

# TOWN OF GAWLER BOUNDARY CHANGE INQUIRY STAKEHOLDER ENGAGEMENT PLAN

Approved by the South Australian Local Government Boundaries Commission

2 May 2024

## 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 for Local Government (the Minister).

In December 2019, the Town of Gawler (ToG) submitted a proposal to the Commission to change its boundaries to include seven separate areas currently within the Light Regional Council, The Barossa Council and the City of Playford. The proposal also included the removal of two areas from the ToG to the City of Playford.

The Commission has considered the proposal and consulted with the affected councils. It decided that the proposal could proceed to an inquiry, developed an Inquiry Plan and consulted with the affected Councils on the Inquiry Plan. The Commission provided a cost estimate to the ToG, and the ToG resolved to proceed with the Inquiry.

BDO has been appointed as the Investigator for the proposal. Following the investigation, BDO will provide a report to the Commission to enable it to make recommendations to the Minister. The Minister will then determine whether or not the proposed council boundary changes will proceed or not proceed

## Purpose of Engagement

Appropriate engagement forms an integral part of the Inquiry into the proposal. Findings from the engagement process will inform BDO's recommendations to the Commission on whether the proposal meets the requirements of the Act, particularly the principles set out in Section 26.

The main elements of the engagement process include:

- ▶ Informing key stakeholders about the ToG boundary change proposal.
- ▶ Obtaining objective information about the impacts of the proposal across on the affected areas and where relevant, the broader areas in the following five streams, in accordance with the Inquiry Plan:
  1. Financial Matters
  2. Land use and planning matters
  3. Council employee matters
  4. Representation matters
  5. Community and service matters
- ▶ Ensure that the stakeholders from the affected areas are reasonably and appropriately engaged to provide feedback (through a range of engagement methods) about the potential impact of the proposal on their areas, relevant to the five inquiry areas identified above or any other matters that may emerge during the Inquiry.
- ▶ Validate information gathered through the various engagement activities to inform BDO's report to the Commission.

## Stakeholder Engagement Duration

BDO will engage with stakeholders as part of the Inquiry in accordance with the Stakeholder Engagement Plan. Engagement will take place over three distinct stages and the anticipated timing for each stage is set out below. Further information about the three stages of engagement is set out in Appendix 1.

- ▶ Stage 1: Late February-to mid-April 2024
- ▶ Stage 2: Late May to early July 2024
- ▶ Stage 3: July 2024.

## Scope of the Inquiry

No recommendation has yet been made about whether the proposal should proceed. At the conclusion of the Inquiry, the Commission may recommend to the Minister that the council boundary changes proceed as proposed, or the Commission may recommend that different boundary changes are made from those which have been proposed. The Commission may also recommend that no changes be made to the existing council boundaries. The Commission will receive BDO's Inquiry Report, prepare its own report and recommendations for the Minister and the Minister will make a final decision.

The Inquiry will be conducted within the following context:

- ▶ Under the Act, the Commission is responsible for receiving and investigating council boundary change proposals. The Commission is an independent body and makes recommendations to the Minister.
- ▶ In December 2019, the ToG proposed to include seven areas within its boundaries from the Light Regional Council, The Barossa Council, and the City of Playford. The proposal also includes moving two areas from the ToG to the City of Playford (see attached maps of the Affected Areas).
- ▶ The ToG's proposal is to change council boundaries, not to amalgamate (merge) councils.
- ▶ The Commission has started an Inquiry into the ToG's proposal. Under the Act and the Commission's Guidelines, the Commission may recover reasonable costs of the investigation from the ToG. The ToG has agreed to pay the costs of the Inquiry and the Inquiry has commenced.
- ▶ The scope of the Inquiry is set under:
  - the *Local Government Act 1999*,
  - the approved Inquiry Plan (which the affected councils were consulted on, and the Commission approved).
  - the Commission's Guidelines, in particular '*Guideline 4 - Investigation of General Proposals Initiated by Councils*' and '*Guideline 9 - Engagement and Consultation.*'
- ▶ BDO has been engaged by the Commission to be the Investigator for the proposal. BDO will seek information about the potential implications of the proposal, inform and consult with affected stakeholders, and report on its findings and recommendations to the Commission.
- ▶ The Commission will consider the report from BDO then make recommendations to the Minister.
- ▶ The Minister will receive the Commission's final report with recommendations. The Minister will make the final decision as to whether the proposal will proceed or not proceed.
- ▶ While the Inquiry and stakeholder engagement is planned for the first half of 2024, the Commission cannot provide timeframes for completion of the Inquiry. The Commission must ensure that it has all of the information required to make a recommendation to the Minister.
- ▶ The proposal from the ToG is the first significant proposal of its kind to proceed to an inquiry since the establishment of the Commission in 2019

