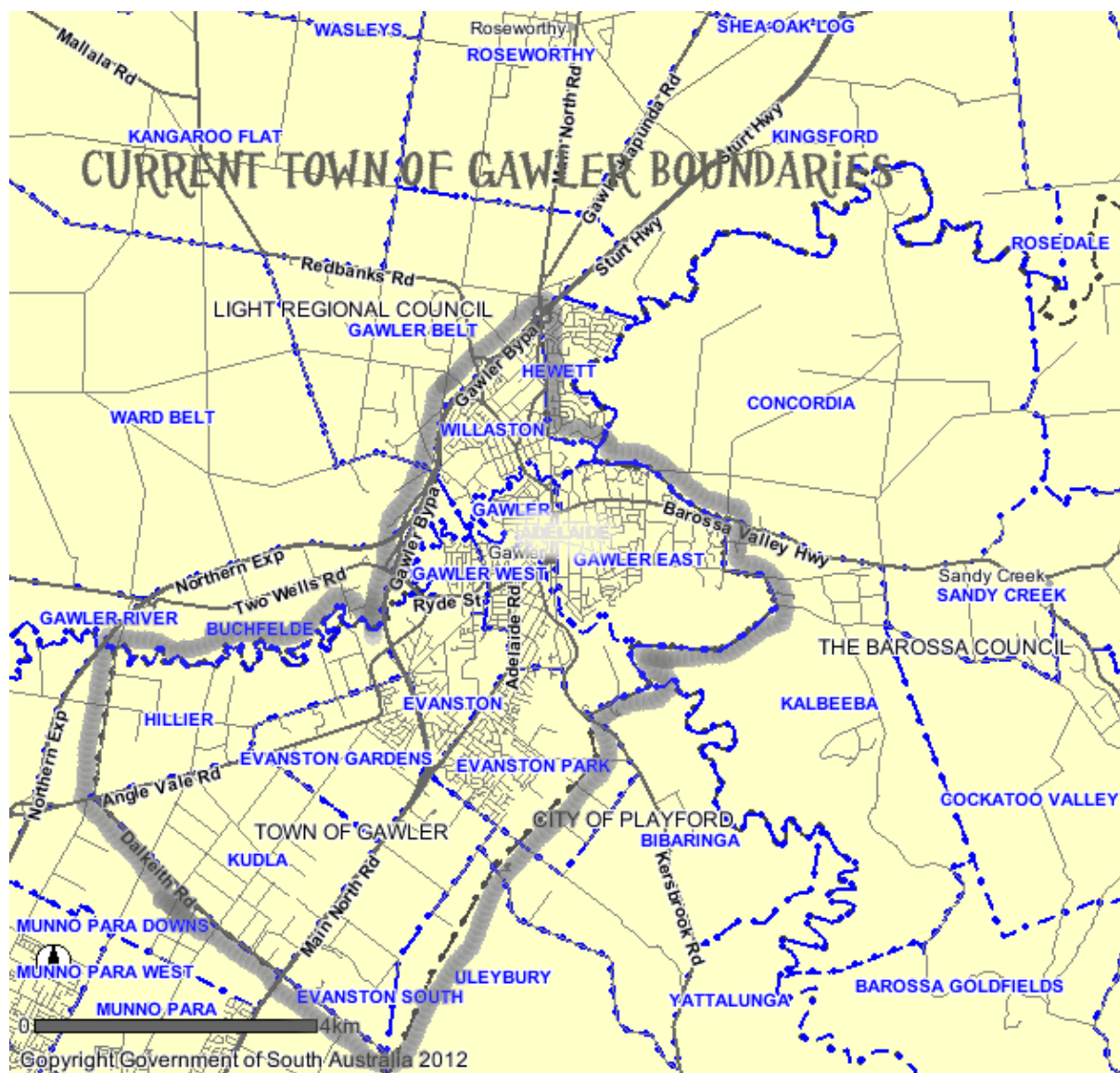
The affected area is the area contiguous to the Gawler urban area which has already been set down for urban development during the ensuing 30 years. Receiving the affected area will improve the capacity of the receiving local government to plan for, develop and manage the affected area. The affected area is physically local to Gawler, the receipt of the affected area by the Town of Gawler will enhance local governments capacity to act locally.

- (f) to encourage local government to provide appropriate services and facilities to meet the present and future needs of local communities; and

The proposal will achieve that objective because:

The affected area is clearly an “outlying area” to the relinquishing Barossa Council. All except a few roads are unsealed and many of those are unmade tracks.

The identified approved 30 year development area contiguous to Gawler and outlying to Barossa will need urban facilities. It is self evident that an extension of the facilities provided by Gawler to its current urban areas will more obviously be a local community provider than management from Barossa central.



This application recognises that obvious minimum future need and projects the need for the future provision of appropriate services and facilities to meet the affected area's local communities needs. *The Local Government Act 1999* requires a projection to meet such future needs.

- (g) *to encourage local government to manage the natural and built environment in an ecologically sustainable manner; and*
- (h) *to define the powers of local government and the roles of council members and officials.*

The proposal will do this :

- by analysing, planning and managing the built environment from the perspective of the local community to which it will adhere, and
- by ensuring an examination of the ecology which will be affected by the community most affected: i.e. the downstream community.

There is already upstream impact by residential, commercial, agricultural and viticultural practises on the major and minor water courses that flow through the affected area. There is great concern expressed that over the last 40 years the health of the North Para river system has deteriorated rapidly and substantially due to these up-stream practises. The whole of the affected Concordia area is a catchment area for the North and South Para River system whose confluence is in the town of Gawler.

The transfer of the whole of the land set out in this proposal will give the receiving council the opportunity to manage the built environment with the ecological environment to ensure that they not only manage the more intensely urbanised areas of Gawler central but are strongly encouraged to properly manage the upstream catchment area that they will inherit water flow from to ensure whole area is ecologically sustainable.

The principles set out in Section 26 of the *Local Government Act 1999*

- (1) *The Panel should, in arriving at recommendations for the purposes of this Chapter (but taking into account the nature of the proposal under consideration), have regard to—*
 - (a) *the objects of this Act; and*

This proposal has addressed the objects of the *Act* – above.

- (c) *the roles, functions and objectives of councils under this Act; and*

These roles, functions and objectives of councils are largely set out in Sections 6,7 and 8 of the *Act*

Principal role of a council. Section 6 *Local Government Act 1999*

A council is, under the system of local government established by this Act, established to provide for the government and management of its area at the local level and, in particular—

- (a) *to act as a representative, informed and responsible decision-maker in the interests of its community; and*

The proposers of this submission are of the view that the receiving Council physical proximity will promote a greater likelihood of more informed, representative and responsible decision making. For example, , the Barossa Council asserted in a recent proposal to the State Government regarding an inclusion of the whole of Concordia (with the exception of the 30 year plan area) in the Barossa protected area that they had consulted with all stakeholders. Many major landholders complain that they were not so consulted and in addition the boundaries of the Barossa Council's recommended area map attached to the Barossa Councils initial discussion paper were changed very substantially, and without any notice to ratepayers, in the said Council's final submission to government.

- (b) *to provide and co-ordinate various public services and facilities and to develop its community and resources in a socially just and ecologically sustainable manner; and*

To avoid repetition we refer to submissions above on proximity, extension of urban services from adjacent rather than remote areas and the better attention to ecological management of upstream built and natural environment by the downstream community. Residents in the area look to the receiving council for the promotion of the provision for Youth activities, and the promotion of the extension of public transport, aged care, hospital and health services from the responsible tiers of government.

- (c) *to encourage and develop initiatives within its community for improving the quality of life of the community; and*

Gawler is reputedly the second fastest urban growth area in the State. The reception of the affected area will give the Town of Gawler the opportunity to develop initiatives for the future and enable it to take into account in its future planning sufficient geographical area. The Town of Gawler is receiving impact from urban communities on its fringes, such as the Light Council's Development of Hewett which it has not been responsible for planning and development of.

It is a better alternative to permit the Town Council which will necessarily have to provide the infrastructure, to also be able to plan the development of the affected area. This will improve the quality of life of Gawler focussed residents because central and outlying infrastructure will be planned under the initiatives of the central Council. It will encourage active planning rather than re-active planning.

- (d) *to represent the interests of its community to the wider community; and*
- (e) *to exercise, perform and discharge the powers, functions and duties of local government under this and other Acts in relation to the area for which it is constituted.*

These objectives are addressed above and not re-iterated here.

Functions of a council. Section 7 *Local Government Act 1999*

The functions of a council include—

- (a) *to plan at the local and regional level for the development and future requirements of its area;*

These particular functions of a council are congruent with objectives of the *Act* and have been addressed under that heading above.

- (b) *to provide services and facilities that benefit its area, its ratepayers and residents, and visitors to its area (including general public services or facilities (including electricity, gas and water services, and waste collection, control or disposal services or facilities), health, welfare or community services or facilities, and cultural or recreational services or facilities);*

The affected area is largely rural and rural living with the limited Council services associated with non-urban living. The State 30 year plan provides for development adjacent to Gawler but in the current Barossa Council and remote from central Barossa. It would be most efficient to extend urban services from Gawler. The inclusion of the affected area will permit the expansion of appropriate selected services within the Gawler Council area for the affected area.

The affected area already is serviced by Gawler for all of urban town centre facilities and services in paragraph (b) (above) except for very limited rural provisions and utilities.

- (c) *to provide for the welfare, well-being and interests of individuals and groups within its community;*
- (d) *to take measures to protect its area from natural and other hazards and to mitigate the effects of such hazards;*
- (e) *to manage, develop, protect, restore, enhance and conserve the environment in an ecologically sustainable manner, and to improve amenity;*

- (f) *to provide infrastructure for its community and for development within its area (including infrastructure that helps to protect any part of the local or broader community from any hazard or other event, or that assists in the management of any area);*

These particular functions of a council are congruent with objectives of the *Act* and have been addressed above.

- (g) *to promote its area and to provide an attractive climate and locations for the development of business, commerce, industry and tourism;*
- (h) *to establish or support organisations or programs that benefit people in its area or local government generally;*
- (i) *to manage and, if appropriate, develop, public areas vested in, or occupied by, the council;*
- (j) *to manage, improve and develop resources available to the council;*
- (k) *to undertake other functions and activities conferred by or under an Act.*

These particular functions of a council are not being pursued by the relinquishing council (the RC) with respect to the affected area (the area).

The affected area is not being promoted by the RC. The RC has recommended to the State that all development in the area immediately adjacent to the affected area be frozen. The development freeze in the area is beneficial to Barossa central's development of tourism as it gives them a clear central set of destinations and focus.

Local Government and electors in the affected area must look to the future. The RC has a demonstrable record of not prioritising the area in pursuit of the objectives of the *Act*.

It appears that there has been little or no promotion of the area, there has been little or no attempt to provide an attractive climate or locations for the development of business, commerce, industry and tourism in the affected area, little or no attempt to establish or support organisations or programs that benefit people in the affected area, little or no development of public areas vested in, or occupied by the council

In conflict with the principles of the *Act*, it appears that with respect to the affected area there has been little or no attempts to manage, improve and develop resources available to the council or to undertake anything other than the bare minimum basic functions and activities conferred by or under any Act.

The proponent electors in the area are of the view that the area is part of the community of interest associated with Gawler and the statutory objects of local government will more likely be pursued if the proposal is accepted.

Objectives of a council. Section 8 *Local Government Act 1999*

A council must, in the performance of its roles and functions—

- (a) *provide open, responsive and accountable government;*
- (b) *be responsive to the needs, interests and aspirations of individuals and groups within its community;*
- (c) *participate with other councils, and with State and national governments, in setting public policy and achieving regional, State and national objectives;*
- (d) *give due weight, in all its plans, policies and activities, to regional, State and national objectives and strategies concerning the economic, social, physical and environmental development and management of the community;*
- (e) *seek to co-ordinate with State and national government in the planning and delivery of services in which those governments have an interest;*

- (f) *seek to facilitate sustainable development and the protection of the environment and to ensure a proper balance within its community between economic, social, environmental and cultural considerations;*
- (g) *manage its operations and affairs in a manner that emphasises the importance of service to the community;*
- (h) *seek to ensure that council resources are used fairly, effectively and efficiently;*
- (i) *seek to provide services, facilities and programs that are adequate and appropriate and seek to ensure equitable access to its services, facilities and programs.*

The Proponents do not set out to make broad criticism of the relinquishing council as to the pursuit of its statutory objectives for what is widely recognised as the Barossa Central area.

There is a clear history of the affected area being marginalised from the Barossa Central Area and therefore their current Local Government.

One method of redressing this could be for electors in the area to adopt a higher profile within the Barossa Council and to ensure election of an area elector on Council. This method sounds well in principle but neglects decades of history, the practical realities of geography, the disproportionate distribution of electors between the central townships of the Barossa and the sparsely populated Concordia area, specially where no wards exist, and the very distinct difference of interests that the affected area has compared to Barossa central.

This is not a general complaint against the Barossa Council . The statements are made for the purpose of supporting the submission that in all aspects addressed the objects of the Local Government Act and the designated functions of Local Government will be best achieved for the affected area, and the region, if the proposal is achieved.

The proposers do not have the resources of the *Boundary Adjustment Facilitation Panel*. The proposers do not have all of the facts and details of issues available to them. They are by legal necessity under the provisions of *The Local Government Act 1991* a local interest group and therefore without substantial resources.

The proponents take the view that affected area is justifiably proposed. Notwithstanding the justification for the inclusion of the area it is an objective of the proposers that the BAFP use its capacity to gather further data for its consideration..

Section 26 . PRINCIPLES FOR THE BOUNDARY ADJUSTMENT FACILITATION PANEL

- (i) *the resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community;*

The affected area is best described as largely undeveloped rural farming land that has been identified by the State Government for urban development. The affected area is, by every assessment and measure best described as contiguous to the Urban areas of the existing Gawler and remote from any other existing urban area.

The proposal does no more than recognise the existing community of interest and provides for the movement of that community to the Council community that it already significantly relates to. By way of examples the postcode of Concordia is the same as the postcode for Gawler and the telephone numbers of Concordia commence with the same telephone numbers as in Gawler and the Gawler Golf Course is at Sandy Creek!

The economics of providing for the projected urban development adjacent to the east of Gawler by the Gawler Council which already provides urban facilities and the opportunity to plan for their further provision in the future to the projected area have been addressed above and contrasted with the provision by the more remote and retarding effect of the development approach to the affected area by the current local government provider.

(ii) proposed changes should, wherever practicable, benefit ratepayers

The State Government has determined that the affected area is appropriate for Urban Development. It seems that, like the Hewett Development, future urban residents will look to Gawler for urban infrastructure and social identity.

It is practical and appropriate that the rates payable, and the development fees be paid to and the planning process be performed by the Town of Gawler and that the ratepayers of Gawler benefit from the provision of such services to the affected area which is adjacent to them and would otherwise be burdensome on them.

Efficiency of provision of services and proximity to the council offices and the associated prospect of more inclusive development are factors that should be included. In addition the social attachment to the Local Council area is more likely to promote voluntary social services such as member of community groups and service clubs;

(iii) a council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently;

If Gawler is inevitably to have adjacent development as set out in the 30 year plan then it should not be sprawl. This proposal will provide that the development will be brought in to the planning sphere of the Town of Gawler and will provide the town of Gawler with the income rate base from the development that it will be providing the infrastructure for.

