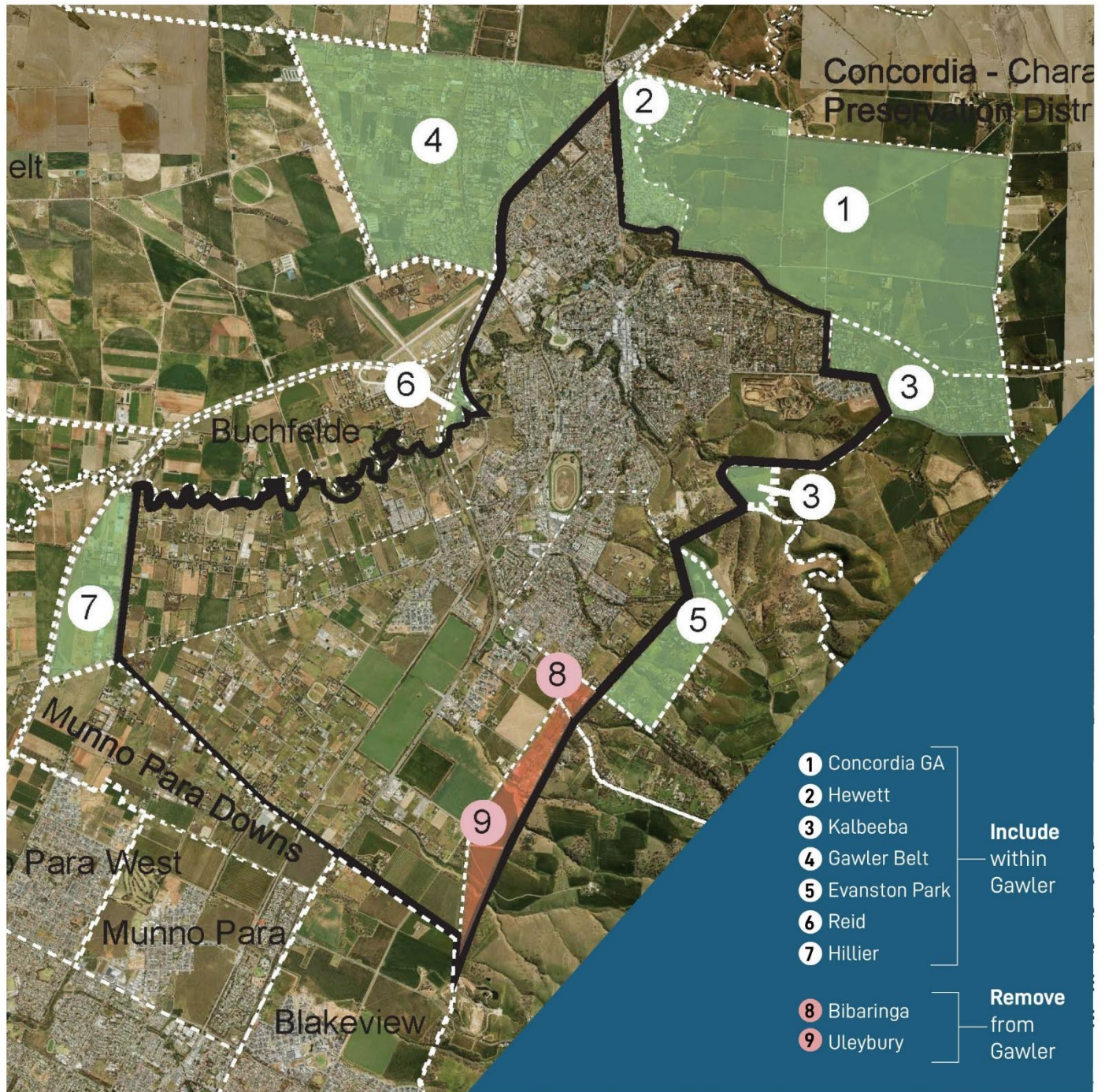


Town of Gawler

BOUNDARY CHANGE PROPOSAL – STAGE 2 GENERAL PROPOSAL



DECEMBER 2020

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1. OVERVIEW

The Town of Gawler is a unique place with a strong sense of history. Although now considered a part of metropolitan Adelaide, it was the first country town to be established in South Australia in 1839 and the Town closely connects to the Barossa Valley and smaller rural towns such as Roseworthy.

The Town of Gawler is located 42 kilometres to the north of Adelaide City and is relatively small at 41.1 square kilometres. The Town has been a regional centre since its inception, including as a stop off point for the towns to the north (Burra and Kapunda) in the early years. The Town of Gawler remains a regional centre today, catering for sporting activities, schooling, events and community activities.

The heart of Gawler is triangular rather than square due primarily to the topography and river systems. The Town of Gawler is defined geographically by its river systems including the Gawler River, the South Para River and the North Para River. Parts of the Town of Gawler are hilly (to the north and east) and other parts to the west and south are flatter. The Town of Gawler has large sections of natural area, particularly along its river systems.

The Town of Gawler remains a Regional Service Centre and whilst the latest population data (2016) states that Gawler has a residential population of 23,034, it services a regional catchment which is estimated to be in excess of 110,000 people and growing.

Today, the Gawler Town Centre maintains its longstanding role as a service centre for a predominantly rural hinterland however, it is also emerging as the regional centre for a rapidly urbanising region. The areas around Gawler to the south, east and north-east are undergoing significant and rapid residential development and, in the longer term, the urban catchment for Gawler will extend to Concordia. Consequently, Gawler will be required to service this growing catchment and meet its future economic, social and environmental demands.

The Town of Gawler is seeking to realign its boundary in accordance with *Chapter 3, Part 2 of the Local Government Act 1999* (the Act) and seeks, through the submission of this General Proposal, consideration of the matter by the Boundaries Commission (the Commission) on the proposed realignments.

Town of Gawler's proposed boundary adjustments are focussed on:

- Formalising Gawler's existing (and future) Community of Interest, which currently extends past existing boundaries.
- Ensuring people who consider themselves to be part of Gawler have a say and are appropriately represented in decision making processes.
- Planning for future growth, through the alignment of the Town of Gawler boundary to the State Government's Urban Growth Boundary.
- Removing current administrative anomalies such as property boundary interceptions and/or realign boundaries so that entire suburbs are included (or excluded).
- Ensuring Gawler continues to function as a Regional Service Centre, providing greater opportunity for investment and job creation.
- Creating a local government administrative construct that can best work with the market to facilitate investment and job creating opportunities relative to the One Gawler community that will be created.

This Proposal seeks both the inclusion of new areas as well as the renouncement of land within the current Town of Gawler Local Government Area boundary as follows:

Areas to be included in the Town of Gawler:

- Area 1 - Concordia Growth Area
- Area 2 - Hewett
- Area 3 – Kalbeeba (including Springwood)

- Area 4 - Gawler Belt
- Area 5 - Evanston Park
- Area 6 – Reid
- Area 7 – Hillier

Areas to be removed from the Town of Gawler:

- Area 8 - Bibaringa
- Area 9 - Uleybury

An overview map of the proposed changes and detailed maps of each area of interest are presented in **Attachment 1**.

Councils affected by the Proposal include The Barossa Council, Light Regional Council and City of Playford.

2. KEY CONSIDERATIONS

2.1 Overview

The key rationale applied to Town of Gawler's deliberations when considering boundary adjustments for Gawler include:

- The Gawler Township has and will continue to function as a Regional Service Centre to the lower mid north servicing a catchment in excess of 110,000 people and growing. This is expected to increase significantly over the coming decades.
- As development occurs immediately adjoining the current Town of Gawler boundary the equity of residents living adjacent its borders utilising the Gawler community's services (particularly current Hewett and Gawler Belt residents and future Concordia residents) needs to be addressed to provide Council with capacity to provide quality infrastructure and services to its Community of Interest and the region.
- Future generations forming part of the Gawler community in real and functional terms should have equal and appropriate representation in local decision making rather than being governed by distant entities.
- The formation of a community that is based on collective responsibility and engagement are the foundations on which a community that is harmonious and sustainable will flourish.
- Coordinated local governance (including but not limited to urban development expansion) by one entity, as opposed to potentially four separate local government bodies, will ensure more coordinated decision making, the most cost effective provision of services and best facilitate investment to drive job creation and economic prosperity for the region.

Town of Gawler has adopted a strategic approach to boundary reform. A number of factors have been key to Council's deliberations, as summarised below.

2.2 Community of Interest

There are many elements that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important.

The Gawler Community of Interest can be illustrated as follows:



Town of Gawler is one of the fastest growing Local Government Areas (LGA) in the State and is also under significant pressure from residential growth adjacent to its current boundaries. While it is acknowledged that Gawler is a regional service centre for the wider region, it is clear that Gawler's Community of Interest extends well beyond its current boundary.

Council has supported residents of its neighbouring areas through the provision of infrastructure and services for many years. Indeed, it would be fair to say that neighbouring councils and developers in those areas have leveraged the proximity of Gawler's services and community infrastructure to support the success of their residential developments.

Council has not only recognised that its true Community of Interest extends beyond its current boundaries but has actively been working to incorporate the needs of the extended community in its strategic planning for a number of years. In doing so, Council has also recognised the increased pressure that this places on both Gawler's services and its existing ratepayers.

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 as not all activities require membership or registration for the use of a service/facility. From data Council has recorded, it could be assumed that the utilisation rate would be relatively high when considering the following few examples of community facilities and services provided by Council and their utilisation rates from members of the community who reside beyond Council's boundary as provided below:

- Approximately 50% of Gawler's Aquatic Centre Learn to Swim students reside outside of

Gawler.

- 7 schools outside of the Gawler LGA utilise the Gawler Aquatic Centre for DECD swimming lessons.
- 46% of students who participated in DECD swimming lessons attend schools outside of the Gawler LGA.
- 36% of Gawler Aquatic Centre season pass members reside outside of Gawler.
- 33% of Gawler library members reside outside of Gawler.

During the recent Community Consultation on Boundary Reform (see section 4 for more details) the overall survey results clearly showed that 55% of all respondents felt that they, or others in their household, most associated with Gawler despite only 44.1% of the respondents to the survey indicating they were residents of the Gawler LGA.

To further demonstrate the strong connections that exist between the Areas of Interest and Gawler, showing that Gawler's Community of Interest extends beyond its current boundaries, respondents were asked to provide information in the survey regarding the main area that they undertake a series of everyday activities. Responses clearly indicated strong connections between the majority of respondents and the Gawler Community with the results shown below for activities undertaken within the Gawler LGA:

- 78% of respondents do their grocery and other food shopping
- 74% of respondents access general medical services
- 70% undertake their religious observance activities
- 63% access services such as public library, justice of the peace and other community services
- 61% are involved in Community groups and social clubs etc in Gawler
- 59% participate in organised sport/fitness for themselves or children
- 50% leisure /entertainment.

To further demonstrate how our community extends beyond the current Council boundary the following has also been noted:

- Public transport routes connect Hewett residents with the Town of Gawler LGA but not to areas/services of Light Regional Council.
- Approximately 1 in every 4 volunteer enquiries to Council are from outside of the Gawler LGA
- Council's Home Assist program has, on occasion, serviced some residents from outside the Gawler LGA because a client crosses boundary lines and other providers or The Barossa Council's Home Assist program has refused to service them.
- In the past, due to their contribution to the Gawler community, two (2) Hewett residents have been awarded Australia Day honours by the Town of Gawler.
- Over 34% of the Members of the Youth Space are from outside the Gawler LGA with 14% of the members residing in Hewett.

From a service perspective, the Town of Gawler remains the primary service centre for the region, with approximately 560 rate paying businesses located within the Town. These businesses are scattered throughout the Town in a number of shopping and service precincts with the most predominant being:

- The Town Centre & Adelaide Road Precincts.
- Gawler Green Shopping Centre.
- Gawler Park Home Maker Centre.
- Light Industry Zone in Willaston.

Gawler is also a regional service point for many allied health services, Federal Government (Centrelink, Medicare) and State Government departments (Service SA, Education, Gawler Health Service, Emergency Services, SA Police).

While not formally within the Town of Gawler LGA, Council already recognises the proposed Areas of Interest as being part of the Gawler community. Planning for both the current and future Community of Interest which is anticipated to come to fruition over the next 20-30 years is critical and challenging. A perfect example of how Council has been actively working to incorporate the needs of the extended community in its strategic planning. For a number of years Council has been supporting and planning for the expansion of its sporting and recreational facilities and infrastructure to service the wider catchment not just Town of Gawler residents.

With regards to providing sport and recreation facilities, Gawler has the two court Gawler Sport and Community Centre; Starplex at Trinity College (located on private school land) which has four courts, a 25 metre indoor pool and theatre; and the 50 metre outdoor Gawler Aquatic Centre. In addition to these built facilities, it has Essex Park/Showgrounds and adjacent river parklands which is a 16 hectare sports precinct that includes linear trails. There are eight council owned district level sports facilities in the region and a further six located on private or school grounds.

The Gawler Open Space, Sport and Recreation Plan (GOSSRP), adopted in July 2016, already takes into consideration a more regional context due to the vicinity of areas such as Hewett and Roseworthy and the likely pressures these growth areas will place on the Gawler township.

The Gawler Aquatic Centre is at its end of useful life having served local and regional communities since it opened in 1962. In 2016-2017 Council undertook a feasibility analysis to allow a high level understanding of the future provision of an aquatic facility within Gawler for not just local residents but the regional communities that have been its customers. At the time, the cost of a new Aquatic Centre was estimated at \$25million. The actual cost of the redevelopment will be considerably higher than this estimate due to annual cost escalation and scope change requirements that will evolve over time.

Council is in the process of developing Master Plans for two key recreation precincts: the Karbeethan Reserve Master Plan and the Essex Park and Gawler Showgrounds Regional Sporting Precinct Master Plan, with the latter taking into consideration the regional Aquatic Centre. Planning for these significant recreational precincts is not just to serve Gawler rate payers but also the wider region.

Consideration of the wider Community of Interest via strategic planning is just one example of how Town of Gawler demonstrates its commitment to communities within the Areas of Interest identified in this Proposal that are currently outside its LGA boundary. Other key documents where these Areas of Interest have been included in considerations relative to the broader regional function of Gawler include:

- Gawler Community Plan 2017-2027 and the development of the Draft Gawler Community Plan 2030+
- Gawler Walking and Cycling Plan 2018-2028
- Environmental Management Plan
- Biodiversity Management Plan
- Stormwater Management Plan
- Gawler Open Space, Sport and Recreation Plan
- Gawler Urban Rivers Master Plan
- Social Infrastructure and Services Study
- Youth Development Plan

Not only is it important that Council has the capacity to provide for its immediate community, it is also important that those broader Areas of Interest that form part of the Gawler Community of Interest and have a vested interest are able to participate in the planning process and are appropriately represented when decisions are made. In this regard the beneficiaries of these and other such infrastructure outcomes should also be making an appropriate contribution with respect to both upfront delivery and ongoing maintenance.

2.3 Regional Economic Considerations

Boundary changes must enhance the capacity of local government within the region, so the region can continue to deliver results to local communities in a more strategic and effective way. In this respect, Town of Gawler has had due regard for the importance of protecting and maintaining the following industries for the benefit of the region:

Agriculture – Light Regional Council, Adelaide Plains Council

Light Regional Council and Adelaide Plains Council areas are mostly rural in nature, with small townships distributed throughout these Council areas. Rural land is used largely for farming, particularly grain growing (wheat, barley and oats), and sheep grazing as well as horticulture being predominant along the Gawler River in the Adelaide Plains Council.

Viticulture – The Barossa Council, Light Regional Council

Viticulture is a critical industry within the Barossa Council and wineries situated throughout a number of towns within the Barossa Council. The Barossa Council had clear regard to the Barossa Geographical Indication (GI) Zone in its Stage 1 Proposal for boundary reform seeking that portions of viticultural land from Light Regional Council (e.g. Seppeltsfield) and Mid-Murray Council (e.g. Eden Valley) be included within its council boundaries. Light Regional Council opposed this Proposal.

The intent of The Barossa and Light Regional Councils to protect their respective viticulture industries is acknowledged. As is the intent of the Australian Wine Industry, the creator of the Barossa GI zone for product origin identification and marketing purposes.

It is noted that the Barossa GI Zone also covers current Gawler township areas, Hewett (Light Regional Council) and the Concordia Growth Area (Barossa Council). Town of Gawler is of the view that significant urban areas, either current or proposed, that are located at the periphery of the GI Zone, and at Gawler's doorstep, should not be included within the GI Zone and would best be situated within the Town of Gawler.

Services and other economic sectors (Town of Gawler)

While the population of the Town of Gawler LGA is currently approximately 23,000, Gawler is a regional service centre to the lower mid north servicing an existing catchment of 110,000 people and growing. Noting that this catchment will increase over the coming decades, there is a need to ensure that Town of Gawler has the capacity to deliver services and infrastructure for its Community of Interest and the wider region. This is further discussed above, in section 2.2, and in section 2.4 below.

2.4 Infrastructure, Resources and Planning

Town of Gawler delivers, and is continually planning for, improved services and facilities to benefit this regional catchment, investing heavily in servicing and representing its community and the region. It is continually striving to improve and contribute towards the town's economic and environmental sustainability, the social and recreational services it provides and, as a whole, to realise the collective vision within the Gawler Community Plan, which is to create "a liveable cohesive, active, innovative and sustainable community".

The existing and planned areas located on the immediate periphery of the Gawler LGA form, or will form, a natural extension to the Town of Gawler. Due to location, these communities do and/or will rely upon the services and infrastructure provided by and within the Town of Gawler.

Town of Gawler's proposed boundary changes will enable a strategic and holistic way of planning for the future of our community. A planned, organised way forward is preferred rather than a "tacked on"

approach as was sometimes past experience which assumed that the existing township (Gawler) would essentially absorb the new community and service its residents sufficiently. A planned approach will alleviate the pressures on the Town of Gawler by providing additional capacity that enables services and infrastructure to be created and enhanced in line with community needs.

Town of Gawler will be able to create efficiencies and seek greater integration in the areas of urban growth management, social infrastructure, open space, connectivity and walking and cycling trails that will continue to be required.

In addition to the above, further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures. Often differences exist between development and council policy and procedures that are applicable to areas which are essentially identical in nature and adjacent to one another. This will engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

2.5 30 Year Plan for Greater Adelaide (Urban Growth Boundary)

Developed by the State Government, the 30 Year Plan for Greater Adelaide (first published in 2010 and updated in 2017) provides a vision for how Greater Adelaide would function in 30 years' time with the following objectives:

- a. Maintain and Improve Liveability.
- b. Increase Competitiveness.
- c. Drive Sustainability and resilience to Climate Change.

The 30 Year Plan details future urban growth areas as well as an Urban Growth Boundary – Planned Urban Lands to 2045 which extends beyond Town of Gawler's boundary to Roseworthy, Hewett, the Concordia Growth Area, and sections of Hillier, Kalbeeba and Gawler Belt.

Town of Gawler is of the view that the majority of the urban growth area (with the exception of Roseworthy and part of Gawler Belt) should be included within the Town of Gawler LGA.

2.6 Section 26 – Principles

Town of Gawler's Proposal strongly aligns with the Objects of the *Act* and Principles under section 26 (1) (c) of the *Local Government Act 1999*.

A description of how Council's Proposal aligns with the above principles is provided in detail for each Area of Interest in the following Section 3.

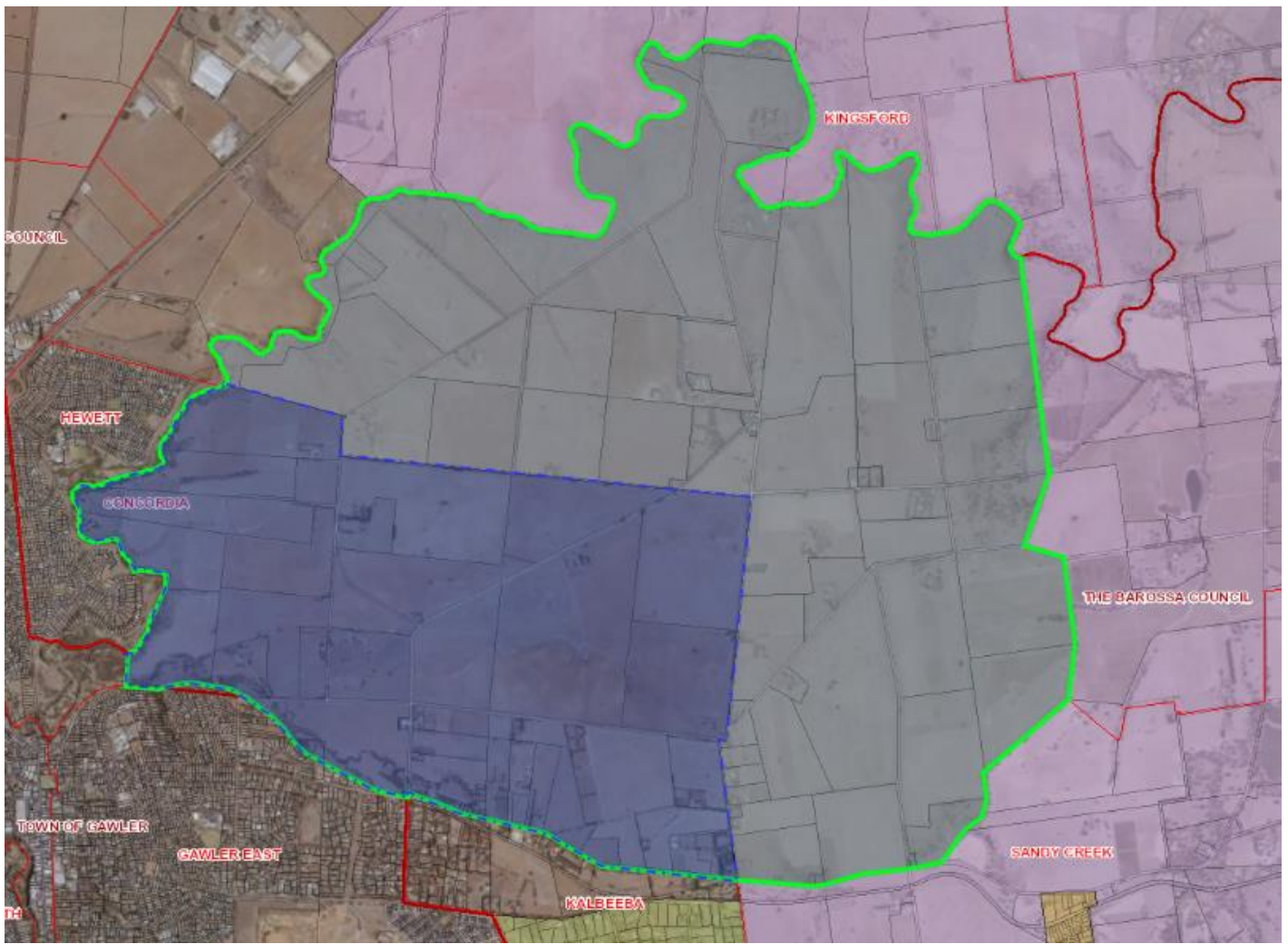
3. PROPOSED BOUNDARY CHANGES

3.1 Concordia Growth Area (Area 1)

The Concordia Growth Area (Concordia) is approximately 984 hectares in size and is bounded by the north para river to the north-west and the Town of Gawler LGA to the south-west.