- ▶ Beyond the scope and process of the Inquiry, information provided by the investigators during public information sessions will be preliminary and subject to feedback and where appropriate, further validation and may change as the inquiry progresses.
- ▶ Although BDO may be able to provide indicative information about the potential financial impacts of the proposal, the financial situation of councils and the rates they pass on to ratepayers are influenced by many factors determined by individual councils. Future changes in rates cannot be accurately predicted by the Inquiry process.

## Scope of Influence on Inquiry Report/Outcomes

In line with the first engagement principle in the Commission’s *Guideline 9 - Engagement and Consultation*, this Stakeholder Engagement Plan has been developed to be fit for purpose to the scope of the ToG’s proposal and consider the Commission’s previous engagement with impacted councils.

This Engagement Plan meets the Commission’s requirements under Guideline 9 to ensure an Engagement Plan is developed for every General Proposal based on the Commission’s four engagement principles. This Plan focuses on the ‘Inquiry into a General Proposal.’

On the Public Participation Spectrum developed by the International Association for Public Participation (IAP2)<sup>1</sup>, stakeholders will be engaged at the “Inform” and “Consult” levels.

- ▶ **Inform:** Stakeholders will be informed by being provided with objective information so they can understand the proposal as it impacts on the affected areas. This will include relevant information being made publicly available on the Commission’s website and through stakeholders being provided with information about the proposal when they are invited to engage with the Investigators.
- ▶ **Consult:** Stakeholders will be consulted to obtain information from them and their feedback on the proposal. This consultation will be genuine, inclusive and respectful per the Commission’s second and third engagement principles, with Investigators making the effort to support councils and communities participating in the Inquiry through three Stages of engagement and multiple methodologies of engagement. Stakeholders’ feedback will be acknowledged. BDO will include information about how stakeholder feedback influences its report.

Together, the actions to Inform and Consult align with the Commission’s fourth engagement principle that engagement is to be informed and transparent.

### Not Determined

Recommendations on the proposal from the Inquiry are currently not determined, including whether the council boundary changes should proceed as proposed, proceed differently than proposed, or should not proceed.

The timing of engagement within each of the three Stages may be determined between stakeholders and the Investigator, subject to meeting overall engagement timeframes.

### Determined:

At this stage, the Commission has determined that the Inquiry will proceed, and it is therefore not negotiable whether the proposal will be investigated.

The scope of the Inquiry has been determined by the Commission in consultation with the affected councils and may be changed if agreed by the Commission. While the Inquiry will be funded by the ToG, engagement with stakeholders will not be remunerated or reimbursed.

While stakeholder engagement is critical to the Inquiry, and will inform the investigator’s report, the final report, including its findings and recommendations, will be that of the independent investigator.

The Commission will receive and consider the report of the investigator, but the Commission’s findings and recommendations will be those of the Commission. In line with its engagement principle that engagement is

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<sup>1</sup> See [IAP2 Public Participation Spectrum - IAP2 Australasia](#).

informed and transparent, the Commission will explain the reasons behind its recommendations. The Minister will make the final decision on the proposal following receipt of the Commission’s recommendations.