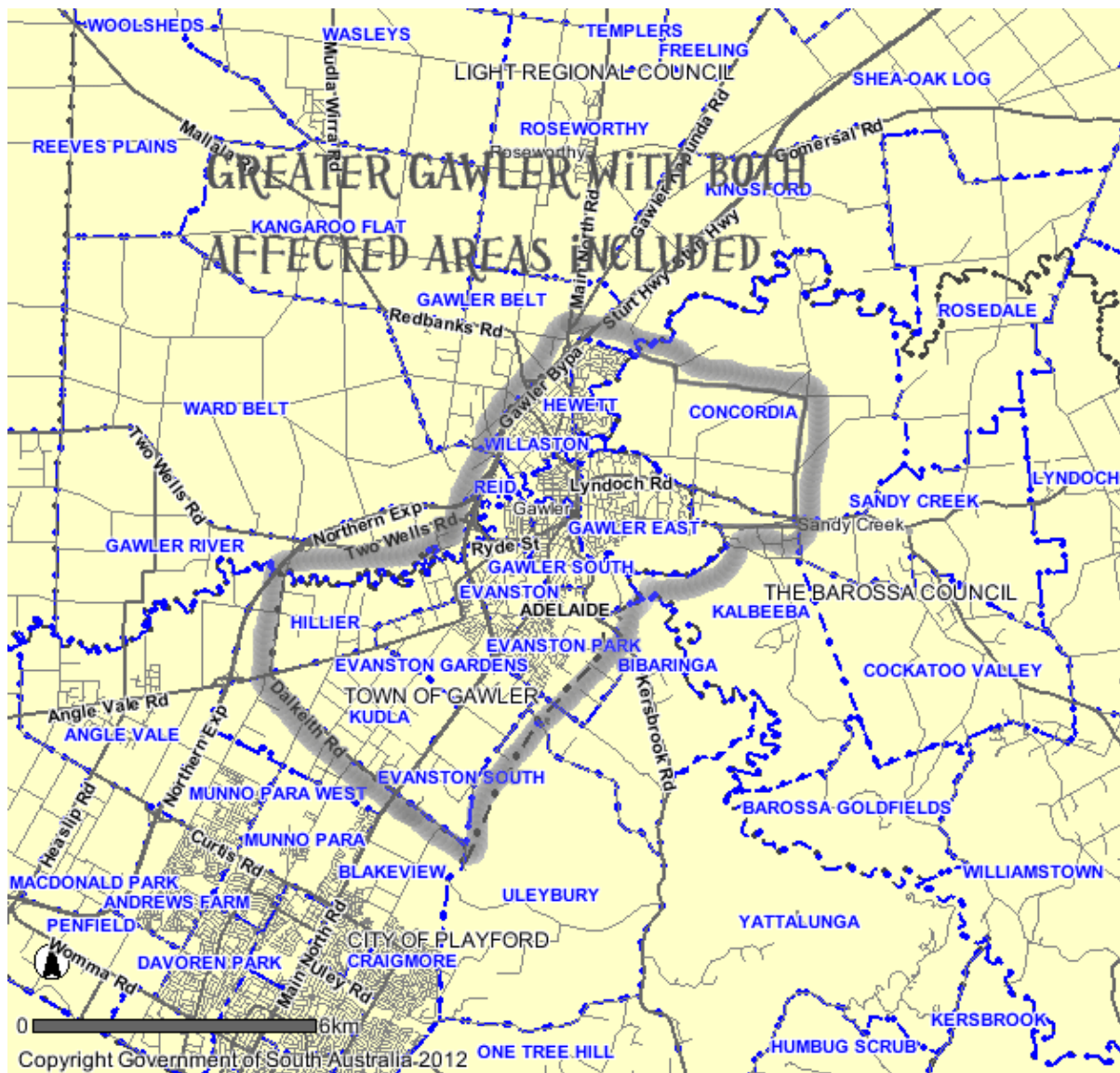
(iv) a council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis;

The services provided by the relinquishing Council have been discussed above. The affected community already turns to Gawler for schooling, library facilities, sporting clubs, swimming pool, recreation centres and leisure and restaurants, shopping and the provision of business and services, mechanical repairs and so on. That is not to say the central Barossa is not utilised as a destination but it is not generally speaking regular community usage, more of a visit. It can be reasonably asserted that the Town of Gawler already offers the community of the affected area a reasonable range of infrastructure and will most likely be able to efficiently expand its services to the adjacent area.

(v) a council should facilitate effective planning and development within an area, and be constituted with respect to an area that can be promoted on a coherent basis;

These issues have been addressed above and are summarised here as: The relinquishing council has passively for decades sought lack of development and diversity in rural or urban development of the affected area. The RC has actively pursued the restriction of the development of further diversity by successfully submitting to the State, without any or adequate consultation with the electors of the affected area that the whole of the balance of the Concordia area should be frozen out of substantial types of development.

The town of Gawler is already expanding eastwards. Early inclusion of the Concordia development area will assist coherent development. Under this proposal the receiving Council will become the planning authority for the already identified urban development area .



(vi) a council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes;

These issues have been addressed above and are summarised here as: The relinquishing Council is criticised for permitting activities which have caused the deterioration of the catchment area of the para river system. There is no intrinsic self interest component for the central Barossa to plan for the environmental protection of the catchment area as it flows away from them and the detriments to the system impact out of their sight. The Town of Gawler has a substantial self interest component in ensuring that planning upstream in the affected area is sustainable and protects the environment.

(vii) 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;

These issues have been addressed above and are summarised here

The relinquishing council, quite properly prides itself on its heritage and seeks to protect the identity of the communities of interest that it has created. It is asserted that it does not, for the reasons set out above, reflect the community of the affected area and certainly does not have as its objectives for the area the same aspirations as the electors, and perhaps more importantly those future residents of the urban areas which will be associated with the adjacent Gawler. The current residents recreational, social and economic interests are not met by the relinquishing council. Future needs will be best met by the adjacent Gawler Council which already provides for most of these needs and if the proposal is accepted it will have the opportunity to plan properly to provide further by being the coherent planning authority for the developing area

(viii) a council area should incorporate or promote an accessible centre (or centres) for local administration and services;

These issues have been addressed above and are summarised here

The administration centre of the relinquishing council is not easily accessible. This is due to the tyranny of distance and the topography, the roads to the Barossa central area where administration takes place are winding and undulating with large gum trees in very close proximity to the carriageways making travel time from the affected area to Council offices some 20 plus minutes. It is no surprise that when on the telephone to the administration centre, residents of Concordia are asked “where is that”.

The administration centre of the receiving Council is accessed by a relatively straight bitumenised main road and is only some 2 minutes away from the closest point of the affected area. This is a significant and not exaggerated difference specially when special trips need to be made for the purpose of council business such as dog registration when they are the opposite direction to that normally and regularly travelled for accessing most other urban services

(ix) 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;

These issues have been addressed above

(x) in considering boundary reform, it is advantageous (but not essential) to amalgamate whole areas of councils (with associated boundary changes, if necessary), and to avoid significant dislocations within the community;

Current residents of the affected area already look to Gawler for community. With the freezing of urban development to the east of the affected area future residents will also do so. The reception of the affected area by the Town of Gawler has no associated dislocation. The proposed boundary reform merely recognises the reality of current and future community locus.

(xi) 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);

These issues have largely been addressed above. While on the periphery of the Barossa Council in terms of marginal connection to the main social and economic features pursued there, electors in the affected area believe that due to their proximity in geographic and social terms they will receive adequate and fair representation within the Town of Gawler. Future residents should have the same reasonable expectations.

(xii) the importance within the scheme of local government that a council be able to co-operate with other councils and provide an effective form of government to the community;

(xiii) a scheme that provides for the integration or sharing of staff and resources between two or more councils may offer a community or communities a viable and appropriate alternative to structural change options; and

It is understood that as adjacent Councils the relinquishing and receiving Councils co-operate on many levels and would of necessity do so in the new urban areas if they remained within the Barossa area but physically annexed to Gawler Town.

This has to be seen as second best practise to the alternative which is proposed, that is to say, having the Town of Gawler providing for its own planning and development of, and provision of services to, those areas more associated with it, in all the varied economic and social manners discussed herein.

(c) the extent and frequency of previous changes affecting the council or councils under this Chapter or the repealed Act.

It is hoped that inquiries reveal further details.

(2) The Panel should, so far as is relevant, give preference to structural changes that enhance the capacity of local government to play a significant role in the future of an area or region from a strategic perspective.

The Town of Gawler and associated region is the second largest growing area in the State but the Town of Gawler is confined to planning within its current urban boundaries with no intrinsic power to plan for the towns peripheral development. This has seen an industrial area to the north of the town being planned by an adjacent council without Gawler having any statutory planning input (The District Council of Light) . Similarly, it has seen a rural living area develop to its west (Gawler Belt) and an urban development annexed to its north eastern area of a very substantial nature (Hewett), each of these without any intrinsic statutory input or any strategic Gawler area plan..

It cannot be known whether a co-ordinated strategic plan for the development of Gawler and environs would have placed these areas where they are with the mix that they have. The Town of Gawler has had to plan to provide the central township infrastructure for these adjacent areas. It could be said that this re-active planning is has resulted in such things as grid locked traffic in and around the main street of Gawler and the inadequacy of funds for development of infrastructure due to the imposed necessary provision of facilities by the Town for an adjacent population from which it does not receive the rate base.

The Town of Gawler has not been able to play any significant strategic role in the future of the area and, without the affected area of Concordia being relinquished to it, that impotence will continue.

By receiving the affected area the Town of Gawler will have its capacity enhanced to plan strategically for the area and be given the opportunity to play a significant role in the areas development.

The “freezing” of development in the Barossa Valley Protection Area of the balance of the Concordia area means that there will be no further eastward urban expansion, towards the Barossa Urban Areas.

This must have the effect of further isolating the Concordia affected area from any association with the Barossa Council and substantially increasing its association with Gawler

WE the undersigned declare that we are each an eligible elector in terms of section 28 (1) of the Local Government Act 1999, and that we support a public initiated submission being made to the

[Insert name of the affected council(s)]

proposing that.....

[Insert a brief outline in 1 or 2 sentences of the intent of the proposal being submitted]

WE further declare that we agree to the nomination of.....

[Insert the names of five persons who are willing to represent the interests of persons who would be directly affected by the proposal set out in the submission]

[illegible]

Turn Over

[illegible]

PUBLIC INITIATED STRUCTURAL REFORM PROPOSAL

FOR

The alteration of boundaries of Council areas between the

TOWN OF GAWLER

AND

THE LIGHT REGIONAL COUNCIL

Submission is made to the

THE TOWN OF GAWLER

AND

THE LIGHT REGIONAL COUNCIL

for consideration and response

and to

The Boundary Adjustment Facilitation Panel

On theday of.....2012

Ten weeks hence being

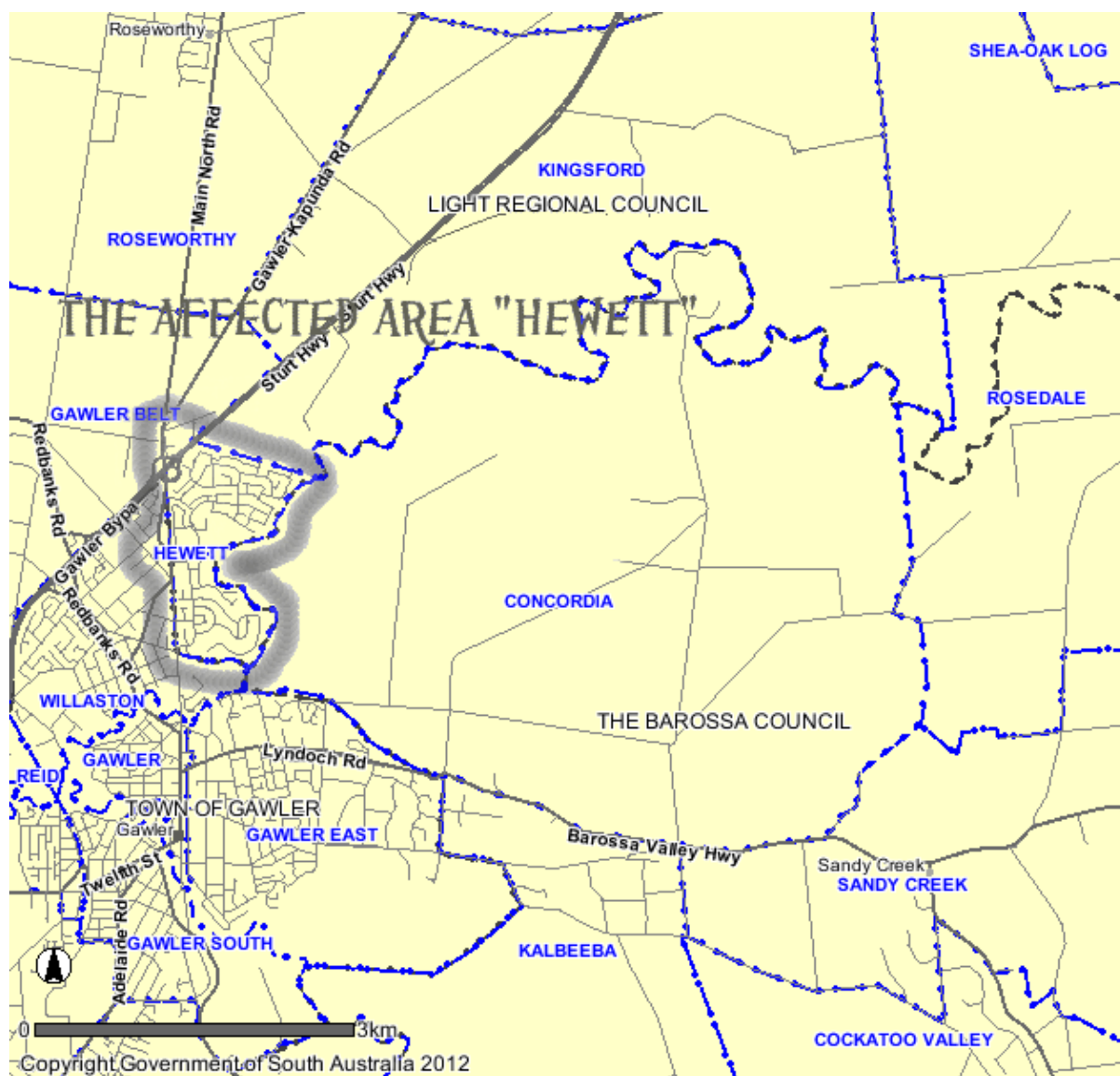
Theday of.....2012

An outline of the submission

It is proposed that the area known as Hewett, an urban area of about 2.5 square kilometres be relinquished by The Light Regional Council to the Town of Gawler.

The “affected area” is as set out in the map below marked “the affected area - HEWETT” and is described as.

An urban area of approximately 2.5 square kilometres known as Hewett



The “receiving Council” is the Town of Gawler.

The “relinquishing Council” is the Light Regional Council.

This “public initiated submission” to alter the external boundaries of the said Councils is made by not less than “20 eligible electors” whose names are set out in the schedule attached hereto each of whom have completed and signed the prescribed declaration.

The five people nominated in this submission to represent the interests of those who would be directly affected by any proposal in this submission are electors from the affected area and set out in the schedule attached hereto and headed “Nominated Representatives”

Grounds for making the submission

The objects of the *Local Government Act 1999* are—

- (d) *to promote the continuance of a system of local government in South Australia under which elected local government bodies are constituted for the better governance of the State in a manner that is consistent with the provisions of Part 2A of the Constitution Act 1934; and*

In pursuit of that objective the proposal will mean that:

the electors in the affected area will be closer geographically to their centre of local government the administration offices of which are more closely associated with their centres of business, social, recreational, educational and health providers rather than Light Regional Council Council centres from which it is geographically, topographically and socially separated by many kilometres, watercourses, hills and non-settled areas which intrinsically separate the communities associated with Gawler from those of the Light

In addition, the area set aside by the State Government’s 30 year plan for urban development which is contiguous to the eastern Gawler urban areas is sought to be included, by separate application, into the Town of Gawler. That application, in conjunction with this application will promote the continuance of a system of local government under which elected local government bodies are constituted for the better governance of the State in a manner that is consistent with the provisions of Part 2A of the Constitution Act 1934.

- (e) *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*

In furtherance of that objective this proposal will mean that:

the electors in the affected area will be encouraged to participate in the affairs of the local government which is closer to them in geographical distance, fewer natural topographic inhibitors and the continuity of greater social and community connection with the receiving council than the relinquishing council

- (c) *to provide a legislative framework for an effective, efficient and accountable system of local government in South Australia; and*

- (d) *to ensure the accountability of councils to the community; and*

In pursuit of that objective this proposal will mean that:

due to the substantial distance between the meeting places and council chambers of the relinquishing council there are natural communication barriers and inhibitors for electors in the affected area to attend frequently at council meetings or to attend in person to pursue their interests or to ensure accountability from the Light Regional Council. The administration offices of the receiving Council are relatively much closer to the affected area and are in the Gawler township which is the urban area containing most of the social infrastructure utilised by the affected area community. This will promote a natural tendency to have greater involvement with and ensure greater accountability from the receiving council.