At its closest point, the land is only 730m from Murray Street within Town of Gawler. In contrast, the land is more than 9km from Lyndoch, the closest township within The Barossa Council. Further to which Concordia is located up to 30km from Nuriootpa which is where The Barossa Council's administration centre is located.

The land has the capacity to accommodate in the order of 9,785 lots/dwellings and approximately 23,000 people in a master planned community that will form a natural extension to the existing township of Gawler.



The suburb of Concordia is outlined above in green. This proposal seeks to realign the boundary to include the Concordia Growth Area (highlighted in blue above) currently located in the Barossa Council into the Town of Gawler. This proposal is not seeking to include the portion of Concordia which lies within the Character Preservation District (Shaded in grey).

A larger, more detailed map of the Concordia Area of Interest is available in **Attachment 1**.



Concordia proximity to Gawler

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. The resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community

For many years, Town of Gawler has been providing for a community that is much larger than its LGA. A planned, organised way forward is preferred rather than a “tacked on” approach as has sometimes been the experience of the past which assumes that the existing township (Gawler) can essentially absorb the new community (Hewett) and service its residents sufficiently. It is important that the Hewett scenario is not repeated, particularly as it relates to the Concordia development.

The Concordia development may commence construction in the coming 3-5 year period and, as outlined above, is forecast to increase population in the community by some 23,000 residents (matching Gawler LGA’s current population). While community infrastructure and a retail precinct are planned for this development, this will require significant investment in infrastructure and resources. The timing of delivering such assets is likely to be out of sync with community needs and is unlikely to deliver the totality of infrastructure requirements for the community.

Due to location, the future Concordia community will heavily rely upon the services provided by and within the Town of Gawler. Council already delivers a significant number of services (library, administration centre, community centres etc.) and it makes sense that this type of community infrastructure is not duplicated less than 1 km away.

If Concordia is integrated within the Town of Gawler it will allow government and the private industry to generate efficiencies through coordinated planning and service delivery and enable Council to provide more comprehensive and competitive services to our community.

Greater economies of scale will be achieved, resulting in improved commercial arrangements and ultimately improving the value for money proposition for Council and the community. Service delivery

efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than two Councils servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

The proposed boundary adjustment will allow the Town of Gawler to enable, amongst other things, greater integration in the areas of hard infrastructure, waste services and maintenance activities, soft infrastructure, social infrastructure, open space, connectivity and walking and cycling trails which the subject communities already rely upon.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils, achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

As outlined above, due to proximity as well as the vision for the development, the future Concordia community will rely on the services and infrastructure that the Town of Gawler provides and will inherently form part of the Gawler Community of Interest. The vision for Concordia is:

“ A master planned, resilient community with an urban form and morphology that captures and preserves the verdant, natural character of the Gawler hills, blended with the unique, historic and community identity of the existing Gawler Township.

Concordia will form a logical, natural and sequential extension to the existing Gawler Township, will maintain and enhance the primacy of the Gawler town centre to fulfil its latent potential as a true regional city and will retain the Barossa's important primary production function and unique landscape character.”

The inclusion of Concordia formally within the Town of Gawler will enable the future Concordia residents to have a strong voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

Cost of living pressures being reduced, by one Council being able to achieve the economies of scale in service delivery, will more than likely materialise by keeping the pressure down on council rates thus benefiting current and future residents, which would otherwise not be realised.

It should be noted that the Concordia development not only presents a challenge for Town of Gawler in managing the desires of a growing community on its boundary prior to population levels triggering specific types of community infrastructure but it actually poses a significant risk to the Gawler Community. Should the development be downgraded (similar to the Roseworthy development) or even stall in its early development phases prior to critical community infrastructure being built the Concordia resident will remain completely reliant on facilities within Gawler LGA. In such a scenario, once again, the ratepayer of the Gawler LGA will be having to significantly support a neighbouring development through the provision of community infrastructure indefinitely, while the Barossa Council will not bear the same risk or impact in the same situation.

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle has been addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale will achieve more efficient and effective service outcomes.

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council investing in significant infrastructure and services which benefit not only its rate paying residents but other non- rate paying members of our greater community, including:

- Public Libraries.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The inclusion of the planned Concordia development within Town of Gawler will enable a truly integrated community and remove any requirement to duplicate services available less than 1km away (should Concordia remain with Barossa Council).

This will result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment, resulting in further improvements (in an integrated manner) to the services and facilities on which the community already rely.

5. 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

As outlined above, a planned, organised way forward is preferred rather than a "tacked on" approach as has been the experience of the past which has occurred on the assumption that the existing township (Gawler) can essentially absorb the new community and service its residents sufficiently.

The Concordia Land Trust controls approximately 612 hectares of land within Concordia, which represents 63% of the Growth Area. Concordia Land Management is pursuing the re-zoning of the Concordia Land and its vision is to:

"Create for Concordia, a master planned, resilient community with an urban form and morphology that captures and preserves the verdant, natural character of the Gawler hills, blended with the unique, historic and community identity of the existing Gawler Township.

Concordia will form a logical, natural and sequential extension to the existing Gawler Township, will maintain and enhance the primacy of the Gawler town centre to fulfill its latent potential as a true regional city and will retain the Barossa's important primary production function and unique landscape character"¹.

Furthermore, Concordia Land Management states that:

"Concordia will strengthen Gawler's future as a leading regional centre, offering residents the very best in contemporary health care, education, government services and shopping choice.

¹ 7 August 2019

Just 730 metres from the retail heart of this historic rural town, Concordia will provide the missing piece of the Gawler town-planning puzzle within the prescribed Urban Growth Boundary for Metropolitan Adelaide.

Overtime, the site will transform into a master planned, resilient community with an urban form and morphology that captures and preserves the verdant natural character of the Gawler Hills, blended with the unique historic and community identity of the existing Gawler Township.”²

It should be noted that Concordia Land Management acknowledges that “the location and positioning of the Concordia Growth Area, being both an extension of Gawler and a gateway to the Barossa, places it in a unique position to potentially address the needs of the local economies in the region, and strengthen both the Gawler and Barossa economies.”³

The inclusion of Concordia within the Town of Gawler will enable a planned approach which will result in greater integration in the areas of hard infrastructure, social infrastructure, open space, connectivity and walking and cycling trails, which will be created and enhanced in line with community needs.

In addition to the above, further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures. Often differences exist between development and council policy and procedures that are applicable to areas which are essentially identical in nature and adjacent to one another, with the Springwood Development a recent example (see Section 3.3 below). A boundary realignment would give the region one council to oversee all administrative functions streamlining processes, making Gawler a “one-stop-shop” for the Gawler growth region for policy and administration issues and support.

Consistent policy and administration through one council will lead to improved overall confidence in the Council and lead to more business investment and improve economic and employment outlook for the area.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate Emergency Action Plan will identify the most strategic opportunities and actions that should be delivered at an appropriate scale within an elevated timeframe, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

² 7 August 2019

³ 7 August 2019

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part of our town's identity and character and is something the local community feels passionately about.

As outlined in Section 2.4 above, Concordia, as a future Community of Interest, is already a consideration within Town of Gawler's planning, however the proposed boundary change will formalise this position and enable truly strategic and holistic way of sustainably planning for the future of our community and the environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;
- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

Due to proximity, Concordia residents will join local churches, community groups and sporting clubs, utilise the retail and service precincts, participate in community events, attend schools and enjoy the many recreation and open space facilities within Gawler, inherently forming part of the Gawler Community of Interest.

It is important that this Community of Interest is formalised within the Town of Gawler LGA so that Council can effectively plan for and represent this community.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services

As outlined above, at its closest point, the planned Concordia development is only 730m from Murray Street, Gawler's Town Centre. Town of Gawler provides quality Customer Service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices, cemeteries administration through to planning and development enquiries. This is also the head office for Council.

The Gawler Civic Centre, located at 89 Murray Street, in the heart of Gawler, provides a customer service transaction point through the Library which allows general enquiries, payment of rates, dog registrations and expiation notices. The Civic Centre also provides Youth Programs in the purposely designed Youth Space, spaces for functions, meetings and events, live performance programs and a local business innovation hub.

Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

In contrast, Concordia is more than 9km from Lyndoch, the closest township within the Barossa Council and 30km from Nuriootpa, the location of the Barossa Council office.

9. 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

This principle is addressed in the response below.

10. 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)

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)⁴, which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
Electors	17,659	17,600	10,316	14,334	15,248	20,350
Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed Areas of Interests, including the future development of Concordia, will not have a material impact on representation requirements in the short-to-mid-term.

Town of Gawler is also of the view that due to proximity (Concordia being less than 1km from Gawler and 30km from Nuriootpa), the inclusion of Concordia within the Town of Gawler will promote greater participation by Concordia residents in local matters including community consultation and decision making, as well as attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will have an impact Council's representation review. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with its regional partners, is already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains.
- Gawler River Flood Plain Management Authority.
- Barossa Regional Procurement Group.
- Barossa Regional Procurement IT Group.
- Northern Adelaide Waste Management Authority.
- Health Services – Country Public Health Network.
- Library Services – with Adelaide Plains Council.

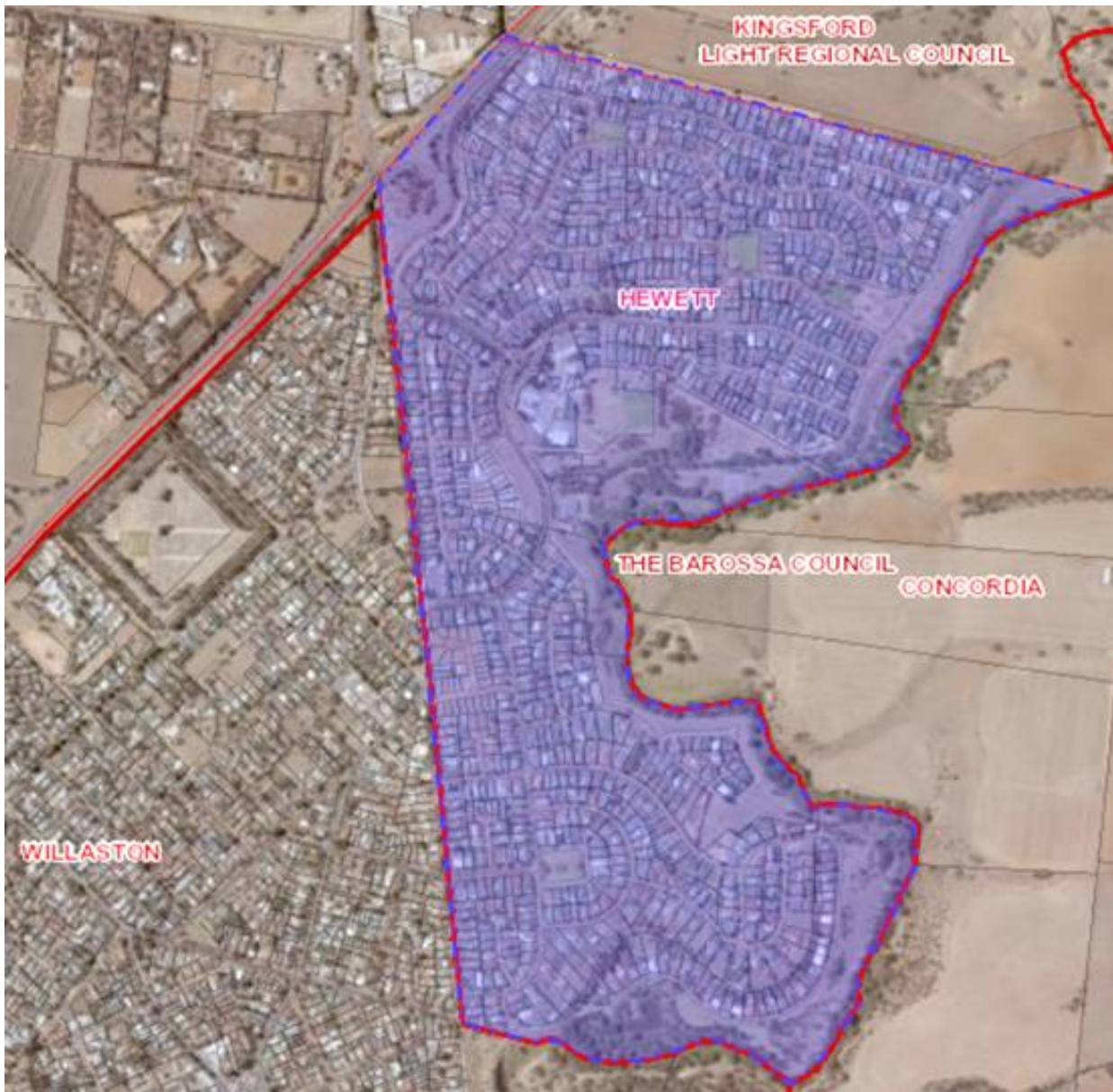
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis).
- Dog Park – Light Regional Council contributing to management/maintenance costs.

The benefits of regional collaboration are acknowledged and opportunities for further collaboration to advance our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the needs and desires of its Community of Interest in the most effective way.

3.2 Hewett (Area 2)

The suburb of Hewett commenced development in the early 2000s and is approximately 144 hectares in size and comprises in the vicinity of 900 homes and 2,500 residents. Although Hewett is now almost entirely urbanized, there remains several pockets of housing allotments yet to be developed.

Situated in Light Regional Council, Hewett is located in excess of 30 kilometres from Light Regional Council's principal service centre of Kapunda and 17km from its nearest satellite office located in Freeling. In comparison, Hewett is located adjacent the Gawler suburb of Willaston and just two kilometres from the Gawler Town Centre.



Include the entire suburb of Hewett (highlighted in purple above) which is currently located within the Light Regional Council.

A larger, more detailed map of Hewett, Area of Interest is available in **Attachment 1**.

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. 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 Light Regional Council suburb of Hewett, due to its close proximity to Gawler, has relied on the large offering of services and infrastructure provided by the Town of Gawler since it was established approximately twenty years ago.

Like Concordia, consolidation of Hewett into the Town of Gawler will enable economic efficiencies to be achieved resulting in improved commercial arrangements and ultimately improving the value for money proposition for Council.

Service delivery efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than two Councils servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

The proposed boundary adjustment will allow the Town of Gawler to enable, amongst other things, greater integration in the areas of hard infrastructure, waste services and maintenance activities, soft infrastructure, social infrastructure, open space, connectivity and walking and cycling trails which the subject communities already rely upon.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils, achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

The Hewett community relies on the services and infrastructure that the Town of Gawler provides and inherently forms part of the Gawler Community of Interest.

The formal inclusion of Hewett within the Town of Gawler will enable Hewett residents to have a strong voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

While current residential rates in the dollar and the impact on residents from the Areas of Interest have been quoted in opposition to Council's proposal, Town of Gawler considers any speculation in this regard to be premature.

It is important to note the limitations in comparing the General Rates applied between one Council and another given the considerable differences that invariably apply between Councils, including, but not limited to, the following factors:

- Different demographics and characteristics.
- Different long term goals and strategies.
- Different Rating methodologies (e.g. % of revenue derived from different land uses (e.g. Residential vs Commercial Rates, etc.), Minimum Rate vs Fixed Charge).
- Different range of services and/or different service levels for a particular service.
- Age/Condition of Fixed Asset stock (e.g. the condition and age profile of a Council's asset portfolio may currently require a higher investment in asset replacement/renewal and/or upgrades, thereby influencing depreciation and investment income / finance charges).

Cost of living pressures being reduced by one Council being able to achieve the economies of scale in service delivery will more than likely materialise by keeping the pressure down of council rates thus benefiting current and future residents, which would otherwise not be realised.

Given the complexities of this matter, Council is of the expectation that a full review of General Rates will be undertaken during the boundary reform process taking into consideration community consultation and to be informed by the outcomes of any investigation.

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle is addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale will deliver more efficient and effective service outcomes.

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council investing in significant infrastructure and services which benefit not only its rate paying residents but other non- rate paying members of our greater community, including:

- Public Libraries.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The above services and infrastructure benefit a community much wider than its existing rate payers, including the Hewett community located just two kilometres from the Gawler Town Centre, as opposed to 30 kilometres from Light Regional Council principal office.

Due to Hewett's proximity to Gawler, Light Regional Council has not needed to heavily invest in services and infrastructure for the Hewett community, nor does it have land available to develop further facilities (e.g. sporting facilities) within Hewett. With the exception of some parks, gardens and playgrounds, the only other community infrastructure constructed by Light Regional Council has been the Hewett Centre - a "*purpose built, not for profit community and function centre providing a central meeting place for those living in the Hewett area, Light District Council and beyond*"⁵. It is noted that Gawler service clubs such as Kiwanis Gawler and Rotary Gawler/Light regularly utilise this function centre for meetings, providing further examples of how Hewett and Gawler are intrinsically linked.

The formal inclusion of Hewett within Town of Gawler will enable a truly integrated community and result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment. This, in turn, delivers further improvements (in an integrated manner) to the services and facilities on which the community already rely.

⁵ <http://hewettcentre.com.au/about-us-2/> 12 November 2019

5. 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

Town of Gawler is seeking to establish a planned, organised way forward in its approach to planning and development for its community. Although Hewett is now almost entirely urbanized, there remains several pockets of residential allotments which are yet to be developed. The inclusion of Hewett within the Town of Gawler will enable greater integration in planning for hard infrastructure, social infrastructure, open space, connectivity and walking and cycling trails.

In addition to the above, further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures. Often differences exist between development and council policy and procedures that are applicable to areas which are essentially identical in nature and adjacent to one another.

Town of Gawler can create efficiencies in this regard, seek greater integration with a town in which this community will consider themselves a part of and, as a result, engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate Emergency Action Plan will identify the most strategic opportunities and actions that should be delivered at an appropriate scale within an elevated timeframe, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part of our town's identity and character and is something the local community feels passionately about.

As outlined in Section 2.4 above, Hewett, as a current Community of Interest, is already a consideration within Town of Gawler's planning. The proposed boundary change will formalise this position and enable a truly strategic and holistic way of sustainably planning for the future of our community and environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;

- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

Residents of Hewett are already considered part of the Gawler community. Many work in Gawler, their children go to school in Gawler, they shop in Gawler precincts and join Gawler sporting teams and competitions.

For example, the North Para River extends through the heart of Gawler and out along the edge of Hewett and hosts a 2.5km linear trail which extends from Clonlea Reserve in Willaston along one side of Hewett. This linear trail is the site used for the weekly 5km Gawler Park Run which both starts and finishes in the Gawler LGA but includes a section of trail within the Light Regional Council LGA.

In recent years, two residents of Hewett have been awarded Australia Day honours by the Town of Gawler due to their contribution to the Gawler community. Hewett and Gawler are intrinsically linked, and it is one community. It is important to formalise this through boundary reform so that Council can effectively plan for and represent the community so Hewett residents can be involved in key decisions that impact the services and infrastructure they enjoy.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services

As outlined above, at its closest point, Hewett is only two kilometres from Murray Street, Gawler's Town Centre which can be easily accessed using public transport. In contrast, Hewett is located in excess of 30km from Light Regional Council's principal service centre of Kapunda and 17kms from its Freeling satellite office.

Town of Gawler provides quality customer service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices, cemeteries administration through to planning and development enquiries. This is also the head office for Council.

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Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

9. 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

This principle is addressed in the response below.

10. 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)

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)⁶, which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
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Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed Areas of Interests, including Hewett, will not have a material impact on representation requirements in the short-mid-term.