## Engagement - High-Level Approach

The engagement approach will be in three stages:

- STAGE 1: Setting the Stage:
  - Initial meetings with affected Council leadership teams to inform them of the process, request provision of initial input and documentation relevant to the areas proposed for the boundary change; and
  - Request a list of stakeholders to engage including community and sporting groups, any business/private sector stakeholders or other groups relative to the affected areas in the proposal.
- STAGE 2: Stakeholder Engagement:
  - Engagement with elected members from the affected councils.
  - Engagement with stakeholders identified by the Commission, the investigator, and councils through requests for information, public sessions, interviews and focus groups, and surveys.
  - Hold three community forums: one online and two in-person, in locations that are accessible to the greatest number of affected residents (expected to be from Hewett and Concordia).
- STAGE 3: Validation:
  - Confirming the Investigators’ understanding and use of information received from stakeholders where there is any ambiguity or lack of clarity.

Included as Appendix 1 is a more detailed outline of information sought from Councils in Stage 1.

## Key Stakeholders

Note: The list of stakeholders will be informed by Stage 1 engagement with impacted Councils.

Where a stakeholder cannot participate in an interview/focus group or wishes to provide additional information following an interview, they will be invited to provide feedback in writing. Secondary interviews or focus groups may be conducted if circumstances warrant.

Stakeholder	Interest in Review	Engagement Method
Elected Members at the Town of Gawler, Light Regional Council, The Barossa Council and the City of Playford	Elected to act on behalf of communities potentially impacted by proposal	Stage 2: Engagement through four separate sessions (one for each affected council) of up to two hours each covering the Inquiry, its process and, where available, any preliminary or indicative findings. Invitation given to provide written feedback and any additional documents and information.
CEO/Leadership team at Town of Gawler	Key roles information about the origin of the proposal from Town of Gawler’s perspective	Initial email Meetings/Interviews in Stage 1 Requests for information during Stage 2 (either CC or potentially direct contact—as per their requests. Currently envisioned to be by email, with follow up phone calls if required).

Stakeholder	Interest in Review	Engagement Method
		Written engagement for Stage 3 (validation).
CEOs/Leadership teams at Light Regional Council, The Barossa Council, and the City of Playford	Key roles in areas impacted by Town of Gawler’s proposal  Have access to information specific to the matters to be investigated and oversight of staff with information	Initial email  Meetings/Interviews in Stage 1  Requests for information during Stage 2 (either CC or potentially direct contact—as per their requests. Currently envisioned to be by email, with follow up phone calls if required).  Written engagement for Stage 3 (validation).
Council staff at the Town of Gawler, Light Regional Council, The Barossa Council and the City of Playford	Their interests and rights may be impacted by the general proposal or specific elements of it, including potential for transfer of staff (and therefore potential impact on conditions of employment).	Stage 1: Initial information through email providing assurance of engagement, when appropriate  Stage 2: More detailed information about the number of employees affected and the nature of the impact on their employment, where applicable.
Specific staff groups at Town of Gawler, Light Regional Council, Barossa and City of Playford: — Planning — Financial — Community services (including libraries, recreation and leisure services) — Infrastructure (including Town Services, Roads and Environment) — Governance (re Representation Matters)	Have information specific to the Inquiry Plan matters investigated during the Inquiry.	Following engagement with Leadership Teams seeking key contacts, engagement undertaken during Stage 2 through:  Written requests for information. Meetings seeking additional information and clarification.  Limited written engagement may occur during Stage 3 for validation (or this may occur through engagement with Executive staff).
Australian Services Union Australian Workers Union  Shop, Distributive and Allied Employees Association (at this stage appears to be relevant to Playford only—to be confirmed)  Possibly United Voice (if any industrial and commercial canteens are impacted)  Including any staff representatives of the above	Represent staff who may be impacted by the proposal.	Stage 2: Email informing of process and of staff impacts  If required, meetings.
Department for Infrastructure and Transport, Planning and Land Use Services (PLUS - Department for Trade and Investment) and the Minister for Planning.	Planning and infrastructure implications (if any).  Support for Ministers for Infrastructure and Transport; Local Government; and Police, Emergency Services and Correctional Services (responsibility for road safety).	Stage 2: Letter with invitation to provide written feedback.  Offer an interview (or seek one, depending on information received) of up to one hour initially.