- (e) *to improve the capacity of the local government system to plan for, develop and manage local areas and to enhance the capacity of councils to act within their local areas as participants in the Australian system of representative government; and*

The proposal will achieve this objective because:

The affected area is an area contiguous to the Gawler urban area which has already been developed as an urban extension to the Town of Gawler. Receiving the affected area will improve the capacity of the receiving local government to plan for, develop and manage the affected area. The affected area is physically local to Gawler, the receipt of the affected area by the Town of Gawler will enhance local governments capacity to act locally.

- (f) *to encourage local government to provide appropriate services and facilities to meet the present and future needs of local communities; and*

The proposal will achieve that objective because:

The affected area is clearly an “outlying area” to the relinquishing Light Regional Council. The distance from Hewett to the Kapunda, Light Regional Council offices is over 32 kilometres. The distance to the Gawler Council Chambers in the Gawler Town centre is 2.5 kilometres. A travel difference of 30 kilometres for those wishing to visit their local government office.

It is self evident that an extension of the facilities currently provided by Gawler to include Hewett areas 2.5 kilometres away will more obviously be a local community provider than management from Kapunda central 32 kilometres distant.

The Local Government Act 1999 requires a projection to meet such future needs.

- (g) *to encourage local government to manage the natural and built environment in an ecologically sustainable manner; and*
(h) *to define the powers of local government and the roles of council members and officials.*

The proposal will do this :

- by analysing, planning and managing the built environment from the perspective of the local community to which it adheres, and
- by ensuring an examination of the ecology which will be affected by the community most affected: i.e. the downstream community.

There is already upstream impact by residential, commercial, agricultural and viticultural practises on the major and minor water courses that flow through the affected area. There is great concern expressed that over the last 40 years the health of the North Para river system has deteriorated rapidly and substantially due to these up-stream practises. The whole of the affected area is a catchment area for the North Para River system whose confluence with the South Para River is in the town of Gawler.

The transfer of the whole of the land set out in this proposal will give the receiving council the opportunity to manage the built environment with the ecological environment to ensure that they not only manage the urbanised areas of Gawler central but are strongly encouraged to properly manage the upstream catchment area that they will inherit water flow from to ensure whole area is ecologically sustainable.

The principles set out in Section 26 of the *Local Government Act 1999*

- (1) *The Panel should, in arriving at recommendations for the purposes of this Chapter (but taking into account the nature of the proposal under consideration), have regard to—*
(a) *the objects of this Act; and*

This proposal has addressed the objects of the *Act* – above.

- (f) *the roles, functions and objectives of councils under this Act; and*

These roles, functions and objectives of councils are largely set out in Sections 6,7 and 8 of the *Act*

Principal role of a council. Section 6 *Local Government Act 1999*

A council is, under the system of local government established by this Act, established to provide for the government and management of its area at the local level and, in particular—

- (d) to act as a representative, informed and responsible decision-maker in the interests of its community; and*

The proposers of this submission are of the view that the receiving Council's physical proximity will promote a greater likelihood of more informed, representative and responsible decision making. A resident of Hewett reports that he has been told that the relinquishing Council views Hewett as a satellite residential area and that therefore no substantial sporting facilities, such as a local football oval will ever be provided locally to Hewett by the Light Regional Council.

- (e) to provide and co-ordinate various public services and facilities and to develop its community and resources in a socially just and ecologically sustainable manner; and*

To avoid repetition we refer to submissions above on proximity, extension of urban services from adjacent rather than remote areas and the better attention to ecological management of upstream built and natural environment by the downstream community. Residents in the area look to the receiving council for the promotion of the provision for Youth activities, and the promotion of the extension of public transport, aged care, hospital and health services from the responsible tiers of government.

- (f) to encourage and develop initiatives within its community for improving the quality of life of the community; and*

Gawler is reputedly the second fastest urban growth area in the State. The reception of the affected area will give the Town of Gawler the opportunity to develop initiatives for the future and enable it to take into account in its future planning sufficient geographical area. The Town of Gawler is receiving impact from urban communities on its fringes, such as the Light Council's Development of Hewett and Gawler Belt and formerly Kalbeeba to the east in the Barossa Council Area which Gawler has not been responsible for the planning and development of but provides the social town centre and infrastructure for.

It is a better alternative to permit the Town Council which will necessarily have to provide the infrastructure, to also be able to plan the further development of, and management of the affected area. This will improve the quality of life of the already Gawler focussed residents of the affected area because central and outlying infrastructure will be planned under the initiatives of a localised Council. It will encourage active planning rather than re-active planning.

- (d) to represent the interests of its community to the wider community; and*
- (e) to exercise, perform and discharge the powers, functions and duties of local government under this and other Acts in relation to the area for which it is constituted.*

These objectives are addressed above and not re-iterated here.

Functions of a council. Section 7 *Local Government Act 1999*

The functions of a council include—

- (d) to plan at the local and regional level for the development and future requirements of its area;*

These particular functions of a council are congruent with objectives of the *Act* and have been addressed under that heading above.

- (e) to provide services and facilities that benefit its area, its ratepayers and residents, and visitors to its area (including general public services or facilities (including electricity, gas and water services, and waste collection, control or disposal services or facilities), health, welfare or community services or facilities, and cultural or recreational services or facilities);*

Leaving aside the provision of utilities the receiving Council already provides to the affected area, either directly, or indirectly by arrangement the services set out above. It would be most efficient to extend urban services from Gawler. The inclusion of the affected area will permit the expansion of appropriate selected services within the Gawler Council area for the affected area, from 2.5 kilometres away rather than 32 kilometres distant..

- (c) *to provide for the welfare, well-being and interests of individuals and groups within its community;*
- (d) *to take measures to protect its area from natural and other hazards and to mitigate the effects of such hazards;*
- (e) *to manage, develop, protect, restore, enhance and conserve the environment in an ecologically sustainable manner, and to improve amenity;*
- (f) *to provide infrastructure for its community and for development within its area (including infrastructure that helps to protect any part of the local or broader community from any hazard or other event, or that assists in the management of any area);*

These particular functions of a council are congruent with objectives of the *Act* and have been addressed above.

- (g) *to promote its area and to provide an attractive climate and locations for the development of business, commerce, industry and tourism;*
- (h) *to establish or support organisations or programs that benefit people in its area or local government generally;*
- (i) *to manage and, if appropriate, develop, public areas vested in, or occupied by, the council;*
- (j) *to manage, improve and develop resources available to the council;*
- (k) *to undertake other functions and activities conferred by or under an Act.*

On any observable measure or method of analysis the affected area of Hewett is indistinguishable from Gawler. It is associated strongly with Gawler by its geography, it is on the same side of the North Para River as Gawler's Willaston area, It is on the same side of the Sturt Highway as Gawler, a major national route as which is a very ready barrier between Gawler/Hewett and the District of Light. Social support organisations, are with rare exceptions, sought by Hewett residents within Gawler, not Kapunda Light. Public areas, apart from smaller intra urban parks are sourced in Gawler and it is Gawler that provides local facilities to Hewett such as a library, swimming pool and sporting ovals, local police station and community recreation centres.

The proponent electors in the area are of the view that the affected area is part of the community of interest associated with Gawler and the statutory objects of local government will more likely be pursued if the proposal is accepted.

Objectives of a council. Section 8 Local Government Act 1999

A council must, in the performance of its roles and functions—

- (a) *provide open, responsive and accountable government;*
- (b) *be responsive to the needs, interests and aspirations of individuals and groups within its community;*
- (c) *participate with other councils, and with State and national governments, in setting public policy and achieving regional, State and national objectives;*
- (d) *give due weight, in all its plans, policies and activities, to regional, State and national objectives and strategies concerning the economic, social, physical and environmental development and management of the community;*

- (e) *seek to co-ordinate with State and national government in the planning and delivery of services in which those governments have an interest;*
- (f) *seek to facilitate sustainable development and the protection of the environment and to ensure a proper balance within its community between economic, social, environmental and cultural considerations;*
- (g) *manage its operations and affairs in a manner that emphasises the importance of service to the community;*
- (h) *seek to ensure that council resources are used fairly, effectively and efficiently;*
- (i) *seek to provide services, facilities and programs that are adequate and appropriate and seek to ensure equitable access to its services, facilities and programs.*

The Proponents do not set out to make broad criticism of the relinquishing council as to the pursuit of its statutory objectives for what is widely recognised as the well managed and progressive Kapunda and Light District area.

But:

There is a clear and severe geographic affect of distance, together with an accident of history which has caused the satellite urban development of the affected area to be developed in the relinquishing council area while effectively being part of the receiving council and marginalised from the relinquishing Council by the tyranny of distance and the separation from the Light Council Offices by some 32 kilometres of mainly open country, broad acre farmlands.

One method of redressing this could be for electors in the area to adopt a higher profile within the Light Regional Council and to ensure election of an area elector on Council. This method sounds well in principle but neglects the practical realities of geography, the disproportionate distribution of electors between the main and more central townships of the Light Council and the limited population of the affected area, an effective suburban area (of Gawler) and the very distinct difference of interests that the affected area has compared to Kapunda Rural Townships.

This is not a general complaint against the Light Regional Council. The statements are made for the purpose of supporting the submission that in all aspects addressed the objects of the Local Government Act and the designated functions of Local Government will be best achieved for the affected area, and the region, if the proposal is achieved.

The proposers do not have the resources of the *Boundary Adjustment Facilitation Panel*. The proposers do not have all of the facts and details of issues available to them. They are by legal necessity under the provisions of *The Local Government Act 1991* a local interest group and therefore without substantial resources.

The proponents take the view that affected area is justifiably proposed never the less it is an objective of the proposers that the BAFP use its capacity to gather further data for its consideration..

Section 26 . PRINCIPLES FOR THE BOUNDARY ADJUSTMENT FACILITATION PANEL

- (xiv) *the resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community;*

The affected area is best described as an urbanised area closely associated with and part of the Gawler community. The affected area is, by every assessment and measure, contiguous to the urban areas of the existing Gawler and remote from any other existing urban area.

The proposal does no more than recognise the existing community of interest and provides for the movement of that community to the Council community that it already significantly relates to.

The economics of providing for the projected urban management and any further development in the affected area by a proximate local government have been addressed above and contrasted with the provision by the more remote management of the affected area by the current, very distant, local government provider.

(xv) proposed changes should, wherever practicable, benefit ratepayers

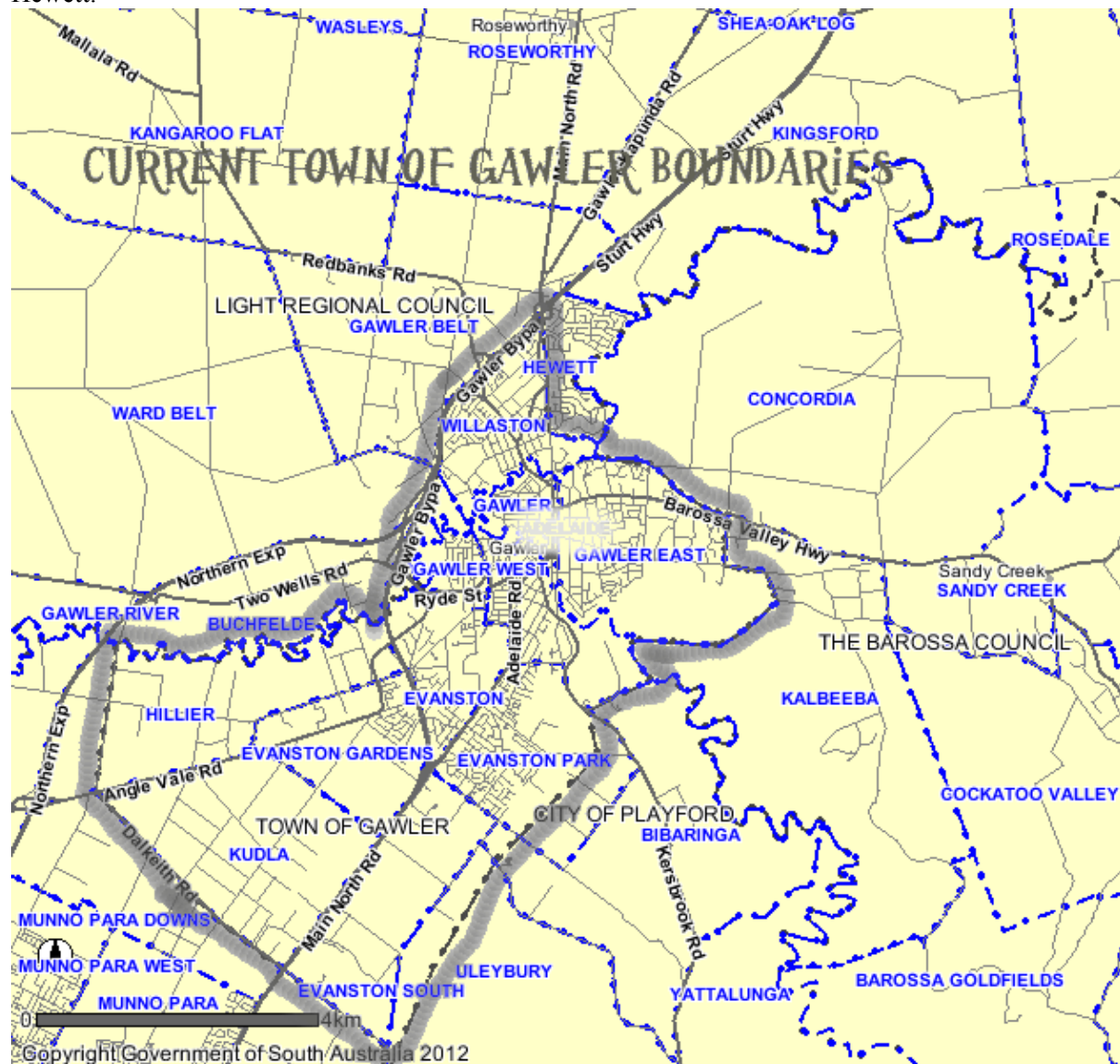
Residents of Hewett look to Gawler for their major urban infrastructure and social identity.

It is practical and appropriate that the rates payable, and the development fees be paid to and the planning process be performed by the Town of Gawler and that the ratepayers of Gawler benefit from the provision of such services to the affected area which is adjacent to them and would otherwise be burdensome on them.