Town of Gawler is also of the view that due to proximity (Hewett being two kilometres from Gawler and 30km from Kapunda), the inclusion of Hewett within the Town of Gawler will promote greater participation by Hewett residents in local matters such as community consultation and decision making, as well as attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will have an impact Council's representation review. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with its regional partners, is already collaborating in a number of areas including:

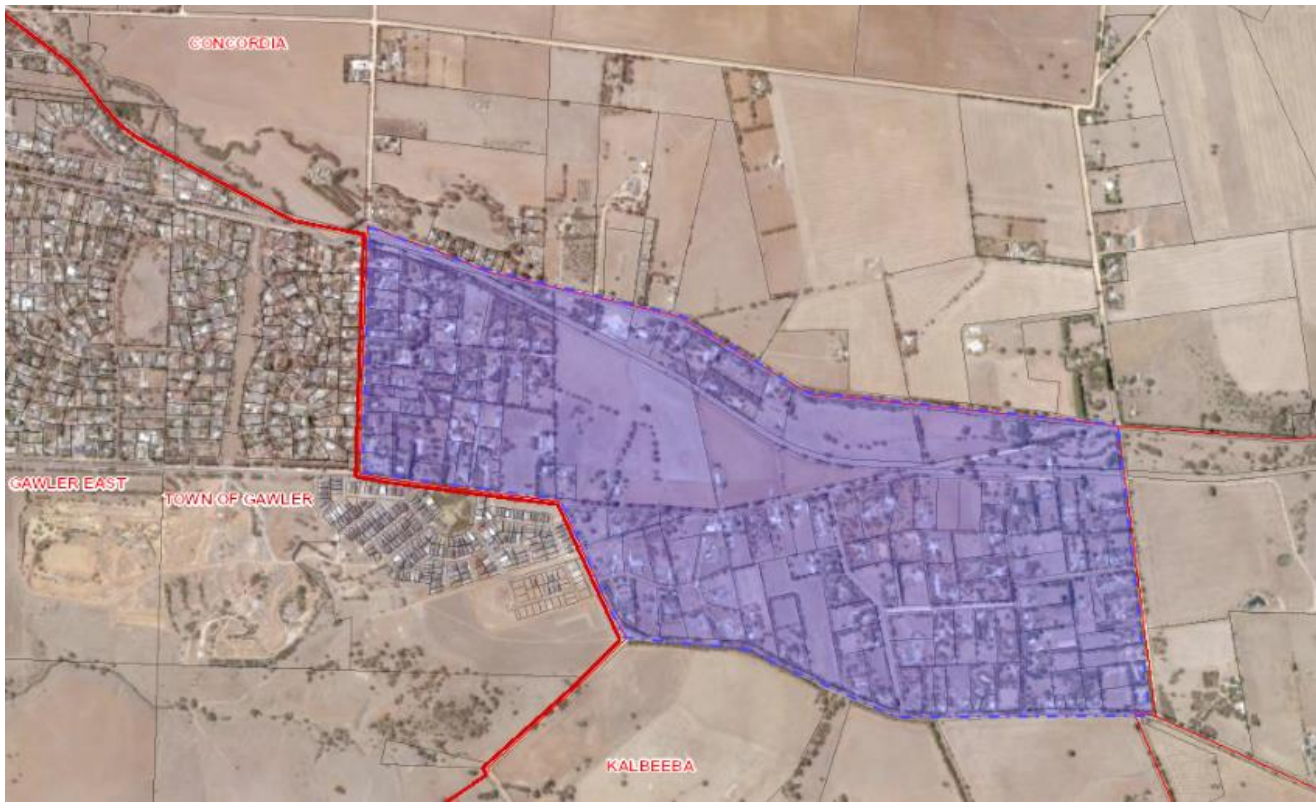
- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains.
- Gawler River Flood Plain Management Authority.
- Barossa Regional Procurement Group.
- Barossa Regional Procurement IT Group.
- Northern Adelaide Waste Management Authority.
- Health Services – Country Public Health Network.
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis).
- Dog Park – Light Regional Council contributing to management/maintenance costs.

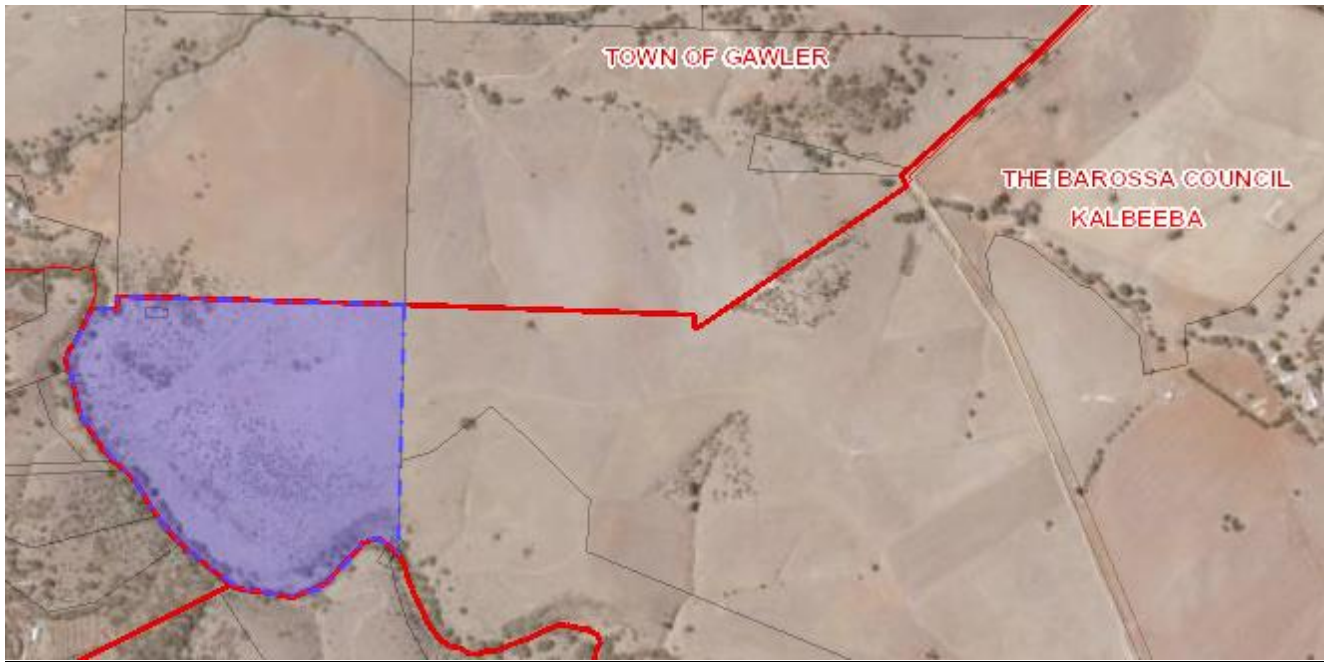
The benefits of regional collaboration are acknowledged and opportunities for further collaboration to advance our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the needs and desires of its community of interest in the most effective way.

3.3 Kalbeeba (including Springwood) (Area 3)

The suburb of Kalbeeba is largely zoned to accommodate primary production activities. However, there are two sections of the suburb which are zoned otherwise (Rural Living and Residential) and directly abut the Town of Gawler. The pockets accommodating Rural Living comprise 147 properties situated in the Barossa Council, with a section of this land falling within the urban growth boundary.

The other section of Kalbeeba, which is zoned residential, is part of the Springwood Development, Gawler East. Due to its terrain and accessibility, it is anticipated that the land situated within the Barossa Council will accommodate approximately 130 allotments. It is noted that the Barossa Council has written to Town of Gawler regarding this Springwood part of Kalbeeba seeking that the Town of Gawler consider taking this area on given its location and integrated nature with the Springwood community. Town of Gawler is happy to consider this area's incorporation into its community. The reasons for this, as detailed below, form effectively the same basis for which Concordia and Hewett suburbs should also form part of Gawler.





Includes two areas from within the suburb of Kalbeeba (highlighted in purple above). These areas include the northern sections which are currently zoned for Rural Living as well as a portion of land which is in fact a part of the Springwood Development in Gawler East.

A larger, more detailed map of the Kalbeeba Areas of Interest, are available in **Attachment 1** as Areas 3A (larger section of Kalbeeba) and 3B (included in Springwood).

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. 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 land within the Barossa Council suburb of Kalbeeba which is zoned as Rural Living and Residential directly abuts the Town of Gawler and forms a natural extension to Gawler East. Due to proximity, residents of the Kalbeeba Area of Interest rely on the large offering of services and infrastructure provided by the Town of Gawler.

This will also be the case for the future residents of the Springwood development which is currently situated within the Barossa Council.

The consolidation of the Kalbeeba Area of Interest into the Town of Gawler will enable economic efficiencies to be achieved resulting in improved commercial arrangements and ultimately improving the value for money proposition for Council.

Service delivery efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than two Council's servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

The proposed boundary adjustment will allow the Town of Gawler to enable, amongst other things, greater integration in the areas of hard infrastructure, waste services and maintenance activities, soft infrastructure, social infrastructure, open space, connectivity and walking and cycling trails which the subject communities already rely upon.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils, achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

The inclusion of the Kalbeeba Area of Interest formally within the Town of Gawler will enable current and future residents to have a strong voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

In addition, the proposed inclusion of the Barossa Council's component of Springwood within the Town of Gawler will be beneficial from an overall governance perspective. This will benefit all parties, resulting in better utilisation of resources, efficient development management and a single point of service for residents and commercial operators.

While current residential rates in the dollar and the impact on residents from the Areas of Interest have been quoted in opposition to Council's proposal, Town of Gawler considers any speculation in this regard to be premature. It is important to note the limitations in comparing the General Rates applied between one Council and another, given the considerable differences that invariably apply between Councils, including, but not limited to, the following factors:

- Different demographics and characteristics.
- Different long term goals and strategies.
- Different Rating methodologies (e.g. % of revenue derived from different land uses (e.g. Residential vs Commercial Rates, etc.), Minimum Rate vs Fixed Charge).
- Different range of services and/or different service levels for a particular service.
- Age/Condition of Fixed Asset stock (e.g. the condition and age profile of a Council's asset portfolio may currently require a higher investment in asset replacement/renewal and/or upgrades, thereby influencing depreciation and investment income / finance charges).

Cost of living pressures being reduced by one Council being able to achieve the economies of scale in service delivery will more than likely materialise by keeping the pressure down of council rates thus benefiting current and future residents, which would otherwise not be realised.

Given the complexities of this matter, Council is of the expectation that a full review of General Rates will be undertaken during the boundary reform process taking into consideration community consultation and to be informed by the outcomes of any investigation.

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle is addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale delivers more efficient and effective service outcomes.

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council investing in significant infrastructure and services which benefit not only its rate paying residents but

other non- rate paying members of our greater community, including:

- Public Libraries.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The above services and infrastructure benefit a community much wider than its rate payers, including the Kalbeeba Area of Interest. Due to Kalbeeba's proximity to Gawler, The Barossa Council has not needed to heavily invest in services and infrastructure for this community. Rather it has been Town of Gawler and its community who have delivered the array of services to which the Kalbeeba community has benefitted from relative to being part of the Gawler community.

The formal inclusion of the Kalbeeba Area of Interest within the Town of Gawler will enable a truly integrated community and result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment. This, in turn, will deliver further improvements (in an integrated manner) to the services and facilities on which the community already rely.

5. 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

Town of Gawler is seeking to establish a planned, organised way forward in its approach to planning and development for its community.

This is particularly important for the Springwood Development. The vast majority of the Springwood Development resides within the Town of Gawler's local government boundary, with the exception of approximately 20% of the land area, which resides within the Barossa Council LGA. It would be beneficial from an overall governance perspective if this development resided in one LGA and Town of Gawler is best positioned in this regard.

It is important to note that Town of Gawler and The Barossa Council have over the past number of years worked collaboratively in the planning for this and other parts of the Springwood Estate relative to the form and function of the estate that forms part of the greater Springwood development. However, there have been differences in policy and direction relative to infrastructure (particularly hard infrastructure) provision which has been frustrating, time consuming and costly for the parties involved. In particular the drafting and processing of infrastructure agreements between the parties.

Compromises have been reached allowing progress to be more recently achieved however, this particular example demonstrates the difficulties where new developments occur in areas covered by more than one Council jurisdiction. It is further noted that The Barossa Council had resolved that it would initially not participate in the execution of the related development deeds but preferred that this area of their Council area be the subject of a boundary reform with the Town of Gawler, to which the administration is now recommending that it proceed with, as outlined in the following resolution from the 16 April 2019 Barossa Council meeting:

GAWLER EAST - TRAFFIC INTERVENTIONS AND COMMUNITY INFRASTRUCTURE DEED AND LAND MANAGEMENT AGREEMENT

B1723

Author: Director Development and Environmental Services

MOVED Cr de Vries that Council;

- (1) Advise the Town of Gawler that Council does not support signing the Traffic Interventions and Community Infrastructure Deed as drafted.
- (2) Advise the Town of Gawler that it will consider a Community Infrastructure Deed for the collection of developer contributions to support social and community infrastructure and transfer to the Town of Gawler funds collected through an appropriate Land Management Agreement or other legal mechanism, where part 3 of this resolution has not been achieved.
- (3) Authorise the CEO to formally commence negotiations with Town of Gawler to investigate and implement the option to have the land contained within the Springwood development which is in The Barossa Council transferred to the Town of Gawler via a boundary adjustment.
- (4) Advise the Town of Gawler that the identified traffic interventions for Kalbeeba Road and the intersection of Kalbeeba Road/Barossa Valley Way will be monitored over the life of the development and considered for future intervention as deemed necessary by Council and that Council will not contribute funding for any State roads, or costs associated with growth directly attributable to the development.

Seconded Cr Wiese-Smith

CARRIED 2018-22/166

The fact that that The Barossa Council resolved not to sign an infrastructure deed for what Town of Gawler considered as necessary for the purposes of facilitating orderly and economic development is a case in point as to the preferred model of having one Council responsible for the oversight of any one development precinct.

Since the above resolution it is noted that progress has been achieved with The Barossa Council agreeing to sign an infrastructure deed but limiting the parameters of the deed to the provision of social infrastructure not hard (road) infrastructure. Conversely, Town of Gawler has invested \$2.4M and the State Government has invested \$68M in the provision of the Gawler East Link Road to support the residential development on the Eastern side of Gawler being the Springwood development (Gawler and Barossa LGA) and the future Concordia development (Barossa LGA).

From an overall governance perspective, the inclusion of the Kalbeeba Area of Interest within the Town of Gawler will result in the better utilisation of resources, efficient development management for Council and further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures applicable to areas which are essentially identical in nature.

The inclusion of the Kalbeeba Area of Interest formally within the Town of Gawler will enable greater integration in planning for hard infrastructure, social infrastructure, open space, connectivity and walking and cycling trails. This will engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate Emergency Action Plan will identify the most strategic opportunities and actions which should be

delivered at an appropriate scale within a timeframe that is elevated, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part to our town's identity and character and is something the local community feels passionately about.

As outlined in Section 2.4 above, as a future Community of Interest, the Kalbeeba Area of Interest is already a consideration within Town of Gawler's planning, however the proposed boundary change will formalise this position and enable truly strategic and holistic way of sustainably planning for the future of our community and the environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;
- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

The Kalbeeba Area of Interest has been identified for inclusion within the Town of Gawler primarily from a Community of Interest perspective, as it forms an extension to Gawler East. Residents of Kalbeeba are already considered part of the Gawler community. Many residents work in Gawler, their children go to school in Gawler, they shop in Gawler precincts and join Gawler sporting teams and competitions. Kalbeeba and Gawler are intrinsically linked, and we are one community. It is important that this is formalised through boundary reform so that Council can effectively plan for and represent this community and Kalbeeba residents can be involved in key decisions that impact the services and infrastructure that they enjoy.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services

At its closest point, Kalbeeba is less than three kilometres from Murray Street, Gawler's Town Centre. In contrast, Kalbeeba is more than 25km from Nuriootpa, the location of the Barossa Council office.

Town of Gawler provides quality Customer Service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices, cemeteries administration through to planning and development enquiries. This is also the head office for Council.

The Gawler Civic Centre, located at 89 Murray Street, in the heart of Gawler, provides a customer service transaction point through the Library which allows general enquiries, payment of rates, dog registrations and expiation notices. The Civic Centre also provides Youth Programs in the purposely designed Youth Space, spaces for functions, meetings and events, live performance programs and a local business innovation hub.

Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

9. 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

This principle is addressed in the response below.

10. 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)

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)⁷, which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
Electors	17,659	17,600	10,316	14,334	15,248	20,350
Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed Areas of Interests, including the Kalbeeba Area of Interest will not have a material impact on representation requirements in the short-mid-term.

Town of Gawler is also of the view that due to proximity (Kalbeeba being less than three kilometres from Gawler and more than 25km from Nuriootpa), the inclusion of Kalbeeba within the Town of Gawler will promote greater participation by Kalbeeba residents in local matters such as community consultation and decision making, as well as attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will have an impact Council's representation review. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains;
- Gawler River Flood Plain Management Authority
- Barossa Regional Procurement Group
- Barossa Regional Procurement IT Group
- Northern Adelaide Waste Management Authority
- Health Services – Country Public Health Network
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020)
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis)
- Dog Park – Light Regional Council contributing to management/maintenance costs

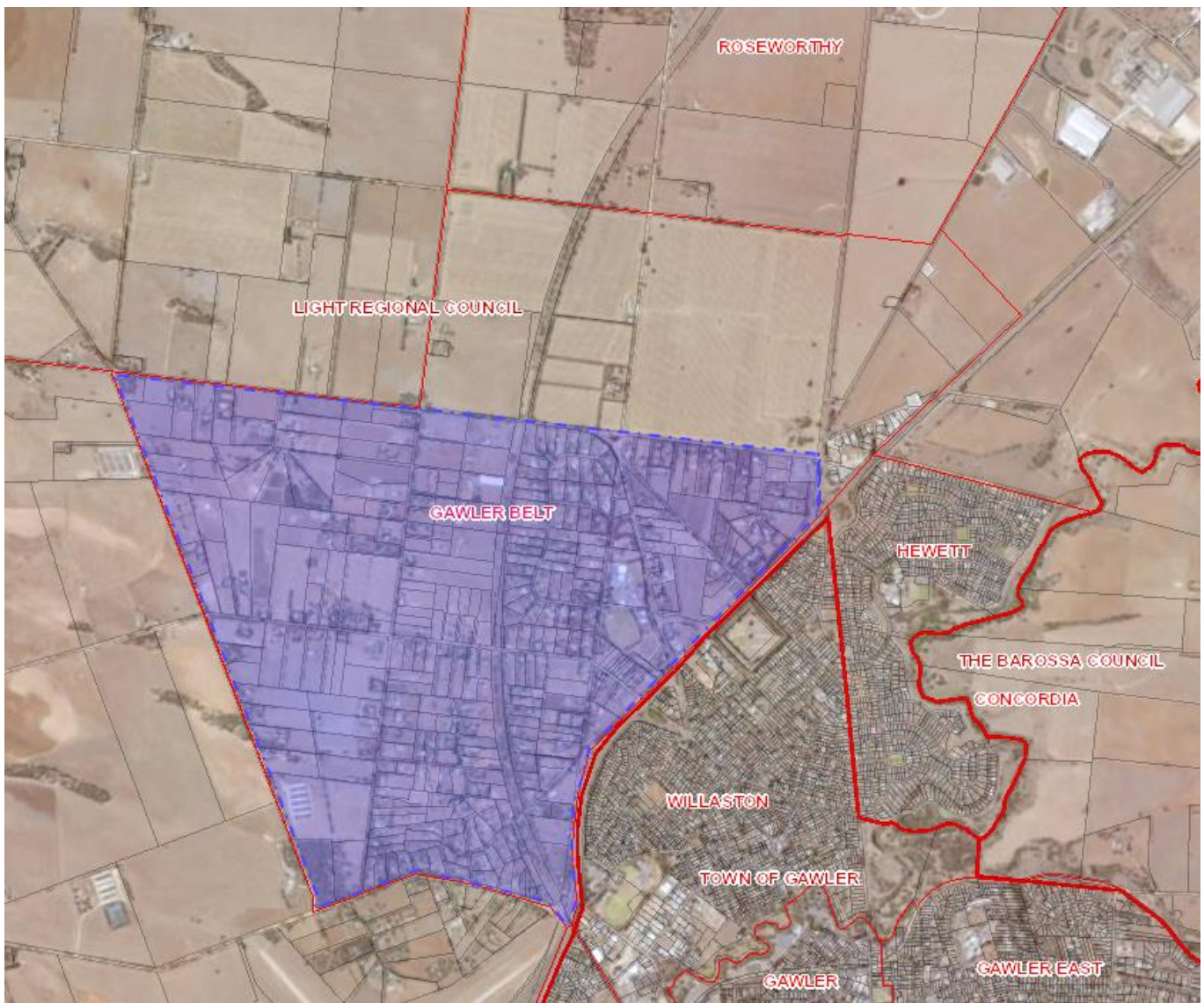
The benefits of regional collaboration are acknowledged and opportunities for further collaboration to advance our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the needs and desires of its community of interest in the most effective way.

3.4 Gawler Belt (Area 4)

The suburb of Gawler Belt is approximately 1,000 hectares in size and as of the 2016 census contains a population of 942 people. The township is located adjacent to the suburb of Willaston (Town of Gawler).

The suburb is zoned largely for Rural Living, however the northern section of the suburb also contains land within primary production and industry zones. In addition, a section of Gawler Belt has been rezoned to residential as part of the Roseworthy Development Plan Amendment (DPA) and lies within Gawler Belt and is in the urban growth boundary.