Stakeholder	Interest in Review	Engagement Method
Rate Payers and community members	Potential impact to rates and services and general interest.	<p>Stage 1: Commission media release that BDO will seek input from the community, <i>If possible</i>, Letters to potentially impacted properties (<i>discussion required re logistics</i>)</p> <p>Stage 2: Invitations to attend via Commission website, councils' websites, councils' existing communication methods with rate payers.</p> <p>Three, two-hour public information sessions, covering the Inquiry, its process and, where available, any preliminary or indicative findings. One session to be held in person in Hewitt (location TBD), one to be held in Concordia (location TBD) and one session to be conducted online. Attendees will be encouraged to provide written feedback via a dedicated email box.</p> <p>Invitation on the Commission website and Councils' websites (if they permit) and an advertisement in the local paper seeking written feedback via email.</p>
Local community services, sporting community groups, businesses across impacted areas of councils	Potential impact to services received, grants, and general interest.	<p>Stage 1: Commission media release about BDO's engagement and that BDO will seek input from the community</p> <p>Stage 2: Invitation seeking written feedback on Commission website and councils' websites (if they permit), through council email lists/groups, and direct correspondence (mostly email) to identified groups and businesses.</p> <p>Targeted stakeholder engagement through focus groups or interviews, depending on information received</p> <p>Stage 3: Validate information received.</p>
Electoral Commission of South Australia	Potential changes in representative structures.	<p>Stage 2: Invitation to provide feedback if relevant to the Inquiry.</p> <p>Offer an interview (or seek one) of up to one hour initially, if required.</p>
Developers, including Concordia Land and Springwood	Have existing relationships with councils; potential impact from change in relevant policies and procedures.	<p>Stage 2: Invitation to provide written feedback.</p> <p>Offer an interview (or seek one) of up to one hour.</p>
Any key groups where collaboration already exists between the councils, and is	Have existing relationships with councils; potential impact from	Stage 2: Invitation to provide written feedback

Stakeholder	Interest in Review	Engagement Method
highlighted For example: RDA, Gawler River Authority, Health etc.	change in relevant policies and procedures	Offer an interview (or seek one) of up to one hour

## Risk Analysis

Risk	Mitigation
Stakeholders unavailable to provide timely feedback	Stage 1 to initiate stakeholders for feedback. Flexibility in engagement times, methodology and options. BDO to follow-up with key stakeholders if no responses.
Lack of constructive engagement	Reinforcing key messages about BDO and the Commission seeking to engage genuinely, no decisions have been made yet, report will be independent.
Interviews/engagement fail to garner useful information	Background information provided to stakeholders before any meetings, consultant well-briefed on activities to date and upcoming activities. Development of targeted questions for stakeholders. Clear emerging ideas/proposals discussed rather than too many “generalities” along with potential opportunities/constraints.
Stakeholders are unsure their feedback has been considered/concerns engagement was not genuine	Communications to be clear about the Stakeholder Scope of Influence (outlined above). Closing the loop on stakeholder engagement by acknowledging all feedback/information and, where appropriate, providing engagement participants with an overview of information/feedback obtained to validate content. Timing of seeking feedback enables provision of information/perception against emerging themes/proposals or key questions. Report to include information about the impact of stakeholder engagement.
Stakeholders seek negative media in regard to engagement process or about the Commission or inquiry	Reinforcing key messages about Commission seeking diverse views and fulsome input, that the Inquiry is independent, and that no decisions have been made.
Stakeholder perception that engagement methodology is not comprehensive enough.	Engagement with councils on draft engagement methodology. Commission has final decision on scope of engagement. Ensuring that information about how to engage is broadly advertised and encourage stakeholders to use their networks to spread the information to affected communities.