Efficiency of provision of services and proximity to the council offices and the associated prospect of more inclusive development are factors that should be included. In addition the social attachment to the Local Council area is more likely to promote voluntary social services such as member of community groups and service clubs;

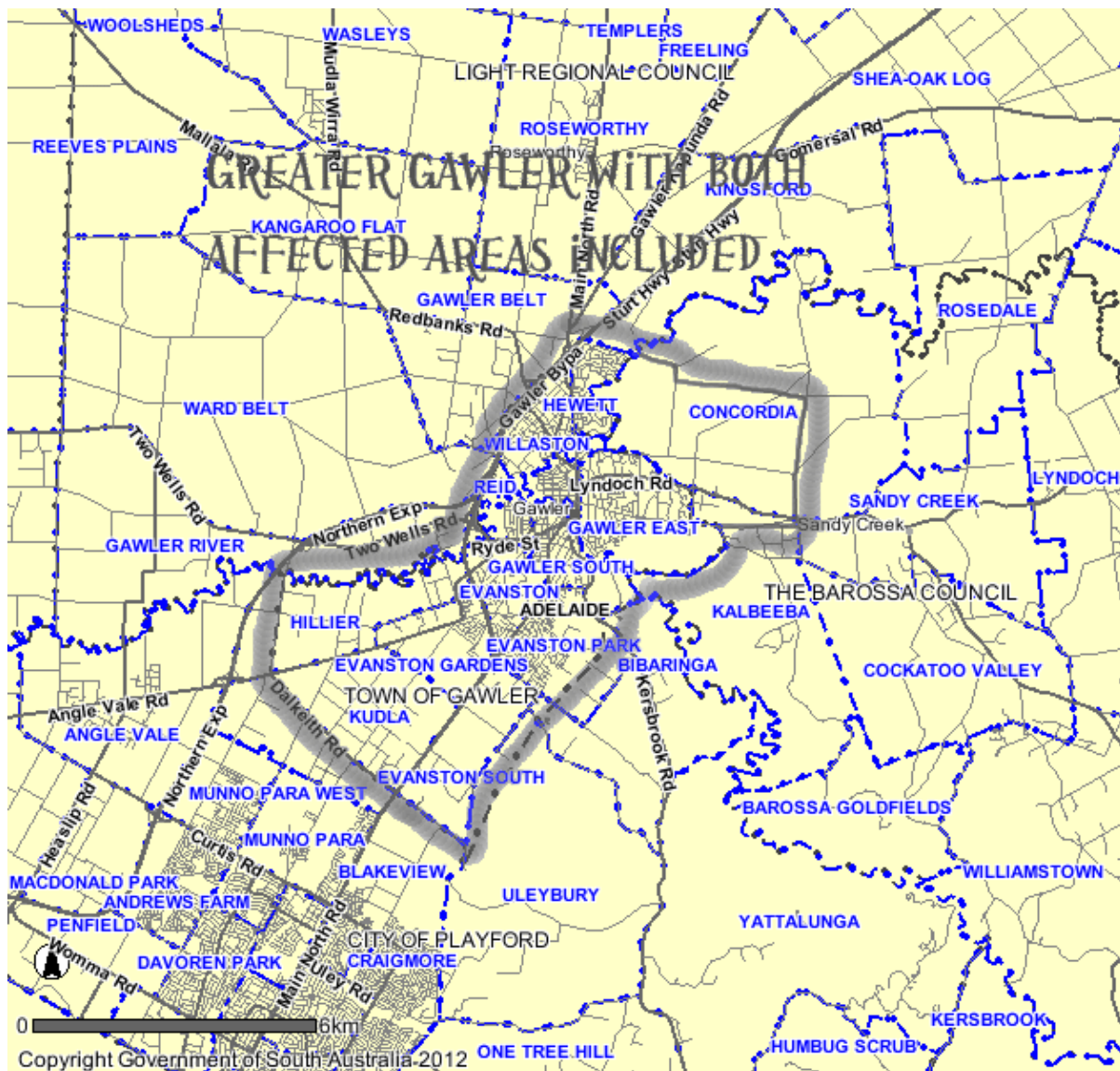
(xvi) a council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently;

The 30 Year Plan for Greater Adelaide identifies further urban growth associated with Gawler and delineates in red the total new urban area. The area so identified delineated includes the affected area of Hewett.



If Gawler is inevitably to have adjacent development as set out in the 30 year plan then it should not be urban sprawl, by which the writer means generally un-co-ordinated ad-hoc expansion of urbanisation.. There is a real risk of urban sprawl around Gawler as the area to be urbanised while actual an extension of Gawler is currently in three local government areas. That is to say, Hewett on Gawlers north east is in Light, Concordia on Gawlers East is in Barossa and Gawler in its eastern and southern development areas is in Gawler

This proposal will provide that the development areas already marked out in the 30 year plan by the State Government Planners will be brought in to the planning sphere of the Town of Gawler.



It is much more likely that a single Council as planning authority will avoid urban sprawl and develop a more coherent and well planned urbanisation of greater Gawler. In addition it will provide the town of Gawler with the income rate base from the development that it will, in any event, be providing the infrastructure for.

- (xvii) *a council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis;*

The services provided by the relinquishing Council have been discussed above. The affected community already turns to Gawler for schooling, library facilities, sporting clubs, swimming pool, recreation centres and leisure and restaurants, shopping, police station and patrol services and the provision of business and services, mechanical repairs and so on. It can be reasonably asserted that the Town of Gawler already offers the community of the affected area a reasonable range of infrastructure and will most likely be able to efficiently expand its services to the area.

- (xviii) *a council should facilitate effective planning and development within an area, and be constituted with respect to an area that can be promoted on a coherent basis;*

These issues have been addressed above and are summarised here as:

The affected area has already developed as an urban suburb of Gawler. It is already part of Gawler in every respect except inclusion in local government.

(xix) a council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes;

These issues have been addressed above and are summarised here as: There is no intrinsic self interest component for the Light Council to plan for the environmental protection of the catchment area as it flows away from them.. The Town of Gawler has a substantial self interest component in ensuring that planning upstream in the affected area is sustainable and protects the environment.

(xx) 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;

These issues have been addressed above and are summarised here

The relinquishing council is mostly broad acre pastoral land with a smattering of Country Townships contrasted with the recent development of a very substantial industrial area at the southern end, well away from the central town of Kapunda. The affected area is the only urban area of the district council of light which is attached to a major urban centre, that of Gawler. The affected area reflects the attachment values associated with an outer suburban area rather than a broad acre farming community and as such can reasonably be expected not to easily integrate into the farming community structures, values expectations and aspirations.

It is much more likely to develop, and actually has already done so, an attachment consistent with the Gawler community structures, values expectations and aspirations

The current residents recreational, social and economic interests are not met by the relinquishing council. Future needs will be best met by the adjacent Gawler Council which already provides for most of these needs and if the proposal is accepted it will have the opportunity to plan properly to provide further by being the coherent planning authority for the developing area

(xxi) a council area should incorporate or promote an accessible centre (or centres) for local administration and services;

These issues have been addressed above and are summarised here

The administration centre of the relinquishing council is not easily accessible. This is due to the tyranny of distance, some 32 kilometres. The administration centre of the receiving Council is accessed travelling down a single short suburban road, a distance, at its shortest, of about a kilometre.. This is a significant and not exaggerated difference specially when special trips need to be made for the purpose of council business such as dog registration when they are the opposite direction to that normally and regularly travelled for accessing most other urban services

(xxii) 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;

These issues have been addressed above

(xxiii) in considering boundary reform, it is advantageous (but not essential) to amalgamate whole areas of councils (with associated boundary changes, if necessary), and to avoid significant dislocations within the community;

Current residents of the affected area already look to Gawler for community. The reception of the affected area by the Town of Gawler has no associated dislocation. The proposed boundary reform merely recognises the reality of current and future community locus.

(xxiv) 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);

These issues have largely been addressed above. While on the periphery of the Light Regional Council in terms of marginal connection to the main social and economic features pursued there, electors in the affected area can believe that due to their proximity in geographic and social terms they will receive adequate and fair representation within the Town of Gawler.

- (xxv) *the importance within the scheme of local government that a council be able to co-operate with other councils and provide an effective form of government to the community;*
- (xxvi) (xiii) *a scheme that provides for the integration or sharing of staff and resources between two or more councils may offer a community or communities a viable and appropriate alternative to structural change options; and*

It is understood that as adjacent Councils the relinquishing and receiving Councils co-operate on many levels and would of necessity do so in the future if the affected area remained within the Light Council but physically annexed to Gawler Town.

This has to be seen as second best practise to the alternative which is proposed, that is to say, having the Town of Gawler providing for its own planning and development of, and provision of services to, those areas more associated with it, in all the varied economic and social manners discussed herein.

- (f) *the extent and frequency of previous changes affecting the council or councils under this Chapter or the repealed Act.*

It is hoped that inquiries reveal further details.

- (2) *The Panel should, so far as is relevant, give preference to structural changes that enhance the capacity of local government to play a significant role in the future of an area or region from a strategic perspective.*

The Town of Gawler and associated region is the second largest growing area in the State but the Town of Gawler is confined to planning within its current urban boundaries with no intrinsic power to plan for the town's peripheral development. This has seen an industrial area to the north of the town being planned by an adjacent council without Gawler having any statutory planning input (The District Council of Light) . Similarly, it has seen a rural living area develop to its west (Gawler Belt) and an urban development annexed to its north eastern area of a very substantial nature (Hewett), each of these without any intrinsic statutory input or any strategic Gawler area plan..

It cannot be known whether a co-ordinated strategic plan for the development of Gawler and environs would have placed these areas where they are with the mix that they have. The Town of Gawler has had to plan to provide the central township infrastructure for these adjacent areas. It could be said that this re-active planning is has resulted in such things as grid locked traffic in and around the main street of Gawler and the inadequacy of funds for development of infrastructure due to the imposed necessary provision of facilities by the Town for an adjacent population from which it does not receive the rate base.

WE the undersigned declare that we are each an eligible elector in terms of section 28 (1) of the Local Government Act 1999, and that we support a public initiated submission being made to the

[Insert name of the affected council(s)]

proposing that.....

[Insert a brief outline in 1 or 2 sentences of the intent of the proposal being submitted]

WE further declare that we agree to the nomination of.....

[Insert the names of five persons who are willing to represent the interests of persons who would be directly affected by the proposal set out in the submission]

[illegible][illegible]

[REDACTED]

From: [REDACTED]
Sent: Monday, 2 September 2024 9:13 AM
To: Gawler Boundary Review
Subject: Gawler Boundary Review - submission in support.
Attachments: 2012 04 24 Public Council Minutes - attachment under separate cover 'Greater Gawler - Gawler 2013' from [REDACTED].pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

Dear Sir or Madam.
I support the Gawler Boundary expansion as submitted by the Town Of Gawler.
I attach a copy of my submission.

My submissions have always been based around the community of common concerns and interests principle rather than fiscal.

I would ask you to note that objections from relinquishing Councils and residents from the areas sought to be incorporated into Gawler are largely financial.
It is understandable that residents are often happy paying country rates while enjoying adjacent urban facilities and they therefore oppose joining in to Gawler which result in higher rating.

That is not a good way to look at the future identity and community of common interests of Gawler and Greater Gawler.

[REDACTED]
[REDACTED]
Gawler.
SA 5118.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 10 September 2024 12:44 AM
To: Gawler Boundary Review
Subject: Gawler Boundary Review

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

Evening,

I have lived in Hewett for 23 yrs and attended the meeting held by the BDO at the Hewett Centre. It was very evident from the those attending they wanted no part of what was seen as this asset grab by the Gawler Council.

Firstly, the Gawler Council have made no attempt to explain their reasoning to the affected parties. They could not attend the meeting in Hewett and provide any information.

Looking at the regions to be annexed to the Gawler Council, it is all about taking over areas that a relatively new or developing and will be paying high rates.

To create some faith in the intention it should be more about what additional services will be provided rather than implying what it being taken from Gawler.

To say that Gawler Council provide much of the services to these areas is rather overrated. People in these areas travel elsewhere like Munno Para and Elizabeth, as access to Gawler services can be rather restricted in terms of parking and choice etc.

To say that Gawler Council Offices are closer than Light Regional Council Offices is irrelevant as most communication is electronic.

The whole area dynamics is changing with developments to the north of the Sturt Highway. I think people in Hewett might see facilities developed in this area as more meeting their needs in terms of basic retail shopping and education.

Regards,

[REDACTED]
[REDACTED] Hewett

[REDACTED]

From: [REDACTED]
Sent: Saturday, 8 February 2020 4:25 PM
To: 'light@parliament.sa.gov.au'
Subject: Gawler Council Boundary Expansion
Tony Piccolo MP.

Dear Sir,

I am writing to express my extreme dissatisfaction with the current situation where Gawler council is proposing that it annex Hewett and Gawler Belt purely to increase its revenue base, contrary to its propaganda touting residents use of council services (of which few to no council services are used by Hewett residents). The Gawler "services" used by Hewett residents are privately operated commercial businesses of which Gawler council have no part in facilitating. Hewett residents equally use services located in other council areas, of which all should be happy to receive the patronage.

As per my correspondence to the Bunyip (attached below), I believe Gawler council has failed the most basic test for justifying boundary expansions into another council and continuing with the proposal will only squander further ratepayer funds. I believe any review panel approving such a proposal must be colluding with the Gawler council, as common sense would dictate that it be rejected.

Additionally in my correspondence to the Bunyip I have urged Hewett ratepayers to contact you to protest this invasion and the flawed legislation that has allowed it to proceed.

Your urgent attention to this matter would be appreciated.

Letter to the Bunyip Editor.

In reference to Gawler Council's recent assault on Hewett and other areas, in an attempt to annex adjoining revenue rich areas, surely the first test for any boundary reform must be a net benefit to the residents and rate payers in the areas proposed to be annexed. This simple test fails In Gawler council's proposal to annex Hewett. Based on current rates (general rate in the dollar - Gawler V's Light) rate payers in Hewett would instantly get hit with a rate increase of approximately 13.6%. This represents several hundred dollars to most Hewett rate payers.

Surely the second test must be some improvement in council efficiency (net saving to all rate payers in the council) and or facilities in the subject area. As Light council currently does a good job in maintaining the Hewett roads, parks and reserves (recently adding toilets to the main park) I doubt Gawler would improve on this.

Gawler council has shown itself to be dysfunctional with petty bickering escalating to thousands of dollars wasted on legal fees against its own members, and CEO's recommending increased remuneration for themselves after failed attempts to jump ship. I'm sure I don't want to pay higher rates to join the Gawler council circus.

Gawler council is yet to even bother to contact Hewett residents, unlike Light council which has made personal contact to discuss the matter. This further proves that Gawler couldn't care less about the residents, caring only about the cash grab. Their actions don't match their words.

The state government need to stop this farce before it goes any further and any more rate payer money is wasted. I urge all Hewett residents to write to their local state member protesting this invasion and the flawed legislation that has allowed it.

[REDACTED]
[REDACTED] Hewett
[REDACTED]

Thank you for the opportunity submit my thoughts on the important issue of boundary reform.

I am writing as a Gawler ratepayer.

Gawler is a great place to live. In a lifestyle and business decision I chose Gawler to be my forever home over twenty years ago. It has just about everything I need in a living and working environment.

It has a great train service to the city. It has good local and national shops. It has a supportive and professional health network that I can tap into when needing jabs or my hay fever tablets. The well-kept parks and gardens are many and varied and I can watch and participate in numerous sporting events at great venues.

The Institute and the library space within provide cultural diversity through exhibitions, performances and services. The Business Centre incubates new and upcoming local business talent. Youth has its own working space and programmes.

In short, Gawler has a great sense of amenity.

But this all comes at a cost and that cost of supplying or supporting such services and amenities rests predominantly with the ratepayers.

Whilst we welcome people coming in from other council areas to spend money in local business, or to take advantage of state offices or, our recreational facilities, the increased foot and vehicle traffic takes its toll on locally funded services. Traffic levels increase, the provision of parking for more than the population percentage calculated at any one time is overtaxed, creating frustration and ironically results in calls for better or more services from council, normally in the form of a posed photo and storyline in our local press.

As the likes of Hewitt, Roseworthy, and Concordia expand, their populations proximity to a fully functioning service centre, right

on their doorstep is seen as a bonus, as most of their council services are many kilometres away. They will use what is local, they will use what is most convenient and they will use the services of Gawler free of charge to them but at an increasing cost to the towns ratepayers.

Gawler is like the hub of a dynamic wheel. Each of the spokes connects Gawler to outer areas, which act as conduits to the town hub.

Gawler cannot continue to act as such a hub without an *expanded* revenue stream. This would logically need to come from an *expanded* ratepayer base through the towns boundaries being *expanded*. - *Gawler needs to expand to survive.*

Barossa covers 912 square kilometres servicing 23,000 residents

Light covers 1,298 square kilometres and services 16,000 residents

Gawler covers 41 square kilometres and services 20,000 residents but services a catchment of 50,000 people

To provide the expected services to an increasing regional population in the future, council must have a broader ratepayer base.

To attract state and federal funding to cover the need for larger services we have to show our council population has grown. You can't ask for a bigger hospital if the population of the council is shown to be statistically stagnant.

Demographically the region has population centres. Barossa and Light are less concentrated than Gawler, with a small number of towns spread through their council region. Land is available for development.