It is proposed that the Rural Living section of Gawler Belt be included within the Town of Gawler and that the area that has been rezoned as residential as part of the Roseworthy DPA should remain aligned with Roseworthy which is within the Light Regional Council.



Include the section of Gawler Belt which encompasses the existing rural living community (highlighted in purple above). This land is currently located within the Light Regional Council.

A larger, more detailed map of the Gawler Belt Area of Interest is available in **Attachment 1**.

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. 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 Light Regional Council suburb of Gawler Belt, due to its close proximity to Gawler, relies on the large offering of services and infrastructure provided by the Town of Gawler.

Consolidation of Gawler Belt into the Town of Gawler will enable economic efficiencies to be achieved resulting in improved commercial arrangements and ultimately improving the value for money proposition for Council.

Service delivery efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than two Council's servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

The proposed boundary adjustment will allow the Town of Gawler to enable, amongst other things, greater integration in the areas of hard infrastructure, waste services and maintenance activities, soft infrastructure, social infrastructure, open space, connectivity and walking and cycling trails which the subject communities already rely upon.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

The Gawler Belt community relies on the services and infrastructure provided by the Town of Gawler and inherently forms part of the Gawler Community of Interest.

The formal inclusion of Gawler Belt within the Town of Gawler will enable Gawler Belt residents to have a strong voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

While current residential rates in the dollar and the impact on residents from the Areas of Interest have been quoted in opposition to Council's proposal, Town of Gawler considers any speculation in this regard to be premature. It is important to note the limitations in comparing the General Rates applied between one Council and another, given the considerable differences that invariably apply between Councils, including, but not limited to, the following factors:

- Different demographics and characteristics.
- Different long term goals and strategies.
- Different Rating methodologies (e.g. % of revenue derived from different land uses (e.g. Residential vs Commercial Rates, etc.), Minimum Rate vs Fixed Charge).
- Different range of services and/or different service levels for a particular service.
- Age/Condition of Fixed Asset stock (e.g. the condition and age profile of a Council's asset portfolio may currently require a higher investment in asset replacement/renewal and/or upgrades, thereby influencing depreciation and investment income / finance charges).

Cost of living pressures being reduced by one Council being able to achieve the economies of scale in service deliver, will more than likely materialise by keeping the pressure down of council rates thus benefiting current and future residents, which would otherwise not be realised.

Given the complexities of this matter, Council is of the expectation that a full review of General Rates will be undertaken during the boundary reform process taking into consideration community consultation and to be informed by the outcomes of any investigation.

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle is addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale delivers more efficient and effective service outcomes.

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council investing in significant infrastructure and services which benefit not only its rate paying residents but other non- rate paying members of our greater community, including:

- Public Libraries.
- Aquatic Centre.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The above services and infrastructure benefit a community much wider than its rate payers, including the Gawler Belt community, at its closest point is located less than two kilometres from the Gawler Town Centre, as opposed to over 30km from Light Regional Council's principal office.

Due to Gawler Belt's proximity to Gawler, Light Regional Council has not needed to heavily invest in services and infrastructure for the Gawler Belt community.

The formal inclusion of Gawler Belt within the Town of Gawler will enable a truly integrated community and result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment, resulting in further improvements (in an integrated manner) to the services and facilities on which the community already rely.

5. 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

Town of Gawler is seeking to establish a planned, organised way forward in its approach to planning and development for its community. The inclusion of a portion of Gawler Belt within the Town of Gawler will enable greater integration in planning for hard infrastructure, social infrastructure, open space, connectivity and walking and cycling trails.

Due to proximity, Gawler Belt has been included within Council's considerations relating to stormwater management and has been incorporated into the Draft Gawler and Surrounds Stormwater Management Plan, further demonstrating Gawler Belt's link to the Town of Gawler.

In addition to the above, further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures. Often differences exist between development and council policy and procedures that are applicable to areas which are essentially identical in nature and adjacent to one another.

Town of Gawler in this regard can create efficiencies, seek greater integration with a town in which this community will consider themselves apart of and as a result engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes.

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate Emergency Action Plan will identify the most strategic opportunities and actions that should be delivered at an appropriate scale within an elevated timeframe, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents the Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part of our town's identity and character and is something the local community feels passionately about.

As outlined in Section 2.4 above, as a future Community of Interest, Gawler Belt is already a consideration within Town of Gawler's planning, however the proposed boundary change will formalise this position and enable truly strategic and holistic way of sustainably planning for the future of our community and the environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;
- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

Gawler Belt forms a natural extension to Gawler and has inherently become part of the township. There are no public facilities or services located in this area and the community rely heavily upon the Town of Gawler in this regard.

Residents of Gawler Belt are already considered part of the Gawler community. Many work in Gawler, their children go to school in Gawler, they shop in Gawler precincts and join Gawler sporting teams and competitions.

Furthermore, Xavier College is located in Gawler Belt and with over 800 enrolments in 2018⁸, and provides education to many of Gawler's young people, reflected in the following statement *"We are in partnership with the families in the Gawler and surrounding region, developing and nurturing our young people in a safe, welcoming environment."*⁹

Consistent with the rationale provided for Hewett, this proposed boundary adjustment will formalise the already existing Community of Interest and provide the residents of Gawler Belt with a stronger voice in the community regarding the delivery of services and infrastructure. It will also greater economies of scale and service delivery efficiencies.

Due to proximity, Gawler Belt has been included within Council's considerations relating to stormwater management and has been incorporated into the Draft Gawler and Surrounds Stormwater Management Plan, further demonstrating Gawler Belt's link to the Town of Gawler.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services;

As outlined above, at its closest point, Gawler Belt is located less than two kilometres from Murray Street, Gawler's Town Centre. In contrast, Gawler Belt is located in excess of 30km from Light Regional Council's principal service centre of Kapunda.

Town of Gawler provides quality Customer Service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices, cemeteries administration through to planning and development enquiries. This is also the head office for Council.

The Gawler Civic Centre, located at 89 Murray Street, in the heart of Gawler, provides a customer service transaction point through the Library which allows general enquiries, payment of rates, dog registrations and expiation notices. The Civic Centre also provides Youth Programs in the purposely designed Youth Space, spaces for functions, meetings and events, live performance programs and a local business innovation hub.

Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

9. 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

This principle is addressed in the response below.

10. 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)

⁸ Xavier College, 2018 Annual Report to Community via <http://www.xavier.catholic.edu.au/>

⁹ <http://www.xavier.catholic.edu.au/who-we-are>, 20 August 2019

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)¹⁰, which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
Electors	17,659	17,600	10,316	14,334	15,248	20,350
Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed areas of interests, including a portion of Gawler Belt will not have a material impact on representation requirements in the short-mid-term.

Town of Gawler is also of the view that due to proximity (Gawler Belt being less than 2km from Gawler and 30km from Kapunda), the inclusion of Gawler Belt within the Town of Gawler will promote greater participation by Gawler Belt residents in local matters such as community consultation and decision making, as well as attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will Council's representation review as this would be dependent on the timing of the proposal and the nature of any recommendations. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains.
- Gawler River Flood Plain Management Authority.
- Barossa Regional Procurement Group.
- Barossa Regional Procurement IT Group.
- Northern Adelaide Waste Management Authority.
- Health Services – Country Public Health Network.
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis).

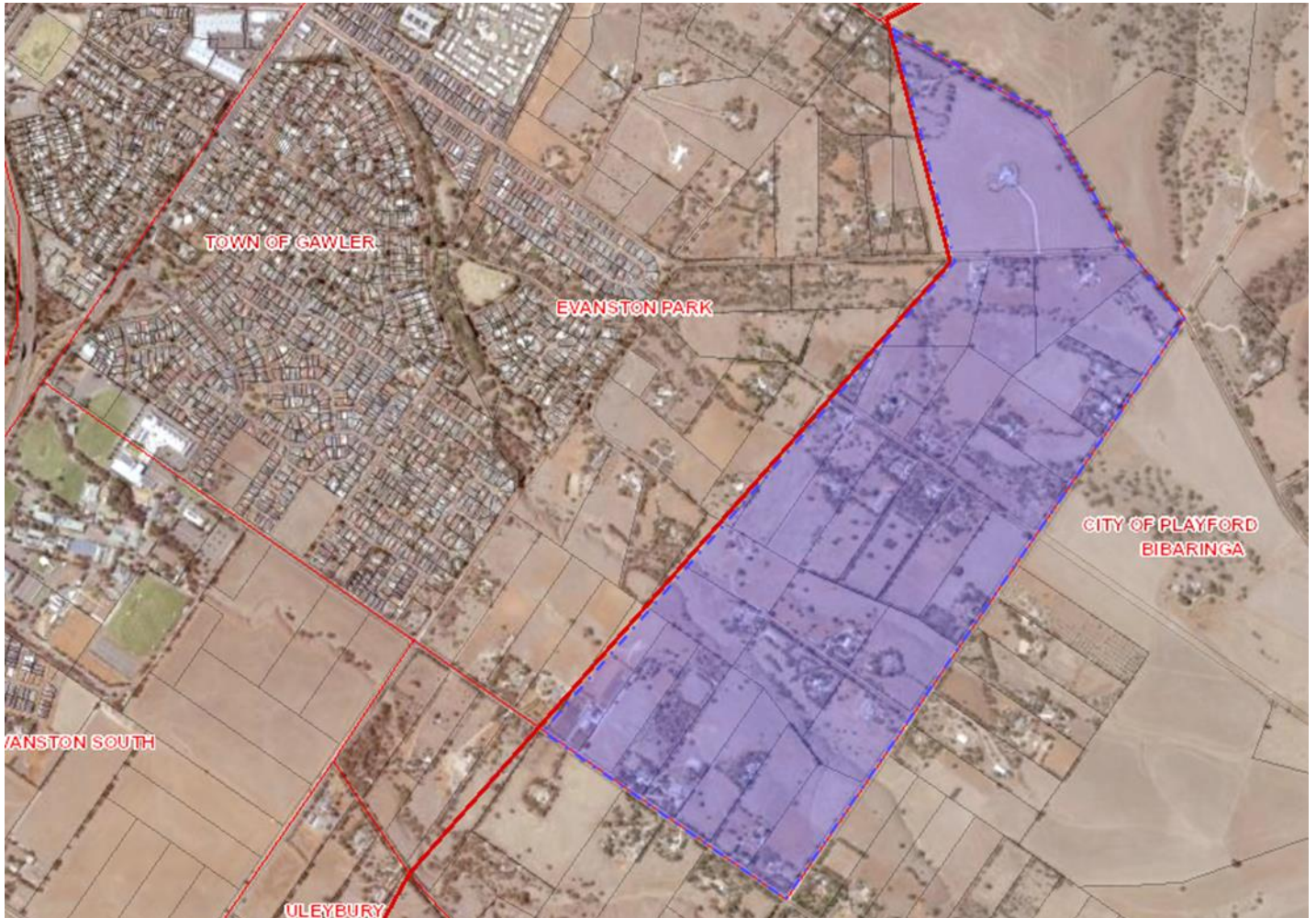
- Dog Park – Light Regional Council contributing to management/maintenance costs.

The benefits of regional collaboration are acknowledged and opportunities for further collaboration for the benefit of our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the wants and needs of its Community of Interest in the most effective way.

3.5 Evanston Park (Area 5)

Evanston Park is primarily situated within the Town of Gawler, with the remainder of the suburb situated within the City of Playford. The current boundary is an arbitrary line that has been drawn from Alexander Avenue to Potts Road and onto Eckerman Avenue and intercepts nine properties.

Town of Gawler proposes that the boundary should be adjusted to include all of the land situated in Evanston Park. This potential boundary change will impact 24 properties currently situated within the City of Playford.



Include the remaining area of the Evanston Park suburb which is located in the City of Playford (highlighted in purple above).

A larger, more detailed map of the Evanston Park Area of Interest is available in **Attachment 1**.

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. The resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community

As outlined above, there are nine properties within Evanston Park situated both in the Town of Gawler and City of Playford. Properties which intercept multiple council boundaries can create inefficiencies as well as frustration for residents who are paying Council rates in two Council areas. In addition, instances where these landowners are seeking to undertake development, they require permission from both Councils and in some instances this is elevated to the State Government for assessment.

Town of Gawler considered the merits of an Administrative Proposal e.g. *“to correct an anomaly that is, in the opinion of the Commission, generally recognised e.g. where the boundary intercepts one or more privately owned properties”*, to rectify this issue.

However, ultimately Town of Gawler is of the view that the inclusion of the land situated in Evanston Park as the most appropriate option.

Service delivery efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than two Council's servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

The proposed boundary adjustment will allow the Town of Gawler to enable, amongst other things, greater integration in the areas of hard infrastructure, waste services and maintenance activities, soft infrastructure, social infrastructure, open space, connectivity and walking and cycling trails which the subject communities already rely upon.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils, achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

For the nine properties that intercept two council boundaries, the proposed change will remove frustrations associated with interacting with two LGAs and streamline development processes.

The formal inclusion of all land situated within Evanston Park within the Town of Gawler will enable those impacted residents to have a stronger voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

While current residential rates in the dollar and the impact on residents from the Areas of Interest have been quoted in opposition to Council's proposal, the Town of Gawler considers any speculation in this regard to be premature. It is important to note the limitations in comparing the General Rates applied between one Council and another, given the considerable differences that invariably apply between Councils, including, but not limited to, the following factors:

- Different demographics and characteristics.
- Different long term goals and strategies.
- Different Rating methodologies (e.g. % of revenue derived from different land uses (e.g. Residential vs Commercial Rates, etc.), Minimum Rate vs Fixed Charge).
- Different range of services and/or different service levels for a particular service.
- Age/Condition of Fixed Asset stock (e.g. the condition and age profile of a Council's asset portfolio may currently require a higher investment in asset replacement/renewal and/or upgrades, thereby influencing depreciation and investment income / finance charges).

Cost of living pressures being reduced, by one Council being able to achieve the economies of scale in service delivery, will more than likely materialise by keeping the pressure down of council rates thus benefiting current and future residents, which would otherwise not be realised.

Given the complexities of this matter, Council is of the expectation that a full review of General Rates will be undertaken during the boundary reform process taking into consideration community consultation and to be informed by the outcomes of any investigation.

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle is addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale delivers more efficient and effective service outcomes.

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council investing in significant infrastructure and services which benefit not only its rating paying residents but other non- rate paying members of our greater community, including:

- Public Libraries.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The above services and infrastructure benefit a community much wider than its rate payers, including the entire Evanston Park community.

The formal inclusion of all land situated within Evanston Park within the Town of Gawler will enable a truly integrated community and result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment, resulting in further improvements (in an integrated manner) to the services and facilities on which the community already rely.

5. 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

Town of Gawler is seeking to establish a planned, organised way forward in its approach to planning and development for its community.

From an overall governance perspective, the inclusion of all land situated within Evanston Park, within the Town of Gawler will result in the better utilisation of resources, efficient development management for Council and further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures applicable to areas which are essentially identical in nature.

Town of Gawler in this regard can create efficiencies, seek greater integration with a town in which this community will consider themselves apart of and as a result engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate

Emergency Action Plan will identify the most strategic opportunities and actions that should be delivered at an appropriate scale within an elevated timeframe, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part of our town's identity and character and is something the local community feels passionately about.

As outlined in Section 2.4 above, as a future Community of Interest, Evanston Park is already a consideration within Town of Gawler's planning, however the proposed boundary change will formalise this position and enable truly strategic and holistic way of sustainably planning for the future of our community and the environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;
- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

Residents of Evanston Park are already considered part of the Gawler community. Many work in Gawler, their children go to school in Gawler, they shop in Gawler precincts and join Gawler sporting teams and competitions. It is important to formalise this through boundary reform so that Council can effectively plan for and represent this community and all Evanston Park residents can be involved in key decisions that impact the services and infrastructure they enjoy.

Consistent with the rationale provided for Hewett and Gawler Belt, this proposed boundary adjustment will formalise the already existing Community of Interest and provide the impacted residents with a stronger voice in the community regarding the delivery of services and infrastructure. It will also greater economies of scale and service delivery efficiencies.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services.

At its closest point, the Evanston Park Area of Interest is approximately 10km from Murray Street within Town of Gawler. In contrast, Evanston Park is approximately 17km from the City of Playford.

Town of Gawler provides quality Customer Service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices,

cemeteries administration through to planning and development enquiries. This is also the head office for Council.

The Gawler Civic Centre, located at 89 Murray Street, in the heart of Gawler, provides a customer service transaction point through the Library which allows general enquiries, payment of rates, dog registrations and expiation notices. The Civic Centre also provides Youth Programs in the purposely designed Youth Space, spaces for functions, meetings and events, live performance programs and a local business innovation hub.

Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

9. 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

This principle is addressed in the response below.

10. 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)

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)¹¹, which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
Electors	17,659	17,600	10,316	14,334	15,248	20,350
Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed areas of interests, will not have a material impact on representation requirements in the short-mid-term.

Town of Gawler is also of the view that the inclusion of the Evanston Park Area of Interest within the Town of Gawler will promote greater participation by all Evanston Park residents in local matters such as community consultation and decision making, as well as attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will Council's representation review as this would be dependent on the timing of the proposal

and the nature of any recommendations. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

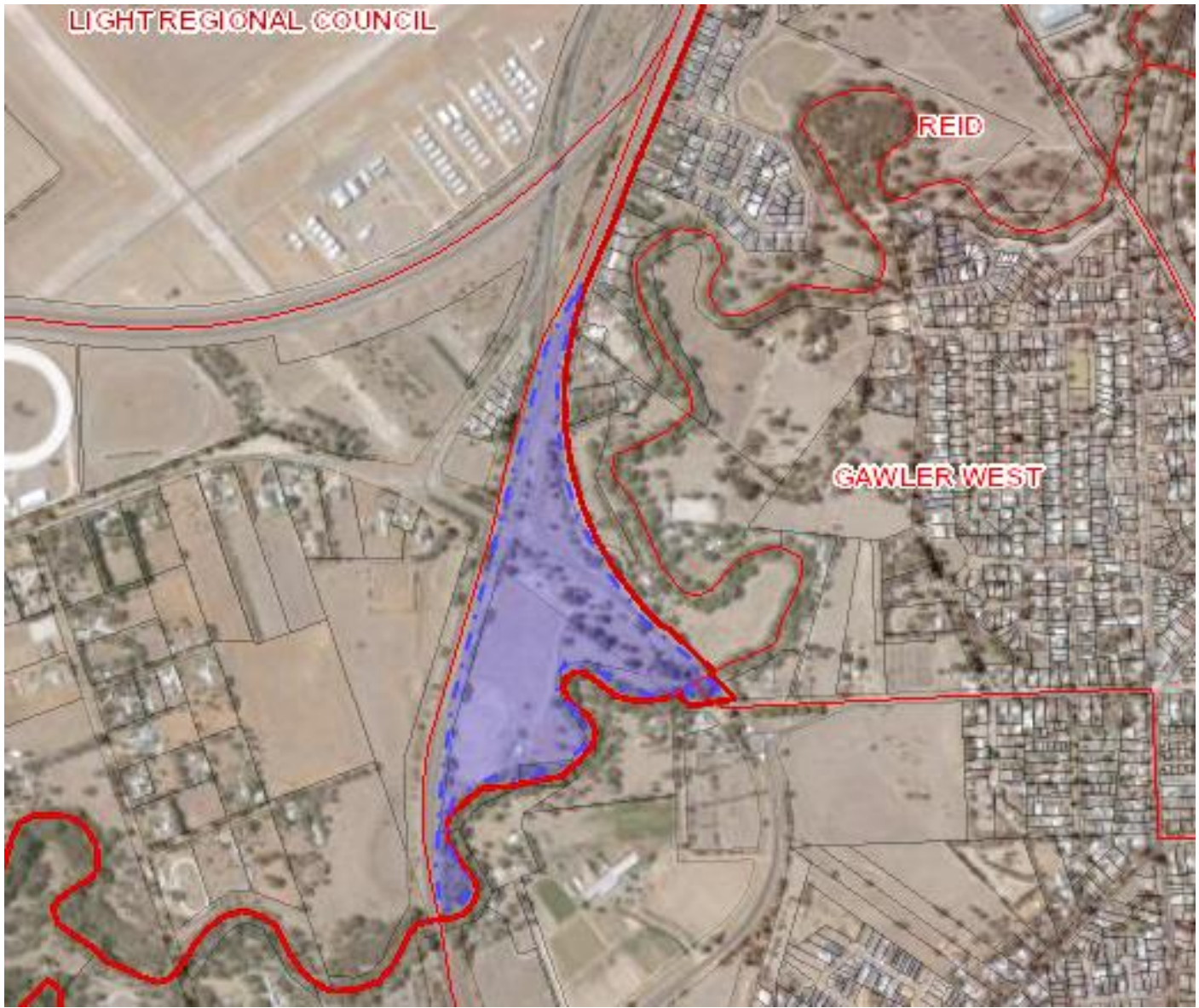
Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains.
- Gawler River Flood Plain Management Authority.
- Barossa Regional Procurement Group.
- Barossa Regional Procurement IT Group.
- Northern Adelaide Waste Management Authority.
- Health Services – Country Public Health Network.
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis).
- Dog Park – Light Regional Council contributing to management/maintenance costs.

The benefits of regional collaboration are acknowledged and opportunities for further collaboration to advance our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the needs and desires of its community of interest in the most effective way.