## Communications and Engagement Contacts

### Stakeholder engagement contact

- ▶ Annetay Henderson-Sapir, BDO: Annetay.Henderson-Sapir@bdo.com.au

### Media contact

- ▶ Local Government Boundaries Commission: boundaries.commission@sa.gov.au, 08 7133 1311.

## Approval

### Approval for Engagement Plan

- ▶ Local Government Boundaries Commission

## Appendix 1: Stages of Engagement

### Stage 1 of Engagement (Council):

- ▶ The investigators (BDO) are seeking factual information to inform the Inquiry. BDO want to hear each Council's views about the Town of Gawler's proposal.
- ▶ Information from each Council and other stakeholders will inform BDO's findings and recommendations to the Commission. While engagement will inform BDO's findings, their findings will be independent.
- ▶ The engagement will have three stages:
  - Stage 1, with each of the impacted councils
  - Stage 2, with a range of stakeholders, including subject matter experts through questions and targeted interviews; community members, ratepayers, and groups through a call for written submissions and focus groups where appropriate; council staff through a survey (where relevant); and
  - Stage 3, confirms BDO's understanding and use of information received from individuals or organisations where there is any ambiguity or lack of clarity.
- ▶ Any information each Council has already collected about the potential impacts of the proposal on their council across the five areas of the Inquiry, which are:
  - Financial Matters
  - Land use and planning matters
  - Council employee matters
  - Representation matters
  - Community and service matters
- ▶ An invite to provide any initial written information across each of these areas, as well as nominate a lead staff member with whom BDO can ask follow-up questions, particularly the areas below:
  - Planning
  - Financial
  - Community services (including libraries, recreation and leisure services)
  - Infrastructure (including Town Services, Roads and Environment)
  - Governance (including Representation Matters)
- ▶ BDO welcomes information about key stakeholders in each Council area that should be consulted eg community, sporting, business, or other groups you think BDO should consult. Consideration will be given to adding them to Stage 2 of BDO's engagement.

### Stage 2 of Engagement (Communities of Interest / Stakeholders):

- ▶ Provide selected and relevant foundation messages from above, targeted to the various stakeholder groups.
- ▶ As part of the engagement process, BDO are seeking information from each of the stakeholder groups identified on Pages 4 to 6 above about the impacts of the potential boundary changes for each particular stakeholder group. For example, ratepayers and communities within the affected areas are likely to have an interest in the impact on changes in council rates resulting from potential boundary changes. BDO are seeking information about the potential impacts of the proposed boundary changes.
- ▶ Impacted stakeholders are invited to provide feedback to BDO using the options provided in the "Engagement Method" section of the stakeholders table above. For example, ratepayers and communities have the opportunity to provide feedback and information to BDO at a public information session, or by lodging a written or emailed submission to the Commission.
- ▶ Information and feedback gained will inform BDO's investigation and recommendations to the Commission.



- ▶ Where appropriate, stakeholders will have the opportunity to check how BDO uses the information provided once it is reviewed and considered.

Stage 3 of Engagement (All Parties where required):

- ▶ Following Stage 2 of the Engagement process, BDO will collate the information and feedback received and summarize the key issues to be addressed as part of the investigation.
- ▶ In Stage 3 of the engagement process, BDO will check their understanding and the accuracy of the information and feedback, by providing a summary of the information and feedback to stakeholders for review.
- ▶ Stakeholders are encouraged to review the summary documents and let BDO know if any of the information or feedback is inaccurate or requires further clarification.

Town of Gawler Boundary Change Inquiry - Approved Stakeholder Engagement Plan		
Version	Comments	Date
1.0	SA Local Government Boundaries Commission Approved	02/05/2024