In Gawler, we don't have the land, we don't have small towns dotted around. We struggle between a land buffer and two hard lines. We just have the Town of Gawler. Even our name reflects our constraints. Gawler has nowhere to grow.

The inclusion of Concordia in Gawlers boundary for example, should not be seen simply as an opportunistic land grab. Rather it should be seen as an economic and logistically sensible way to provide linked services to this new suburb, underpinning the ratepayer base line of Gawler. Because Gawler is where these people will shop, socialise and pass through. Concordia is 23kilometres from Tanunda. It is 900metres from Murray st along the rail line.

If Gawler is to continue as a regional service hub and a council in its own right, it must have the ratepayer base to provide the services required and expected. This can't happen without boundary reform.

Without boundary reform, the town will have a bleak future as more and more amenity is expected from less and less funding.

Without sounding melodramatic, 10 years from now Gawler will have nowhere to go as an independent council and it will be subsumed into one of the neighbouring councils. Councils whose epicentres will be a long way from our main street.

This is our or should I say Your Opportunity to take the long and hard road to secure Gawlers future viability.

Boundary Reform is controversial and yes it will create divisions and argument. But if we don't move on it now, we may not have another chance to grow the confident and vibrant space that is our Gawler

[REDACTED]

[REDACTED] Gawler East

[REDACTED]

From: [REDACTED]
Sent: Thursday, 22 August 2024 7:29 AM
To: Gawler Boundary Review
Subject: Gawler taking Light

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

[REDACTED]

I strongly oppose being part of Gawler Council. If Gawler are unhappy about sharing their facilities with neighbouring councils then discuss redevelopment with each other.

[REDACTED]

Sent on the go with Vodafone
Get [Outlook for Android](#)

[REDACTED]

From: [REDACTED]
Sent: Saturday, 31 August 2024 5:35 PM
To: Gawler Boundary Review
Subject: Information Session

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

Hi BDO,

I attended the Information Session held at the Hewett Community Centre on 21 August 2024. One additional statement/question that I have is:

I just can't image that the Light and Barossa Councils will entertain a zero cost boundary change, ie, relinquish valuable rate income areas that those councils have invested in. Will the inquiry consider the financial value (eg, infrastructure loss and loss of rates income) that the Light and Barossa Councils will seek in return for the boundary change and how the Gawler Council will fund that transaction?

Many thanks

[REDACTED]
Hewett resident

[REDACTED]

From: [REDACTED]
Sent: Friday, 27 September 2024 9:06 AM
To: Gawler Boundary Review
Subject: Kalbeeba changing boundary

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

[REDACTED]

We do not agree with Gawler council taking over boundary of Kalbeeba. [REDACTED]
Sent from my iPad

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 2 October 2024 11:56 AM
To: Gawler Boundary Review
Subject: Fwd: No re zoning

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: October 2, 2024 at 11:21:48 AM GMT+9:30
To: [REDACTED]
Subject: No re zoning

[REDACTED]
[REDACTED]
[REDACTED]

02-10-24

Gawler Council

Dear re-zoning committee

I am writing to formally object to the proposal to change zoning regulations that would include my home in the Gawler council area. As a long-time resident of Kalbeeba, I have witnessed firsthand the impact of recent subdivisions on our community, which have already begun to negatively affect the quality of life and property values in our area.

The proposed changes could further exacerbate these issues, introducing additional pressures on local infrastructure, traffic, and community resources. My property, like many others, is already feeling the strain from recent developments, and I am deeply concerned that further changes will lead to increased congestion and diminished living conditions.

I urge you to reconsider this proposal and take into account the concerns of long-standing residents who value the unique character and tranquility

of Kalbeeba. Protecting our community from further disruption is essential for maintaining our quality of life.

Thank you for considering my objection. I hope to see a decision that reflects the needs and desires of the residents.

Sincerely,

██████████

██████████

Sent from my iPhone

[REDACTED]

From: [REDACTED]
Sent: Monday, 9 September 2024 12:09 PM
To: Gawler Boundary Review
Subject: Proposed boundary changes

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

[REDACTED]

Good morning,

My family currently reside in Hewett in the Light Council area. We have for the last 16 years, very happily. We are more than happy with all the services provided by the Light Council.

We oppose any council changes suggested by the Gawler Council.

Regards

[REDACTED]

Sent from my iPad

[REDACTED]

From: [REDACTED]
Sent: Friday, 20 September 2024 12:35 PM
To: Gawler Boundary Review
Subject: Proposed Changes

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

I VOTE NO

King regards
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, 20 September 2024 3:10 PM
To: Gawler Boundary Review
Subject: Re Gawler Council boundaries

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

[REDACTED]

BDO Advisory,
We are NOT in favour of the Proposed Change to the Town of Gawler's Boundaries.

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPad

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 28 August 2024 3:59 PM
To: Gawler Boundary Review
Subject: RE: Town of Gawler Boundry Inquiry

[REDACTED]

Hello BDO,
Thankyou for responding to [REDACTED] my wife,
I can only trust my feedback will be noted as I signed the bottom of the email and you can see I am
the husband not the wife. I hope you have read the whole email to the end.

Kind Regards Again

[REDACTED]
[REDACTED] Gawler Belt SA 5118

On ,Tue Aug 27 2024 16:40:16 GMT+0930 (Australian Central Standard Time), Gawler
Boundary Review <gawlerboundaryreview@bdo.com.au> wrote:

----- Original Message -----

Dear [REDACTED]

Thank you for attending our Forum on Wednesday 21 August. Your input is valuable to
us, and we appreciate that you took the time to share your thoughts. Your feedback
will be noted.

Thank you once again for taking the time to share your thoughts with us.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Saturday, August 24, 2024 2:23 PM
To: Gawler Boundary Review <gawlerboundaryreview@bdo.com.au>
Subject: Town of Gawler Boundry Inquiry

[REDACTED]
[REDACTED]

I was one of the Gawler Belt Residents at the engagement meeting run by BDO at Hewett Centre on the evening of Wednesday 21st of August 2024.

I understand that the BDO personnel had to go through the whole proposal etc to meet their obligations to the Boundaries Commission but this obviously raised concerns by all the residents present that their issues were not being heard or addressed correctly.

1. Stakeholders repeatedly advised that the previous level of communication about the proposal was badly lacking.
2. Many of the Stakeholders mentioned either would not have access to computer and other technically forms of advice.
3. It was felt that instead of addressing these concerns they were being brushed over just for BDO to complete and fulfil their obligation to the boundaries commission to satisfy their KPI's.

Many Years ago ToG refused any attempt to develop Hewett and Gawler Belt locations, but now there is over 1,360 rateable sites they now want the boundary changed.

Here are serious questions that should be investigated by BDO in their role as an independent and unbiased party.

1. Do ToG plan to advise all their current Ratepayers as to the expenditure cost they are incurring on this process, regardless of the outcome ?

It appears to me that all the friends and ratepayers I have in ToG are completely unaware of what has been going on and communication from ToG has been massively understated.

2. Will BDO recommend to the Commission in order to do their job properly the lack of Communication on all fronts from participating Councils should be revisited so as to reach all affected ratepayers ?

As the proposing council is responsible for the cost around this change it is obvious the lack of their and all other parties advising stakeholders has been totally unacceptable. Communication should be revisited with both Electronic forms of media as well as post, newspaper, and all other forms to engage all elderly stakeholders as well.

3. Do ToG plan to separate Residential Land Use Category from Primary Production as numerous properties in the Gawler Belt area will be hugely affected by the change should it go ahead ?

Currently the Light Regional Council has the above LUC's separate with significant variations in the rate per dollar charged.

The ToG have these two categories lumped together which in my case and many others represents over a \$1,000 increase on my current rates under LRC and as an Age Pensioner would find this very difficult to contend with.

4. Do ToG plan to have the State Government change their legislation regarding the freeze of Sub Division of the Gawler Belt Green Zone to allow for the infill of this same zone ?

In 2019 the State Government in an attempt to keep the primary production areas and Gawler Belt Green Zone in place they legislated to freeze all Sub Division of the large blocks in these areas. If you wished to Sub Divide you could only split once (e.g. 5 acres split into 2 = 2 and 1/2 acres each).

If a property holder wished to divide final lodgement of request had to be submitted no later than April 2019.

5. Does BDO intend to advise their recommendations to stakeholders prior to their final submission to the Commission ?

Whilst BDO on the evening were very unspecific on this question, it was pointed out that in the 9 page Scope of the TOWN OF GAWLER BOUNDARY CHANGE INQUIRY STAKEHOLDER ENGAGEMENT PLAN Approved by the South Australian Local Government Boundaries Commission 2nd May 2024,

That the scope allows for many of the actions requested by the participants at the meeting on the night.

i.e.

Revisit communication to all stakeholders for BDO to do their inquiry justice.

Advise Stakeholders on suggested recommendations before finalising.

Liaise with the Boundaries Commission around all of the requests to visit the inquiry both fairly and in greater depth, regardless of cost to ToG.

To address all the questions raised as by stakeholders as the ramifications are wide spread.

Summary

While ToG may continually argue that these areas are all using their infrastructure and resources, it is important to realise that the amount of financial return the ToG is currently already getting from the stakeholders should and cannot be understated. Remember ToG did not want these areas to develop, but now that they have been they wish to increase revenue by accessing over 1,360 to 1500 properties with no consideration of the very stakeholders they wish to encompass or the Councils who have done the hard yards.

As seen by the BDO staff on the night by show of hands the stakeholders present were in no doubt they did not want the boundaries changed.

If the above suggestions were followed and the communication revisited I am in no doubt the overwhelming numbers of stakeholders would have the same result and as such BDO should utilise these findings.

Kind Regards

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 25 September 2024 7:45 PM
To: Gawler Boundary Review
Subject: Review of Gawler boundaries

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

I am a resident of Light Council and I do not agree to the proposal for Hewett to move to Gawler Council.

Yours sincerely

[REDACTED]

[REDACTED]
[REDACTED]

Town of Gawler Boundary Change Inquiry

Sunday, 29 September 2024

To whom it may concern,

We give permission for the contents on this submission to be published, however, request that any identifying information is removed prior to publication i.e. names, contact details.

We are residents of the Hewett Community and we are strongly opposed to the proposed boundary change to include Hewett in the Town of Gawler Council area.

We have lived in Hewett for 10 years. Our employment takes us regionally and to the city. We intermittently utilise services from Gawler (some minor grocery/ food shopping and medical services) however all other retail and entertainment services are sought outside of the Gawler locality - primarily in the Barossa, Playford or Adelaide areas.

The proposal

Community of Interest

As the Town of Gawler has always prided itself on being a 'Regional Service Centre', we must ask why there is a sudden desire to capture all those that utilise its facilities within its boundaries? The proposal states the Town of Gawler LGA is currently approximately 23,000, Gawler is a regional service centre to the lower mid north serving an existing catchment of 110,000 people. Contrary to the attitude displayed by the Town of Gawler, this is not the Lion King and we are not working on the premise of 'all that the light touches is yours' so the members of Gawler Council that have commissioned this inquiry need to decide if Gawler is to consider itself a "regional hub" or not.

It appears the mindset is for the boundaries to be extended to accommodate the community of interest, as this proposal doesn't seem to align with the reality that a regional hub is deliberately positioned to also provide for those outside the physical boundaries. The argument that the use of services relates to an increased demand on infrastructure is negligible and a false equivalence, with many Gawler residents also accessing retail services further north in the Barossa or south to Playford yet these areas accept that there is always a certain amount of demand on infrastructure to be

expected in return for increased retail throughput and make no similar demands of residents in the Gawler area.

We have concerns about a statement heard recently at the Hewett Centre Community Forum that the Gawler Council had the opportunity to include Hewett within its township boundaries in 2010, however the Town of Gawler rejected this proposal. Why now, once Hewett is all but established with both residential and community facilities, does Gawler want it included in the property boundaries? Currently, the Roseworthy development is in very close proximity to Hewett yet is not included in the proposed boundary realignment. We then must ask, will there be another boundary realignment proposal once the Roseworthy development is established? It all gives the impression that Gawler Council is taking a 'you do all the work, we'll reap the rewards' attitude to Hewett and other areas.

We have concerns about the proposal using equity to push the agenda. Whilst we appreciate that Council needs to have fair and impartial considerations of all elements, we can't help but consider who will be the beneficiaries. When we look at the Hewett Community we see new infrastructure, community facilities and significant investments in the area. However, when we visit the Gawler main street we see tired, run down facilities in need of significant investment. The idea of equity implies an increase in revenue and a redistribution to other areas, so where does Hewett stand in this scenario? We have concerns that the Town of Gawler will use the injection of revenue from areas such as Hewett, that are currently in a well-maintained state, and then prioritise the distribution of resources to improve areas within the existing Gawler area, leading to the detriment of the standard of services we have come to expect and enjoy from the Light Regional Council. We then also need to strongly question whether our rates will have the same value and return from the Town of Gawler as we currently enjoy with Light Regional Council.

The proposal also relies quite heavily on the Gawler Aquatic Centre statistics which claim almost half of the School Learn to Swim programs are from outside the area. Interestingly, we then also discovered in the same document that the Gawler Aquatic Centre is at the end of its useful life and has a projected a replacement cost of approximately \$25M, further making the timing and purpose of this proposal and inquiry highly questionable.

The proposal is also referencing statistical data gathered in 2020 provided by 158 people of a claimed catchment area of 110,000 people. 70 responses from Gawler, 53 from Hewett, 28 from Barossa, and 7 from Playford. 55% stated that they identified as part of the Gawler community. We can reasonably extrapolate that from only 10% (or 8 people) of residents outside of the Gawler boundaries identify as part of the Gawler community. We would respectfully argue that the "Gawler community" does not extend past that of the Gawler property boundaries. Additionally, grocery/food shopping and

medical services are identified from the survey as the most significant use of services - services which are privately owned.

Public transport is identified as another element which connects Hewett residents to Gawler. We would respectfully argue that this is not the case as services cease in Hewett after about 6.30pm and most Hewett residents are consequently reliant primarily on personal vehicles and the most common routes taken/major roads are the M2 and A20, part of which is literally called the “Gawler Bypass”.

It is worth noting that an overwhelming proportion of Light Regional Council and Barossa Council respondents to the 2020 consultations do not support the proposal. Similarly, the Hewett Community Forum presented a unanimous position of opposing the proposal.

Strategic Planning for the broader community has been touted as evidence for the boundary realignment. However, we argue that, as a regional hub, the strategic planning has been undertaken for the broader 110,000 catchment. This does not demonstrate the need for the boundary realignment but shows a good policy for a Regional Service Centre.

Regional Economic Considerations

Historically, Light Regional Council is mostly rural in nature however it does not go unnoticed that Roseworthy currently has substantial urban proposals in development. Currently the areas within close proximity to Gawler that, through current and proposed development are increasingly becoming urban in nature, are not included in the proposal. So we again must question if there will be a repeat of the original decision made by the Town of Gawler around the Hewett development whereby it is not seen as valuable or considered a “part of the Gawler community” until such times as it is fully developed?

We believe that the 'services and other economic sectors' issues raised in the inquiry has been addressed through the region hub discussions above and are of the opinion that it is highly contradictory to self-identify as a “regional hub”, but then to argue that partial/intermittent use of infrastructure by all surrounding areas justifies a boundary realignment that includes some (but not all) surrounding areas.

Infrastructure, Resources and Planning

If the purpose of the boundary realignment is to provide consistent and improved infrastructure, then why does the proposal exclude the Roseworthy development? Using the Town of Gawler’s own logic for other areas included, this development will be

utilising the same infrastructure and resources in the suggested holistic nature of planning for the region.