3.6 Reid (Area 6)

A section of the suburb of Reid falls into Light Regional Council. The area is bounded by the Gawler Bypass to the west and the Gawler River to the south and east as can be seen from the map below. The defined boundary traverses Paternoster Road multiple times placing sections within the ownership of Town of Gawler and Light Regional Council. Town of Gawler is seeking to realign the boundary to the Gawler Bypass. This proposed change will impact one property, currently situated within Light Regional Council.



Include the remaining area of the Reid suburb which is located in the Light Regional Council (highlighted in purple above).

A larger, more detailed map of the Reid Area of Interest is available in **Attachment 1**.

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. The resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community

Town of Gawler, from an efficiency perspective is already in effect undertaking minor operational works in parts of this area that fall within Light Regional Council and is seeking to formalise existing arrangements. The defined boundary traverses Paternoster Road multiple times placing sections within the ownership of Town of Gawler and Light Regional Council. Historically Town of Gawler has

maintained the roadway in both LGAs, albeit the most recent roadway upgrades have been funded by adjoining land developers in Reid as part of external infrastructure provision negotiations, Town of Gawler delivered these works.

2. Proposed changes should, wherever practicable, benefit ratepayers

As outlined above, the proposed boundary change will impact one property situated within Light Regional Council, with the remaining land under the control of Light Regional Council.

The formal inclusion of all land situated within Reid within Town of Gawler will enable those impacted residents to have a stronger voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

While current residential rates in the dollar and the impact on residents from the Areas of Interest have been quoted in opposition to Council's proposal, Town of Gawler considers any speculation in this regard to be premature. It is important to note the limitations in comparing the General Rates applied between one Council and another, given the considerable differences that invariably apply between Councils, including, but not limited to, the following factors:

- Different demographics and characteristics.
- Different long term goals and strategies.
- Different Rating methodologies (e.g. % of revenue derived from different land uses (e.g. Residential vs Commercial Rates, etc.), Minimum Rate vs Fixed Charge).
- Different range of services and/or different service levels for a particular service.
- Age/Condition of Fixed Asset stock (e.g. the condition and age profile of a Council's asset portfolio may currently require a higher investment in asset replacement/renewal and/or upgrades, thereby influencing depreciation and investment income / finance charges).

Cost of living pressures being reduced, by one Council being able to achieve the economies of scale in service delivery, will more than likely materialise by keeping the pressure down of council rates thus benefiting current and future residents, which would otherwise not be realised.

Given the complexities of this matter, Council is of the expectation that a full review of General Rates will be undertaken during the boundary reform process taking into consideration community consultation and to be informed by the outcomes of any investigation

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle is addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis.

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale delivers more efficient and effective service outcomes .

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council

investing in significant infrastructure and services which benefit not only its rate paying residents but other non- rate paying members of our greater community, including:

- Public Libraries.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The above services and infrastructure benefit a community much wider than its rate payers, including the entire Reid community.

The formal inclusion of all land situated within Reid within Town of Gawler will enable a truly integrated community and result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment, resulting in further improvements (in an integrated manner) to the services and facilities on which the community already rely.

5. 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

Town of Gawler is seeking to establish a planned, organised way forward in its approach to planning and development for its community.

From an overall governance perspective, the inclusion of all land situated within Reid, within Town of Gawler will result in the better utilisation of resources, efficient development management for Council and further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures applicable to areas which are essentially identical in nature.

Town of Gawler in this regard can create efficiencies, seek greater integration with a town in which this community will consider themselves apart of and as a result engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate Emergency Action Plan will identify the most strategic opportunities and actions that should be delivered at an appropriate scale within an elevated timeframe, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part of our town's identity and character and is something the local community feels passionately about.

Reid is already a consideration within Town of Gawler's planning, however the proposed boundary change will formalise this position and enable truly strategic and holistic way of sustainably planning for the future of our community and the environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;
- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

All residents of Reid are already considered part of the Gawler community. Many work in Gawler, their children go to school in Gawler, they shop in Gawler precincts and join Gawler sporting teams and competitions. It is important to formalise this through boundary reform so that Council can effectively plan for and represent this community and all Reid residents can be involved in key decisions that impact the services and infrastructure they enjoy.

Consistent with the rationale provided for Evanston Park, this proposed boundary adjustment will formalise the already existing Community of Interest and provide the impacted residents with a stronger voice in the community regarding the delivery of services and infrastructure. It will also greater economies of scale and service delivery efficiencies.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services

At its closest point, the Reid Area of Interest is approximately two kilometres from Murray Street within Town of Gawler. In contrast, the Reid Area of Interest is located in excess of 30km from Light Regional Council's principal office in Kapunda.

Town of Gawler provides quality Customer Service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices, cemeteries administration through to planning and development enquiries. This is also the head office for Council.

The Gawler Civic Centre, located at 89 Murray Street, in the heart of Gawler, provides a customer service transaction point through the Library which allows general enquiries, payment of rates, dog registrations and expiation notices. The Civic Centre also provides Youth Programs in the purposely designed Youth Space, spaces for functions, meetings and events, live performance programs and a local business innovation hub.

Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

9. 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

This principle is addressed in the response below.

10. 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)

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)¹², which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
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Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed areas of interests, including Reid will not have a material impact on representation requirements in the short-mid-term.

Town of Gawler is also of the view that due to proximity, the inclusion of the Reid Area of Interest within the Town of Gawler will promote greater participation by Reid residents in local matters such as community consultation and decision making, as well as attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will Council's representation review as this would be dependent on the timing of the proposal and the nature of any recommendations. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains.
- Gawler River Flood Plain Management Authority.
- Barossa Regional Procurement Group.

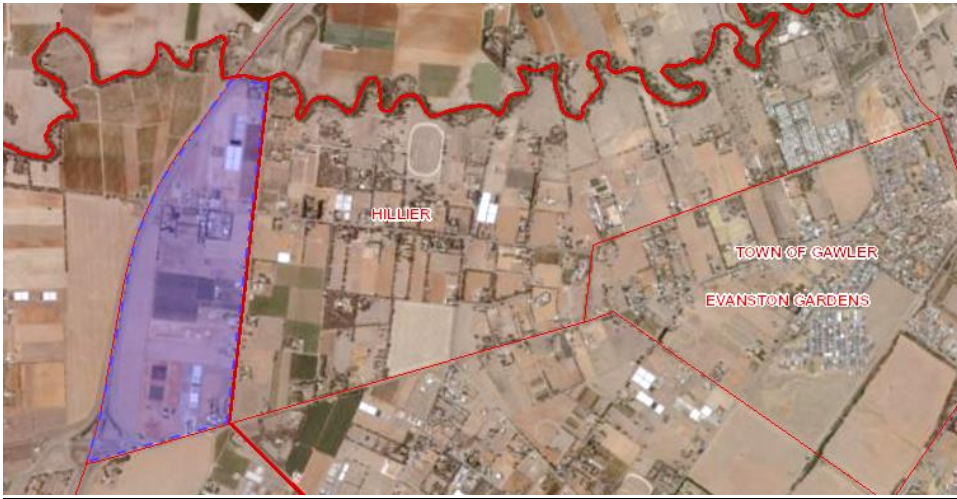
- Barossa Regional Procurement IT Group.
- Northern Adelaide Waste Management Authority.
- Health Services – Country Public Health Network.
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis).
- Dog Park – Light Regional Council contributing to management/maintenance costs.

The benefits of regional collaboration are acknowledged and opportunities for further collaboration for the benefit of our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the wants and needs of its Community of Interest in the most effective way.

3.7 Hillier (Area 7)

A section of the Hillier suburb falls outside of the Town of Gawler boundary. This section is bounded by the Gawler River to the north, Wingate Road to the east, the Northern Expressway to the west and Angle Vale Road to the south.

The section of Hillier which falls within the City of Playford is bounded by Angle Vale Road, the Gawler River to the north and the Northern Expressway and lies within Playford's Primary Production Zone. This potential boundary change will impact 23 properties currently situated within the City of Playford.



Include the remaining area of the Hillier suburb which is located in the City of Playford (highlighted in purple above).

A larger, more detailed map of the Hillier Area of Interest is available in **Attachment 1**.

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. The resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community

Consistent with its approach for Evanston Park, Town of Gawler is seeking to include the entire suburb of Hillier within the Town of Gawler.

Service delivery efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than Council's servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

The proposed boundary adjustment will allow the Town of Gawler to enable, amongst other things, greater integration in the areas of hard infrastructure, waste services and maintenance activities, soft infrastructure, social infrastructure, open space, connectivity and walking and cycling trails which the subject communities already rely upon.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils, achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

The inclusion of all land situated within Hillier formally within the Town of Gawler will enable those impacted residents to have a stronger voice within the community (by having appropriate representation in local decision making) and financially contribute towards the services and infrastructure utilised and enjoyed by the community.

This will benefit the entire Gawler Community of Interest as it will provide greater equity for current Gawler rate payers who have been heavily servicing a Community of Interest much larger than its

current rate base and will provide Council with greater capacity to deliver improved services and infrastructure to the growing Gawler community (current and future proposed rate payers) and the region.

While current residential rates in the dollar and the impact on residents from the Areas of Interest have been quoted in opposition to Council's proposal, Town of Gawler considers any speculation in this regard to be premature. It is important to note the limitations in comparing the General Rates applied between one Council and another, given the considerable differences that invariably apply between Councils, including, but not limited to, the following factors:

- Different demographics and characteristics
- Different long term goals and strategies
- Different Rating methodologies (e.g. % of revenue derived from different land uses (e.g. Residential vs Commercial Rates, etc.), Minimum Rate vs Fixed Charge)
- Different range of services and/or different service levels for a particular service
- Age/Condition of Fixed Asset stock (e.g. the condition and age profile of a Council's asset portfolio may currently require a higher investment in asset replacement/renewal and/or upgrades, thereby influencing depreciation and investment income / finance charges).

Cost of living pressures being reduced, by one Council being able to achieve the economies of scale in service delivery, will more than likely materialise by keeping the pressure down of council rates thus benefiting current and future residents, which would otherwise not be realised.

Given the complexities of this matter, Council is of the expectation that a full review of General Rates will be undertaken during the boundary reform process taking into consideration community consultation and to be informed by the outcomes of any investigation

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

This principle is addressed in the response below.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed inclusion of the Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region. If anything, the generation of economies of scale delivers more efficient and effective service outcomes .

Town of Gawler invests heavily in servicing and representing its community and, for many years, providing for a community that is much larger than its LGA. While this has provided a great opportunity to showcase Gawler and all it has to offer, it has also put strain on Gawler's rate payers with Council investing in significant infrastructure and services which benefit not only its rating paying residents but other non- rate paying members of our greater community, including:

- Public Libraries.
- Roads and infrastructure.
- Parks, gardens, bike tracks and playgrounds.
- Sporting precincts.
- Waste, recycling and environmental management.
- Community services such as youth and community development, environmental health and safety.
- Community infrastructure such as the Aquatic Centre and recreation precincts.

The above services and infrastructure benefit a community much wider than its rate payers, including

the entire Hillier community.

The formal inclusion of all land situated within Hillier within Town of Gawler will enable a truly integrated community and result in greater economies of scale and service delivery efficiencies that will create additional opportunity for investment, resulting in further improvements (in an integrated manner) to the services and facilities which the community already rely upon.

5. 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

Town of Gawler is seeking to establish a planned, organised way forward in its approach to planning and development for its community. More particularly Council has commenced a process to review the rural areas land use zoning provisions in the broader area to which the Hillier is a part of. This precinct of Gawler should be considered in these deliberations given the intrinsic relationship the area has with this greater southern part of Gawler.

From an overall governance perspective, the inclusion of all land situated within Hillier within the Town of Gawler will result in the better utilisation of resources, efficient development management for Council and further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures applicable to areas which are essentially identical in nature.

Town of Gawler in this regard can create efficiencies, seek greater integration with a town in which this community will consider themselves apart of and as a result engender greater confidence in the market and seek to promote more opportunity for investment and job creation.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

Town of Gawler takes environmental considerations seriously and holds new development to a high standard.

Town of Gawler was in fact one of the first Councils in Australia to declare a climate emergency and as a result are in the process of developing a Climate Emergency Action Plan. The Climate Emergency Action Plan will identify the most strategic opportunities and actions that should be delivered at an appropriate scale within an elevated timeframe, providing immediate, effective and ongoing action with consideration for both Council corporate actions and Council actions to support the community.

Amongst numerous strategic documents Town of Gawler has commissioned the development of a Council wide Biodiversity Management Plan to provide strategic guidance in managing assets of high biodiversity value. This has included identifying areas of high priority for revegetation action, threats to existing biodiversity assets and opportunities for future biodiversity enhancement. Further environmentally focused strategies and guiding documents developed by Council include the Town of Gawler Stormwater Management Plan and the Town of Gawler Environmental Management Plan. Combined these documents allow Council to place environmental considerations at the forefront of our assessment process and ensure development is sympathetic of the natural environment.

Town of Gawler is located where the North and South Para Rivers meet to form the Gawler River. The natural environment plays an integral part of our town's identity and character and is something the local community feels passionately about.

As outlined in Section 2.4 above, as a future Community of Interest, Hillier is already a consideration within Town of Gawler's planning, however the proposed boundary change will formalise this position and enable truly strategic and holistic way of sustainably planning for the future of our community and the environment.

7. 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

There are many factors that contribute to the recognition of a Community of Interest, some are tangible and easy to identify/measure whereas others are more difficult to substantiate as they are intangible but felt strongly through the community which makes them equally important. These factors include:

- value systems, identity, beliefs and sense of belonging;
- where people, live, work and play; and
- governance (representing the interests of the community).

This is further illustrated in Section 2.2 of this document.

Residents of Hillier are already considered part of the Gawler community. Many work in Gawler, their children go to school in Gawler, they shop in Gawler precincts and join Gawler sporting teams and competitions. It is important to formalise this through boundary reform so that Council can effectively plan for and represent this community and all Evanston Park residents can be involved in key decisions that impact the services and infrastructure they enjoy.

Consistent with the rationale provided for Hewett, Gawler Belt and Evanston Park, this proposed boundary adjustment will formalise the already existing Community of Interest and provide the impacted residents with a stronger voice in the community regarding the delivery of services and infrastructure. It will also greater economies of scale and service delivery efficiencies.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services

Town of Gawler provides quality Customer Service at various locations to deliver all the functions undertaken by Town of Gawler.

The Gawler Administration Centre, located at 43 High Street Gawler East provides a full suite of Customer Service functions from general enquiries, payments of rates, fees and expiation notices, cemeteries administration through to planning and development enquiries. This is also the head office for Council.

The Gawler Civic Centre, located at 89 Murray Street, in the heart of Gawler, provides a customer service transaction point through the Library which allows general enquiries, payment of rates, dog registrations and expiation notices. The Civic Centre also provides Youth Programs in the purposely designed Youth Space, spaces for functions, meetings and events, live performance programs and a local business innovation hub.

Each of the above locations are utilised to support Community Engagement during public consultation programs and management. Other Customer Service points support the functions of the specific facility eg Gawler Sports and Community Centre (Nixon Tce Gawler), Gawler Aquatic Centre (Victoria Tce & Main North Rd Gawler) and Council's Works Depot (Paxton St Willaston).

In addition, the Town of Gawler website provides access to information and provides for online lodgement of development applications and is a payment gateway for customers available 24/7.

9. 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

This principle is addressed in the response below.

10. 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)

Town of Gawler is currently represented by the Mayor and 10 Area Councillors. Council's total representation quota (the number of electors for each Councillor) is 1:1,605 (17,659 electors)¹³, which is relatively consistent with the Statewide average representation quota of 1763 and the quotas of local and similar size councils to Gawler as outlined in the table below.

	Town of Gawler	The Barossa Council	Light Regional Council	City of Murray Bridge	City of Whyalla	City of Alexandrina
Electors	17,659	17,600	10,316	14,334	15,248	20,350
Councillors	11	12	11	10	10	12
Ratio	1,605	1,466	937	1,433	1,524	1,695

Based on the above information, Town of Gawler is of the view that the inclusion of the proposed areas of interests, including the Hillier are of interest will not have a material impact on representation requirements in the short-mid-term.

Town of Gawler is also of the view the inclusion of the Hillier Area of Interest within the Town of Gawler will promote greater participation by all Hillier residents in local matters such as community consultation and decision making, including attendance at community and Council meetings and events.

Council's Representation Review period is currently scheduled for October 2020 - October 2021. Previous advice received from the Boundaries Commission is that it is not clear whether this boundary proposal will Council's representation review as this would be dependent on the timing of the proposal and the nature of any recommendations. It is further noted that the matter of representation reviews is under consideration as part of the Local Government Reform process.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains;
- Gawler River Flood Plain Management Authority
- Barossa Regional Procurement Group
- Barossa Regional Procurement IT Group
- Northern Adelaide Waste Management Authority
- Health Services – Country Public Health Network
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020)
- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis)

- Dog Park – Light Regional Council contributing to management/maintenance costs

The benefits of regional collaboration are acknowledged and opportunities for further collaboration for the benefit of our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the wants and needs of its Community of Interest in the most effective way.

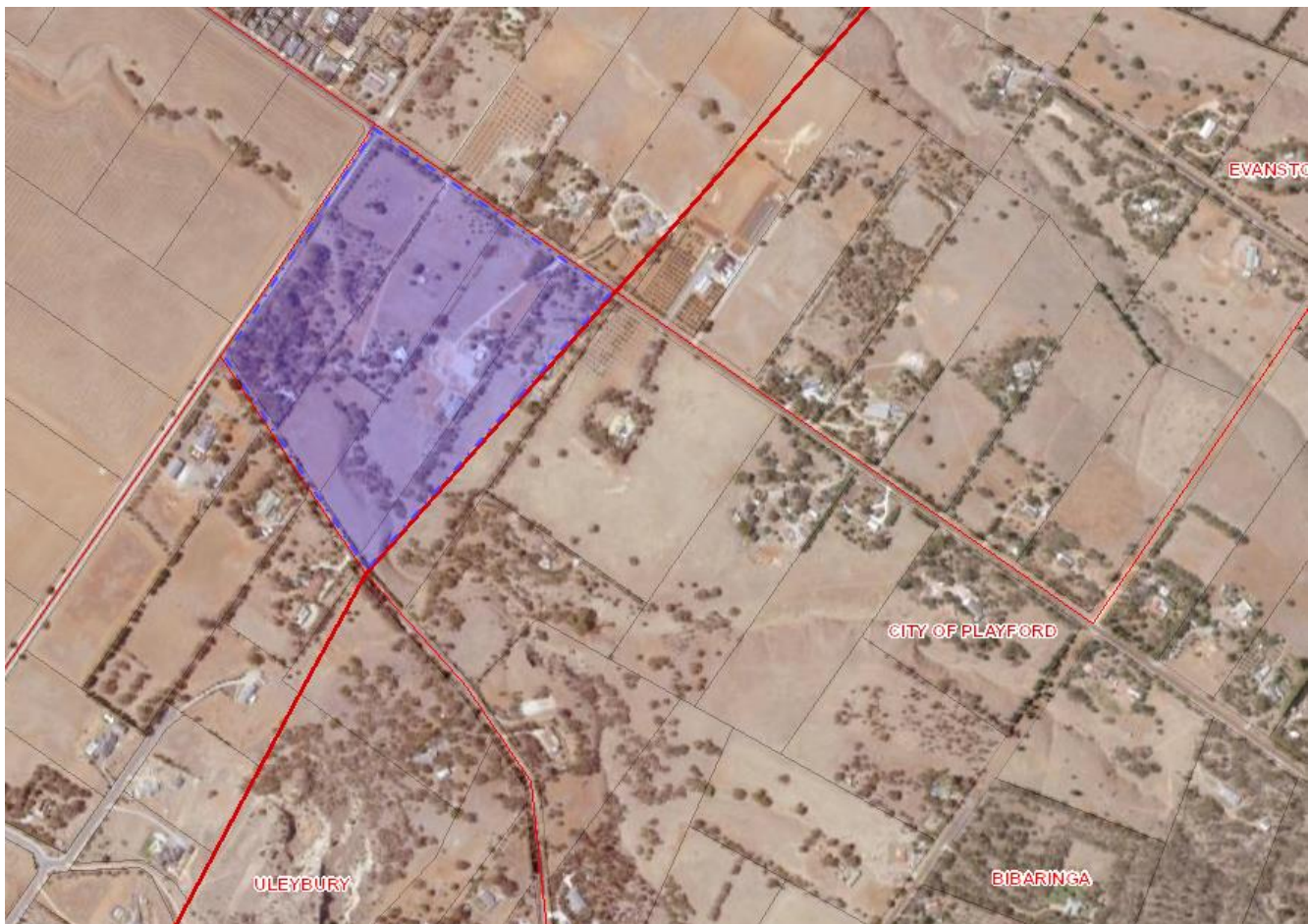
3.8 Bibaringa (Area 8) and Uleybury (Area 9)

Town of Gawler contains 4 properties in the suburb of Bibaringa, located within Council's Rural Zone along the eastern boundary. The remainder of Bibaringa falls in the City of Playford with the majority of the suburb being located within the Hills Face Zone.

Additionally, Town of Gawler contains 23 properties in the suburb of Uleybury, also located in Council's Rural Zone along the eastern boundary. The remainder of Uleybury falls in the City of Playford and within their Hills Face Zone.

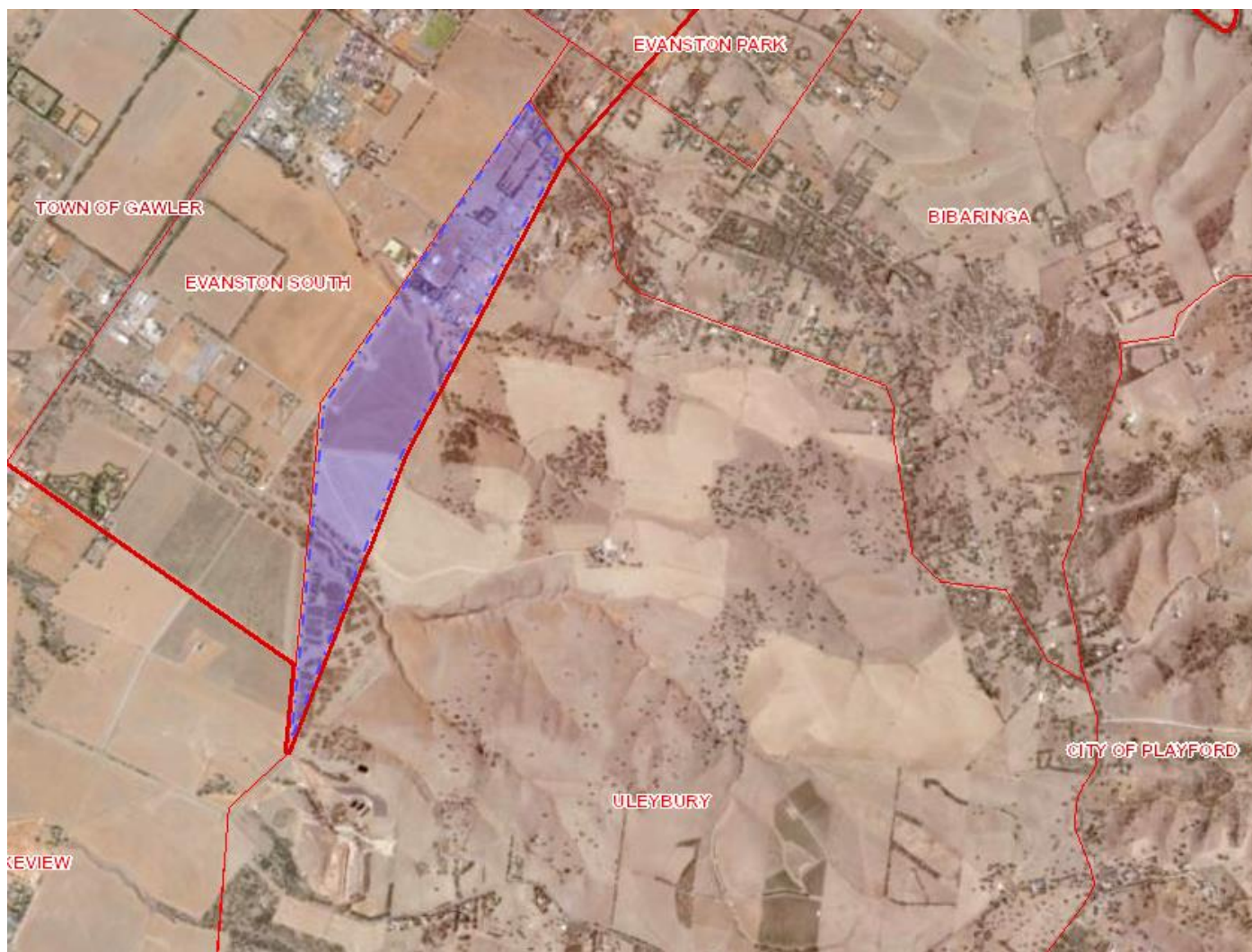
The current boundary intercepts 1 property in Bibaringa and a further 3 in Uleybury.

Town of Gawler proposes that council boundaries be re-aligned so that all land situated within Uleybury and Bibaringa be located in the City of Playford, with Bentley Road and Adams Road forming the new boundary. This potential boundary change will impact 4 properties situated in Bibaringa and a further 23 properties situated in Uleybury.



Remove the small area of the Bibaringa suburb which is located in Town of Gawler (highlighted in purple above). Transfer this land to the City of Playford.

A larger, more detailed map of the Bibaringa Area of Interest is available in **Attachment 1**.



Remove the small area of the Uleybury suburb which is located in Town of Gawler (highlighted in purple above). Transfer this land to the City of Playford.

A larger, more detailed map of the Uleybury Area of Interest is available in **Attachment 1**.

Town of Gawler provides the following information in respect to how this proposed boundary adjustment meets the principles under section 26 (1) (c) of the *Local Government Act 1999*.

1. The resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community

As outlined above, there are four properties within Bibaringa and Uleybury situated both in Town of Gawler and City of Playford. Properties which intercept multiple council boundaries can create inefficiencies as well as frustration for residents who are paying Council rates in two Council areas. In addition, instances where these landowners are seeking to undertake development permission from both Councils is required and in some instances this is elevated to the State Government for assessment.

Town of Gawler considered the merits of an Administrative Proposal e.g. *“to correct an anomaly that is, in the opinion of the Commission, generally recognised e.g. where the boundary intercepts one or more privately owned properties”*, to rectify this issue.

The majority of the suburbs of Bibaringa and Uleybury fall within the City of Playford. Consistent with its approach to Evanston Park, Town of Gawler propose that all land situated within Uleybury and Bibaringa be located in the City of Playford.

Service delivery efficiencies will be achieved as one Council will be responsible for its Community of Interest, rather than two Council's servicing their respective areas even though this may result in Town of Gawler servicing one side of the road and a neighbouring council servicing the other.

Consolidation of local government administrative services will generate the economies of scale that will more likely assist in the cost of such services being reduced better enabling one Council, as opposed to two Councils, achieving reductions in rates that residents and business have to pay.

2. Proposed changes should, wherever practicable, benefit ratepayers

For the four properties that intercept two council boundaries, the proposed change will remove frustrations associated with interacting with two LGAs and streamline development processes.

For the remaining properties, the formal inclusion of all land situated within Bibaringa and Uleybury within the City of Playford will enable those impacted residents to have a stronger voice within their suburbs and the wider community.

3. A council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently

Town of Gawler has undertaken due diligence in the form of a high level financial analysis as part of its boundary reform investigations which is provided as **Attachment 2** for information. Town of Gawler is confident that the proposed removal of the Bibaringa and Uleybury Areas of Interest will not materially impact Council's ability to deliver infrastructure and services to the Gawler community and the region.

It is not anticipated that the formal inclusion of the 27 properties within the Bibaringa and Uleybury Area of Interest will not materially impact City of Playford's financial position.

4. A council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis

The formal inclusion of all land situated within Bibariga and Uleybury within the City of Playford will enable a truly integrated community for those Areas of Interest. This will also result in greater economies of scale and service delivery efficiencies creating additional opportunity for investment, resulting in further improvements (in an integrated manner) to the services and facilities on which the community already rely.

5. 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

From an overall governance perspective, the inclusion of all the land situated in Bibaringa and Uleybury within the City of Playford is likely to result in the better utilisation of resources, efficient development management for Council. In addition, further efficiencies can be realised and appreciated by the private sector through consistent policies and procedures applicable to areas which are essentially identical in nature.

6. A council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes

The majority of the land within the suburbs of Bibaringa and Uleybury fall within the City of Playford. Town of Gawler considers that the proposed inclusion of the remaining land from these suburbs within the City of Playford will enable a more consistent and holistic approach to the above matters for these areas.

7. 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

The majority of Uleybury and Bibaringa is already situated within the City of Playford and it is Town of Gawler's view that this proposed change will enable a truly integrated community for those Areas of Interest.

8. A council area should incorporate or promote an accessible centre (or centres) for local administration and services

At its closest point, the Bibaringa and Uleybury Area of Interest is approximately 5km from Murray Street within Town of Gawler. In contrast this Area of Interest is approximately 10km from the City of Playford's Civic Centre. Both Gawler and Playford Councils can provide accessible local administration and services for these Areas of Interest. However, for the same reason as outlined above, Town of Gawler is of the view as the majority of Uleybury and Bibaringa is already situated within the City of Playford, this proposed change will enable a truly integrated community for those Areas of Interest.

9. 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

The inclusion of the Uleybury and Bibaringa Areas of Interest within the City of Playford will promote greater participation by all residents of those suburbs in local matters such as community consultation and decision making, as well as attendance at community and Council meetings and events.

10. Residents should receive adequate and fair representation within the local government system, while over-representation in comparison with councils of a similar size and type should be avoided (at least in the longer term)

The City of Playford is currently represented by the Mayor and 15 Councillors and has a representation quota of 1:3,798 (60,775 electors)¹⁴ which is relatively consistent with the quotas of similar size councils. Therefore, Town of Gawler is of the view that the inclusion of the proposed areas of interests, will not have a material impact on representation requirements of City of Playford in the short-mid-term.

Furthermore, removal of these Areas of Interest from within Town of Gawler will also not have a material impact on Council's representation requirements.

11. A scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change

Town of Gawler, in partnership with regional partners are already collaborating in a number of areas including:

- Joint funding arrangements through Regional Development Australia, Barossa, Gawler, Light and Adelaide Plains.
- Gawler River Flood Plain Management Authority.
- Barossa Regional Procurement Group.
- Barossa Regional Procurement IT Group.
- Northern Adelaide Waste Management Authority.
- Health Services – Country Public Health Network.
- Library Services – with Adelaide Plains Council.
- Animal Management Services – sharing of the dog pound with Light Regional Council.
- Environmental Health Inspectorial Services – ad-hoc support arrangement with Light Regional Council and Adelaide Plains Council.
- Information Technology Services (Light Regional Council from 2018 - 2020).

- Human Resource Management (with Barossa Council from 2016 - 2019, now provided on an ad-hoc basis).
- Dog Park – Light Regional Council contributing to management/maintenance costs.

The benefits of regional collaboration are acknowledged and opportunities for further collaboration for the benefit of our communities continue to be explored. However, limitations of this approach due to conflicting priorities and policies must also be acknowledged. Town of Gawler believes that through the boundary reform process the proposed boundary adjustments will enable greater efficiencies and provide Council with the capacity to deliver on the wants and needs of its Community of Interest in the most effective way.

4. Community and Stakeholder Consultation

4.1 Consultation Design

Council adopted a draft Consultation and Communication Strategy as part of Stage 2 of its Boundary Reform Strategy.

Council, prior to commencing the first consultation phase, sought further clarification from the Boundaries Commission on key elements of the consultation required to be undertaken as part of the Stage 2 submission process. The questions and issues raised by Council caused the Commission to review its processes and guidelines prior to responding.

As a result Guideline 3 had been amended to read that:

“The purpose of consultation at this stage of the process in submitting a proposal is to demonstrate that an initiating council has undertaken the consultation that is necessary to determine that it should submit a general proposal to the Commission for considering (noting that it is the Commission’s role to consult with all affected communities on the impact of all proposals that it investigates).”

This amendment removed the requirement for an initiating Council to consult with the Communities of Interest that do not currently fall within its existing Local Government Area (LGA). Thereby relieving Council of the challenges it faced in undertaking a broad consultation with a neighbouring council’s residents in the development of a General Proposal.

It should be noted that, notwithstanding the above, Council’s consultation process (although targeted primarily at the Town of Gawler community) also provided for and welcomed comments from neighbouring Council areas and communities.

In line with the amendment to Guideline 3 Council updated its adopted Consultation and Communications Plan to help guide the community and stakeholder consultation phase on boundary reform. An excerpt of the Actions pertaining to the public consultation phase of this project is attached **(Attachment 3)** to provide an overview of the comprehensive work undertaken to ensure that:

- a) the community and stakeholders were informed about Council’s Boundary Change Proposal; and
- b) were aware of several opportunities they had open to them to engage with Council on the matter to find out more information and provide their comments and feedback.

The Community consultation consisted of the following elements:

- Your Voice Gawler Consultation Platform (website) used for providing information links, access to a consultation survey and receiving questions and written submissions
- Written submissions could be provided via Council’s Your Voice Gawler consultation platform or lodged with Council via email, post or in person at the Gawler Administration Centre.
- Consultation Survey could be responded to online via Your Voice Gawler consultation platform and in hard copy at the following Council facilities: Gawler Civic Centre, Gawler Administration Centre, Gawler Sport and Community Centre, Evanston Gardens Library.
- Open Public Forums were held at 7pm on 21 and 28 September 2020 at the Gawler Sport and Community Centre.
- Information was available at the following Council facilities: Gawler Civic Centre, Gawler Administration Centre, Gawler Sport and Community Centre, Evanston Gardens Library.

Council needed to gauge the level of support or opposition within the community for boundary reform and indeed verify if the Proposal, with the 9 defined areas comprising the Communities of Interest were in line with the broader Community sentiment. To ensure the Community were aware

of the Council's Boundary Change Proposal and had ample opportunity to provide feedback to Council an extended consultation period of 6 weeks was chosen, instead of the minimum 21 days, and promotion of the consultation was set at a high level.

The Consultation was promoted via:

- Council's website
- email banner in Council's email signature
- Rates notice insert provided to all ratepayers
- Corflute signs around Gawler
- Gawler App and social media platforms (several times a week) and Eventbrite
- Invitations to participate sent via letter to stakeholders and email to registered users of Your Voice Gawler
- Public Notice in The Bunyip newspaper
- Posters and information points in Council facilities.

4.2 Consultation Outcome

The Boundary Reform Community Consultation was held between 26 August and 7 October 2020.

As previously mentioned to ensure all ratepayers were provided with information on Council's Boundary Reform Proposal and had the opportunity to participate in the community consultation if they so desired, Council ensured a Boundary Reform Consultation information leaflet (**Attachment 6**) regarding the consultation was included in the Council's rates notice mail out to 8,447 households/businesses and provided as a link to a further 1,301 ratepayers who have registered to receive their rates notices by email. The leaflet and information on how to participate in the consultation and hard copies of the consultation survey were also available at the reception desks in Council owned facilities throughout the consultation period.

Council also sent letters to over 145 stakeholders (including affected Councils) and community organisations such as sporting clubs and associations, community groups, schools and service clubs etc inviting them to attend an open public forum or to provide a written submission to the consultation. Similarly an email invitation to participate was sent to the 238 Registered Users of Council's Your Voice Gawler Consultation Portal on the Council website and the 24 people who had previously registered their details to receive updates on the boundary reform matter as it progresses.

That is in excess of 10,155 direct attempts to provide the members of the community and stakeholders an opportunity to connect with Town of Gawler to engage with the Boundary Reform Consultation.

Open Public Forums

Council held two Open Public Forums during this consultation inviting community members to attend a session to hear why Council was seeking boundary reform, what was included in the Council's Proposal for Boundary Change and to learn more about the process Council must navigate. The forums, held on 21 and 28 September 2020, were open to all who wished to attend.

Both forums were held in a Covid –Safe manner in line with Covid-19 restrictions that were in place at the time.

Each forum was facilitated by Nicole Halsey from URPS who ensured that all attendees had an opportunity to raise their questions, were heard and were informed on how they could also provide further feedback through a written submission to Council or through completing the consultation survey.

The agenda for the forums consisted of Mayor Karen Redman and Chief Executive Officer Henry Inat

providing a short presentation on the Council's Proposal and the community aspects of boundary change. Ms Alex Hart from the Office of Local Government also attended providing an overview of the Commission's process set down by the legislation and guidelines.

All three presenters then opened up for questions from the floor. Both forums were live streamed on Council's YouTube channel and the recordings of the sessions are still available online.

Forum 21 September 2020 <https://www.youtube.com/watch?v=mSUqHZNPj48>

Forum 28 September 2020 <https://www.youtube.com/watch?v=OZHMvHTv9Gw>

Of the 62 attendees recorded across the two Public Forums 34 (54%) were residents of the Town of Gawler.

Attendees to the forums from neighbouring Council areas included the Mayor of The Barossa Council, Councillors and Staff from Light Regional Council as well as residents from the Communities of Interest identified in Council's Proposal. The forums provided ample opportunity for the broader community to ask questions and raise their concerns with the Council's current Proposal. It was evident attendees from neighbouring Council areas wished to:

- clarify what the process is going forward,
- raise questions and voice their concerns with Council's Proposal; and
- indicate that the majority of them, were not supportive of change.

Attendees were provided with an opportunity to provide some comments on sticky notes regarding what they liked about Council's Proposal and what they didn't like about the Proposal – responses were colour coded to represent which Council area the respondent lived in. This was done to allow easy identification of comments made by our key target market, being Town of Gawler residents, and those from neighbouring areas.

Only residents of Gawler provided any positive commentary on what they liked about the Council's Proposal as provided in the table below:

What I like about the Proposal	
Response	Council Area
The Community wants it! Engage them	Gawler
It future proofs Gawler for the impending growth	Gawler
It's fair and reasonable	Gawler
It strengthens our community for the future	Gawler
I like the open response to the "rates vs Future Need" - it's not a money grab. It's about our evolution. We need to know what that is!!	Gawler
Gawler has a particular place in the fabric of Adelaide geographically and culturally. It is the obvious Council to take responsibility.	Gawler
I like the fact that my Council is willing to look to the future. It's a vote to investigate, not a vote to execute.	Gawler

Both Gawler and attendees from neighbouring councils took the time to identify what they disliked about the proposal as provided in the table below:

What I don't like about the Proposal	
Very happy with services provided by Light Council	Light
Concern re development of open space, to und Council. Will parks deteriorate? Will there be less up keep?	Light
Concerned re financial implications of moving the boundaries	Gawler

I don't need to be a paying member of a Council to feel part of a community	Gawler
I don't like the "he said she said" in the media with poor information "fed" to the public. The Commission needs to be able to "set the rules".	Gawler
Noting TOG will still be a small council - Proposal doesn't go far enough	Gawler
All about getting more money	Gawler
Annexation to Gawler - shop with your feet, more conveniently in Playford at a better price.	Gawler
Annexation to Gawler - TOG has demonstrated history of squandering rate payer funds. Expect this to continue.	Gawler
Annexation to Gawler - TOG has demonstrated history of continued neglect of rural areas - expect nothing - your rates will go up up up.	Gawler
No to Gawler Council - I don't trust this council	Barossa

Two interesting comments from the table above, highlighted in blue, were placed in the “What I don’t like about the Councils Proposal” section but are actually in favour of the council progressing Boundary Reform:

- one noting that in their opinion the Commission needs to set the rules as they saw the inflamed media coverage an issue for the community; and
- a double negative comment – the attendee was not supportive of the Council Proposal as in their mind it did not go far enough and should have sought to create a larger Council LGA;

It was evident from both forums that many attendees found the knowledge gaps that are inherent in the boundary change process made it very difficult for them to conclude the financial viability of proceeding with boundary reform. The following unanswered question left many with concerns, for example:

- not being able to conclusively state the full cost to ratepayers to proceed with boundary realignment if the Council proposal is successful;
- the impact on residents rates both new residents and current residents;
- the possibility of a level of compensation that may need to be paid to other Council’s for community infrastructure; and
- any effects or changes to service levels for the community.

It was clear that many attendees appreciated the opportunity to pose questions on the proposed changes, how transitions would occur if the Proposal was successful and the reasons why Council was pursuing change. Also, attendees were very keen to understand the legislated process fully.

Consultation Survey

Council engaged market research company Square Holes to design, program, analyse and provide a written report on the Boundary Reform Consultation Survey. This was hosted online and accessed by a link on the Council’s consultation webpage as well as being available in hard copy at various Council reception areas.

The survey was designed to enable the results to be analysed and reported at an aggregate level, with segmentations to compare preferences of key audiences within the overall sample with respondents identifying as residents of the Town of Gawler being identified as the key target market and residents of neighbouring Council areas being other segments of interest also to be captured, reported and able to be analysed further if required.

The overall number of responses for the survey was 158 completed surveys a statistically valid response to conduct meaningful and robust analysis at an overall level with a margin of error of [+/- 7%], with a 95% confidence interval.

44.1% of survey participants were from the Town of Gawler. Other respondents identified themselves as Light Regional Council 33.7%, The Barossa Council 17.8%, City of Playford 3.5% (only 7 respondents) and Other 1%.

This project was carried out in compliance with ISO 20252 - Market, opinion and social research, including insights and data analytics — Vocabulary and service requirements.

The focus of the survey was to provide the community of the Gawler Local Government Area the opportunity to comment on:

1. Town of Gawler's Stage 1 Boundary Change Proposal;
2. The 'Communities of Interest' as expressed in the Proposal: and
3. Whether Council should seek to have the boundaries of Gawler reviewed by an independent body – being the South Australian Local Government Boundaries Commission.