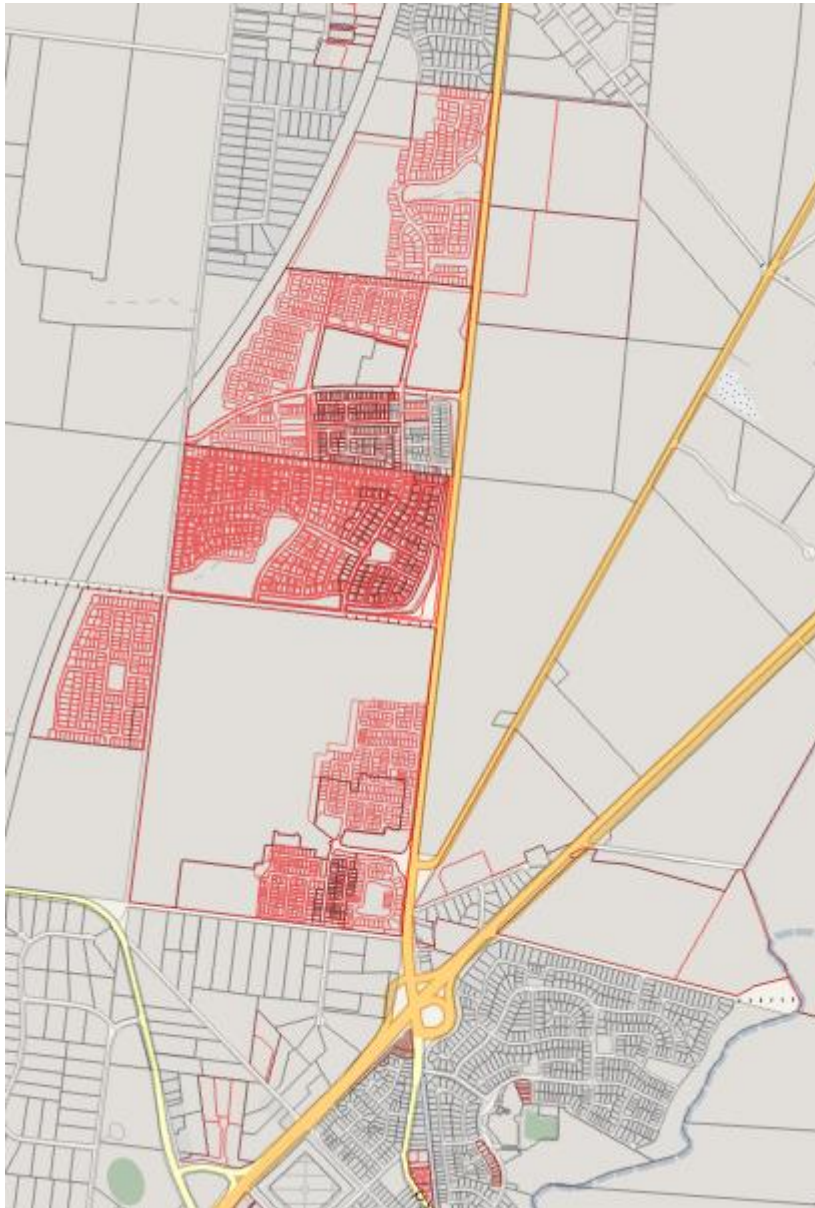


Figure 1: Proposed land divisions in Roseworthy development (SAPPA, 2024)

The proposal claims to provide increased efficiency which can be realised by the private sector through developments, however this is not necessarily the case. The State Government has been vocal about its ‘award-winning planning system which provides consistency across the state’. If we look at the zoning proposed for Hewett and Concordia areas, we can see that there are inconsistencies which would almost certainly create inefficiencies in planning for infrastructure and associated resources.

The proposal made comparisons about the distance between Hewett and the nearest Council office, stating a distance of 30km and 17km respectively for Light Regional

Council principle and satellite offices compared with 2km to the Gawler Council office (arguably this is closer to 4km from the furthest properties in Hewett). We argue that this is irrelevant as in the last 10 years we have never visited the Light Regional Council offices, which we would expect would be a common theme among the residents of Hewett (as a side note, we were not even completely sure of their exact location until this proposal and inquiry were raised). Councils, especially since Covid, have pushed for a predominantly online presence, ensuring that most services and requests can be obtained or completed through online platforms. Proximity to Council offices appears to be a major point of reference in the proposal (and in the presentation provided at the Hewett Centre Community Forum) but seems largely irrelevant given the consultation documents and the process of providing feedback have also been largely conducted online. Another proposed change that contradicts this point is the removal of sections 8 and 9 for Bibaringa and Uleybury respectively that will then see residents of those areas forced to use the Playford Council offices as their nearest physical service point, an arguably unnecessary change to a comparatively small area that will add further cost to the overall process and burden on the residents.

Additionally, reference to Public Library usage is irrelevant given that membership is universally available to libraries across the state. The physical location of Council owned facilities is becoming less critical to the community in favour of an improved online presence and associated platforms, and any use of this as a factor of why an area should or should not be included in certain Council areas is somewhat irrelevant.

30 Year Plan for Greater Adelaide

We question why only most of the urban growth area, and not all, is proposed to be included in the Town of Gawler LGA boundaries, as the areas included appear almost arbitrary? A genuine desire to provide for the broader urban community would have included the Roseworthy development so without further explanation on this matter we can only assume that there is an ulterior motive for the blatant gerrymandering of the proposed boundary changes to only include established, financially beneficial areas within the Town of Gawler LGA boundaries.

The Commissions requirements

Financial matters

In reviewing the operating surplus of the Town of Gawler compared to the Light Regional Council, it was noted that the Town of Gawler recorded a deficit of \$826,000 with expenses exceeding the income received. Whilst our position comes from a rudimentary understanding of council finances, our concerns relate specifically to the Town of Gawler's intentions relating to the proposed acquisition of more affluent areas. Is this not a financially motivated proposal to improve the bottom line?

Rating differences will result in an increase in rates for Hewett residents with dubious claims about benefits to the community. Issues raised at the Hewett Centre Community Forum revolved around the Town of Gawler not having adequate rating policies for rural and rural living properties resulting in significant increases in rate instalments. These discrepancies are overwhelmingly in favour of the Town of Gawler. We question what is fair or equitable about this proposed change?

We again draw attention to the aging and end-of-life developments which currently exist within the Town of Gawler. These facilities should form part of the Long-Term Financial Plan and be funded through grant funding and existing budgets. Acquiring newly established and more affluent areas is not a sustainable model to revenue raise for community facilities.

Land Use and Planning Matters

Hewett residential areas are zoned Neighbourhood where Gawler residential areas are zoned General Neighbourhood. Efficiencies, as proposed, are not going to be achieved with differing zoning. Additionally, general policies usually differ between 'metropolitan' areas and 'regional' areas resulting in a mismatch between policy provisions.

Council Employee Matters

Growth areas require additional staff, specifically in the planning and infrastructure teams. We have concerns regarding Town of Gawler's ability to effectively service the significant increase in planning and infrastructure requirements. A review of the Council job listings over the last few years has seen a 'transient' planning staff suggests that future needs may not be efficiently provided. Additionally, an increased demand for staff in the Gawler area would only see an exacerbation of the utilisation of an already

aging infrastructure, potentially leading to a repeat of this entire process again in the future and all the associated costs.

Summation

We feel very strongly that this boundary reform should not go ahead as proposed by the Town of Gawler as we are satisfied with our current quality of services and do not have any great need to integrate with, nor any major cause to rely on the Town of Gawler. Additionally, there are several troubling issues with the reasoning provided and unanswered questions around the need for this change to be proposed at all, as addressed in this submission and we trust that you will make the correct choice in your recommendation to leave the existing Council boundaries as they currently are.

Kind regards

Hewett Residents strongly opposed to the boundary realignment

[REDACTED]
[REDACTED]
Hillier, South Australia, 5116
[REDACTED]
[REDACTED]

17th of August 2024

Kyffin Thompson
C/O BDO Advisory
Level 7, 420 King William Street
Adelaide, SA, 5001

Dear Mr. Thompson,

RE: Town of Gawler Boundary Change Proposal

I am writing to express my strong opposition to the proposed boundary change that would transfer our area from the Playford Council to the Gawler Council.

My concerns are based on the belief that Gawler Council may not adequately represent the interests of the residents and ratepayers in the same manner as Playford Council. Historically, Gawler Council has demonstrated a reluctance towards development, often impeding opportunities for property growth and improvement within their jurisdiction. Recent developments in the Gawler area have only proceeded due to state government intervention, rather than the proactive efforts of Gawler Council, which has actively worked to restrict such progress.

I am apprehensive that a transition to Gawler Council would disadvantage ratepayers in the Hillier area, limiting our ability to fully capitalize on the expanding northern developments. Our family has longstanding ties to Playford Council, and we have previously experienced the adverse effects of a boundary change when property we owned was rezoned from Playford to Gawler. This rezoning significantly impacted the value and potential use of that property, and I am concerned about a repeat of this negative experience with our current property.

I have spoken with a number of residents in the area and all share the same views, concerns and apprehensions about the proposed boundary change and would prefer to remain a part of the Playford Council.

Given these factors, I urge you to reconsider this boundary change proposal to avoid diminishing property values and adversely affecting our family's future.

Thank you for considering my concerns.

Sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Saturday, 24 August 2024 2:23 PM
To: Gawler Boundary Review
Subject: Town of Gawler Boundry Inquiry

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

I was one of the Gawler Belt Residents at the engagement meeting run by BDO at Hewett Centre on the evening of Wednesday 21st of August 2024.

I understand that the BDO personnel had to go through the whole proposal etc to meet their obligations to the Boundaries Commission but this obviously raised concerns by all the residents present that their issues were not being heard or addressed correctly.

1. Stakeholders repeatedly advised that the previous level of communication about the proposal was badly lacking.
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3. It was felt that instead of addressing these concerns they were being brushed over just for BDO to complete and fulfil their obligation to the boundaries commission to satisfy their KPI's.

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As the proposing council is responsible for the cost around this change it is obvious the lack of their and all other parties advising stakeholders has been totally unacceptable. Communication should be revisited with both Electronic forms of media as well as post, newspaper, and all other forms to engage all elderly stakeholders as well.

3. Do ToG plan to separate Residential Land Use Category from Primary Production as numerous properties in the Gawler Belt area will be hugely affected by the change should it go ahead ?

Currently the Light Regional Council has the above LUC's separate with significant variations in the rate per dollar charged.

The ToG have these two categories lumped together which in my case and many others represents over a \$1,000 increase on my current rates under LRC and as an Age Pensioner would find this very difficult to contend with.

4. Do ToG plan to have the State Government change their legislation regarding the freeze of Sub Division of the Gawler Belt Green Zone to allow for the infill of this same zone ?

In 2019 the State Government in an attempt to keep the primary production areas and Gawler Belt Green Zone in place they legislated to freeze all Sub Division of the large blocks in these areas. If you wished to Sub Divide you could only split once (e.g. 5 acres split into 2 = 2 and 1/2 acres each). If a property holder wished to divide final lodgement of request had to be submitted no later than April 2019.

5. Does BDO intend to advise their recommendations to stakeholders prior to their final submission to the Commission ?

Whilst BDO on the evening were very unspecific on this question, it was pointed out that in the 9 page Scope of the TOWN OF GAWLER BOUNDARY CHANGE INQUIRY STAKEHOLDER ENGAGEMENT PLAN Approved by the South Australian Local Government Boundaries Commission 2nd May 2024,

That the scope allows for many of the actions requested by the participants at the meeting on the night.

i.e.

Revisit communication to all stakeholders for BDO to do their inquiry justice.

Advise Stakeholders on suggested recommendations before finalising.

Liaise with the Boundaries Commission around all of the requests to visit the inquiry both fairly and in greater depth, regardless of cost to ToG.

To address all the questions raised as by stakeholders as the ramifications are wide spread.

Summary

While ToG may continually argue that these areas are all using their infrastructure and resources, it is important to realise that the amount of financial return the ToG is currently already getting from the stakeholders should and cannot be understated.

Remember ToG did not want these areas to develop, but now that they have been they wish to increase revenue by accessing over 1,360 to 1500 properties with no consideration of the very stakeholders they wish to encompass or the Councils who have done the hard yards.

As seen by the BDO staff on the night by show of hands the stakeholders present were in no doubt they did not want the boundaries changed.

If the above suggestions were followed and the communication revisited I am in no doubt the overwhelming numbers of stakeholders would have the same result and as such BDO should utilise these findings.

Kind Regards

[REDACTED]

[REDACTED] Gawler Belt, SA 5118

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 10 September 2024 3:05 PM
To: Gawler Boundary Review
Cc: [REDACTED]
Subject: Town Of Gawler's Boundaries
Attachments: Bunyip3.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

BDO Advisory,

Attached is a previous document addressed to Tony Piccolo MP. Which was dated **Feb 8, 2020**. Our position has not changed. Gawler council has gotten worse, their debt has increased, their rates have gone up and they are probably still arguing costing the rate payers money!

Please do not let the Gawler council take Hewett.

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 18 September 2024 1:01 PM
To: Gawler Boundary Review

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

I live in Kalbeeba and do all my business in Gawler. With the new shops at Springwood Gawler is closer than before.
Barossa is relatively remote and their communities too far away for weekly convenience. The proposal for a separate town at Concordia shows just how divorced from reality the Barossa council is regarding development close to Gawler.
Kalbeeba should be part of the Gawler council area.

[REDACTED]

From: [REDACTED]
Sent: Saturday, 21 September 2024 8:48 AM
To: Gawler Boundary Review

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

I say NO to any change to Council boundaries.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 3 September 2024 1:19 PM
To: Gawler Boundary Review
Cc: [REDACTED]
Subject: Vehemently Against being absorbed into Gawler Council

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Yellow Category

[REDACTED]

To whom it may concern,

I live in Gawler Belt and have done for 14 years.

I have a business in Gawler and speak to at least 90 people who live in Gawler every week and some of my family live within the ToG (Town of Gawler) council area.

Firstly, I find it highly disturbing and underhand that such a process can get so far without Gawler Council putting forward a proposal as to how they are going to service the residents of this future "super council" without any checks being made as to whether they have the infrastructure and wherewithal to do so.

Gawler council have a reputation for being extremely difficult to deal with, extremely wasteful with ratepayers' monies, extremely expensive and have a bullying culture within the council.
In 14 years I haven't heard of one positive thing said about this council.

Light council on the other hand have been very easy to deal with over the years and have invested considerably in Gawler Belt (sealing roads). Historically, when residents wanted to start living in Gawler Belt, ToG didn't want to know so Light council came on board. Now, because we are established, are not very needy, and pay substantial rates because of the value of our properties, ToG want the revenue from our area.

We are a rural community with no footpaths, no play areas, only private schools, no street lights, no postal service and most of us want to keep it that way. Gawler council don't even have a rateable category for us, let alone infrastructure to manage our area (i.e. unsealed roads).

I am extremely concerned about the secrecy and lack of transparency around this process and have been informed that only half of the Gawler council voted for this Boundary reform. I did fill out the survey but the questions were pointed and limited and in "council speak". I have friends and patients who live in Hewett who aren't even aware of what's happening and it will affect them too. Why have BDO not sent a letter to every rate payer that will be affected by this?

I did attend the meeting at the Hewett Centre which was advertised as being from 6pm to 7.30 and was firstly disappointed to find that there was no registration process, therefore no evidence that we had attended. Unfortunately I had other commitments at 7.30pm and had to leave. I was also concerned about misinformation given by ToG to BDO which had not been checked and it makes me wonder how BDO can

possibly make recommendations with only half the facts. Thankfully, ALL of the residents there made it quite clear that WE do NOT want this boundary reform to happen and I can only hope that this is taken into account when the decision is being made. We, as rate payers, surely, are the major stake holders here.

Every councils' borders meet the borders for another council so, as far as I am concerned, that is not a reasonable excuse for taking over a council area. When I lived in Port Adelaide Enfield council I used Norwood facilities a lot more than our council but Norwood didn't make a bid to take over our area.

My family do not use services in Gawler, in fact I avoid going to or through Gawler whenever possible since they have foolishly narrowed Murray St so that even the bus struggles to get down the road and the car parking in Gawler centre has been reduced considerably making it difficult to access the businesses in Gawler.

I implore that further investigations into Gawler Councils' ability to service our areas are looked in to before making a rash decision to throw Gawler Belt "to the wolves" so to speak. And please take into consideration the view of the few residents that were informed about this. Take into account that of the small number of people informed, a large number responded against the proposal.

Regards

[REDACTED]

6.8. Summary of Survey Responses

There were 446 responses to the survey, both from online responses and those completed in hardcopy then emailed or mailed to BDO. Almost all respondents did so as residents and rate payers, not representatives of an organisation. Approximately two-thirds (65%) of respondents stated they live, own a property or pay rates in an area affected by the boundary proposal realignment. 54% of respondents had concerns that this proposal may negatively impact them, only 5% thought it would positively impact them.

From Table 6.16 Survey Responses: Extent of Support of the Proposal by Council and Locality of Rate Payer/Resident below, it is evident that the majority of respondents (nearly 80%) expressed some level of opposition to the proposal. It should be noted that the respondents are not a reflective sample of the greater Gawler area. Of respondents, 69% of responses came from people reporting to be residents or rate payers in Light Regional Council. Nearly half of Light Regional Council respondents (48%) stated they live in Hewett; 29% reported they live in Gawler Belt. Within survey responses, 82% of all opposition to the proposal came from people who live in Light Regional Council.

Table 6.16 Survey Responses: Extent of Support of the Proposal by Council and Locality of Rate Payer/Resident

Council and Locality of Rate Payer/Resident	Strongly Oppose	Somewhat Oppose	Neutral	Somewhat Support	Strongly Support	Total
Light Regional Council	253	18	8	8	16	303
Gawler Belt	65	1	2	4	6	78
Hewett	121	8	1	1	4	135
Hewett, Gawler Belt	1					1
Blank	66	9	5	3	6	89
Town of Gawler	13	5	6	2	34	60
Bibaringa					1	1
Evanston Park					2	2
Hillier		1		1	1	3
Reid			1			1
Uleybury	3	1			1	5
Blank	10	3	5	1	29	48
The Barossa Council	39	3	1	6	5	54
Concordia	5					5
Concordia, Kalbeeba	1					1
Kalbeeba	24	1	1	3	1	30
Blank	9	2		3	4	18
City of Playford	8		1		2	11
Evanston Park	3		1		2	6
Hillier	4					4
Blank	1					1
Tea Tree Gully	1					1
Town of Gawler, City of Playford	2	3			1	6
Bibaringa		1				1
Evanston Park	1				1	2

Council and Locality of Rate Payer/Resident	Strongly Oppose	Somewhat Oppose	Neutral	Somewhat Support	Strongly Support	Total
Hillier		2				2
Blank	1					1
Light Regional Council, Town of Gawler	4				1	5
Gawler Belt	2					2
Hewett	2					2
Blank					1	1
Light Regional Council, City of Playford	1					1
Hewett	1					1
Light Regional Council, Town of Gawler, City of Playford	1					1
Gawler Belt	1					1
The Barossa Council, Town of Gawler	2					2
Kalbeeba	1					1
Blank	1					1
The Barossa Council, Light Regional Council				1		1
Total	324	29	16	17	59	445⁴

The rationale for residents and rate payers' position was analysed. As evident from Table 6.17 Frequently Reported Rationales for Stated Position below, rates were a key concern for many respondents. 46% of concerns were due to potential rate increases and 23% due to potential impact on council services.

⁴ While there were 446 responses, one respondent did not answer this question.

Table 6.17 Frequently Reported Rationales for Stated Position⁵

Council of Rate Payer/Resident	Community	Financial concerns about ToG	Personal issues with ToG	Zoning Concerns	Non Specified Opposition	General Support	Rates	Council Services	Total
City of Playford	0	0	0	1	0	1	5	3	10
Light Regional Council	8	11	15	23	4	3	149	79	292
Light Regional Council, Town of Gawler	0	1	1	1	0	0	2	1	6
The Barossa Council	2	3	3	5	2	2	16	3	36
Town of Gawler	0	0	2	1	1	16	6	4	30
Town of Gawler, City of Playford	0	0	0	2	0	0	1	0	3
Total	10	15	21	33	7	22	179	90	377

People who live, work, or own property in Light Regional Council, are 3x more likely to visit community services (e.g. libraries, justice of the peace) in their own council (45%), than to visit Barossa Council (15%), and 28% more likely than Gawler Council (17%). This compared to Gawler Council, where 70% of residents report using in their own council, compared to travelling to Light Regional Council (10%) or The Barossa Council (7%).

⁵ Only the most frequent rationales included. Total does not equal total number of responses.

Table 6.18 Location of Community Services (e.g. libraries, justice of the peace) Used per Month, by Council of Rate Payer/Resident

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
City of Playford	City of Playford	0	0	0	0	0	0	3	3
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	1	0	2	3
	The Barossa Council	0	0	0	0	0	0	1	1
	None	0	0	0	0	0	0	0	0
Light Regional Council	City of Playford	5	4	4	3	4	0	4	24
	Light Regional Council	18	24	25	11	34	22	17	151
	Town of Gawler	10	12	11	6	15	0	7	61
	The Barossa Council	8	6	6	3	10	11	8	52
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler	City of Playford	0	0	1	0	0	0	1	2
	Light Regional Council	1	0	1	0	0	0	1	3
	Town of Gawler	0	0	1	1	0	1	1	4
	The Barossa Council	0	0	1	1	0	0	1	3
	None	0	0	0	0	0	0	0	0
The Barossa Council	City of Playford	1	0	0	0	0	0	0	1
	Light Regional Council	1	0	1	0	0	2	1	5
	Town of Gawler	4	3	1	2	0	4	2	16
	The Barossa Council	5	3	3	2	5	5	5	28
	None	0	0	0	0	0	0	0	0
Town of Gawler	City of Playford	2	3	1	0	2	2	0	10
	Light Regional Council	1	3	2	0	0	1	0	7
	Town of Gawler	2	10	2	2	9	10	8	43
	The Barossa Council	2	1	1	0	1	1	0	6
	None	0	0	0	0	0	0	0	0
Town of Gawler, City of Playford	City of Playford	0	1	1	1	0	0	0	3
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	1	0	0	1	0	0	2
	The Barossa Council	0	0	0	1	0	0	0	1
	None	0	0	0	0	0	0	0	0

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
Tea Tree Gully	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Unley, City of Adelaide	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, City of Playford	City of Playford	1	0	0	0	0	0	0	1
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	1	0	0	0	0	0	0	1
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
The Barossa Council, Light Regional Council	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	1	0	0	0	0	1
	Town of Gawler	0	0	1	0	0	0	0	1
	The Barossa Council	0	0	1	0	0	0	0	1
	None	0	0	0	0	0	0	0	0
The Barossa Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	1	0	0	1
	None	0	0	0	0	0	0	0	0
Total		60	71	62	33	82	60	64	432

People who report being rate payers or residents of the Town of Gawler are 6.3x more likely to participate in organised community groups and social clubs in their own council than visit other councils, compared to rate payers and residents of The Barossa Council (2.8x) and those in Light Regional Council (2.4x).

Table 6.19 Location of Participation in Organised Community Groups and Social Clubs per Month, by Council of Rate Payer/Resident

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
City of Playford	City of Playford	0	0	0	0	0	1	2	3
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	1	0	1	2
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council	City of Playford	0	2	3	0	4	0	1	10
	Light Regional Council	3	9	16	5	37	18	17	105
	Town of Gawler	1	4	7	3	17	3	7	42
	The Barossa Council	2	4	6	2	7	8	11	40
	None	0	0	0	0	1	0	0	0
Light Regional Council, Town of Gawler	City of Playford	0	0	1	0	0	0	0	1
	Light Regional Council	0	0	1	0	1	0	0	2
	Town of Gawler	0	0	1	0	2	0	0	3
	The Barossa Council	0	0	1	0	2	0	0	3
	None	0	0	0	0	0	0	0	0
The Barossa Council	City of Playford	0	0	0	0	0	0	1	1
	Light Regional Council	0	0	1	0	0	1	3	5
	Town of Gawler	0	1	0	0	0	3	5	9
	The Barossa Council	0	4	2	1	5	7	7	26
	None	0	0	0	0	0	0	0	0
Town of Gawler	City of Playford	0	0	4	0	0	1	0	5
	Light Regional Council	1	0	1	0	2	1	0	5
	Town of Gawler	1	2	9	1	8	5	12	38
	The Barossa Council	1	0	1	0	2	1	2	7
	None	0	0	0	0	0	0	0	0
Town of Gawler, City of Playford	City of Playford	0	0	1	0	0	0	0	1
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	1	0	0	1
	The Barossa Council	0	0	1	0	0	0	0	1
	None	0	0	0	0	0	0	0	0

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
Tea Tree Gully	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	1	0	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Unley, City of Adelaide	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	1	0	0	0	1
	None	0	0	0	0	0	0	0	0
Light Regional Council, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
The Barossa Council, Light Regional Council	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	1	0	0	0	0	1
	None	0	0	0	0	0	0	0	0
The Barossa Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	1	0	0	1
	The Barossa Council	0	0	0	0	1	0	0	1
	None	0	0	0	0	0	0	0	0
Total		9	26	56	13	91	49	70	314

People who report being rate payers or residents of The Barossa Council are only 1.5x more likely to visit their own council to use recreational and sporting facilities outside of organised lessons/events/matches very frequently (more than 5 times a week), than in another council. This compares to residents of Light Regional Council (2x more likely to frequently use their own council's facilities than another council) and the Town of Gawler (6.8x more likely to frequently use their own council's facilities than another council).

Table 6.20 Usage of Recreational and Sporting Facilities (Outside of Organised Lessons/Events/Matches) per Month, by Council of Rate Payer/Resident

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
City of Playford	City of Playford	0	0	0	0	0	1	4	5
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	1	1	3	5
	The Barossa Council	0	0	0	0	0	0	3	3
	None	0	0	0	0	0	0	0	0
Light Regional Council	City of Playford	0	3	2	2	4	0	5	16
	Light Regional Council	1	9	13	12	28	19	34	116
	Town of Gawler	2	5	7	7	7	6	10	44
	The Barossa Council	1	3	7	7	11	10	16	55
	None	0	1	0	0	3	0	0	4
Light Regional Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	2	0	0	2
	Town of Gawler	0	1	0	0	1	0	0	2
	The Barossa Council	0	0	0	0	1	0	0	1
	None	0	0	0	0	0	0	0	0
The Barossa Council	City of Playford	0	1	0	0	0	0	2	3
	Light Regional Council	0	0	0	0	2	1	2	5
	Town of Gawler	0	2	0	0	1	2	7	12
	The Barossa Council	1	4	1	1	3	5	9	24
	None	0	0	0	0	0	0	0	0
Town of Gawler	City of Playford	0	0	4	1	2	2	1	10
	Light Regional Council	1	0	0	1	3	1	2	8
	Town of Gawler	1	2	4	2	9	11	9	38
	The Barossa Council	1	0	1	1	3	3	0	9
	None	0	0	0	0	0	0	0	0
Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	1	1	2
	Light Regional Council	0	0	0	0	0	1	1	2
	Town of Gawler	0	0	0	0	0	0	2	2
	The Barossa Council	0	0	0	0	0	1	0	1
	None	0	0	0	0	0	0	0	0

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
Tea Tree Gully	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	1	0	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Unley, City of Adelaide	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	1	0	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	1	0	0	0	1
	The Barossa Council	0	0	0	1	0	0	0	1
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
The Barossa Council, Light Regional Council	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	1	1
	None	0	0	0	0	0	0	0	0
The Barossa Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	1	0	1
	None	0	0	0	0	0	0	0	0
Total		8	31	39	34	83	65	112	372

Respondents who are rate payers or residents of The Town of Gawler participate in organised sport, sporting lessons or swimming 6.5x more in their own council than in other council areas. This compares to residents of Light Regional Council (1.4x) and The Barossa Council (2.1x)

Table 6.21 Location of Participation in Organised Sport, Sporting Lessons or Swimming per Month, by Council of Rate Payer/Resident

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
City of Playford	City of Playford	0	0	0	0	0	1	2	3
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	0	0	0	2	1	2	5
	The Barossa Council	0	0	0	0	1	1	0	2
	None	0	0	0	0	0	1	0	1
Light Regional Council	City of Playford	0	1	1	0	5	1	6	14
	Light Regional Council	2	6	4	3	25	18	22	80
	Town of Gawler	3	2	2	4	21	11	14	57
	The Barossa Council	1	1	3	3	9	11	20	48
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	1	0	0	1
	Town of Gawler	0	0	0	0	1	0	1	2
	The Barossa Council	0	0	0	0	1	0	0	1
	None	0	0	0	0	0	0	0	0
The Barossa Council	City of Playford	0	0	1	0	0	0	1	2
	Light Regional Council	0	0	0	0	0	1	3	4
	Town of Gawler	0	1	0	0	1	2	6	10
	The Barossa Council	1	1	2	2	4	4	9	23
	None	0	0	0	0	0	0	0	0
Town of Gawler	City of Playford	1	0	0	0	1	2	1	5
	Light Regional Council	1	0	0	0	1	1	0	3
	Town of Gawler	2	2	1	1	12	5	6	29
	The Barossa Council	1	0	0	0	1	1	2	5
	None	0	0	0	0	0	0	0	0
Town of Gawler, City of Playford	City of Playford	0	1	0	0	0	1	0	2
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	1	0	0	1	0	1	3
	The Barossa Council	0	0	0	0	0	1	0	1
	None	0	0	0	0	0	0	0	0

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
Tea Tree Gully	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Unley, City of Adelaide	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	1	1
Light Regional Council, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
The Barossa Council, Light Regional Council	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
The Barossa Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	1	0	0	1
	None	0	0	0	0	0	0	0	0
Total		12	16	14	13	87	65	97	304

Of the 298 respondents who are rate payers or residents of Light Regional Council; 67% visit Gawler Council and 51% visit Barossa Council at least once to shop and visit other retail facilities such as cafes and restaurant, compared to 60% within their own council.

Table 6.22 Usage of Shopping and Other Retail Facilities per Month, by Council of Rate Payer/Resident

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
City of Playford	City of Playford	0	0	0	0	1	2	4	7
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	0	0	0	2	1	2	5
	The Barossa Council	0	0	0	0	0	1	2	3
	None	0	0	0	0	0	0	0	0
Light Regional Council	City of Playford	1	3	6	2	19	37	44	112
	Light Regional Council	0	6	6	5	34	55	72	178
	Town of Gawler	2	6	6	4	38	60	85	201
	The Barossa Council	1	5	3	3	23	46	73	154
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler	City of Playford	0	0	0	0	0	2	2	4
	Light Regional Council	0	0	0	0	0	2	2	4
	Town of Gawler	0	0	0	0	0	2	3	5
	The Barossa Council	0	0	0	0	0	2	2	4
	None	0	0	0	0	0	0	0	0
The Barossa Council	City of Playford	0	0	0	0	6	3	8	17
	Light Regional Council	1	0	0	0	2	1	3	7
	Town of Gawler	1	0	1	0	11	8	14	35
	The Barossa Council	1	1	0	2	11	9	17	41
	None	0	0	0	0	0	0	0	0
Town of Gawler	City of Playford	0	0	0	0	7	5	14	26
	Light Regional Council	0	0	0	0	3	1	7	11
	Town of Gawler	0	0	0	0	6	11	33	50
	The Barossa Council	0	0	0	0	6	4	12	22
	None	0	0	0	0	0	0	0	0
Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	2	4	6
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	1	3	4
	The Barossa Council	0	0	0	0	0	1	0	1
	None	0	0	0	0	0	0	0	0

Council of Rate Payer/Resident	Council for Services	*<1*	1	2	3	4	5+	10+	Total
Tea Tree Gully	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
Light Regional Council, Unley, City of Adelaide	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	1	0	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	1	0	1
	None	0	0	0	0	0	0	0	0
Light Regional Council, City of Playford	City of Playford	0	0	0	0	0	0	1	1
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	1	1
	The Barossa Council	0	0	0	0	0	0	1	1
	None	0	0	0	0	0	0	0	0
Light Regional Council, Town of Gawler, City of Playford	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	0	0	1	1
	The Barossa Council	0	0	0	0	0	0	0	0
	None	0	0	0	0	0	0	0	0
The Barossa Council, Light Regional Council	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	1	1
	Town of Gawler	0	0	0	0	0	0	0	0
	The Barossa Council	0	0	0	0	0	0	1	1
	None	0	0	0	0	0	0	0	0
The Barossa Council, Town of Gawler	City of Playford	0	0	0	0	0	0	0	0
	Light Regional Council	0	0	0	0	0	0	0	0
	Town of Gawler	0	0	0	0	1	0	1	2
	The Barossa Council	0	0	0	0	1	0	1	2
	None	0	0	0	0	0	0	0	0
Total		7	21	22	16	169	259	407	901