Importantly the survey results showed that **the majority of residents of the Town of Gawler (68%) are in strong support of the Proposal developed by Council and supported having the South Australian Boundaries Commission further investigate potential changes to the Council boundary.**

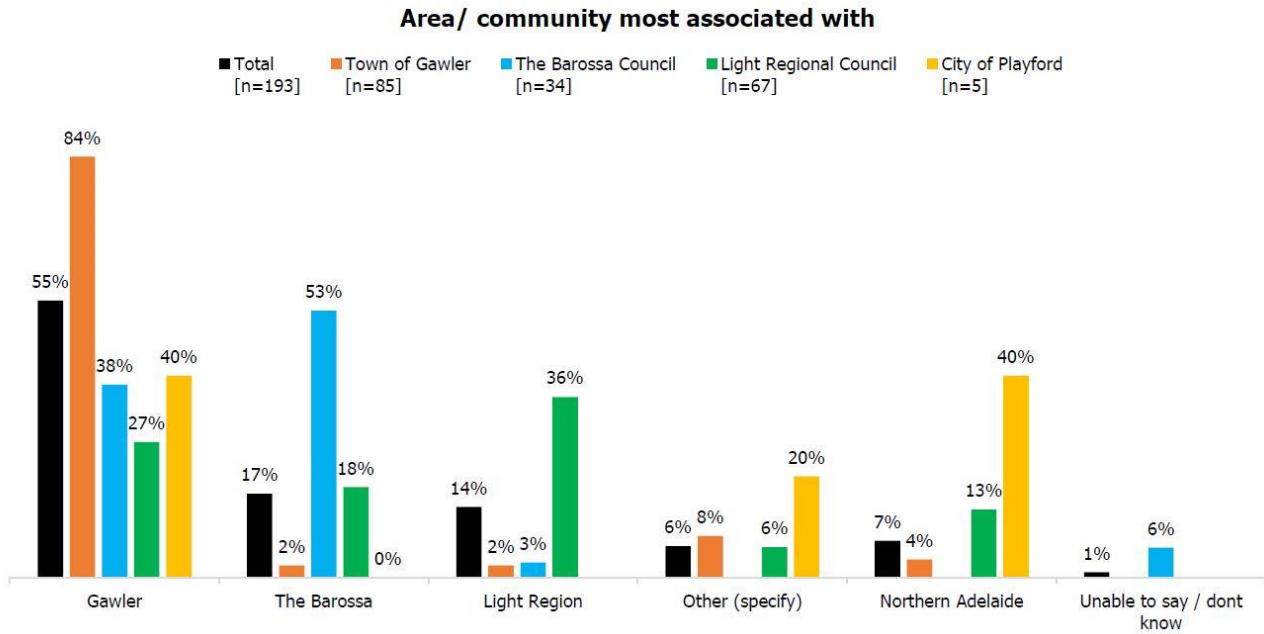
From what you know or have been told, do you support or oppose Council's Proposal to have the South Australian Boundaries Commission further investigate potential changes to the Town of Gawler's council boundaries?



Gawler's Proposal to adjust its boundaries to include areas/residents from outside of its current boundaries is based on the predication that Gawler's true community, the community's social fabric, extends beyond its current boundaries. The community connections made through social and cultural activities, accessing services, shopping as well as transport and infrastructure connections within the identified Communities of Interest form an integral part of the Gawler Community.

The survey provided insights on how respondents from all areas connected into the social fabric of Gawler by asking "What area/community do you, or others in your household most associate yourselves with?"

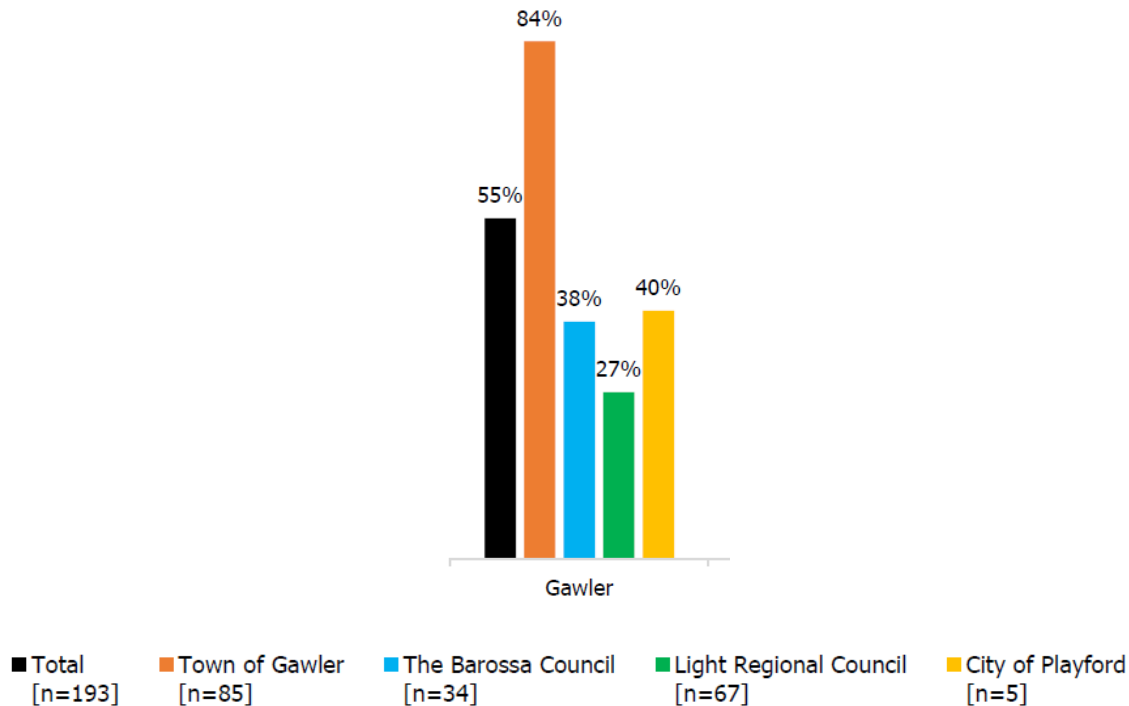
- 38% and 27% of Barossa Council and Light Regional Council residents most associate with the Town of Gawler



Over half (55%) of all respondents to the survey most associated themselves with the Gawler community/area, despite only 44.1% of all respondents identifying as Town of Gawler residents.

Clearly demonstrating that some residents outside of the Gawler LGA do consider themselves part of the Gawler Community and that the Gawler Community does extend beyond the Council's current boundaries with residents of neighbouring Council's choosing to identify themselves as part of the Gawler Community.

In fact 38% of respondents from The Barossa Council LGA, 27% of respondents of the Light Regional Council LGA and 40% of respondents from the City of Playford LGA indicated they or others in their household were most associated with the Gawler Community rather than their own Council area as shown in the graph below:



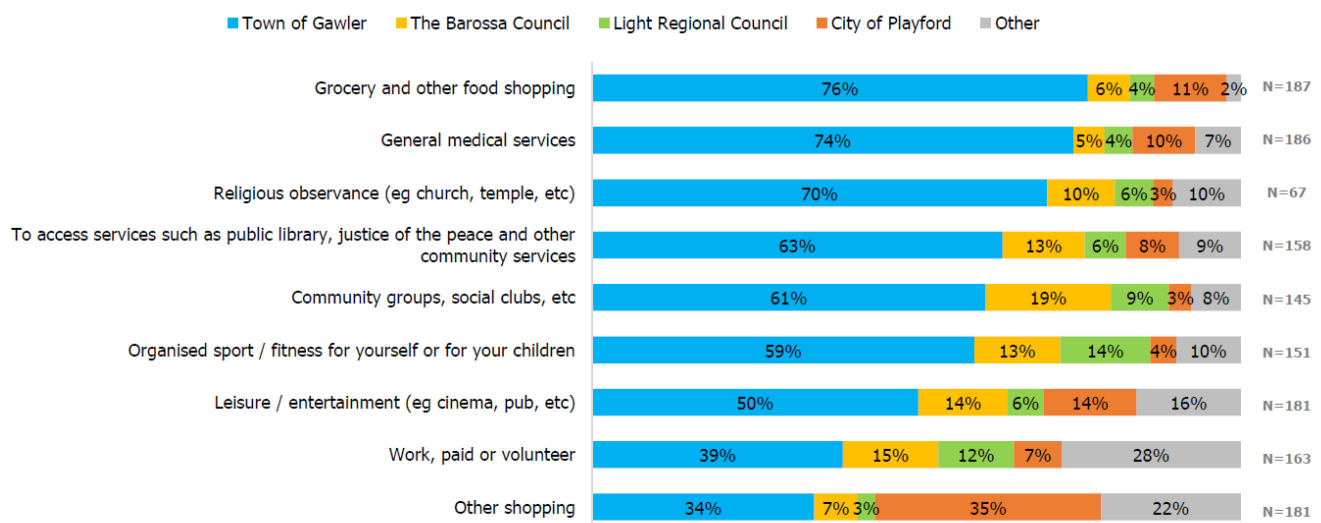
When considering that community members responding to community consultations often are those that have a strong position on a matter such as those directly affected by any change this could indicate that a sentiment of ‘being part of the Gawler Community’ may actually be higher in the broader community who are less motivated by the issues/opportunities presented to them by boundary reform. This assumption is further supported by other insights from the survey used to identify the various social connections that are present in the community.

Respondents were asked to identify the main Council area in which they undertake their normal everyday activities such as shopping, religious observance, access to services (medical, library, justice of peace etc) or participate in community organisations, leisure activities and organised sport.

Gawler services the majority of the respondents to the survey for most shopping and community services as shown in the graph below:

Main area to undertake the following activities:

[N/A responses removed]



With only 44.1% of respondents to the survey being from the Gawler LGA the above graph demonstrates how residents in our neighbouring areas are part of the fabric of the Gawler Community supporting and being involved in community groups, social clubs and accessing services, participating in their religious practices and supporting the local economy. This clearly aligns with the current Council Proposal for Boundary Reform.

From feedback (comments) of those who support boundary reform, there is a general sense that it is more equitable for those who utilise the services and infrastructure in the Town of Gawler to help financially support them.

The following statistics pertain to the sentiment of the respondents who identified as being part of the Gawler LGA.

The majority of residents of the Town of Gawler (65%) agreed with the efficiency of one Council management.

Agreement with the efficiency of one Council management	Agree	Neutral	Disagree
Town of Gawler	65%	8%	22%

The majority of Town of Gawler residents (76%) who responded indicated they were in strong support of most aspects of the Proposal as shown below:

Boundary reform could realign the footprint of Gawler to include adjacent areas already seen as part of the Gawler community and who already utilise services and infrastructure provided by the Town of Gawler



The comments from responders of the key target market (76%) who supported the change in the footprint of Gawler, provided a general sense that it is only fair that those who utilise the services and infrastructure should financially support them.

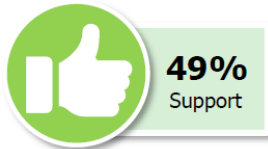
Those Town of Gawler Residents opposed to this statement (23%) provided commentary which indicated they perceived previous mismanagement of the Town of Gawler, had concerns regarding the service delivery if stretched across more homes, that the usage of services did not justify the realignment of boundaries and the Proposal was just a money grab.

Areas suggested to be included in Gawler are Concordia Growth Area, Hewett, Kalbeeba, Gawler Belt (portion of), Evanston Park, Reid and Hillier.



This would suggest that the urban growth areas identified within the Proposal, to be considered for inclusion in Gawler’s LGA, aligns with the current Gawler Community (within the LGA) vision of who is part of the true Gawler Community.

Areas suggested to be removed from Gawler are Bibaringa and Uleybury.



The removal of the areas of Bibaringa and Uleybury from the Gawler LGA was the least popular aspect of the Proposal with respondents from the Gawler LGA, support for this element of the Proposal dropped below 50%.

The commentary of the survey responses in support of this aspect of the Proposal suggests that there is a perception that these areas are more closely aligned with other Councils such as City of Playford and are more geographically distant from Gawler. Those who opposed this indicated that their perception was that Gawler Council was aiming to remove areas that are not profitable and seek areas that would be profitable rather than realign to maximise community connections for the residents or correct issues with property boundaries splitting properties across multiple council areas.

Suggested changes to boundaries if Council proceeds would be investigated by the Local Government Boundaries Commission (an independent body). Council would fund the investigation as the initiating Council.



Notably 67% of respondents from the Town of Gawler supported proceeding to the investigative stage of the process even though this may be a significant expense and understanding the investigation would be funded by the initiating Council – Town of Gawler - ratepayers.

Only 19% of local Gawler residents were opposed to funding an investigation indicating they considered it an unnecessary ratepayer expense and a waste of money.

The proposed realignment would allow Council to provide more comprehensive and competitive services to the community.



The respondents in support of this statement indicated that they agreed that Gawler would be able to improve the quality of services offered, lessen the burden on current ratepayers and that it would be considered fairer for those who use the services to contribute to them.

Those who opposed this statement indicated some scepticism around how realignment would allow Gawler to dramatically improve services and had issue with the terms 'more comprehensive and competitive' being too vague with no tangible plans to ensure this happens contained in the Council's Proposal.

The survey results clearly indicated that whilst the majority of Town of Gawler respondents are supportive of the Council's Proposal respondents from neighbouring Council areas were just as strongly opposed.

The table below shows the overall survey result and then a segmentation of the result based on LGA clearly indicating that the residents of Town of Gawler support the Council's Proposal and the pursuit of boundary reform as part of the Council's strategic direction.

Support for Council's Proposal	Support	Neutral	Oppose
Total	42%	9%	45%
Town of Gawler	68%	9%	20%
The Barossa Council	19%	4%	74%
Light Regional Council	15%	10%	69%

N.B results for the City of Playford were not included as an individual segment in the above analysis due to its very small sample size.

It is interesting to note that when looking at the aggregated survey result (result from all respondents) that despite respondents from neighbouring Councils making up 56% of total respondents the overall survey result shows almost as many respondents supporting the Council Proposal as those opposing it (42% vs 45%), with the remaining 9% indicating they are neutral on the subject.

The Boundary Reform Consultation Survey Report (**Attachment 4**) is provided in full with comments from the respondents from each Council LGA included in the survey report (verbatim). These comments identify where Council needs to focus its energy as it pursues boundary reform as they highlight the areas of concern for not only Town of Gawler residents but also for the Community of Interest as a whole.

Written Submissions

The number of written submissions received during the Consultation period was 22 – all written submissions received are provided in **Attachment 5**. Of the 22 written submissions 7 were supportive of the Council's Proposal, (all 7 originating from residents of Gawler LGA).

Submissions in favour of boundary reform indicated that the authors believed it was “about time” Council sought boundary realignment, did not indicate any particular changes were required to the current proposal and that it would be appropriate for the Communities of Interest to be part of Gawler and contributing to the Gawler LGA. Two particular submissions worth noting were:

1. In regard to a property in both Gawler and Playford LGA's who supports the whole of Evanston Park being within the Gawler LGA. This property is currently split between two LGA's. The owners of this property, Mark Thesinger and Jane Crothers, not only have to pay rates to 2 different Council's but also has complexities to manage around different zoning in each section of their land and difficulty when undertaking development on their land.
2. A submission from Mr John Bolton, highlighting a historic boundary change proposal received by the Town of Gawler in 2013, purporting the inclusion of both Hewett and part of Concordia being included in the Gawler LGA showing that the matter of Boundary Reform has been discussed in the community for a number of years.

The majority of written submissions received were from neighbouring council areas and are not in favour of the Council's Proposal,. It is clear that many residents in adjacent council areas have concerns about changes to their current service levels and the rates they may pay as well as having concerns about changing to the Town of Gawler as their local council. There were also concerns that

the more rural areas in Council's Proposal would see an increase in development if they became part of the Gawler LGA. *Written Submissions from the Barossa Council Area*

Submissions received from residents and stakeholders in the Barossa Council Area were against the Proposal's stance on both the larger area of Kalbeeba and the Concordia Growth Area being considered for re-alignment. Submissions identified concerns regarding a possible increase in rates, changes to zoning, particularly with regard to density of development and not wishing to change Council area.

Mayor Bim Lange on behalf of The Barossa Council provided a written submission (included in Attachment x) raising some concerns regarding some commentary at the second Open Public Forum and the manner in which the survey was designed and undertaken.

The matter raised regarding the Forum was a genuine error made by the CEO Henry Inat, when asked if Barossa Council were in support of Kalbeeba becoming part of the Gawler LGA. CEO, Henry Inat, mistakenly responded with his understanding of the position of The Barossa Council in regards to the whole of the Kalbeeba area rather than just that of the smaller section of Kalbeeba, which is included in the Springwood Development. It is noted that the CEO's statement was then corrected for the public record by Mayor Bim Lange, who was in attendance and asked to respond from the floor, clarifying that The Barossa Council did not hold the same opinion with regards to the larger portion of Kalbeeba currently included in the Council's Boundary Change Proposal. Mayor Lange confirmed the section of Kalbeeba within Springwood had potential to be incorporated within the Gawler Council area. The clarification provided by Mayor Lange was noted and appreciated.

The submission from The Barossa Council also addresses the Council's Proposal in the context of the Section 26 Principles for Boundary Change and commentary around Town of Gawler's position on each principle is included in the Consultation submission summary in **Attachment 5**.

Concordia Land Management Group provided a written submission (**included in Attachment 5**), from Leyton Funds, advising that they do not support the Proposal. The submission reiterates that the Concordia Land has lodged a proposal with the State Government seeking a declaration of a Precinct for the Concordia Growth Area and highlight that this is one way in which a development can be undertaken "while not being constrained by a focus on individual council boundaries."

The submission continues..." 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 in the main be achieved through greater regional collaboration."

The position put forward by Leyton Funds is not aligned with the Vision for the Concordia development as depicted on their website which states:

"Concordia Land Management's (CLM) vision is to create for Concordia, a master planned, resilient community with an urban form and morphology that captures and preserves the verdant, natural character of the Gawler hills, blended with the unique, historic and community identity of the existing Gawler Township.

Concordia will form a logical, natural and sequential extension to the existing Gawler Township, will maintain and enhance the primacy of the Gawler town centre to fulfil its latent potential as a true regional city and will retain the Barossa's important primary production function and unique landscape character."



Building a Greater Gawler. Preserving the Barossa Valley.

Concordia is an area of rural land adjoining the eastern boundary of Gawler, South Australia. Its development offers an opportunity for Gawler to become a leading regional centre while protecting the history and vineyards of the nearby Barossa.

Concordia Land Management's (CLM) vision is to create for Concordia, a master planned, resilient community with an urban form and morphology that captures and preserves the verdant, natural character of the Gawler hills, blended with the unique, historic and community identity of the existing Gawler Township.

Concordia will form a logical, natural and sequential extension to the existing Gawler Township, will maintain and enhance the primacy of the Gawler town centre to fulfill its latent potential as a true regional city and will retain the Barossa's important primary production function and unique landscape character.

Image: Screen shot of the Concordia Website November 2020

The written submission also identifies that the development at Concordia aims to grow to a size of 23,000 residents – the same population size as the current Gawler LGA and claims that as such Concordia will provide significant infrastructure and services to its new residents.

However, this would only occur over the long term of the development (possibly the next 30 years or more) and when trigger points in population levels are reached – in the meantime Gawler and its ratepayers will endure added growth pressure on services and infrastructure and bear the financial burden of such. There is also a risk that if the development stalls during that period it may not eventuate to the full extent of this vision and may continue to rely on the services of the Gawler LGA permanently. e.

Written Submissions from Light Regional Council Area

Mayor Bill O'Brien on behalf of Light Regional Council provided a written submission (**included in Attachment 5**) against the Proposal requesting Town of Gawler to pay particular regard to part 3 (part c) of the resolution provided as part of its submission (below):

- Authorises the Mayor and Chief Executive Officer to provide a response to the Town of Gawler:
 - a. acknowledging the Town of Gawler's correspondence and recognises its intention to engage with its community on the question of its nominated boundary changes,
 - b. Advising that if the Town of Gawler; proposal is successful it is Light Regional Council's view that this would have the effect of making Light Regional Council

unsustainable, to the detriment of this Council's ratepayers, its service delivery capacity and its genuine regional aspirations, and

- c. Requests that the Town of Gawler includes in any subsequent 'general proposal' submission it may make to the Boundaries Commission, a request that the Commission gives detailed consideration to service requirements (social, recreation, economic, regional) for the communities spanning the Town of Gawler ; Adelaide Plains Council Light Regional Council The Barossa Council and (part) City of Playford areas (interpreted as being a part of the Town of Gawler's nominated region featuring "110,000 persons' and how these may best be met when factoring in present supply of facilities, forecast projects, current population levels and forecast population growth expectations (adjusted for trending including any CoVID-79 pandemic related considerations).

Written Submission from the City of Playford Area

City of Playford has not engaged at all with Town of Gawler with regard to boundary reform despite repeated invitations to do so.

The only written submission received from a City of Playford resident was also noted previously. Mark Thesinger and Jane Crothers are "dual residents" – their property in Evanston Park spans both Gawler and Playford council areas. They are in favour of the boundary reform proposal and are in favour of their property being fully located in the Gawler LGA.

In summary key themes rising from the consultation:

1. It was evident that those in favour of progressing boundary realignment see that Gawler can be enhanced as a community via the reforms, improving community infrastructure, assets and services. It is noted by many that a small rates base is being asked to continue to support and sustain its neighbours in increasing numbers and some believe the neighbouring Councils are happy to leverage Gawler's facilities for their own residents without considering the impact on Gawler's residents and Town of Gawler.
2. Those in favour did not provide any suggestions for significant changes to the current Proposal as it stands although the removal of Bibaringa and Uleybury was where the Gawler community seemed most divided.
3. It was also evident, particularly from the forum questions and commentary, that the difficulties in providing accurate and detailed data around the total cost of not only progressing to an investigation but the actual receiving of a new area into the Council LGA and the costs associated with that process, makes it more difficult for some people to fully support the Proposal even if they feel that the communities identified in the Proposal should all be one community under one Council.
4. Residents who currently live outside of the Gawler LGA are in the majority against any change.
5. Zoning presents an issue that many Residents of the 'Communities of Interest' needed more clarification on – some welcomed a change of Council believing their zoning would change as a result and they would be able to subdivide, some didn't want change in case the zoning was changed and they were going to be pressured by development. Council has advised that the zoning would remain in place and a like for like zoning would be in place if the LGA boundary was realigned.
6. Commentary and enquiries around the effect on ratepayers, both the current Gawler Residents and from the neighbouring Councils, is a key question for the Community. It

remains a factor that cannot be fully defined at this early stage of the process and this makes it more difficult for an initiating Council to demonstrate the value of this strategic move.

The majority of feedback was received via the consultation survey as this was a constructive, consistent and easy way for community members to provide their views. Importantly the results of this survey indicate that:

1. The majority of Town of Gawler Residents (68%) are in favour of Council progressing a Boundary Reform General Proposal;
2. The majority of Town of Gawler Residents agree that boundary realignment should be investigated by an independent body, being the SA Local Government Boundaries Commission;
3. The majority of Town of Gawler Residents support the areas defined as the 'Communities of Interest' for inclusion in the Gawler LGA.
4. Town of Gawler Residents seem divided on the area defined within Council's Proposal for the removal from the Gawler LGA.
5. The majority of Town of Gawler Residents support progressing a Boundary Reform General Proposal even though the initiating Council (Town of Gawler) will have to pay for any investigation undertaken by the Commission.

Taking the results of the consultation as a whole, Council is committed to progressing boundary reform on behalf of the Gawler Community, being mindful that under the Guidelines for Boundary Change consultation by Council at this stage is:

"... to demonstrate that an initiating council has undertaken the consultation that is necessary to determine that it **should submit a general proposal to the Commission for considering** (noting that it is the Commission's role to consult with all affected communities on the impact of all proposals that it investigates)."

5. CALENDAR OF EVENTS

Council formally resolved to actively investigate and pursue Boundary Reform for the Gawler LGA in May 2019. The Calendar of Events below highlights the timing of key Council decisions, announcements, notices, public and other meetings, actions by stakeholder groups, press articles. Copies of supporting documents listed in the summary table below are available in **Attachment 6**.

Date	Action
2014 [Att 6: Item 1]	2014-2024 Strategic Directions Report – Boundary Reform was mentioned as a Strategic Goal 1.1.3 to promote local government boundary realignments to more accurately reflect the township of Gawler's population and reinforce its sense of a community with common interests.
09-12-2016 [Att 6: Item 2]	Advice received from Hon Geoff Brock MP – Minister for Local Government – letter to TOG Mayor - Local Government Boundary Adjustment Amendment Bill 2016 was introduced to Parliament on 16 November 2016 ~
2017 [Att 6: Item 3]	2017-2027 Community Plan – Boundary Reform was highlighted as a strategic direction within Goal 1.1.3
12-09-2017 [Att 6: Item 4]	Advice to Mayor - Local Government Boundary Adjustment Amendment Act 2017 has been assented - Thanks for submission - Hon Geoff Brock MP
21-12-2018 [Att 6: Item 5]	Official Media Release – Priorities moving forward
10-05-2019 [Att 6: Item 6]	Letter from Barossa Mayor Lange to TOG Mayor – Establishment of Concordia Precinct Authority
January 2019	Change to State Government Legislation allowing a Boundary Change Proposal to be initiated by a Council(s) or Publicly Initiated by a percentage of eligible electors.
28 May 2019 [Att 6: Item 7]	Council resolved to investigate its boundaries following a Motion on Notice (item 16.3) presented by Mayor Redman 28 May 2019 Council Meeting Agenda 28 May 2019 Council Meeting Minutes
29-05-2019 [Att 6: Item 8]	Official Media Release – Council to Investigate its Boundary
03-06-2019 [Att 6: Item 9]	Letters to Mayor Bim Lange of The Barossa Council and Mayor Bill O'Brien of Light Regional Council – providing information on Resolution 2019:05:COU001 to investigate Boundary Reform.
10 September 2019 [Att 6: Item 10]	Council resolved to continue to investigate boundary reform, adopting, in principle, the following Council boundary adjustments as the basis for preparing a Stage 1 Proposal.

	<p>Areas to be included in the Town of Gawler:</p> <p>Area 1- Concordia Growth Area</p> <p>Area 2 - Hewett</p> <p>Area 3 – Portion of Kalbeeba (including portion of Springwood)</p> <p>Area 4 – Portion of Gawler Belt</p> <p>Area 5 - Evanston Park</p> <p>Area 6 - Reid</p> <p>Area 7 – Hillier</p> <p>Areas to be removed from the Town of Gawler:</p> <p>Area 8 – Portion of Bibaringa</p> <p>Area 9 – Portion of Uleybury</p> <p>10 September 2019 Special Council Meeting Agenda 10 September 2019 Special Council Meeting Agenda Attachments (online) 10 September 2019 Special Council Meeting Minutes</p>
16-09-2019 [Att 6: Item 11]	Official Media Release – Gawler to investigate boundary reform to future-proof population expansion
17-09-2019 [Att 6: Item 12]	Facebook Post – Official Media Release - Gawler to investigate boundary reform to future-proof population expansion
18-09-2019 [Att 6: Item 13]	The Bunyip - page 1,12,13 – Hands off our land – Mayor Redman – Why boundary reform matters – LRC digs in for boundary battle
18-09-2019 [Att 6: Item 14]	TOG Mayor to Playford Mayor - Special Council Meeting held on 10 September 2019
18-09-2019 [Att 6: Item 15]	TOG Mayor to APC Mayor - Special Council Meeting held on 10 September 2019
18-09-2019 [Att 6: Item 16]	TOG Mayor to LRC Mayor - Special Council Meeting held on 10 September 2019
18-09-2019 [Att 6: Item 17]	TOG Mayor to Barossa Mayor - Special Council Meeting held on 10 September 2019
24-09-2019 [Att 6: Item 18]	Question on Notice – Cr I Tooley – and response provided by Administration
25-09-2019	Meeting on Boundary Reform – all Mayors and CEOs of affected Councils invited – attended only by Mayor and CEO's of The Barossa Council and TOG
02-10-2019	The Bunyip – Page 12 – boundary reform no rates grab Mayor Redman

[Att 6: Item 19]	
02-10-2019 [Att 6: Item 20]	The Leader - Page 1 and 4 - Light Regional Council Mayor Bill O'Brien Under Threat - boundary reform
09-10-2019 [Att 6: Item 21]	The Leader - Page 18 - Letters to the editor - Mayor Bill O'Brien Light ~ boundary reform article was well balanced and fair
09-10-2019 [Att 6: Item 22]	The Barossa Council – Letter to Mayor Karen Redman
17-10-2019	Meeting of Light Regional Council and Barossa Council Mayors and CEO's
21-10-2019 [Att 6: Item 23]	Letter to Boundary Commission – response to correspondence from Hickinbotham Group
22-10-2019 [Att 6: Item 24]	Motion on Notice (adjourned items) – Cr I Tooley – motion was Lost
28-10-2019 [Att 6: Item 25]	Letter from Light Regional Council to Boundary Commission – regarding Gawler and Barossa Proposals
31-10-2019 [Att 6: Item 26]	Letter - Boundary Commission Update
26-11-2019 [Att 6: Item 27]	2018-2019 Annual Report – key Objective
26 November 2019 [Att 6: Item 28]	<p>Council considered:</p> <ul style="list-style-type: none"> • Further analysis on the proposed boundary adjustments • Communication and Consultation Plan for Stage 1 and 2 of the Boundary Reform process • Stage 1 Proposal for submission to the Boundaries Commission <p>Council resolved to submit a Stage 1 Proposal for consideration by the Boundaries Commission and adopted the Communication and Consultation Plan for Stage 1 and 2 of the Boundary Reform process.</p> <p>26 November 2019 Council Meeting Agenda 26 November 2019 Council Meeting Agenda Attachments (online) 26 November 2019 Council Meeting Minutes</p>
02-12-2019	Boundary Reform Meeting - Mayors and CEO's of Light Regional Council, TOG, Barossa and Mid Murray Councils attended – as reported in the 25 February 2109 Council Report
04-12-2019	TOG Stage 1 Boundary Change Proposal submitted to the Commission Gawler Boundary Change Stage 1 Proposal - South Australia (dpti.sa.gov.au)
09-12-2019 [Att 6: Item 29]	Official Media Release – Town of Gawler to forward proposal to Boundary Commission

11-12-2019 [Att 6: Item 30]	The Bunyip - Page 7 - Civic Centre scoops multiple planning awards - boundary reform a long time coming Mayor Redman
12-12-2019 [Att 6: Item 31]	Facebook Post – Official Media Release - Town of Gawler to forward proposal to Boundary Commission
16-12-2019 [Att 6: Item 32]	Letter from LRC Mayor to TOG Mayor – views on TOG Stage 1 Proposal Submission
18-12-2019 [Att 6: Item 33]	Facebook Post – Mayor Karen Redman provides an overview from 17-02-2019 Council Meeting Facebook Video - December 2019 Council meeting summary
06-01-2020 [Att 6: Item 34]	Advice to Mayor - Notification of Stage 1 Potential Boundary Proposal from the Boundaries Commission regarding The Barossa Council potential Proposal.
13- 02-2020 [Att 6: Item 35]	Response from Boundaries Commission re TOG Stage 1 Boundaries Proposal – advice Council can proceed to submit a stage 2 General Proposal if it wishes.
25 February 2020 [Att 6: Item 36]	<p>Council considered under item 12.4 of the agenda:</p> <ul style="list-style-type: none"> • The response from the SA Boundary Commission advising Council that, based on the Stage 1 proposal for Boundary Change submitted to the Commission in December 2019, Council is invited to submit a General Proposal for Boundary Change. • Whether to continue investigations into boundary reform • Correspondence from Light Regional Council requesting Town of Gawler defer or withdraw their submission to the Commission • The Barossa Council's decision to not proceed with a boundary reform proposal at this time. <p>Council resolved to proceed with its investigations into boundary reform.</p> <p>25 February 2020 Council Meeting Agenda 25 February 2020 Council Meeting Attachments (online) 25 February 2020 Council Meeting Minutes</p>
27-02-2020 [Att 6: Item 37]	Letter to Light Regional Council in response to letter dated 16-12-2019 in regards to Boundary Reform and regarding resolution to proceed
5-03-2020 [Att 6: Item 38]	Letter to Boundaries Commission seeking clarification
12-03-2020 [Att 6: Item 39]	Letter to Adelaide Plains Council Mayor regarding Boundary Reform March 2020 - update re resolution to proceed
19-03-2020 [Att 6: Item 40]	Letter to City of Playford regarding Boundary Reform March 2020 - update regarding resolution to proceed
20-03-2020 [Att 6: Item 41]	LRC Mayor O'Brien to Mayor Redman – TOG is progressing with its boundary reform considerations

21-04-2020 [Att 6: Item 42]	Letter from Light Regional Council Mayor O'Brien to The Barossa Council Mayor Lange – LRC has encouraged TOG to defer or withdraw their boundary expansion aspirations in favour of delivering a Regional Vision
21-04-2020 [Att 6: Item 43]	Letter from Light Regional Council Mayor O'Brien to The Playford City Council Mayor Docherty – LRC has encouraged TOG to defer or withdraw their boundary expansion aspirations in favour of delivering a Regional Vision
29-04-2020 [Att 6: Item 44]	Letter from Light Regional Council Mayor to TOG Mayor – Resolution of Council 28 April 2020
5-05-2020	Meeting held between TOG and Office of Local Government Staff to clarify matters of consultation and letter of response from Commission
06-05-2020 [Att 6: Item 45]	The Bunyip – Page 1 and 4 – Light Regional Council boundary reform proposal Goodbye Gawler - submission illogical says Mayor Redman
07-05-2020 [Att 6: Item 46]	Letter to LRC Mayor from TOG Mayor Karen Redman – re request for TOG to withdraw or defer proposal
11-05-2020 [Att 6: Item 47]	Email to Commission from TOG CEO Henry Inat requesting further clarification and considerations.
18-05-2020 [Att 6: Item 48]	Letter from Light Regional Council Mayor to TOG Mayor – Regional Structural Reform – LRC lodged a proposal with the Boundaries Commission
11-05-2020 [Att 6: Item 49]	Letters sent to all affected Councils from TOG requesting further information in regards to assets and infrastructure to further inform TOG boundary reform Proposal.
11-06-2020 [Att 6: Item 50]	Response from Light Regional Council – declining to provide further asset data
16-06-2020 [Att 6: Item 51]	Response from The Barossa Council – declining (at this time) to provide further asset data
6-07-2020 [Att 6: Item 52]	Response from Boundaries Commission to TOG regarding points of clarification
28 July 2020 Council Meeting [Att 6: Item 53]	<p>Council considered under item 11.1 of the agenda:</p> <ul style="list-style-type: none"> • Adoption of the updated Consultation and Communications Plan for Boundary Reform. • Whether to proceed to Community Consultation on the matter. <p>Council resolved to adopt the updated Consultation and Communications plan and proceed to Community Consultation on boundary reform.</p> <p>28 July 2020 Council Meeting Agenda 28 July 2020 Council Meeting Agenda Attachments (online) 28 July 2020 Council Meeting Minutes</p>
29-07-2020	Facebook Post – Mayor Karen Redman talks Boundary Reform with CEO Henry Inat (video) 29 July 2020 - Weekly Video - YouTube

[Att 6: Item 54]	
29-07-2020 [Att 6: Item 55]	The Bunyip – Page 3 - Mayor plans LGA presidency run - public consultation nears on boundary reform proposal
04-08-2020 [Att 6: Item 56]	Official Media Release – Town of Gawler Boundary Reform Update
05-08-2020 [Att 6: Item 57]	The Bunyip – Opinion – Page 6 – Have your say on boundary reform proposal
05-08-2020 [Att 6: Item 58]	The Bunyip – Page 5 – Hostile Takeover – Hewett survey shows resistance to boundary reform – Light Regional to prepare own consultation
05-08-2020 [Att 6: Item 59]	Letter from Mayor Redman to The Barossa Council Mayor Lange regarding Boundary Reform 3 August 2020 - update regarding resolution to proceed to public consultation
05-08-2020 [Att 6: Item 60]	Letter from Mayor Redman to City of Playford Mayor Docherty regarding Boundary Reform 3 August 2020 - update regarding resolution to proceed to community consultation
05-08-2020 [Att 6: Item 61]	Letter from Mayor Redman to Light Regional Council Mayor O'Brien regarding Boundary Reform 3 August 2020 - update regarding resolution to proceed to community consultation
12-08-2020 [Att 6: Item 62]	The Bunyip – Opinion – Page 6 – Hands Off Hewett
19-08-2020 [Att 6: Item 63]	Letter from Light Regional Council Mayor O'Brien to Mayor Karen Redman regarding Town of Gawler Agenda Report of 28-07-2020 council meeting Item 11.1 Boundary Reform Proposal Update
24-08-2020 [Att 6: Item 64]	Official Media Release – Gawler's Boundary Change Proposal opens for consultation
26-08-2020 [Att 6: Item 65]	Consultation Opens - Public Notices – The Bunyip Page 36 – Have your say public consultation advertisement
26-08-2020 [Att 6: Item 66]	The Bunyip Page 13 – Boundary Expansion consultation opens
31-08-2020 [Att 6: Item 67]	Facebook Post – Consultation Survey and Open Forum
02-09-2020 [Att 6: Item 68]	The Bunyip – Page 2 – pause of Lights Boundary Consultation
04-09-2020 [Att 6: Item 69]	Facebook Post – Open Forums – 21 and 28 September 2020
04-09-2020	Facebook Post – Open Forum

[Att 6: Item 70]	
07-09-2020 [Att 6: Item 71]	Facebook Post – Consultation Survey
Week of 7-09-2020 [Att 6: Item 72]	Boundary Reform Consultation flyer included as insert in approximately 9,800 rates notices.
09-09-2020 [Att 6: Item 73]	Facebook Post – Open Forum
13-09-2020 [Att 6: Item 74]	Facebook Post – Consultation Survey
15-09-2020 [Att 6: Item 75]	Facebook Post – Open Forum
16-09-2020 [Att 6: Item 76]	Facebook Post – The Bunyip – Important Information – Open Forum
16-09-2020 [Att 6: Item 77]	Half Page Bunyip Advert – The Bunyip – Have your say on Boundary reform – open forum
17-09-2020 [Att 6: Item 78]	Facebook Post – Consultation Survey
21-09-2020 [Att 6: Item 79]	Facebook Post – Open Forum
21-09-2020 [Att 6: Item 80]	Open Public Forum held at the Gawler Sport and Community Centre – open to all
23-09-2020 [Att 6: Item 81]	The Bunyip – Page 3 – Gawler Council Talks Boundary Reform
23-09-2020 [Att 6: Item 82]	The Bunyip – Page 6 – Editorial – Boundary Reform battle continues
24-09-2020 [Att 6: Item 83]	Facebook Post – Consultation Survey
27-09-2020 [Att 6: Item 84]	Facebook Post – Open Forum
28-09-2020 [Att 6: Item 85]	Facebook Post – Open Forum
28-09-2020	Open Public Forum held at the Gawler Sport and Community Centre – open to all
30-09-2020	The Leader – Page 7 – Barossa Adds to boundary reform consultation

[Att 6: Item 86]	
30-09-2020 [Att 6: Item 87]	The Bunyip – Page 6 – Editorial – Boundary reform a rip off – real boundary reform
30-09-2020 [Att 6: Item 88]	The Bunyip – Page 2 – tough questions asked at boundary reform forum – Barossa responds to Gawlers boundary reform survey
01-10-2020 [Att 6: Item 89]	Facebook Post - Consultation Survey
02-10-2020 [Att 6: Item 90]	Letter from The Barossa Council Mayor Lange to Mayor Karen Redman regarding Town of Gawlers Proposal
05-10-2020 [Att 6: Item 91]	Facebook Post – Consultation Survey
07-10-2020 [Att 6: Item 92]	The Bunyip – Page 6 - Editorial – Cost savings in boundary reform?
07-10-2020 [Att 6: Item 93]	The Bunyip – Page 20 – last chance to have your say at the boundary reform consultation
7-10-2020	Consultation Closed – 5pm
3 rd November 2020 Special Council Meeting [Att 6: Item 94]	<p>Council considered under item 6.1 of the agenda:</p> <ul style="list-style-type: none"> Written submissions and results of the Community and Stakeholder Consultation. <p>Council received and noted the survey results and written submission of the Community & Stakeholder Consultation on boundary reform.</p> <p>3 November 2020 Special Council Meeting Agenda 3 November 2020 Council Agenda Attachments 3 November Special Council Meeting Minutes</p>
11-11-2020 [Att 6: Item 95]	The Leader – Page 4 – Neighbours oppose Gawler Council Boundary Reform Proposal
24-11-2020 [Att 6: Item 96]	Facebook Post – Ordinary Council Meeting – Motion of Notice
24-11-2020 [Att 6: Item 97]	Council Report 16.2 Motion of Notice – Cr Tooley – Motion was lost.
02-12-2020 [Att 6: Item 98]	The Bunyip – Page 15 – Boundary Reform survey results reviewed
15-12-2020 [Att 6: Item 99]	<p>Council considered under item 11.5 of the agenda</p> <ul style="list-style-type: none"> Draft Stage 2 General Proposal for Boundary Change Submission of the General Proposal to the Boundaries Commission for consideration.

	<p>Council resolved to proceed with the submission of the Gawler General Proposal</p> <p>15 December 2020 Council Meeting Agenda</p> <p>15 December 2020 Council Meeting Minutes</p>
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6. MEDIA COVERAGE

6.1 Local media coverage on the Town of Gawler Boundary Reform Proposal has been extensive as it is an important strategic decision for the local community that will, whether successful or not, shape Gawler's future.

Local newspapers are The Bunyip, The Leader and The Barossa Herald.

As can be expected in this type of newsworthy scenario the Media coverage has often been created to maximise on the dissent of two of the three affected Council's, particularly by portraying the emotional objections and suggestions of counter boundary reform proposals from Light Regional Council. Whilst that approach was not helpful it has raised awareness in each of the council areas involved.

All media coverage has been collated and provided as part of the Calendar of Events supportive documentation in **Attachment 6**.

7. SUMMARY

Town of Gawler works regionally and collaboratively in a number of ways with its neighbouring councils to support the community however, this collaborative approach has severe limitations with respect to the different priorities and approaches that metropolitan and regional councils apply to service provision.

Light Regional Council has voiced its dissent with Town of Gawler's Proposal indicating that the loss of areas such as Hewett and Gawler Belt will impact on its long term viability. Town of Gawler recognises the impact of a reduced rate income on Light Regional Council if boundary reform occurred as proposed. However, a boundary change would also result in a reduction in services required to be delivered by Light Regional Council and therefore the impact on its bottom line would not be as significant as the reduction in income. Town of Gawler also excluded the Roseworthy Development within its proposed changes to ensure that Light Regional Council remained viable.

The Barossa Council has indicated that it is open to discussions to realign to the Springwood Development area (part of Area 3 - Kalbeeba) that is currently in The Barossa Council with Town of Gawler. The Barossa Council has also indicated that it is opposed to the remaining portion of Kalbeeba and the Concordia Area of Interest being considered for inclusion in Town of Gawler.

Town of Gawler recognises that its General Proposal for Boundary Change will have financial impacts on its neighbouring councils however, these impacts do not in themselves discount the need to have the Boundaries Commission undertake an independent investigation with respect to its existing Local Government Area boundaries. Town of Gawler is sincerely concerned that without significant boundary reform its existing ratepayers will continue to bear the financial impacts of supporting the needs of a much larger community. Boundary realignment is an opportunity to create a fair and balanced distribution within the growing community.

Town of Gawler has developed this Stage 2 Boundary Change General Proposal for submission to the SA Local Government Boundaries Commission for consideration because it believes that the Community of Interest as identified in this Proposal should be formalised into one community to ensure appropriate representation, community connection, community development and management can be undertaken in a financially sustainable manner.