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7. References

- ¹ Town of Gawler 2020, 'Boundary Change Proposal - Stage 2 General Proposal,' December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 6.
- ² Ibid, p 7.
- ³ PlanSA 2024, 'Planning and Development Fund,' https://plan.sa.gov.au/our_planning_system/schemes/planning_and_development_fund.
- ⁴ Town of Gawler 2023, *2023-2024 Annual Business Plan*, gawler.sa.gov.au, p 10.
- ⁵ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 7.
- ⁶ South Australian Local Government Boundaries Commission 2021, 'Town of Gawler Stage 2 Boundary Change General Proposal', letter to Bill O'Brien (Mayor, Light Regional Council), Bim Lange (Mayor, The Barossa Council) and Glen Docherty (Mayor, City of Playford).
- ⁷ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, <http://dit.sa.gov.au/local-government/boundaries-commission/current-proposals>, pp 72, 77.
- ⁸ Plan SA 2023, *Land Supply Report for Greater Adelaide Residential*, Department of Trade and Investment, V2, September, plan.sa.gov.au, pp 10, 41.
- ⁹ Ibid., p 12.
- ¹⁰ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, pp 8; 15-16.
- ¹¹ Town of Gawler 2023, *2023-2024 Annual Business Plan*, gawler.sa.gov.au, p 9.
- ¹² Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 3.
- ¹³ The Barossa Council 2024, *Barossa Community Plan 2024-2044*, *Community-Plan-2024-2044.PDF*, accessed 17/01/25, p.5.
- ¹⁴ The Barossa Council 2021, *Infrastructure and Asset Management Plan, 2020 - 2040, V1.02*, March, barossa.sa.gov.au, p 36.
- ¹⁵ SGS Economics and Planning 2022, *Barossa Local Economic Development Plan*, April, barossa.sa.gov.au, pp 13, 24, 25.
- ¹⁶ Ibid., p 13.
- ¹⁷ Ibid., pp 16, 21.
- ¹⁸ Ibid., p 26.
- ¹⁹ The Barossa Council 2018, *Disability Access & Inclusion Action Plan, 2020-2023*, Revised, barossa.sa.gov.au, p 9.
- ²⁰ SGS Economics and Planning 2022, *Barossa Local Economic Development Plan*, April, barossa.sa.gov.au, p 26.
- ²¹ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, pp 15-16.
- ²² Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 11.
- ²³ Ibid., p 7.
- ²⁴ Ibid., pp 18-19.
- ²⁵ Ibid., p 6.
- ²⁶ Concordia Land 2025, *Concordia Land*, concordialand.com.au.
- ²⁷ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 12.

- ²⁸ Ibid, pp 9-10.
- ²⁹ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 15.
- ³⁰ Ibid., p 73.
- ³¹ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 4.
- ³² Commonwealth of Australia 2024, 'Schedule: Housing Support Program (HSP)—Stream 1 (HSP1) and Community Enabling Infrastructure Stream (CEI): Federation Funding Agreement—Affordable Housing, Community Services and Other', <https://federalfinancialrelations.gov.au/sites/federalfinancialrelations.gov.au/files/2024-11/Housing%20Support%20Program%20-%20Stream%201%20and%20CEI%20SA%20Schedule%20Signed.pdf>, p 10.
- ³³ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 75.
- ³⁴ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 8.
- ³⁵ Department for Housing and Urban Development n.d., *Code Amendment ID: 10014 Concordia*, https://plan.sa.gov.au/have_your_say/code-amendments/view_consultation_item?catsid=10014.
- ³⁶ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 13.
- ³⁷ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, pp 11-12, 74.
- ³⁸ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 4.
- ³⁹ Ibid., p 4.
- ⁴⁰ Ibid., pp 17-19.
- ⁴¹ Ibid., p 21.
- ⁴² Ibid., p 12.
- ⁴³ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p29.
- ⁴⁴ Ibid., p 10.
- ⁴⁵ Department for Infrastructure and Transport n.d., *Adelaide Regional Rail Extensions Planning Study*, https://dit.sa.gov.au/infrastructure/public_transport_projects/adelaide-regional-rail-extensions-planning-study.
- ⁴⁶ Government of South Australia 2025, *Key Rail Corridors for Northern and Southern Regions to Support Growing Communities*, 16 March, www.premier.sa.gov.au/media-releases/news-items/key-rail-corridors-for-northern-and-southern-regions-to-support-growing-communities.
- ⁴⁷ Ibid., pp 9-10.
- ⁴⁸ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 10.
- ⁴⁹ Tonkin 2024, *Gawler and Surrounds Stormwater Management Plan* for Town of Gawler, Light Regional Council and Barossa Council, Ref: 20141387R006F, p 10.
- ⁵⁰ Ibid., p 82.
- ⁵¹ Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 8.
- ⁵² Department for Trade and Investment 2023, *Proposal to Initiate an Amendment to the Planning and Design Code, Concordia Code Amendment*, plan.sa.gov.au, p 11.

- ⁵³ Jensen Planning + Design 2016 in Tonkin 2024, *Gawler and Surrounds Stormwater Management Plan* for Town of Gawler, Light Regional Council and Barossa Council, Ref: 20141387R006F.
- ⁵⁴ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, pp 25-26, 28, 73.
- ⁵⁵ Ibid., p 30.
- ⁵⁶ Ibid., p 28.
- ⁵⁷ The Barossa Council 2023, *Annual Budget and Business Plan 2023/24*, barossa.sa.gov.au, p 27.
- ⁵⁸ Town of Gawler 2023, *2023-2024 Annual Business Plan*, gawler.sa.gov.au, p 21.
- ⁵⁹ The Barossa Council 2023, *Annual Budget and Business Plan 2023/24*, barossa.sa.gov.au, p 27.
- ⁶⁰ The Barossa Council 2022, *Kalbeeba West Development Guidelines*, July, barossa.sa.gov.au/downloads/guidelines/Kalbeeba-West-Development-Guidelines.pdf.
- ⁶¹ Light Regional Council n.d., *Our Vision, Mission and Values*, <https://www.light.sa.gov.au/yourcouncil/visionmissionandvalues>, accessed 17/01/25.
- ⁶² Tonkin 2024, *Gawler and Surrounds Stormwater Management Plan* for Town of Gawler, Light Regional Council and Barossa Council, Ref: 20141387R006F, p 13.
- ⁶³ Hewett Centre 2025, *Function and Events*, <https://hewettcentre.com.au/functions-and-events/>.
- ⁶⁴ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 21.
- ⁶⁵ Ibid., p 19.
- ⁶⁶ Ibid., p 20.
- ⁶⁷ Light Regional Council n.d., 2020, *Structural Reform Proposal - Stage 1*, May, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 4.
- ⁶⁸ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, pp 5, 9.
- ⁶⁹ Ibid., p 19.
- ⁷⁰ Tonkin 2024, *Gawler and Surrounds Stormwater Management Plan* for Town of Gawler, Light Regional Council and Barossa Council, Ref: 20141387R006F, p 62.
- ⁷¹ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 20.
- ⁷² Ibid., p 22.
- ⁷³ Light Regional Council 2023, *2023/24 Annual Business Plan, Budget, and Long-Term Financial Plan*, light.sa.gov.au accessed 5/6/24.
- ⁷⁴ Light Regional Council n.d., *Strategic Plan 2024-2028*, light.sa.gov.au, p 29.
- ⁷⁵ South Australian Employment Tribunal 2021, *Light Regional Council AWU Enterprise Agreement 2021*, <https://www.saet.sa.gov.au/forms/light-regional-council-awu-enterprise-agreement-2021/>.
- ⁷⁶ South Australian Employment Tribunal 2021, *Town of Gawler AWU Enterprise Agreement No. 12/2021*, <https://www.saet.sa.gov.au/forms/town-of-gawler-awu-enterprise-agreement-no-12-2021/>.
- ⁷⁷ South Australian Employment Tribunal 2021, *Light Regional Council and Officers Enterprise Agreement 2021*, <https://www.saet.sa.gov.au/forms/light-regional-council-and-officers-enterprise-agreement-2021/>.
- ⁷⁸ South Australian Employment Tribunal 2021, *Town of Gawler Municipal Officers Enterprise Agreement 2021*, <https://www.saet.sa.gov.au/forms/town-of-gawler-municipal-officers-enterprise-agreement-2021/>.

- ⁷⁹ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 87.
- ⁸⁰ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 33.
- ⁸¹ *Ibid.*, p 35.
- ⁸² *Ibid.*, p 36.
- ⁸³ *Ibid.*, pp 34-36.
- ⁸⁴ St Yves Roseworthy 2024, *Discover a unique community*, styves.com.au/land-for-sale.
- ⁸⁵ Tonkin 2024, *Gawler and Surrounds Stormwater Management Plan* for Town of Gawler, Light Regional Council and Barossa Council, Ref: 20141387R006F, p 62.
- ⁸⁶ *Ibid.*, p 32.
- ⁸⁷ *Ibid.*, p 62.
- ⁸⁸ *Ibid.*, p 89.
- ⁸⁹ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 49.
- ⁹⁰ *Ibid.*, p 49.
- ⁹¹ *Ibid.*, pp 46-47.
- ⁹² South Australian Employment Tribunal 2021, *Light Regional Council AWU Enterprise Agreement 2021*, <https://www.saet.sa.gov.au/forms/light-regional-council-awu-enterprise-agreement-2021/>, clause 8.3.2.
- ⁹³ South Australian Employment Tribunal 2021, *Light Regional Council and Officers Enterprise Agreement 2021*, <https://www.saet.sa.gov.au/forms/light-regional-council-and-officers-enterprise-agreement-2021/>, clause 8.3.2.
- ⁹⁴ City of Playford, *Playford Community Vision 2043*, https://cdn.playford.sa.gov.au/general-downloads/Policy-Documents/SC-SP_1310_CommunityVision2043.pdf, accessed 17/01/25.
- ⁹⁵ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, p 43.
- ⁹⁶ *Ibid.*, p 40.
- ⁹⁷ *Ibid.*, p 55.
- ⁹⁸ Town of Gawler n.d., *Gawler Community Plan 2035*, https://www.gawler.sa.gov.au/__data/assets/pdf_file/0031/1671394/Gawler-Community-Plan-2035-low-res-V2.pdf, accessed 17/01/25.
- ⁹⁹ Tonkin 2024, *Gawler and Surrounds Stormwater Management Plan: Town of Gawler, Light Regional Council & Barossa Council*, Ref: 20141387R006F, p 35.
- ¹⁰⁰ *Ibid.*, p 10.
- ¹⁰¹ *Ibid.*, p 11.
- ¹⁰² *Ibid.*, p 132.
- ¹⁰³ *Ibid.*, pp 68-69, 88.
- ¹⁰⁴ *Ibid.*, p 10.
- ¹⁰⁵ *Ibid.*, p 11.
- ¹⁰⁶ *Ibid.*, pp 37, 44.
- ¹⁰⁷ Gawler River Floodplain Management Authority 2023, *Annual Report 2022-23*, gawler.sa.gov.au, accessed 3/5/24), p 6.

- ¹⁰⁸ Town of Gawler 2020, *Boundary Change Proposal - Stage 2 General Proposal*, December, dit.sa.gov.au/local-government/boundaries-commission/current-proposals, pp 14, 30.
- ¹⁰⁹ Town of Gawler 2023, *2023-2024 Annual Business Plan*, gawler.sa.gov.au, p 9.
- ¹¹⁰ *Ibid.*, p 25.
- ¹¹¹ Government of South Australia 2025, *Greater Adelaide Regional Plan 2025*, <https://regional.plan.sa.gov.au/regional-plans/greater-adelaide> accessed 1/4/25, p 144.
- ¹¹² Australian Bureau of Statistics n/d, *Data by region*, <https://dbr.abs.gov.au/>, accessed 17/1/25.
- ¹¹³ Plan SA 2024, Local Area (SA2 and LGA) Population Projections for South Australia, 2021 to 2041, https://plan.sa.gov.au/__data/assets/pdf_file/0011/1344971/Local-Area-SA2-and-LGA-Population-Projections-for-South-Australia,-2021-to-2041.pdf, accessed 17/01/25, pg.70.
- ¹¹⁴ Town of Gawler 2024, *Town of Gawler Annual Business Plan & Budget 2024-2025*, https://www.gawler.sa.gov.au/__data/assets/pdf_file/0017/1723202/Town-of-Gawler-Annual-Business-Plan-and-Budget-2024-2025.pdf, accessed 15/4/25, pg. 53.
- ¹¹⁵ City of Playford 2024, *Annual Business Plan and Budget 2024/25*, <https://cdn.playford.sa.gov.au/general-downloads/01-ABP-and-Appendices.pdf>, accessed 17/1/25, pg. 81.
- ¹¹⁶ The Barossa Council 2024, *Annual Budget and Business Plan 2024/2025*, www.barossa.sa.gov.au/assets/downloads/annual-budget-and-business-plans/Annual-Business-Plan-and-Budget-2024-2025-V1-3-as-adopted-19-June-2024.PDF, accessed 15/4/25, pg. 42.
- ¹¹⁷ Light Regional Council 2024, *Long Term Financial Plan 2024-2035*, www.light.sa.gov.au/__data/assets/pdf_file/0029/1649171/Long-Term-Financial-Plan-2024-2035.pdf, accessed 17/1/25, pg. 10.
- ¹¹⁸ Mount Barker District Council 2024, *Register of Salaries - Extract*, www.mountbarker.sa.gov.au/__data/assets/pdf_file/0034/1068964/Signed-Register-of-Salaries-22-October-2024.pdf, accessed 22/10/24.
- ¹¹⁹ City of Prospect 2023, *Salaries Register*, https://www.prospect.sa.gov.au/__data/assets/pdf_file/0026/1451285/City-of-Prospect-Salary-Register-November-2023.pdf, accessed 23/11/24.
- ¹²⁰ The Rural City of Murray Bridge 2025, *Register of Salaries- Extract*, https://www.murraybridge.sa.gov.au/__data/assets/pdf_file/0040/1665589/Salary-Register-Rural-City-of-Murray-Bridge-02-January-2025-Final.pdf, accessed 2/1/25.
- ¹²¹ Mid Murray Council 2024, *Register of Salaries - Extract*, https://www.mid-murray.sa.gov.au/__data/assets/pdf_file/0009/1121202/Salaries-Register-as-at-19.11.2024.pdf, accessed 19/11/24.
- ¹²² Southern Mallee District Council 2024, *Register of Salaries - Extract*, https://www.southernmallee.sa.gov.au/__data/assets/pdf_file/0033/1145967/Register-of-Salaries-30.07.2024.pdf, accessed 30/07/24.
- ¹²³ Town of Gawler 2023, *Register of Salaries 2023*, Provided by Town of Gawler, accessed 16/04/25.
- ¹²⁴ Town of Gawler 2025, *AWU Wage Schedule 2023*, Provided by Town of Gawler, accessed 16/04/25.
- ¹²⁵ Light Regional Council 2021, *Enterprise Bargaining Agreement LRC and AWU 2021*, Provided by LRC, accessed 16/04/25.
- ¹²⁶ Light Regional Council 2021, *Enterprise Bargaining Agreement LRC and SAMOA 2021*, Provided by LRC, accessed 16/04/25.
- ¹²⁷ YourSay 2024, 'YourSay Online Promotion Report: Town of Gawler Boundary Change Inquiry—Community Engagement, 24 July to 30 September 2024,' not published.
- ¹²⁸ Electoral Commission of South Australia 2024, *Enrolment Statistics*, www.ecsa.sa.gov.au/enrolment/enrolment-statistics.
- ¹²⁹ Plan SA 2024, *SA Property and Planning Areas (SAPPA)*, sappa.plan.sa.gov.au (accessed 11/2/24; 23/2/24).